GENESIS
PLANNING
CONSULTANTS

Westmeath Co Council
Planning Section
Aras An Chontae
Mount Street
Mullingar
N91 FH4N

3rd November 2026

By: E Copy

Re: Application 2660435
Planning application on lands at Ballykeeran and Cornamaddy Townlands, Athlone

Lorraine,

We refer to application 2660435 and attach our responses to the Further Information request dated 9th October 2026.

Point 1

Further to submissions received from the Westmeath National Roads Office (WNRO) and Transport Infrastructure Ireland (TII), concerns have been raised regarding the potential for the proposed development to impact upon and prejudice the future upgrade of the N55. Accordingly, the applicant is requested to liaise with the WNRO and submit a revised site layout which provides sufficient scope for the future N55 upgrade and omits or repositions any development that may conflict with the Preferred Route Corridor.

Response:
By way of background a workshop meeting was held with the project team and Shane Gill; Westmeath National Roads Office (WNRO) on 19th October 2026.

At this meeting it was explained the WNRO require a 5 metre strip from the inner-side of the existing footpath extending into the project site as an area to be kept free from development.

This 5 metre strip is to facilitate future active travel upgrades alongside the N55 in the future.

Discussions also focused on the eastern-most extent of the site area and it was agreed that the only amendments deemed necessary by the WMRO were the quadrant of the site directly adjacent to the proposed duplex block.

Office UK: Dean Swift Building, Armagh Business Park,
Hamiltonsbawn Road, Armagh, BT60 1HW
Email: info@genesisplanning.co.uk

Tel: (+44) 28 30493 001
Tel: (+353) 45 571 682

In response this 5 metre strip has been incorporated into the revised layout; the dashed line shown below demonstrates how this area is now proposed as being kept free from any built development or site works.

For reference the original layout vs the proposed amendments hereby submitted under Further Information are shown for comparison.

As shown the 5 metre strip is free from development works; and the duplex block has also been reduced in length by omitting a triplex unit and the overall block moved to the west.

Also the proposed road serving the third party lands to the north has been re-designed; and which also is positioned outside of the 5 metre strip from the N55.



Figure 1 Extract from original site layout plan with 5 metre strip denoted

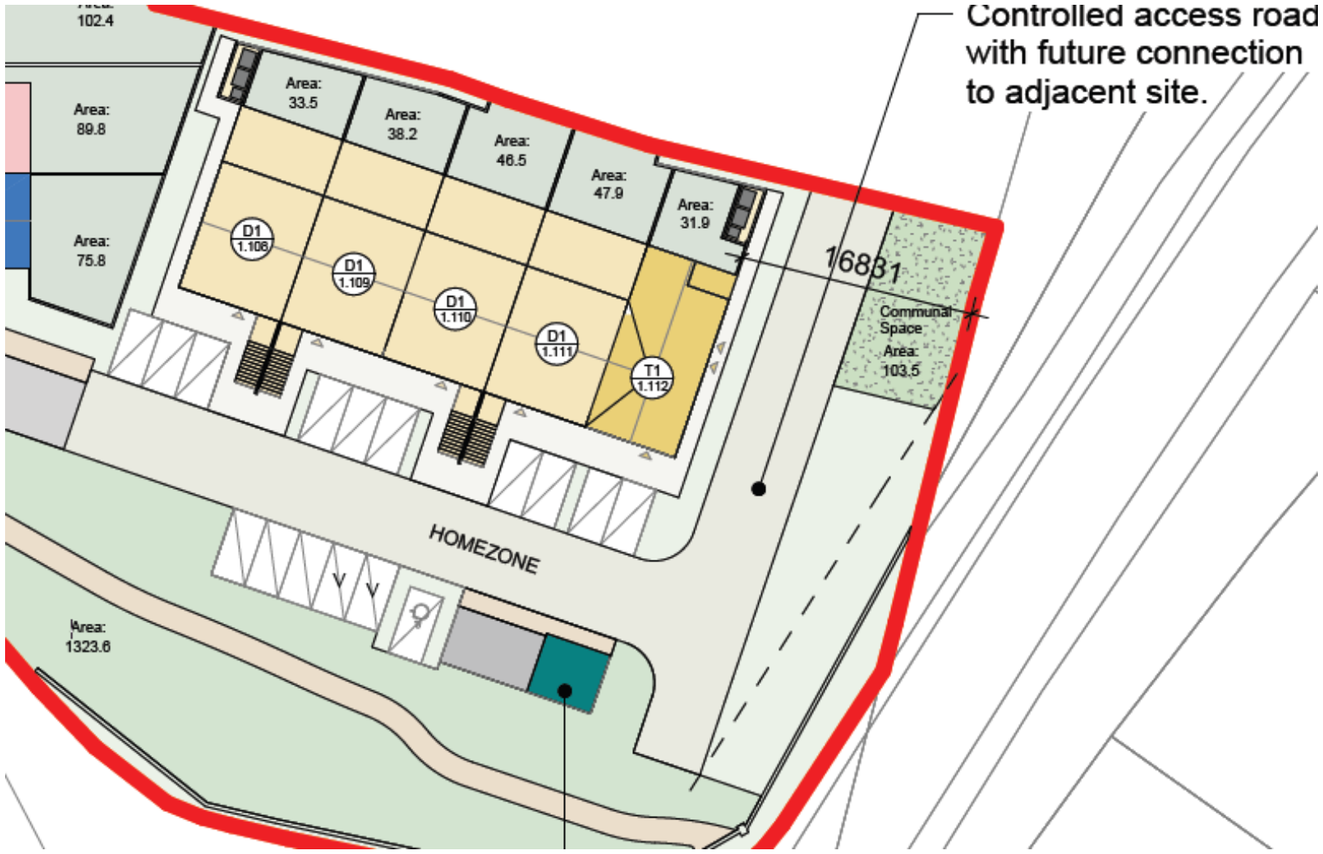


Figure 2 Extract from proposed site layout with 5 metre strip denoted

On these grounds we say Further Information point no.1 is fully addressed.

Point 2

Having regard to the proposed introduction of a temporary construction access onto the L5479 (Bullet Road), the applicant is requested to submit a Traffic Impact Assessment (TIA) in respect of the proposed use of this route by construction traffic. The assessment should consider the impact of such traffic on the operation, capacity and safety of the L5479, including its junction with the N55, and should identify the anticipated volume and nature of construction traffic associated with the development. The TIA should further clearly identify the timeframe and duration for which the temporary entrance is proposed to remain in use and the arrangements for its cessation and reinstatement thereafter.

Response:
The previously proposed temporary construction access onto the L5479 is now omitted from the proposal.

Accordingly no further Traffic Assessments are required in relation to this matter.

Point 3

You are requested to submit a report outlining the operation of the proposed creche in a residential area having regard to trip generation, vehicular movements, staff parking, parent set down and all other matters having to regard to satisfactory operation of a creche in a residential area. The designer should consider devising traffic routes independent of adjacent home zones emphasising enhanced set down facilities to minimise the impact of residential impact for the proposed development. The applicant should also confirm the proposed number of staff that will require a parking space and the number of spaces required for peak times during drop off and pick up.

Response:

In the first instance we highlight the creche location and layout has been repositioned to the northwest of the site consistent with the parent permission 318736-23. For reference the consented vs proposed layout are shown below.

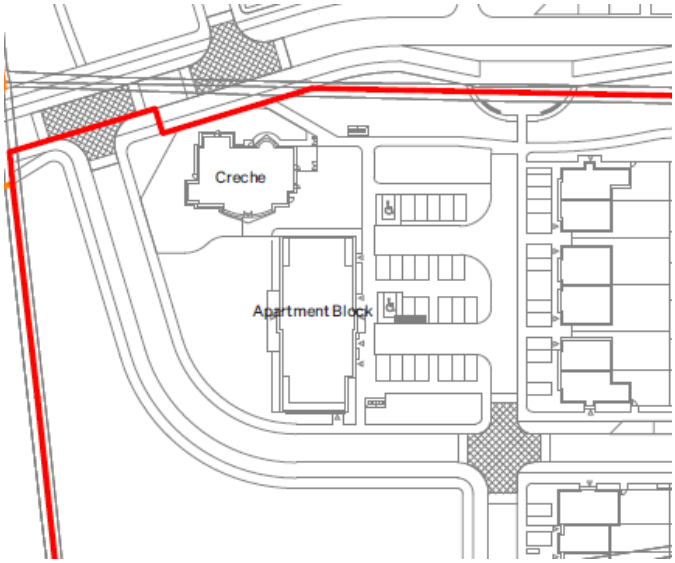


Figure 3 Layout under 318736-23



Figure 4 Revised site layout

By way of comparison we summarise parking provision, childcare capacity and staff numbers below.

	Consented Creche	Proposed Creche
Child Capacity	58 children	58 children
Total Parking	12 spaces	12 spaces
Total Staff	7 staff	7 staff
Access Arrangement	Designated parking; access from Link Street	Designated parking; access from Link Street

Table 1 Summary of Consented vs Proposed Creche

As can be seen there is no material change in operational size or traffic impacts between the consented and proposed creche.

Furthermore the trip generation was assessed under the parent permission Traffic and Transportation Assessment. Specifically section 4.1.3 therein sets out as per the following extract:

4.1.3 Creche

The category of "Education – Creche" has been assessed as the most appropriate development type category for this part of the development and the trip rates for the AM and PM peak periods are shown below:

Trip rates per Sqm

	Trip rate to development	Trip rate from development
AM Peak	6.629	5.181
PM Peak	5.211	5.861

For the proposed creche of 450sqm, this would give the following trips to and from the proposed development:

Trip Generation – 438sqm

	Trip rate to development	Trip rate from development
AM Peak	29	23
PM Peak	23	26

In this context we say the operational impact from the Creche is settled by virtue of the parent permission and given the general arrangement within the site aligns with the parent permission (being accessed by the main Link Street) there are no changes in road design matters or capacity of the internal estate road that need further assessment.

Indeed it can be concluded that with an increase of 2no. parking spaces from the parent permission then the revised design is an improvement in parking provision for patrons and staff.

Accordingly we say point no. 3 is also addressed.

GENESIS
PLANNING
CONSULTANTS

Point 4

The revised crèche proposal is not considered satisfactory in terms of either siting or architectural treatment. While capacity remains unchanged at 58 childcare spaces, the relocation of the building from the north-western portion of the site has significantly reduced its prominence within the development. Furthermore, the revised design closely replicates the scale, form and appearance of the adjoining semi-detached housing and fails to provide an appropriate architectural identity for a purpose-built childcare facility.

You are requested to submit revised proposals to significantly revise the siting and design of the crèche, including consideration of its relocation to the previously proposed north-western position, as raised at pre-planning stage. The revised building should provide a distinctive, dual-aspect architectural response which positively addresses the main approach road, strengthens the entrance to this phase of the wider large scale residential scheme and contributes to the legibility and character of the overall development.

Response:

In the first instance we highlight the creche location and layout has been repositioned to the northwest of the site consistent with the parent permission 318736-23. For reference the consented vs proposed layout are shown below.

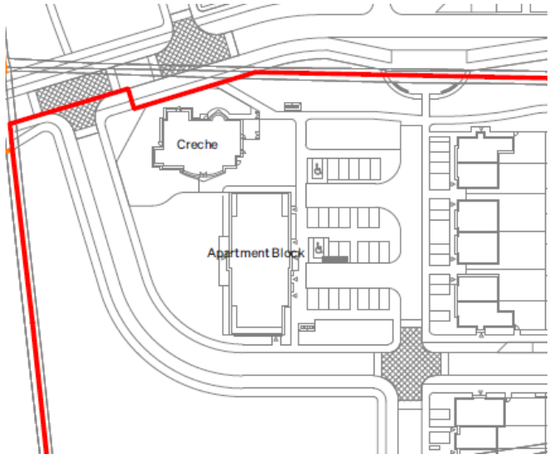


Figure 5 Layout under 318736-23

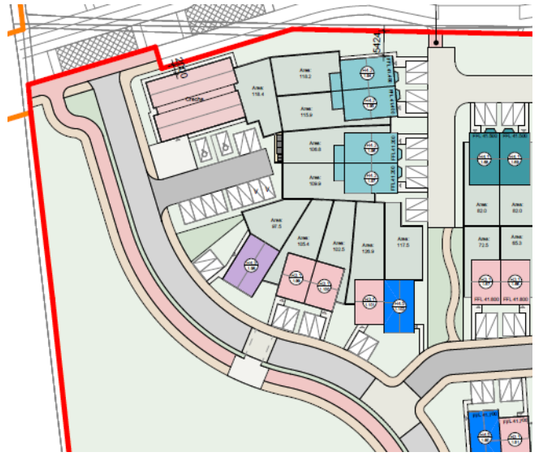


Figure 6 Revised site layout

Also in terms of Architectural treatment the Creche has been amended to create a focal point within the development and which also positively addresses the main approach road.

The updated elevation and design treatments are shown opposite.

Accordingly we say point no. 4 is fully addressed.



Figure 7 CGI of proposed Creche



Figure 8 CGI of proposed Creche

Point 5

The applicant is requested to submit a revised site layout plan providing for an appropriate and direct access connection from the internal road network to the third-party lands located along the eastern boundary of the application site. As currently proposed, the layout would appear to enclose and effectively landlock these lands, thereby unduly constraining their future development potential.

While the proposed controlled access arrangement is noted, it is considered that the development should revert to the approach permitted under the parent permission, whereby adequate frontage and direct access to the internal road network was provided. Revised proposals shall ensure that the future development potential of the adjoining lands is not prejudiced and shall have due regard to the requirements set out under Item No. 2 above.

Response:

In the first instance we highlight the parent permission did not provide for an access to these lands; save for removing mature trees.



Figure 9 Extract from parent permission 318736-23 site layout

Under the LRD amendment application the proposed amendment was as shown opposite.Taking into account both Further Information points 1 and 5 a revised access road is now incorporated into the revised layout.

The revised site layout relocates the road to the third-party lands towards the eastern site boundary. For completeness an indicative Masterplan concept layout is also shown to demonstrate how these third party lands will be facilitated by the proposed access point.

On these basis, betterment is achieved from the parent permission scenario and point 5 is addressed in a manner that fully provides for access to the third party lands.



Figure 10 Original site layout under 2660435



Figure 11 Revised site layout under 2660435

Point 6

The applicant is requested to address the following matters raised by the Athlone District Municipal Engineer:

(a) Provide dimensions for all road widths, footpath widths and home zone widths, having regard to the requirements of DMURS.

Response: The dimensions, for roads, footpaths and 'homezones' are supplied and in compliance with the requirements of DMURS. Please refer drawing 251416-ORS-Z1-00-DR-TR-700 for further detail and 251416-ORS-Z1-00-DR-TR-701 for kerbing proposals.

(b) Review all pedestrian crossings to ensure they are located on desire lines, as identified under Item 3.2 of the Road Safety Audit, in accordance with DMURS.

Response: b) All crossings have been reviewed and revised as part of this submission to align with the requirements of the Road Safety Audit. Crossings to be provide are dedicated crossings on desire lines and avoid parking movements.

(c) Review all junctions within the development to ensure pedestrian priority is appropriately incorporated throughout the scheme in accordance with DMURS.

Response: All junctions have been reviewed and provided with raised pedestrian priority crossings per detail NTA-TCD-0700-005 to calm traffic and reinforce a self-regulating environment

(d) Submit proposals addressing Item 3 of the Road Safety Audit, with all measures designed in accordance with DMURS.

Response: Item 3 of the Road Safety Audit has been reviewed and addressed in the revised design in compliance with DMURS.

(e) Provide details of the footpath and kerb arrangement at residential entrances, as a representative sample for the development, in response to Item 6 of the Road Safety Audit, demonstrating compliance with DMURS.

Response: A proposed kerbing layout is provided as drawing 251416-ORS-Z1-00-DR-TR-701 for review. Kerbing proposals align with DMURS recommendations.

(f) Review the parking layout where parking manoeuvrability concerns have been identified under Item 7 of the Road Safety Audit. Revised layouts and supporting drawings are requested demonstrating compliance with Figure 4.81 of DMURS.

Response: The overall layout has been revised and the parking areas identified have been autotracked for compliance. These are presented as part of drawings 251416-ORS-Z1- 00-DR-TR-730-734

(g) Examine all private parking spaces where potential conflict may arise between vehicles and pedestrians at pedestrian crossings and priority junctions, as identified under Items 8 and 9 of the Road Safety Audit, and provide revised details demonstrating compliance with DMURS.

Response: The overall layout has been revised and the parking areas identified have been autotracked for compliance. These are presented as part of drawings 251416-ORS-Z1- 00-DR-TR-730-734

Point 7

The applicant is requested to submit an updated Site-Specific Flood Risk Assessment, or an addendum to the Flood Risk Assessment prepared for the parent permission, completed by a suitably qualified person. The assessment should have regard to the revised site layout and assess the implications of the proposed site levels, road levels, finished floor levels, and the surface water drainage and attenuation strategy.

Response: In the first instance we refer to Section 34 (3C) of the Planning and Development Act, 2000 (as amended) we note the Planning Authority is restricted in it's determination of the application to only consider the modifications to the previously granted development.

By way of background a Flood Risk Assessment was carried out for the parent permission 318736-23; appended herewith for completeness.

Key findings of the FRA for permission 318736-23 are summarised:

'Section 4; Conclusion:

The site of the proposed development is within Zone C, and is appropriate for the Proposed residential development from a flood risk perspective. The Minimum Finished Floor Level is 40.50m O.D. which is 4.0M above the 1% AEP Event recorded at the closest node under the CFRAM study. Also the minimum Finished Ground level is 40.2mOD, which is over 4.0m.above flood level.

We note from drainage tests carried out to inform SUDS drainage measures there may some local pluvial drainage issues caused by water logging/ponding on the site. To ensure the proposal is not at risk of pluvial flooding ground levels across the site are being raised/re-profiled. This design response addresses the poor permeability of existing soil(s) on-site and the raising the site along with the surface water network being designed to cater for rainfall events up to a 1 in 100-year return period with an allowance for climate change of 20%. Surface water run-off exceeding the allowable outflow rate for the site will be stored in storm-tech underground attenuation tanks as per the SUDS design strategy and this will ensure greenfield run-off rates and no increased flood risk from rainfall or pluvial events affecting third party lands.

Also the water shed analysis under separate cover shows the lines of drainage within the site and how these are addressed by the proposed scheme. Finally in terms of culverts proposed we have reviewed the existing culvert network at the northern extent of the site which crosses under the local road; and which is noted as 900mm diameter pipe. Therefore the design approach has been to replicate this existing 900mm pipe into the culvert/ditch crossings proposed, and this is found to be an adequate design size to accommodate flows along the ditches. As set in section 2.7 of this FRA the existing diches within the site have a limited catchment area and channel flows are found to be 1.48m3/s. To ensure the proposed culverts will are adequately sized the culverts proposed have a hydraulic capacity of 7.0 m3/s. Our analysis finds that the proposed culverts are adequately sized to cater for channel flows in all scenarios and will not increase flood risk elsewhere.'

In summary all design levels and infrastructure remain as granted, with no changes to the wider roads or drainage network. The Engineering particulars which accompanied the parent permission remain applicable and matters are settled in this regard.

The accompanying Engineering proposals and report by ORS set out how the proposal aligns with matters assessed under the parent permission.

On these basis point 7 is addressed.

Point 8

The applicant is requested to review the proposed surface water drainage strategy and submit revised proposals demonstrating greater integration of nature-based SuDS measures, where feasible. Consideration should be given to measures such as swales, rain gardens and bioretention areas, with the objective of reducing reliance on piped drainage infrastructure and underground attenuation. Revised proposals should demonstrate how surface water can be managed through appropriate nature-based solutions within the site.

Response: In the first instance we again refer to Section 34 (3C) of the Planning and Development Act, 2000 (as amended) we note the Planning Authority is restricted in it's determination of the application to only consider the modifications to the previously granted development.

By way of background the same SUDS principles and design approach are incorporated into the amendment application hereby proposed.

We would also refer the Planning Authority to the parent permission and in particular the Engineering Services report which sets out why the SUDS methodology is appropriate for the site; appended for reference. As set out in section 6 therein:

'Based on the site Investigation there is poor permeability on site (refer to Appendix F) and this limits us in respect of our stormwater disposal options to retention and attenuation.

It is therefore proposed that we use permeable paving or porous asphalt and bio retention either tree pits or shrubbery to retain and attenuate flows. It is noted the overburden locally is a Fen and is not suitable for swales or other overland flow measures'. (page 16)

For the LRD amendment given the same site conditions are applicable the same SUDS strategy is applicable; ORS address same in section 3 of the Engineering Services report;

3.3 Surface Water Drainage
The proposed amendment to the parent permission does not seek to amend the discharge point detailed as part of the permission, or to revise the surface water strategy for the parent permission. Proposals to facilitate the amendment at phase 1 follow the parent permission strategy of disposal of surface water to the existing drainage channel at the western boundary of the site.

Surface water sewers are proposed to collect runoff and discharge to the attenuation tank located within the western green space, as detailed in the parent permission. Surface water will then be discharged from the attenuation tank via a flow control device, at a restricted rate, to the adjacent stream.

Surface water discharge will be limited to the rate agreed as part of the parent permission. Please refer to Appendix B for Drainage Design calculations for further information.

3.3.1 SUDs Strategy
The proposed surface water drainage strategy will incorporate Sustainable Urban Drainage Systems (SuDS) measures where practical to manage surface water runoff, reduce peak discharge rates, improve water quality, and minimise the impact of the development on the existing drainage network. The proposed development will be served by a gravity surface water drainage network, which will collect runoff from the proposed impermeable areas including roads and footpaths. Surface water runoff will be conveyed through the proposed drainage network and attenuated within the proposed attenuation tank located within the western green space. Discharge from the attenuation system will be controlled via a flow control device prior to out falling to the existing stream.

The SuDS measures incorporated within the development will include the use of attenuation storage, flow control measures, landscaped areas and other source control measures where feasible. These measures will assist in reducing surface water runoff rates and volumes, while also providing treatment benefits by reducing pollutant concentrations within stormwater runoff.

All proposed surface water drainage infrastructure will be designed to ensure adequate hydraulic performance and maintain self-cleansing velocities where achievable.

***The proposed SuDS strategy and surface water drainage design has been developed to ensure consistency with the approved parent permission** and is aligned with the drainage principles and requirements established as part of that permission.'*

On these basis we say point 8 is addressed.

Point 9

The applicant is requested to submit an updated Ecological Impact Assessment, or an addendum to the assessment prepared for the parent permission, completed by a suitably qualified ecologist. The assessment should be informed by up-to-date ecological surveys and consider any changes to habitats or species present on the site since the original assessment. Particular regard should be had to the revised layout, drainage, lighting, landscaping and construction phasing arrangements, together with any additional mitigation, monitoring or biodiversity enhancement measures considered necessary.

Response: In the first instance we again refer to Section 34 (3C) of the Planning and Development Act, 2000 (as amended) we note the Planning Authority is restricted in it's determination of the application to only consider the modifications to the previously granted development.

Furthermore we refer to the High Court Judgement in 'South West Regional Shopping Centre Promotion Association Ltd V An Bord Pleanala' wherein at paragraphs 70 & 71 the Judgement states:

'Para. 70 'In this case four grants of planning permission were extended in respect of the Development on the site pursuant to s.42A(1)(a)(i) up until 14th August 2016. This means that the Development is permitted notwithstanding the significant changes that occurred in the objectives of the development plan or the regional development objectives or ministerial guidelines.'

Para 71 'I conclude that the correct basis upon which to assess an application to amend existing planning permissions is to assess the proposed changes, variations and amendments in the light of all applicable current development plans and ministerial guidelines and other planning policies. In light of those matters, the proposed amendments should be assessed to see whether they meet the requirements of proper planning and sustainable development for the area. Matters that are the subject of an extant grant of planning permission ought not to be reassessed.

Accordingly I hold that the Board was required to assess only the modifications to the development in the application to amend the existing planning permissions for the development.'

For reference the extant permission was subject to an EIAR; the findings of the Ecological Impact Assessment incorporated therein did not find any protected species within the site.

For completeness an updated addendum to the parent permission is hereby enclosed; prepared by DNV. Key extracts are summarised:

'DNV was commissioned by Ballymore Real Estate Investments Limited to carry out an updated general ecology survey of the Phase 1 lands in relation to a proposed Large-scale Residential Development (LRD) at Cornamaddy, Athlone, Co. Westmeath, hereafter referred to as 'Proposed Development' or 'Site' when referring to the site area of the Proposed Development.

This survey was carried out by a qualified ecologist in June 2026 and confirmed with an additional survey in October 2026.

For reference by the Planning Authority, multiple ecological field surveys have been carried out at the site to date. Surveys undertaken within the past eighteen months are summarised in Table 1.

Table 1: Field Surveys Undertaken at the Proposed Development Site

Survey	Surveyor	Dates
Preliminary Habitat Survey	KM	11th and 22nd June
Invasive Flora Survey		
Bird Scoping Survey		
Preliminary Bat Habitat Assessments		
Mammal Survey		
General Fauna Survey		
Ecological Walkover Survey		27th October

The habitat types identified on Site were the same as those detailed in the 2023 Environmental Impact Assessment Report (EIAR) submitted for the original application. Whilst habitat extents had changed in the time between the surveys (e.g., both dry meadows and grassy verges habitat (Fossitt Code: GS2) and wet grassland habitat (Fossitt Code: GS4) were more dominant on Site during the 2026 survey when compared to the original survey carried out in August 2022), no significant change in habitats on Site was observed. A greater number of floral species were recorded during the June 2026 survey; however no protected floral species were observed, nor were any Annex 1 habitats recorded on Site or in the immediate surrounding area.

The June and October 2026 surveys found no evidence of resident protected mammals on Site (e.g., badger setts (Meles meles)), and the bird species recorded were not significantly different from the breeding bird assemblage recorded during the 2022 breeding bird surveys detailed in the 2023 EIAR. The lack of significant change in the habitats on Site make it unlikely that faunal assemblages (e.g., bats, birds, mammals etc.) have significantly changed since the ecology surveys undertaken in 2022 and 2023 for the original submission.

As no material change to the habitats and faunal communities on Site have been observed, the proposed mitigation measures detailed in the 2023 EIAR are deemed to be appropriate for the amended application. Proposed mitigation measure recommended within the 2023 EIAR include the following additional surveys:

1. Pre-construction mammal surveys. These surveys will identify evidence of protected mammals and ensure they have not taken up residence within or close to the development footprint. Should breeding or resting places be recorded in the preconstruction surveys, a site-specific mitigation plan shall be prepared and agreed with the NPWS prior to the commencement of works.
2. Two pre-felling emergence surveys will be carried out on tree T1984 within the period of May – September as it has moderate suitability for roosting bats.
3. Pre-construction amphibian surveys. These are to be carried out during the optimal time of year for signs of breeding activity.

Should the listed surveys, in addition to the other measures outlined in the 2023 EIAR submitted for the original application, be carried out as described in the 2023 EIAR, no significant impacts on the local ecology are predicted as a result of the Proposed Development.'

Finally we highlight for the Planning Authority the provisions of condition 4 of the parent permission 318736-23 which states:

'4. All mitigation measures set out in the Natura Impact Statement Report and the Ecological Impact Assessment Report shall be implemented in full in the carrying out and occupation of the permitted development.'

With an extant permission on the lands and with Ecology monitoring required under the parent permission along with additional surveys carried out in 2026 we say Ecology matters are fully addressed both by condition, the extant permission and the addendum Technical Note by DNV enclosed.

Concluding Statement

In the context of the above and enclosed particulars we trust all matters are addressed.

Finally should the Planning Authority deem the Further Information hereby enclosed to constitute Significant Further Information we will arrange for statutory notices pursuant to Article 35 of the Planning and Development Regulations in due course.

Your Sincerely,



Ronan Woods
Director

Enclosures

Planning

- Planning Cover Letter & Statement of Response

Architecture

- 2650-A-PP-261016-RFI Response
- 2650-HWS-CR-XX-D-A-20010_P02 - Proposed Creche
- 2650-HWS-P1-ZZ-D-A-10022_P02 - Site Layout – Proposed
- 2650-HWS-P1-XX-D-A-20019_P01 - Duplex Type D1 (2B4P & 3B5P)
- 2650-HWS-P1-XX-D-A-20020_P01 - Walk-Up Type T1 (1B2P)
- Housing Quality Assessment & Schedule of Accommodation

Landscape

- 8612 Landscape Issue Register
- 8612-PHL-ZZ-ZZ-DR-L-1000 - Landscape Phase 1-General Arrangement
- 8612-PHL-ZZ-ZZ-DR-L-1100 - Landscape Phase 1-Boundary Treatments
- 8612-PHL-ZZ-ZZ-DR-L-3000 - Landscape Phase 1-Softworks Plan
- 8612-PHL-ZZ-ZZ-RP-L-9000 Landscape Design & Access Statement

Environmental

- Construction Environmental Management Plan
- ECIA Addendum Technical Note

Engineering

- Copy of Flood Risk Assessment from parent permission
- Copy of Engineering Services report from parent permission
- Further Information Response by ORS
- 251416-ORS-Z1-00-DR-TR-700_p05 (Proposed Phase 1 Road Layout)
- 251416-ORS-Z1-00-DR-TR-701_p01 (Proposed Phase 1 Road Layout-Kerb Layout)
- 251416-ORS-Z1-00-DR-TR-730_P04 (Swept path analysis- Refuse Truck Sheet 1)
- 251416-ORS-Z1-00-DR-TR-731_P05 (Swept path analysis- Refuse Truck Sheet 2)
- 251416-ORS-Z1-00-DR-TR-732_P04 (Swept path analysis-Fire Tender Sheet 1)
- 251416-ORS-Z1-00-DR-TR-733_P05 (Swept path analysis-Private Car Sheet 1)
- 251416-ORS-Z1-00-DR-TR-734_P01 (Swept path analysis-Private Car Sheet 2)
- CRM-JAK-SW-ZZ-DR-E-60001 (Street Lighting Proposals)