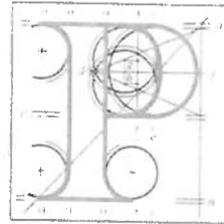


Our Case Number: ACP-323932-25



**An
Coimisiún
Pleanála**

An Taisce
c/o Seán O'Callaghan
Tailor's Hall
Back Lane
Dublin

D08 X2A3

Date: 10 February 2026

Re: Proposed development comprising of 94 no dwelling units, Lissywollen, Westmeath
Lissywollen, County Westmeath

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Commission has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission at laps@pleanala.ie

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Lauren Griffin
Executive Officer
Direct Line: 01-8737244

AA02

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64 Sráid Maoilbhríde 64 Marlborough Street
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An Taisce
The National Trust for Ireland
5 Foster Place
Dublin 2, Ireland
D02 V0P9

20260206-ACP-323932

An Coimisiún Pleanála,
64 Marlborough Street,
Rotunda,
Dublin 1,
D01 V902.

Sent by email to: sids@pleanala.ie

6th February 2026

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 residents 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

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An Taisce – The National Trust for Ireland | *Protecting Ireland's heritage, safeguarding its future*

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Directors: Terri Morrissey (Chair), Neil Whoriskey (Vice Chair), John Conroy (Treasurer), Laura Segura Gutierrez (Secretary),

Finbarr Murray, Helen Shaw, Tony Holohan

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 guidance¹ 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)² 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/cycleable 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.

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).

¹ https://www.nationaltransport.ie/wp-content/uploads/2011/12/Permeability_Best_Practice_Guide_NTA_20151.pdf

² <https://www.opr.ie/wp-content/uploads/2019/08/2013-Design-Manual-for-Urban-Roads-and-Streets-1.pdf>

³ <https://www.darksky.ie/wp-content/uploads/2024/05/DSI-Environmentally-Friendly-Lighting-Guide-4.pdf>

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.⁴

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 additional 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 settlements that are more socially inclusive." [An Taisce emphasis].

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)⁵:

⁴ EUROBATS 8 Guidelines for consideration of bats in lighting projects
https://www.researchgate.net/publication/328306660_Guidelines_for_consideration_of_bats_in_lighting_projects

⁵ Climate Change Advisory Council. 2025. Annual Review 2025 Cross-sectoral Review.
<https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR2025-Cross-sectoral-final.pdf>

"Research indicates that co-adoption of low-carbon 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."

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 units (+19%) and apartment buildings (+12%)⁶. 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.⁷ The 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."*

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 Habitats 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 stepping stones (such as ponds or small woods), are essential for the **migration, dispersal and genetic exchange of wild species.**"*

[An Taisce emphasis].

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

⁶ <https://www.igbc.ie/compact-urban-growth-to-cut-carbon-emissions-in-ireland/>

⁷ <https://storymaps.arcgis.com/stories/d7961ba1d2294770a5fffb55d534f00a>

⁸ https://www.igbc.ie/wp-content/uploads/2024/02/Viable-homes_guidance_v1.0_24-01-30.pdf

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 disturbances of the habitats."

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

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 (Upper)_110' river waterbody, which has been designated as poor water quality status by the EPA under the Water Framework Directive (WFD) and is considered to be 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.

Please acknowledge our submission and advise us of any decision made.

Is mise le meas,

Seán O'Callaghan
Planning and Environmental Policy Officer
An Taisce – The National Trust for Ireland