



An  
Coimisiún  
Pleanála

**Specialist Report:  
Supplementary Ecological  
Impact Assessment**

**ABP-318220-23**

**ABP-318217-23**

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<b>Development</b>	N6 Galway City Ring Road
<b>Planning Authority</b>	Galway County Council Galway City Council
<b>Applicant</b>	Galway County Council on behalf of itself and Galway City Council
<b>Type of Application</b>	Section 51 of the Roads Act 1993, as amended Section 49 of the Roads Act 1993, as amended
<b>Ecologist</b>	Dr Maeve Flynn BSc. PhD. MCIEEM

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## **1.0 Introduction**

### **1.1. Background**

- 1.1.1. As part of the assessment of the EIAR submitted in 2018 for the N6 Galway City Ring Road application under reference number ABP-302848-18 and ABP-302885-18, Mr Richard Arnold of Thomson Ecology prepared an Ecological Impact Assessment Report to support the assessment of biodiversity for the EIA and a separate report supporting the Appropriate Assessment. In terms of the EIAR, Mr Arnold undertook a detailed examination and analysis of all biodiversity information submitted including further information received and consolidated the information obtained at the oral hearing, informing the Inspector's Report prepared by Ms Kellett (Senior Planning Inspector) and dated 22nd June 2021.
- 1.1.2. The assessment of likely significant effects reported on in the Inspectors Report were generally in agreement with the overall residual significant impacts of the proposed road scheme as determined by the applicant's EIAR, with some differences in terms of the magnitude of likely significant impacts on a number of Key Ecological Receptors (KERS) and a finding of overall net biodiversity loss. Mr Arnold's report considered the complexity of the biodiversity receiving environment affected by the N6 GCRR highlighting how distinct geologies; granite in the east and limestone karst east of River Corrib makes the area unusual and influences the ecology of the area and implications for significant impacts on biodiversity. The report also recommended additional mitigation measures that could be implemented; however, the measures don't change significance of residual impacts.
- 1.1.3. The findings of the Inspector's Report of 2021 found that N6 GCRR would result in likely significant impacts on biodiversity. While the design of the road includes measures to avoid or minimise effects on protected sites for nature conservation including Special Areas of Conservation (SACs) such as Lough Corrib SAC, Special Protection Areas for birds and Natural Heritage Areas (NHAs) including Moycullen Bogs significant effects on habitats of high nature value cannot be avoided. Even after the application of mitigation measures and compensation measures, there will be unavoidable loss of high nature value habitats including limestone pavement and wet heath and residual impacts on a number of fauna species including Peregrine Falcon, Barn Owl, Bat species including Lesser Horseshoe Bats.

- 1.1.4. The sequence of events since the case was remitted back to An Coimisiún Pleanála will be set out in the updated Inspectors report. Following a request for further information as part of the remitted case by An Coimisiún Pleanála, the Applicant submitted an updated EIAR and NIS (2023) and the statutory submission period was reopened. The applicant has had the opportunity to provide responses to submissions (October 2025).
- 1.1.5. Mr Arnold was not in a position to complete a review of the updated Environmental Impact Assessment Report or the updated Natura Impact Statement submitted under new case numbers ABP-318220-23 and ABP-318217-23 therefore, an Inspectorate Ecologist of An Coimisiún Pleanála (ACP) was requested to provide a review in line with the approach and headings covered by Mr. Arnold on changes since the submission of the 2018 application.

## **1.2. Updated Environmental Impact Assessment Report**

- 1.2.1. The order of the High Court stated that the remitted application shall take effect from the point in time immediately after the submission of the initial Inspector's Report prepared by Ms Kellett and dated 22<sup>nd</sup> June 2021. Therefore, the Commission can largely rely on the EIA completed in the previous Inspector's Report and associated appendices including Mr Arnold's assessment. The updated EIAR has been prepared in view of changes to the baseline environment, legislation and policy and offered the opportunity to consolidate information arising from modifications of the project that arose from the further information and the oral hearing in the course of that application.
- 1.2.2. The updated EIAR was prepared by the same team lead by Arup and Arup in-house experts, external consultants on behalf of Transport Infrastructure Ireland, Galway City Council and Galway County Council and broadly follows the original format in line with the requirements of the EIA Directive 2014/52/ EU.
- 1.2.3. The ecological consultants Scott Cawley, involved in the 2018 application were retained for the updated EIAR and the competencies of the main authors are presented in Table 1.3 of Chapter 1 of the EIAR.
- 1.2.4. In addition to the updated EIAR, a RFI Response document was submitted which I consider a helpful and accurate summary of the more detailed updated EIAR and associated appendices, drawings and figures. The conclusions of the assessment of

individual environmental topics including biodiversity are considered in context of the following questions, while relying on and updating the previous EIAR where required (2018):

- Are there any changes to the guidance and standards for the methodology for the impact assessment? If so, what are they?
- Has the baseline changed? If so, how and where?
- Do these changes to the baseline alter the conclusions of the impact assessment taking cognisance of updated impact assessment guidance? If so, how?
- Do any changes to the conclusions of the impact assessment alter the mitigation strategy? If so, how?
- Do any changes to the mitigation strategy alter the residual impact assessment? If so, how?
- Are there any changes to the cumulative impact assessment? If so, how?

1.2.5. I agree with the applicant that this is a pragmatic approach in order to present a coherent assessment and avoid undue repetition particularly where there have been no material changes.

1.2.6. Chapter 8 of the updated EIAR provides an updated assessment of likely significant effects of the proposed development on biodiversity in the receiving environment. An executive summary helpfully summarised the key changes since the 2018 EIAR. While the focus of the chapter is on changes since the previous iteration and changes to the ecological baseline in the interim period, the assessment by necessity considers the entirety of the scheme and runs to 579 pages excluding figures.

1.2.7. In summary, key changes to the biodiversity chapter include the following:

- Description of receiving environment to take account of updated ecological surveys undertaken between 2022 and 2024
- Updated figures and appendices
- Takes account of and consolidates ecological information provided over the timeframe of the proposed development since preparation of the 2018 EIAR, including data and assessment arising from further information submitted,

briefs of evidence presented at the Oral Hearing in 2020, amendments that arose during the course of the oral hearing.

- Takes account of the Inspector's Report of 2021.

1.2.8. An updated Natura Impact Statement has also been submitted, and I consider this and any additional implications arising for European sites in a separate supplementary report.

### **1.3. Submissions**

1.3.1. The Department of Housing, Local Government and Heritage submitted observations on Nature Conservation via a Development Applications Unit submission) on the 1<sup>st</sup> of August 2025 and this submission is appended to my report (Appendix I). The observations comprised of three recommendations regarding mitigation measures and identified three technicalities that could be incorporated into the consideration of the project. These are summarised as follows:

- Treatment of all invasive species (all third schedule non-native species) identified within the development zone should be treated prior to the commencement of construction works.
- Water quality monitoring should be agreed before consent granted.
- No stockpiling of surplus materials on habitat identified as Annex I habitat (outside of European Sites).
- Clarification on status of Lough Corrib SAC- no longer candidate site.
- Reclassification of aquatic vegetation has been re-classified as corresponding to Annex I Vegetation of Flowing Waters 3260- a number of maps in the updated EIAR do not reflect this change.
- Requirement for Ecological Clerk of Works (ECoW) as stated in NIS and EIAR is not reflected accurately in the CEMP.

1.4. A number of submissions from third parties also raise concerns related to biodiversity including impacts on sites designated for nature conservation including Lough Corrib SAC, Moycullen Bog NHA, Annex I habitats, habitat loss and destruction, fragmentation of ecosystems, water pollution.

- 1.5. I am satisfied that in terms of general impacts on biodiversity and nature conservation, this has been comprehensively addressed in the Inspector's Report of 2021 and not revisited in this report. The applicant submitted a detailed response to An Coimisiún Pleanála on the observations made by statutory consultee and third parties on the updated (October 2025). Section 4 of the document addresses the Departments submission (DAU).
- 1.6. I am satisfied that the Applicant has comprehensively addressed each of the Department's points. The applicant has acknowledged clerical errors and has made clarifications in its response such that treatment on all third Schedule non-native species will be treated before construction starts, water quality monitoring parameters, sampling locations, frequency and timings have been clarified and most recent water quality status for rivers, lakes, coastal transitional waters and ground water status summarised. No stockpiling will occur within Annex I habitat areas, and all these points will be integrated into the final CEMP with the contactor. The technicalities relating the River Corrib SAC, classification of Annex I 3260 habitat and clarification on status and appointment of Ecological Clerk of Works are clarified and are noted.
- 1.7. I note that over the course of this Project there has been extensive consultation and engagement with the National Parks and Wildlife Service (NPWS) which has shaped the design, mitigation and compensation measures and the point (See Section 8.2.4.2 consultations for a summary of NPWS and other nature conservation bodies) and the relatively minor issues raised in the 2025 observations are reflective of the engagement of the Applicant with the concerns of the NPWS.

## **1.8. Scope of Report**

- 1.8.1. This report to the Planning Inspector and available to the Commission is a written record of my review and examination of the updated EIAR Chapter 8 Biodiversity and associated appendices and figures, RFI Response Document, and response to submissions. This report should be considered in conjunction with the report prepared by Mr Arnold and covers updates to ecological information subsequent to his assessment and recommendations that were adopted in the Planning Inspectors Report (2021).

- 1.8.2. For ease of reference, the format of my report follows the general headings and approach of the ecological impact assessment undertaken by Mr Arnold. The focus of my assessment is on any significant changes since the 2018 application only, where these are relevant to likely significant effects, and I do not revisit the assessment already undertaken by Mr Arnold and the Inspector's Report of 2021.
- 1.8.3. Therefore, for the avoidance of doubt, I am accepting of the assessment undertaken in terms of approach and methodology, competencies of all ecologists and specialist involved in survey and assessment, validity of scientific data, and impact assessment of the Planning Inspector (20221) including Mr Arnold's report.

## **2.0 Description of proposed development**

- 2.1. The Applicant provides a full and detailed description of the proposed N6 GCRR including all amendments since the 2018 EIAR in Chapter 5 Project Description and summarised throughout the updated Project information including the RFI document (Sections 3-5) and summarised in the updated Planning Inspector's Report.
- 2.2. The updated EIAR reflects the relatively minor modifications that were agreed during the oral hearing mainly related to access and land acquisition and includes incorporation of public transport requirements to support a large housing development at Knocknacarra.
- 2.3. Works required to facilitate the project at Galway Racecourse at Ballybritt include the demolition of existing stable yard and provision for both temporary and permanent stables are also considered in detail. I note that this was subject to a separate and approved planning application but due to its connection to the N6 GCRR road scheme, is assessed as part of the Project in the updated EIAR, and also in the updated AA screening and NIS. The total area within the assessment boundary has increased from 280ha in the 2018 EIAR to 334ha due to the inclusion of additional lands at Galway Racecourse

## **3.0 Study area and zone of Influence**

- 3.1.1. Section 8.2.5.1 clarifies that scheme study area refers to the wider study area within which ecological constraints and route selection studies form earlier stages of the

proposed N6 GCRR encompassed. The applicant describes the zone of influence (ZOI) for biodiversity in Section 8.3.2 and figures 8.17.1 and 8.18.1 which encompasses the road and various distances depending on the ecological receptor and ecological pathways.

- 3.1.2. In his report Mr Arnold considered that the zone of influence could extend beyond the distances referenced for several features and that it should be extended to include haul routes and potentially for cumulative impacts.
- 3.1.3. I am satisfied that the Applicant has incorporated the considerations raised by Mr Arnold and extended the ZOI to take account of the potential for increased recreational pressure and construction traffic impacts on European Sites in particular. This is assessed in detail in the updated AA Screening Report and NIS and the Inspector and Commission is also directed to my supplementary Appropriate Assessment Report.
- 3.1.4. The Applicant also provides clarification on the ZOI selected for ecological receptors and I consider that the selected distances are reasonable based on the ecology of individual KERS and ecological connections to the wider area.

## **4.0 Legislation and Policy Context**

Q: Are there any changes to the legislation and policy context?

- 4.1. Section 8.2.2 and 8.2.3 of the updated EIAR lists the legislation and biodiversity relevant to the biodiversity assessment. There have been no significant changes to the legislative context. A number of biodiversity policies have been published in the interim period and these include the following:

- Ireland's 4th National Biodiversity Action Plan 2023-2030
- Galway City Development Plan 2023-2029
- Galway City Biodiversity Action Plan 2014-2024
- Galway County Development Plan 2022-2028
- TII Biodiversity Plan 2023
- TII Landscape Plan 2023

- 4.2. The updated EIAR takes account of a number of additional areas/ features of local biodiversity importance in the city featured in the Galway City development Plan including Terryland Forest park, City Canal system, Waterbody, Cave in Merlin Park, Terryland Glananail, Coopers Cave Terryland which have been incorporated into the LBAs considered in the updated EIAR. These sites are additional to Local Biodiversity Areas (LBAs) identified in Galway City Biodiversity Action Plan 2014-2024).
- 4.3. The Council acknowledges that developments, including the N6 GCRR, will occur in the vicinity of these Local Biodiversity Areas. Local Biodiversity Areas shall be taken into account in the planning, design and assessment of development applications and will inform local area plans, where appropriate.

**Policy 5.2 Protected Spaces: Sites of European, National and Local Ecological Importance point 6:** Protect Local Biodiversity Areas, wildlife corridors and stepping stones based on the Galway Biodiversity Action Plan 2014-2024 and support the biodiversity of the city in the Council's role/responsibilities, works and operations, where appropriate.

- 4.4. I bring the Planning Inspector and Commissioner's attention to the fact that Galway City Biodiversity Action Plan has been updated<sup>1</sup> (2025-2030) and was published in December 2025 and therefore was not considered by the Applicant. The updated Plan provides a framework for the conservation of biodiversity and natural heritage for the Galway City area, updating the polies and objectives of the previous plan. The 2025-2030 plan considers the current state of Galway City's biodiversity, threat and provides biodiversity actions under a number of themes including themes and objectives relevant to planning and development.
- 4.4.1. Local Biodiversity Areas (LBAs) have been reconsidered and renamed as City Biodiversity Areas (CBAs). 16 CBA sites are listed in the updated Galway City Biodiversity Action Plan and these sites now exclude statutory nature conservation areas to distinguish those sites from local sites. I have provided a list of the CBA sites and map extracted from the Plan in Appendix II of my report and provide an updated assessment of impacts on these sites in Section 7 below.

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<sup>1</sup> [Galway City Council Biodiversity Action Plan 2025-2030.pdf](#)

- 4.4.2. As noted in Mr Arnold's Report, the mapping available for the Local Biodiversity Areas is not detailed, with only a small-scale map without labels available in the Galway Local Development Plan. This has not changed in the updated Biodiversity Action Plan making it challenging to accurately determine the interaction of the CBA sites with the N6 GCRR reservation.
- 4.5. Notwithstanding the identification CBAs, the Galway City Development Plan 2023-20239 does give precedence to the N6 GCRR in both policy and objectives: *Priority will be given to the reservation of the N6 GCRR designated strategic road corridor and any associated land requirements over other land use zonings and specific objectives.*
- 4.6. **Policy 4.6** Road and Street Network and Accessibility point 2: *Enhance the delivery of an overall integrated transport solution for the city and environs by supporting the reservation of the designated strategic road corridor to accommodate the N6 GCRR project.*
- 4.7. **Specific objectives 4.8:** Road and Street Network & Accessibility
3. Reserve the route corridor of the N6 Galway City Ring Road (N6 GCRR) project as approved with conditions and modifications by An Bord Pleanála which accommodates the designated strategic road and the associated bridge crossing of the River Corrib.
24. Give priority to the reservation the N6 GCRR designed strategic road corridor and any associated land requirements over other land uses and objectives in the City Development Plan and prohibit developments within the designed strategic road corridor which could potentially prejudice the development of this strategic road and river crossing.

## 5.0 Appraisal Methodology

Q: Are there any changes to the guidance and standards for the methodology for the impact assessment? Is so, what are they?

- 5.1. Section 8.2.2 of the updated EIAR addresses changes in guidance and standards in methodology since the 2018 EIAR. These include the following:

- Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th ed.) (Collins, 2023)
- Bat Mitigation Guidelines for Ireland V2 (NPWS, 2022)
- UK Bat Mitigation Guidelines (Reason and Wray, 2023)
- Survey and Mitigation Standards for Barn owls to inform the Planning, Construction and Operation of National Road Projects (Transport Infrastructure Ireland, 2021)
- EPA Guidelines on Environmental Impact Assessment Reports (2022)
- CIEEM Guidelines for Ecological Impact Assessment version 1.3 (CIEEM 2018 – updated 2024)
- Applications for Regulation 54 Derogations for Annex IV species, Guidance for applicants (Department of Housing, Local Government and Heritage, July 2025)

5.2. I am satisfied that the surveys and impact assessment has followed comparable methodologies and that the updates have been considered and that the methodology and approach taken in the updated EIAR is in line with current best practice.

5.3. I note that TII published a new technical document in December 2025 titled *Biodiversity Metric Tool for Road, Greenway and Light Rail Projects: User Guide Document*. The guide is designed to be used on new TII projects and is not applicable to this project having being published in the course of the planning process.

#### **5.4. Desk study**

5.4.1. Section 8.2.4.1 details sources consulted as part of the updated desktop study to inform updated scope of ecological surveys which included a review of relevant published and unpublished sources of data. I am satisfied that this is a comprehensive exercise and reflective of the best available scientific information available at that point in time.

#### **5.5. Field assessment**

5.5.1. The level of field surveys that informed the 2018 application was significant and included a spectrum of ecological survey from standard habitat characterisation to highly specific and specialised surveys which required varied specialist ecological expertise in flora and fauna and these surveys were further supplemented with

additional field surveys as part of a response to a further information request in 2019 as part of that application.

5.5.2. The updated EIAR has been informed by additional field surveys undertaken between 2022 and 2024 for certain ecological topics. The updated surveys included the following (See updated EIAR 8.2.5.2 Filed Surveys):

- EIA habitat surveys
- Aquatic habitat and aquatic vegetation surveys (Lough Corrib SAC)
- Otter Survey (river Corrib and Coolagh Lakes)
- Mammal survey (excluding bats)
- Bats: building surveys, walked transects, automated detector surveys,
- Breeding bird surveys
- Wintering bird survey
- Barn Owl survey
- Peregrine falcon survey
- Hen harrier survey
- Amphibian survey
- Reptile survey
- Fisheries surveys
- Marsh Fritillary survey
- White clawed crayfish survey

5.5.3. Based on the information presented, I am satisfied that this a comprehensive and up to date dataset compiled in line with industry standards, guidelines and methodology and in terms of the adequacy of the data presented and lifespan of ecological data (CIEEM, 2019<sup>2</sup>).

## **5.6. Evaluation of Nature Conservation Interest**

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<sup>2</sup> CIEEM (2019) Advice note on the lifespan of ecological data

- 5.6.1. The evaluation criteria of biodiversity receptors remain unchanged from the 2018 EIAR following the valuation set out in the TII guidelines (National Road Authority 2009). The Applicant also takes account of the ecological assessment undertaken by the Planning Inspector (2021) and Mr Arnold's supplementary assessment.

## **6.0 Description of existing environment**

Q: Has the baseline changed? If so, how and where?

- 6.1. Section 8.3 of the updated EIAR describes the ecological environment and biodiversity within the Zone of Influence (ZOI) of the proposed N6 GCRR. Results of updated surveys have been incorporated in the impact assessment. Specifically, section 8.3.1 details changes in the ecological baseline since 2018 and I provide a brief summary in this section. The findings are broadly consistent with that recorded previously and I am satisfied that no significant changes in habitat or fauna baseline have been recorded. The single largest area of habitat change (c. 12 ha) is at Lackagh quarry given time frame since active working of that site.
- 6.2. Of relevance is that since 2018, the NPWS has updated spatial data for Lough Corrib SAC which is the only European Site directly crossed by the N6 GCRR. The boundary has been slightly reduced by 0.5ha at the area intersected by the Project. The river Corrib has also been reclassified as corresponding to the Annex I vegetation of flowing waters habitat [3260].
- 6.3. The Special Conservation Interests for (SCIs) for Inner Galway Bay SPA have been updated (2019) to include one further bird species Black-throated diver and to exclude Shoveler. Bottlenose Dolphin and Harbour Porpoise to a number of Marine SACs including Inishmore Island SAC and Kilkieran Bay and Islands SAC

### **European Sites**

- 6.3.1. The N6 GCRR crosses one European Site, Lough Corrib SAC and there are three further European sites in close proximity to the project including Lough Corrib SPA, Galway Bay Complex SAC and Inner Galway Bay SPA. A further 19 European sites are identified as being within a possible ZOI of the Project and these are listed in Table 8.4. This is an increased list from that provided in the 2018 EIAR due to the

expansion of the ZOI as described in Section 3.1.3 of this report. These include the following:

Lough Corrib SAC, Lough Corrib SPA, Galway Bay Complex SAC, Inner Galway Bay SPA, Ardrahan Grassland SAC, Castletaylor Complex SAC, Kiltiernan Turlough SAC, Lough Fingall Complex SAC, Rahasane Turlough SPA, Rahasane Turlough SAC, Cregganna Marsh SPA, Maumturk Mountains SAC, Ballyvaughan Turlough SAC, The Twelve Bens/Garraun Complex SAC, Connemara Bog Complex SAC, Connemara Bog Complex SPA, Ross Lake and Woods SAC, East Burren Complex SAC, Moneen Mountain SAC, Black-Head Black Head-Poulsallagh Complex SAC, Gortnandarragh Limestone Pavement SAC, Inishmore Island SAC and Kilkieran Bay and Island SAC.

### **National Sites**

6.3.2. NHA and pNHA sites

6.3.3. Moycullen Bogs NHA which lies immediately adjacent to the proposed N6 GCRR is the only NHA site that could potentially be affected by the project. This is an increased list from that provided in the 2018 EIAR due to the expansion of the ZOI.

6.3.4. There are a further 31 pNHA sites which could potentially be affected by the Project:

Lough Corrib pNHA, Galway Bay Complex pNHA, Furbogh Wood pNHA, Kiltullagh Turlough pNHA, Ballycuirke Lough pNHA, Connemara Bog Complex pNHA, Drimcong Wood pNHA, Ross Lake and Woods pNHA, Black Head-Poulsallagh Complex pNHA, Lough Fingall Complex pNHA, Rahasane Turlough pNHA, Gortnandarragh Limestone Pavement pNHA, Moneen Mountain pNHA, East Burren Complex pNHA, Kiltiernan Turlough pNHA, Castletaylor Complex pNHA, Turloughcor pNHA, Inishmore Island pNHA, Maumturk Mountains pNHA, The Twelve Bens/Garraun Complex pNHA, Mason Island Machair pNHA, Mweenish Island Machair pNHA, Finish Island Machair pNHA, Duck Island pNHA, Inishmuskerry pNHA, Ardmore Point pNHA, Eagle Rock pNHA, Geabhrog island pNHA, Oilean Na Ngeabhrog (Glenoch Rock) pNHA, Kinvarra Saltmarsh pNHA and Oilean Na Ngeabhrog (Illaugnurraig) pNHA.

### **Local biodiversity areas**

6.3.5. Section 8.3.3.1 lists the relevant local biodiversity areas identified in the Galway City Development Plan 2023-2029 and the Galway City Biodiversity Action Plan 2014-202. As described in section 4.4 above, an updated Biodiversity Action Plan has been published by Galway City Council which has changed the name of local biodiversity areas to city biodiversity areas (CBAs) and separated statutory nature conservation sites. Most of the CBA sites coincide with or partly with the open areas through which the N6 GCRR traverses and there will be significant impacts on 12 of the 16 CBA sites.

**Table 1- City Biodiversity areas from Galway City Biodiversity Action Plan 2025-2030 (See Appendix II for map)**

CBA No.	CBA Name	CBA Description	LBA equivalent from 2018 and updated 2023 EIAR	Residual impacts to relevant Habitats and species) (from EIAR 8.1)
1	Barna Woods, Stream & Wetlands outside Galway Bay Complex SAC.	Woodland, wet heath, scrub, Barna Stream, acid grassland and wet grassland to the north of the site and species rich calcareous grassland bordering Rusheen Bay, supporting several orchid species	Rusheen Bay- Barna woods- Illanafamona  Includes SAC and SPA	No
2	Cappagh-Ballymoneen Peatlands	Large peatland habitat complex, south of Moycullen Bog NHA which supports blanket bog, fen, Tonabrocky stream, transition mire, wet heath, dry heath, wet grassland, acid grassland and scrub located between	Cappagh Ballymoneen (Coast Road to N59 Moycullen Road)	Loss of wet heath and blanket bog (National scale)  Loss Dry-humid grassland and Poor flush and Fen (local)  Bat species

		Cappagh and Ballymoneen roads.		(local)
3	Ballagh-Barnacranny Hill Peatlands	Connemara peatland, including blanket bog, fen, wet grassland, heath and scrub, located east of Tonabrocky. Proximal to Moycullen Bog NHA	Ballagh-Barnacranny Hill (Coast Road to N59 Moycullen Road)	As above
4	Cappagh/Knocknacarra Hill Heathland	Known locally as 'The Kidney' supports habitats including wet heath, dry heath, acid grassland, wet grassland, scrub and ponds	As above	As above
5	Dangan Grasslands & Scrub	Alluvial woodland and scrub, with species rich calcareous grasslands.	River Corrib area (alluvial woodlands)	Bat species (local)
6	River Corrib, Tributaries and Canal System outside River Corrib SAC	City Canal and River System including the Eglinton Canal, Gaol River, Distillery River, and species rich lowland hay meadows near Jordans Island.	City Canal system	Lesser horseshoe bat Other bat species
			River Corrib and Coolagh Lakes (includes SAC and pNHA)- as within SAC- excluded as a CBA but assessed as part of designated sites	Lesser horseshoe bat Other bat species
7	Menlo to Coolough Hill Limestone	Oak-ash-hazel woodland at Menlo Woods, and exposed limestone rock,	Menlough to Coolough Hill (includes quarry)	Loss of limestone pavement habitat petrifying springs,

	habitats outside SAC	calcareous grassland and small turloughs		calcareous springs, Peregrine Falcon, Bat species inc. LHB
8	Ballindooley-Castlegar Limestone & Wetland Habitats	Ballindooley Lough, with fen, reed swamp, wet grassland, scrub and exposed limestone. Castlegar area contains smaller areas of wet grassland, swamps, scrub, exposed limestone and small turloughs.	Ballindooley-Castlegar, Waterbody- near Ballindooley lough	Impacts on Bat species including LHB (national level),
9	Ballybrit Grasslands	Species rich calcareous grassland and small turlough.	Galway Racecourse, Ballybrit	Calcareous grassland
10	Merlin & Rosshill Woods	Broadleaved woodland, limestone pavement, wetlands, limestone caves and petrifying springs.	Not identified as LBA affected (bat activity/connectivity, red squirrel)	No
11	Doughiska Grasslands (West of N6)	Species rich calcareous grassland.	Doughiska	No
12	Roscam Grasslands	Calcareous grassland and shrub.	Not impacted	N/A
13	Roscam-Curragrean Limestone	Habitats Limestone pavement, dry heath and species rich calcareous grassland.	Not impacted	N/A

14	Doughiska-Ardaun Limestone Habitats	Limestone pavement, with calcareous grassland and scrub located to east of city. Orchid-rich grassland, including the protected small white orchid.	Doughiska	Loss of Limestone pavement (international level)  Local scale impacts on bat species
15	Coolagh Grasslands	Limestone pavement, with species rich calcareous grasslands	Doughiska	As above
16	Terryland Forest Park	Broad-leaf woodland, wetlands, species rich grasslands, <b>the Terryland River and Cooper's Cave.</b>	Incorporates two LBAs Coopers cave Terryland, Terry land Glenanail  Terryland forest park excluded in updated EIA	Impacts on national scale on LHB, local impact on other bat species

#### 6.4. Terrestrial habitats and aquatic habitats

6.4.1. Section 8.3.5 of the updated EIAR presents information on habitats. Habitat surveys were undertaken in 2023 to verify results of previous surveys. As per the 2018 EIAR, habitats are described by habitat types after Fossitt (2000) as standard and identified as corresponding Annex I habitat types as relevant. Updated habitat mapping and figures are shown on Figures 8.19.1 to 8.15.15 and 8.22.1 to 8.22.15. Each habitat type recorded is considered and any changes between 2018 and 2023 are identified.

6.4.2. Based on the information presented I am satisfied that a comprehensive and accurate re-examination has been undertaken and that any changes recorded are of a minor nature.

6.4.3. In considering habitats individually, Mr Arnold considered that the Applicant had taken a 'reductionist approach' in terms of qualifying habitat loss (2018 EIAR) and to overcome that he identified 12 habitat clusters which comprised of mosaic of habitats which together have a value potentially greater than the individual habitats. Helpfully, the applicant has taken on board the assessment provided by Mr Arnold

and references the clusters of important habitats in section 8.3.5.49 and expands upon the habitat composition and plant species of conservation importance.

## 6.5. Flora

6.5.1. Only one protected plant species (Flora Protection Order 2022) was recorded as part of the 2018 EIAR, Slender Cotton grass *Eriophorum gracile* and its locations are outside of the ZOI. The Applicant adopted the approach presented in Mr Arnold's report in considering and including rare (but not protected) bryophyte and vascular species as key ecological receptors and including them in the impact assessment.

6.5.2. I note that three additional non-native plant species were recorded in 2023 and the assessment and impact assessment and mitigation measures have taken these into account (see Table 8.17 updated EIAR).

## 6.6. Fauna

### 6.7. Invertebrates

6.7.1. Surveys were updated in 2023 for Marsh fritillary and reduction in suitable habitat for this species was documented.

6.7.2. No legally protected *Vertigo* species were recorded during any survey period. The marsh whorl snail (*Vertigo antivertigo*) is not listed on Annex II but is listed on Irish Red Data list of molluscs and was recorded in wetland habitat on the banks of the River Corrib and at a number of lake and marsh habitats within the ZOI.

6.7.3. Surveys in 2023 confirmed results of 2018 EIAR that White clawed crayfish is not present in rivers associated with the ZOI of the N6 GCRR. Similarly, the absence of Freshwater Pearl Mussel from the River Corrib was confirmed.

## 6.8. Bats

6.8.1. Section 8.3.8.2 of the updated EIAR details the baseline for bat species. Nine species of bat including three populations of lesser horseshoe bat (listed on Annex II and IV) have been recorded within the ZOI. The level of bat survey, particularly for lesser horseshoe bat undertaken for this scheme is comprehensive and includes a multitude of survey methodologies including radio tracking and live marking to determine bat movements and habitat connectivity throughout the area.

6.8.2. Table 8.21 of the updated EIAR lists changes in roost locations and species across the area between 2018 and 2023. Following 2023 surveys, 19 buildings supporting 23 bat roosts are within the N6 GCRR, a change from 15 buildings supporting 20 bat roosts in 2018. These include eight Soprano pipistrelle roosts, one Common pipistrelles roost, three unidentified pipistrelle bat roosts, three Brown long-eared bats, three Lesser horseshoe bat roosts, two Leislars bat roosts and three unidentified Myotis species bat roosts. Locations are provided on Figures 8.28.1, 8.30.1, 8.32.1 and 8.34.1.

#### 6.9. Mammals other than bats

6.9.1. The updated surveys in 2023 found no significant change in distribution of mammal species and findings are consistent with 2018 EIAR in relation to Otter and other species including pine martin and red squirrel.

6.9.2. I note that seven additional badger setts were recorded in 2023 survey, one of which is inside the assessment boundary bringing total number of sets to 24. (See updated EIAR Table 8.22)

#### 6.10. Breeding birds

6.10.1. A breeding bird survey was undertaken at various dates between April and June 2023 to update baseline data. All birds recorded during this period are listed in Table 8.23 and considered in terms of their conservation status with regard to being listed as SCI species for SPA site and their status on Birds of Conservation Concern Ireland (BoCCI, Gilbert *et al*, 2021).

6.10.2. An updated Barn owl survey was conducted between May and June 2023 to determine suitability for presence of Barn Owl. The presence of Barn Owl was confirmed at 5 sites with breeding pairs at two sites, one of which is located in close proximity to the edge of the fenceline of proposed N6 GCRR. This confirmed breeding pair (Menlo Castle area) is an update to the data on this species from earlier surveys where occupation was recorded but not breeding. The other breeding pair is over 4km from the proposed road. Another location within 500m of the proposed N6 GCRR showed evidence of use by Barn Owl during the winter period (roost site).

- 6.10.3. Surveys in 2023 also recorded breeding Peregrine Falcon at two quarry sites with a nest attempt confirmed at one of these sites. One of these sites is along the fence line of the proposed scheme and the second within 400m.
- 6.11. Wintering birds
- 6.11.1. An updated wintering bird survey was undertaken, and an additional 6 species of conservation concern were recorded from previous between 2022 and 2024 (see Table 8.25).
- 6.12. Amphibians and Reptiles
- 6.12.1. Section 8.3.11 details the baseline for the two amphibian species recorded i.e. Smooth newt and Common frog. Common Lizard was also recorded and considered of local importance. There is no significant change to baseline for these species.
- 6.13. Fish
- 6.13.1. Section 8.3.13 details various surveys undertaken for fish species. The baseline with respect to fish has not changed with the exception of the record of European Eel record from Ballindooey Lough from DNA sampling in 2023.
- 6.14. Conclusion of baseline:
- 6.14.1. The survey periods comprising 2013/14, 2015, 2016, 2017 and again in 2019, 2022-2024 that are included in the 2018 EIAR and updated EIAR comprise an extraordinary volume of survey and data gathered over a decade.
- 6.14.2. The most current surveys indicate continued minor changes -increase in GS1/-pressure and threats, decreased intensity of land use for agriculture, scrub encroachment, pressures from residential and other development.
- 6.14.3. Based on the scientific information presented I am satisfied that minor changes have occurred to the ecological baseline in line with what would be expected and overall the ecological baseline upon which the assessment of likely significant effects is made is consistent with that presented in the 2018 EIAR. The updated surveys have been effective in identifying where more significant changes have occurred such as the upgrading of an occupied Barn Owl site to a breeding location.

## **7.0 Impact Assessment: Construction and operational Stage Impacts**

Q: Do these changes to the baseline alter the conclusions of the impact assessment taking cognisance of updated impact assessment guidance? If so, how?

- 7.1. Section 8.5 of the updated EIAR details the evaluation of impacts at both construction and operational phases, considering all possible direct and indirect impact mechanisms on all key ecological receptors (KERS) from impacts on Lough Corrib SAC to impacts on individual flora and fauna species. As outlined throughout this report, the assessment presented has consolidated matters raised since the 2018 EIAR and incorporates the assessment undertaken in the Inspector's Report of 2021.
- 7.2. Based on the updates to the baseline ecological data presented, I am in agreement with the position taken by the applicant that the updates do not significantly affect the conclusions of impact assessment except for Barn Owl and Peregrine Falcon where the potential magnitude of impacts are increased due to likely disturbance/ loss of breeding sites adjacent to the outer boundary of the proposed N6 GCRR.
- 7.3. Potential impacts on biodiversity due to air quality has been reassessed to take account of updated air quality assessment and information, however this did not alter the assessment conclusions of the 2018 assessment.
- 7.4. A full and detailed assessment is provided in the Inspector's Report of 2021 and associated supplementary reports prepared by Mr Arnold and I do not repeat the assessment here. I am satisfied that the assessment undertaken by Mr Arnold which informed the Inspector's Report of 2021 was very comprehensive and took a precautionary approach to the identification and magnitude of likely significant effects.
- 7.5. Where Mr Arnold's report deviated from the Applicants in terms of valuation of Key Ecological receptors and magnitude of impact, these are considered and have been aligned in the updated EIAR. For example, in section 8.5.7.2 the Applicant considers the difference between the significance level attributed by Mr Arnold to loss of bat roosts being significant at a National level to the predicted local level magnitude of significance. The Applicant justifies the impact levels based on low numbers of bats (excluding Lesser horseshoe bat) and the acceptance of the NPWS of this

assessment in the granting of derogations to allow for the safe exclusion of bats from these sites.

- 7.6. A summary of likely significant effects of the proposed N6 GCRR on biodiversity in the absence of mitigation is presented in Table 8.41 of the updated EIAR. Likely significant effects from international scale to local scale are predicted for an extensive array of habitats and species.
- 7.7. Likely significant effects on remote SAC, SPA and pNHA and NHA sites as part of the extension of the ZOI arising from the Inspectors Report (2021) and in particular Mr Arnold's consideration of construction related traffic impacts and impacts on nature conservation sites from increased access due to the operation of the road have been excluded by the applicant (Section 8.5.4.2).

## **8.0 Mitigation and Compensation measures**

Q: Do any changes to the conclusions of the impact assessment alter the mitigation strategy? If so, how?

- 8.1. Section 8.6.1 of the updated EIAR considers changes since 2018 EIAR. The mitigation strategy was reviewed and updated and incorporated all relevant amendments made during the oral hearing (note that these were considered in the Inspector's Report of 2021 and by Mr Arnold in the assessment presented in 2021). The updates to the assessment from updated desk and field studies did not necessitate any material changes to the mitigation strategy and therefore are not repeated here. Table 8.44 of the updated EIAR provides a summary of mitigation measures required to address likely significant effects on the N6 GCRR on biodiversity.
- 8.2. The applicant has fully engaged with the recommendations arising from the assessment prepared by Mr. Arnold (Appendix 4 of the Inspector's Report of 2021) and all but two of these recommendations have been incorporated into the EIAR and mitigation strategy.
- 8.3. Two measures that were recommended by Mr Arnold have not been adopted by the applicant. These relate to planting of infiltration drains for habitat benefits for marsh

whorl snail and the translocation of ant hills. I am satisfied with the reasons provided by the applicant to exclude inclusion of these measures.

- 8.4. The submission made by DHLGH in 2025 identified a number of clarifications required in relation to mitigation and monitoring measures and I am satisfied that these have been fully addressed by the Applicant.
- 8.5. I bring the attention to the Inspector and the Commission that the Applicant secured and submitted updated Bat derogations (issued under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011-2021) to safely excluded bats from roost sites that require destruction for delivery for the N6 GCRR. The derogations are set out in Section 0.2 of the Response to Submissions (October 2025) for ease of refence. In granting the derogations, the NPWS has accepted the mitigation measures and that there are no reasonable alternatives to the removal of the roosts to facilitate the scheme. An application to update the derogations to ensure that they valid for the calendar year 2026 is stated to have been made by the applicant and a link to the derogation section of the NPWS website is provided in the Response document. However, at the time of preparation of my report the NPWS derogation webpage was under maintenance (last checked 13/01/2026<sup>3</sup>) and I was unable to view the 2026 derogations. I am satisfied that in granting the 2025 (updated) derogations the Commission can have confidence that the bat mitigation is appropriate and proportional in respect of impacts on bats and their roosts and there is no reason that an extension of those derogations for 2026 would not be granted. In the event that the scheme is approved, it is the Applicants obligation to ensure that all derogations are up to date at the time of works.

## **8.6. Compensation measures**

- 8.6.1. Section 8.9 of the updated EIAR presents information on compensation measures designed to offset or reduced predicted impacts where mitigation measures cannot fully ameliorate predicted significant effects.
- 8.6.2. Since 2018, minor changes to compensation measures have been made based on minor changes to design of project, changes in land use and ecological succession recorded as part of updated surveys. There have been minor amendments to

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<sup>3</sup> [Derogations - 2025 | National Parks & Wildlife Service](#); [Derogations - 2026 | National Parks & Wildlife Service](#)

habitat loss calculation and habitats that did not have a residual impact previously including blanket bog and habitat mosaics comprised of Annex I habitats.

- 8.6.3. The likely significant effects relate to habitat loss, potential for permanent loss of a Peregrine Falcon nest site, mortality of Barn Owl and impacts on local bat populations including Lesser Horseshoe bat and compensation measures are designed around these impacts.
- 8.6.4. The Applicant recognises the conclusions of Mr Arnold's assessment : the mitigation and compensation measures do not lessen the severity or likelihood of many of the identified impacts and many of the measures such as the use of viaducts and tunnels, habitat creation and provision of overpasses and underpasses are beneficial.
- 8.6.5. Compensatory management plans for loss of Annex I habitats are detailed in Appendix A8.27 and Figures 8.38.1 to 8.38.15 and a summary of residual impacts in table 8.47.
- 8.6.6. Compensation measures for bats include installation of replacement structures (artificial roosts) at locations close to original roost sites, and specific measures for Lesser Horseshoe bats, bat boxes, compensation for loss of foraging habitat with planning of new hedgerows in fields between the Project and Menlo Castle.
- 8.6.7. In relation to Peregrine Falcon, an alternative nest site will be provided on Galway City Council owned lands southeast of Lackagh Quarry (See Figure 8.38.8). The challenge of successful use by the species of artificial nest sites is acknowledged and there is uncertainty as to the effectiveness of this measure.

## **9.0 Residual impacts**

Q: Do any changes to the mitigation strategy alter the residual impact assessment?  
If so, how?

- 9.1. I am satisfied that the relatively minor changes recorded in the Biodiversity baseline, re-evaluation of impacts and consideration of mitigation measures and compensation measures does not materially alter the residual impact assessment and findings of the Inspector's Report of 2021 which adopted the precautionary approach and assessment provided by Mr Arnold.

- 9.2. With the exception of Barn Owl and Peregrine Falcon, the magnitude of residual impacts determined by the applicant have not altered to any significant extent since the 2018 EIAR. Where the Inspector’s Report of 2021 and Mr Arnold’s assessment considered a greater level of impact on the geographic scale, these differences have largely been accounted for and clarified in the updated EIAR.
- 9.3. With respect to Barn Owl, a level of uncertainty remains as to effectiveness of mitigation measures and therefore it is appropriate to adopt a worst-case scenario that there remains a potent of permanent impacts on at the Menlo Castle nest site and enduring mortality risk from collision. This is considered significant at the local scale by the applicant, however given the conservation status of Barn Owl (Red list BoCCI) a more conservative estimate of County level of impact may be appropriate which is a magnitude lower than that detailed in Mr Arnold’s report for this species.
- 9.4. In Table 2 below I have compiled a summary of the residual impacts remaining after application of mitigation and compensation highlighting where such impacts are additional since 2018 (See Section 8.10 of updated EIAR and cross reference with Table 13 of Mr Arnold’s summary of residual effects).
- 9.5. **Table 2 Summary of significant residual effects that will remain after the application of mitigation measures and compensation measures (from updated EIAR 2023).**

Likely Significant residual effects	Geographic scale (NRA/ TII)	Additional since 2018
permanent loss of c.1.54ha of the priority Annex I habitat Limestone pavement [*8240]	International	Increase in loss by c. 1ha
permanent loss of c.3.95ha of a mosaic containing Wet heath [4010], Dry heath [4030] and Molinia [6410]22	National	Increase in loss of wet heath by c. 1.02 ha
permanent loss of c.0.01ha of the priority Annex I habitat Blanket bog (active) [*7130]	International	Additional
permanent loss of c.0.01ha of the mosaic containing the priority Annex I habitat	International	Additional

Blanket bog (active) [*7130], Wet heath [4010] and Dry heath [4030]		
permanent loss of four Petrifying spring [*7220] features at Lackagh Quarry	County	No
permanent loss of 18 Calcareous springs (FP1) at Lackagh Quarry, c.5.24ha of Dry-humid acid grassland (GS3) and c.1.30ha of Poor fen and flush habitat (PF2).	Local	Additional in terms of increase from 15 springs, increase in loss of 1.17 ha poor flush and fen, decrease in loss of dry humid acid grassland
permanent loss of c.0.03ha of the mosaic containing the priority Annex I habitat Limestone pavement [*8240], and Calcareous grassland [6210]	International	Additional
Likely significant residual effects on <b>Habitat Clusters 1-12</b> ranging from the local to international scale, dependent upon the potential impacts of the Project on each of the individual ecological receptors that make up the biodiversity resource within a given habitat cluster	<b>Local to international</b>	Additional since 2018 EIAR- clusters defined as part of Inspectors Report 2021)  Note permanent habitat loss on individual habitats is included in the effects listed above
loss of local populations of the red-listed bryophyte species Imbricate bog moss <i>Sphagnum affine</i>	National	Additional
loss of local populations of the red-listed bryophyte species Woodsy thyme moss <i>Plagiomnium cuspidatum</i> , Lesser striated feathermoss <i>Plasteurhynchium striatulum</i> and Red bog-moss <i>Sphagnum capillifolium</i>	County	Additional
loss of local populations the plant Eyebright <i>Euphrasia arctica</i>	Local	Additional
Loss of local population of Spring gentian ( <i>Gentiana verna</i> )	Local	Additional
potential permanent loss of a Peregrine falcon nest site at Lackagh Quarry	County	Additional  (confirmed nest attempt)
potential permanent loss of a Barn Owl nest site at Menlough	Local / county	Additional

		(as confirmed in updated survey)
A likely significant residual effect, on all bat species (including lesser horseshoe bat) due to the presence of the proposed N6 GCRR within their foraging areas	Local	No
<b>City biodiversity areas (previously local biodiversity areas)</b>	<b>Impacts from international to local depending on KER affected- accounted for above</b>	<b>Note: Impacts on individual habitats and species accounted for above</b>
CBA 2 Cappagh-Ballymoneen Peatlands		Loss of wet heath and blanket bog (National scale)  Loss Dry-humid grassland and Poor flush and Fen (local)  Bat species (local)
CBA 3 Ballagh-Barnacranny Hill Peatlands		As above
CBA 4 Cappagh/ Knocknacarra Hill Heathland		As above
CBA 5 Dangan Grasslands & Scrub		Bat species (local)
CBA 6 River Corrib, Tributaries and Canal System outside River Corrib SAC		Lesser horseshoe bat  Other bat species
CBA 7 Menlo to Coolough Hill Limestone habitats outside SAC		Loss of limestone pavement habitat petrifying springs, calcareous springs, Peregrine Falcon,  Bat species inc. LHB

CBA 8 Ballindooley-Castlegar Limestone & Wetland Habitats		Impacts on Bat species including LHB (national level),
CBA 14 Doughiska-Ardaun Limestone Habitats		Loss of Limestone pavement (international level)  Local scale impacts on bat species
CBA 15 Coolagh Grasslands		As above
CBA 16 Terryland Forest Park		Impacts on national scale on LHB, local impact on other bat species

## 10.0 Cumulative impact Assessment

Q: Are there any changes to the cumulative impact assessment? If so, how?

- 10.1. Section 8.8 considers the cumulative impact assessment for biodiversity and includes for updates since the 2018 EIAR (see also Section 19.5 and chapter 21).
- 10.2. I am satisfied that this assessment is adequate taking into account other large infrastructure projects and development since the 2018 EIAR. The assessment focuses on the pressures on the key ecological receptors and no additional impacts that could significantly add to the predicted residual effects are identified.

## 11.0 Conclusion

- 11.1. The proposed N6 GCRR projects is complex and impactful in terms the level of likely significant impacts remaining after the application of mitigation and compensation measures.
- 11.2. Significant effects on European sites including Lough Corrib SAC are excluded through the design of the scheme and application of mitigation measures. Significant residual impacts on NHA and pNHA sites are also excluded.
- 11.3. The assessment of direct and indirect effects of the proposed N6 GCRR in updated EIAR (2023) finds that after the application of mitigation measures significant

residual effects will arise as individual habitats including Annex I habitats such as limestone pavement and ecological sites/ habitat clusters of high nature value cannot be avoided. Significant effects on individual species including Bat species, Barn Owl, and Peregrine Falcon are also predicted.

11.4. These findings are in line with the assessment undertaken in view of the 2018 EIAR.

Signed:



Maeve Flynn BSc. PhD. MCIEEM  
Inspectorate Ecologist, An Coimisiún Pleanála

13/01/2026

## **Appendix I**

Submission from Development Applications Unit on behalf of the National Parks and Wildlife Service of the Department of Housing, Local Government and Heritage (01<sup>st</sup> August 2025)

(next page)

An Roinn Tithíochta,  
Rialtais Áitiúil agus Oidhreacht  
Department of Housing,  
Local Government and Heritage



**Planning Ref: 177AE-N6 Galway Ring Road**  
(Please quote in all related correspondence)

01 August 2025

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

Via email: [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

**Proposed Development:** S177AE application for N6 Galway City Ring Road (GCRR) around Galway City.

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.

#### **Nature Conservation**

The following observations are made by the Department in its role as a prescribed body under planning legislation and as the authority with overarching responsibility for nature conservation and the nature directives (i.e. the Birds and Habitats Directives). The observations are not exhaustive and are intended to assist An Coimisiún Pleanála in its review and evaluation of the current proposal in the context of, among other things, obligations and commitments in relation to nature conservation, European sites, biodiversity and environmental protection generally. These observations are should be read together with all relevant previous Departmental observations.

#### **Recommendations:**

1. Section 9 of the Construction Environmental Management Plan (CEMP) states that advance treatment of invasive species may be required, such as Japanese Knotweed, and will be decided on a site-by-site basis. For example, in summary Table 9.2, areas of confirmed Japanese Knotweed within the development footprint states that "*isolating the species may not be possible, likely that treatment may be required*". The Department recommends all third Schedule non-native species subject to restrictions under Regulations 49 and 50 Part 1: Plants listed in S.I. No. 477/2011 European Communities (Birds and Natural Habitats) Regulations 2011

#### **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



identified in the development zone should be treated prior to the commencement of construction works.

2. In relation to Water Quality Monitoring, the Natura Impact Statement (NIS) section 10.5 states "*regular monitoring of downstream receptor water quality...will be carried out*" and section 8.5 in CEMP states the "*Local Authority will make recommendations on the water quality parameters to be assessed, sampling intervals and locations*". Monitoring is essential to assess the effectiveness of any mitigation measures outlined in the NIS and Environmental Impact Assessment Report (EIAR). The Department recommends the details should be agreed before any consent is granted.
3. Regarding stockpiling of surplus materials, the Department notes the commitment for no stockpiling on lands within a European site (NIS 2.4.8 and CEMP 8.4.3), and stockpiling of materials will be 50m away from Annex I habitat within a designated site. Annex I habitats outside designated sites have not been explicitly considered here, and the Department recommends no stockpiling on Annex I habitats outside designated sites.

#### **Technicalities:**

- A. Lough Corrib SAC – The Statutory Instrument for this site was published in 2022. 'EUROPEAN UNION HABITATS (LOUGH CORRIB SPECIAL AREA OF CONSERVATION 000297) REGULATIONS 2022' - S.I. no 384 of 2022. Therefore Lough Corrib is no longer a candidate SAC (cSAC). Lough Corrib is referred to as a cSAC in some updated reports, for example the 'River Corrib Bridge Constructability Report – updated March 2025'.
- B. The Department notes the aquatic vegetation in the River Corrib has been reclassified, on a precautionary basis, as corresponding to the Annex 1 habitat 'Vegetation of Flowing Waters 3260'. The NIS states '*At the site of the proposed River Corrib bridge where the elevated structure passes over habitats within the SAC, including Annex I habitat, Vegetation of Flowing Waters 3260...*'. However, some maps have not been updated to reflect this change. For example, plate 2 at the start of the NIS technical summary, and plate 8.1 in EIAR. The Department recommends An Coimisiún Pleanála take this into account.
- C. The requirement for an Ecological Clerk of Works (ECoW) is stated in the NIS and EIAR. However, the CEMP makes reference to an Environmental Manager (EM) and there is no ECoW role outlined. The Department recommends An Coimisiún Pleanála takes this into account.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at [manager\\_dau@npws.gov.ie](mailto:manager_dau@npws.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

A handwritten signature in black ink, which appears to read 'Simon Dolan', is written over a horizontal line.

Simon Dolan  
Development Applications Unit  
Administration

## Appendix II

### City Biodiversity Areas (CBAs) from Galway City Biodiversity Action Plan 2025-2030<sup>4</sup>

CBA No.	CBA Name	CBA Description
1	Barna Woods, Stream & Wetlands outside Galway Bay Complex SAC.	Woodland, wet heath, scrub, Barna Stream, acid grassland and wet grassland to the north of the site and species rich calcareous grassland bordering Rusheen Bay, supporting several orchid species
2	Cappagh-Ballymoneen Peatlands	Large peatland habitat complex, south of Moycullen Bog NHA which supports blanket bog, fen, Tonabrocky stream, transition mire, wet heath, dry heath, wet grassland, acid grassland and scrub located between Cappagh and Ballymoneen roads.
3	Ballagh-Barnacranny Hill Peatlands	Connemara peatland, including blanket bog, fen, wet grassland, heath and scrub, located east of Tonabrocky. Proximal to Moycullen Bog NHA
4	Cappagh/ Knocknacarra Hill Heathland	Known locally as 'The Kidney' supports habitats including wet heath, dry heath, acid grassland, wet grassland, scrub and ponds
5	Dangan Grasslands & Scrub	Alluvial woodland and scrub, with species rich calcareous grasslands.
6	River Corrib, Tributaries and Canal System outside River Corrib SAC	City Canal and River System including the Eglinton Canal, Gaol River, Distillery River, and species rich lowland hay meadows near Jordans Island.
7	Menlo to Coolough Hill Limestone habitats outside SAC	Oak-ash-hazel woodland at Menlo Woods, and exposed limestone rock, calcareous grassland and small turloughs

<sup>4</sup> [Galway City Council Biodiversity Action Plan 2025-2030.pdf](#)

8	Ballindooley-Castlegar Limestone & Wetland Habitats	Ballindooley Lough, with fen, reed swamp, wet grassland, scrub and exposed limestone. Castlegar area contains smaller areas of wet grassland, swamps, scrub, exposed limestone and small turloughs.
9	Ballybrit Grasslands	Species rich calcareous grassland and small turlough.
10	Merlin & Rosshill Woods	Broadleaved woodland, limestone pavement, wetlands, limestone caves and petrifying springs.
11	Doughiska Grasslands	Species rich calcareous grassland.
12	Roscam Grasslands	Calcareous grassland and shrub.
13	Roscam-Curragrean Limestone	Habitats Limestone pavement, dry heath and species rich calcareous grassland.
14	Doughiska-Ardaun Limestone Habitats	Limestone pavement, with calcareous grassland and scrub located to east of city. Orchid-rich grassland, including the protected small white orchid.
15	Coolagh Grasslands	Limestone pavement, with species rich calcareous grasslands
16	Terryland Forest Park	Broad-leaf woodland, wetlands, species rich grasslands, the Terryland River and Cooper's Cave.

