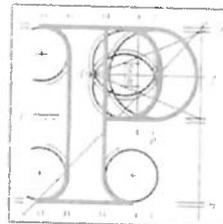


Our Case Number: ACP-323932-25



**An
Coimisiún
Pleanála**

Development Applications Unit
The Manager
Newtown Road
Wexford
Y35 AP90

Date: 10 February 2026

Re: Proposed development comprising of 94 no dwelling units, Lissywollen, 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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An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage



Planning Ref: ACP-323932-25
(Please quote in all related correspondence)

06 February 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email: laps@pleanala.ie

Re: Notification under the Planning and Development Act, 2000, as amended

Proposed Development: S177AE application for the Development of 94 no. dwelling units at lands 150m north of the N55, Lissywollen Td., Athlone, County Westmeath.

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.

Aonad na nIarratas ar Fhorbairt

Development Applications Unit

Oifigi an Rialtais

Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90



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.

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).

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.

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.

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.

¹ Nature-based Solutions for the Management of Rainwater and Surface Water Runoff. Department of Housing 2022. <https://www.gov.ie/en/publication/10d7c-nature-based-solutions-to-the-management-of-rainwater-and-surface-water-runoff-in-urban-areas-best-practice-interim-guidance-document/>

² Protecting Watercourses: Planning for Watercourses in the Urban Environment - A Guideline Developed by Inland Fisheries Ireland. A Guide to the Protection of Watercourses through the use of Buffer Zones, Sustainable Drainage Systems, Instream Rehabilitation, Climate / Flood Risk and Recreational Planning <https://www.fisheriesireland.ie/sites/default/files/migrated/docman/IFIUrbanWatercoursesPlanningGuide.pdf>



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.

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 pollution³. 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

³ Challéat, S., K. Barré, A. Laforge, D. Lapostolle, M. Franchomme, C. Sirami, I. Le Viol, J. Milian, and C. Kerbiriou. 2021. Grasping darkness: the dark ecological network as a social-ecological framework to limit the impacts of light pollution on biodiversity. *Ecology and Society* 26(1):15. <https://doi.org/10.5751/ES-12156-260115>

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 Dark Sky Ireland Guidelines - Our vision and policy on reducing light pollution in Ireland
https://www.darksky.ie/wp-content/uploads/2020/04/BestPracticesInPublicLighting_BEspey2020.pdf



scale because blue light is more easily distributed in the atmosphere than green and red light⁶.

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.
- 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.
- Use low and fully shielded/cowled downward-pointing lights, smart sensors and trimming (part-night lighting) schemes. Avoid upward and horizontal facing lighting.
- Conserve dark areas, particularly around native vegetation and any areas that may be in use by bats, birds and nocturnal mammals.

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.

You are requested to send further communications to this Department’s Development Applications Unit (DAU) at manager.dau@hnpws.gov.ie where used, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices
Newtown Road
Wexford
Y35 AP90

Is mise, le meas

Simon Dolan
Development Applications Unit
Administration

⁶ Falchi, F, P. Cinzano, C.D. Elvidge, D.M. Keith & A. Haim (2011): Limiting the impact of light pollution on human health, environment and stellar visibility. *Journal of Environmental Management* 92: 2714-2722.