



Planning Ref: 2660059
16th March 2026

Planning Section
Offaly County Council

Dear Sir/Madam

Re: The construction of a single storey dwelling and a wastewater treatment system and a vehicular entrance and all associated site works at Townparks, Daingean, Co. Offaly.

Comment

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

Having reviewed the documentation submitted with this application. The proposed development is located immediately adjacent to/ overlaps with the **Grand Canal proposed Natural Heritage Area (pNHA) (Site Code 002104)**.

As stated by the National Parks and Wildlife Service (NPWS) Site Synopsis, the Grand Canal is a linear man-made waterway whose pNHA designation includes the canal channel and its banks. It supports a diverse habitat mosaic—hedgerow, tall herb vegetation, calcareous grassland, reed fringe, open water, scrub and woodland—and species of conservation concern, including Annex II species such as otter and white-clawed crayfish. Towpath vegetation reflects midlands calcareous soils, with species such as Crested Dog's-tail, Quaking Grass and Sweet Vernal-grass usually found.¹

The canal acts as an important ecological refuge within intensively farmed landscapes. Locally, hedgerows and garden boundaries consist of blackthorn, bramble, ash, hazel and elder. Canal-side vegetation transitions from narrow reedbed to marsh/wet grassland and dry grassland, with aquatic macrophytes including water milfoil, unbranched bur-reed, shining pondweed and Canadian waterweed. Calcareous grassland elements also support orchid species (common spotted, fragrant, twayblade), quaking grass, yellow rattle, bird's-foot trefoil, sedges, wild carrot, lady's bedstraw and ox-eye daisy. The canal's ecological value derives from both species' diversity and the connectivity of its continuous linear habitats.

¹https://www.offaly.ie/app/uploads/Council/Council_Services_A-Z/Planning_Building/Grand-Canal-Greenway-Pollagh-EIA-Screening-Report.pdf

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson), John Burgess, Damian Downes, Deirdre McDermott, Muiris Ó Céidigh, Dr. Patricia O Hare, John G. Pierce, Sheila Pratschke, Prof. Mark Scott, Dr. Mary Tubridy

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Chapter 4: *Biodiversity and Landscape* of the Offaly County Development Plan 2021–2027 sets out protections for proposed Natural Heritage Areas, and biodiversity and ecological networks more generally:

- **BLP-01** *Protect, conserve and seek to enhance the county's biodiversity and ecological connectivity*
- **BLP-04** *"Protect and maintain the conservation value of all existing pNHAs in the County and ensure development does not adversely affect their ecological integrity"*

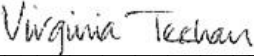
Despite the site's proximity to the pNHA, the application is not accompanied by any ecological assessment. No information is provided regarding:

- Baseline habitat conditions on the canal bank or adjoining lands;
- An assessment of potential effects (both construction and operation) on species or habitats associated with the pNHA, and any associated mitigation if required.

The Local Authority are justified to request further information to attain a proportionate level of ecological assessment to demonstrate that there are no negative impacts on the pNHA. In the absence of the required level of ecological assessment the Heritage Council cannot rule out negative impacts, particularly during the construction phase. Therefore, currently the proposal is contrary to the aforementioned policies of Offaly CDP 2021-2027 specifically policy BLP-04 which seeks to conserve the ecological value of proposed Natural Heritage Areas.

I trust these views will inform Offaly County Council's determination of the application.

Yours sincerely,


Virginia Teehan

Chief Executive Officer

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