



An
Coimisiún
Pleanála

Inspector's Report ABP-321144-24

Development	Proposed Development of a public realm scheme
Location	Townlands of Clifden, County Galway
Local Authority	Galway County Council
Type of Application	Application for approval made under Section 177(AE) of the Planning and Development Act, 2000 (local authority development requiring appropriate assessment)
Observer(s)	Adel Hade Anne Conroy Barry Reilly Catriona Coyne Clifden Arts Festival Clifden Bike Shop Clifden Tidy Towns Cllr Gerry King Cllr. Eileen Mannion Connemara Chamber of Commerce Connemara Greenway Alliance Denise Moran Dunja Vulic-Aspell

Edie Moran
Ellen Claire Nee
Gerald Stanley & Son Ltd.
Gráinne Martyn
Harry Joyce
Heather Greer
John O' Reilly
Joseph Joyce
Julia & Paddy Foyle
Kevin Gavin
Laurence McGonagle
Lavinnia O'Malley
Mairéad King
Maria Black
Matt O'Sullivan Estate Agent, Auctioneer &
Valuer
Michele & Brian Hehir
Mullarkey's Bar
O'Dalaigh Jewellers
Pat Casey
Pauline Fagan
Peter Lewis
Scoil Mhuire Parents Association
Seamus & Rosanne Burke
Sean and Jim O'Malley
Simon Conneely
Sinéad Keogh
Teresa & John Cleary
The Connemara Hamper
The Foyle Family

Walsh's Bakery

Date of Site Inspection

30th April 2025

Inspector

David Ryan

1.0 Introduction

- 1.1. Galway County Council is seeking approval from An Coimisiún Pleanála to undertake a public realm scheme in Clifden, Co. Galway within the Twelve Bens/Garraun Complex SAC, which is a designated European site. There are several other designated European sites (SPAs and SACs) in proximity to the proposed works (see further analysis below). A Natura Impact Statement (NIS) and application under Section 177AE was lodged by the Local Authority on the basis of the proposed development's likely significant effect on a European site.
- 1.2. Section 177AE of the Planning and Development Act 2000 (as amended) requires that where an appropriate assessment is required in respect of development by a local authority, the authority shall prepare an NIS and the development shall not be carried out unless the Board has approved the development with or without modifications. Furthermore, Section 177V of the Planning and Development Act 2000 (as amended) requires that the appropriate assessment shall include a determination by the Board as to whether or not the proposed development would adversely affect the integrity of a European site and the appropriate assessment shall be carried out by the Board before consent is given for the proposed development.
- 1.3. **Further Information**
 - 1.3.1. The Board sought further information on 02/05/25, a response to which was received on 19/06/25. Following correspondence from the Commission the applicant published notices advising of the submission of the further information and the date by which submissions were to be made to the Commission. A submission was received from 1 no. prescribed body which is summarised in section 7.0 of this report. 2 no. observations were received and these are summarised in section 7.0.

2.0 Proposed Development

- 2.1. The proposed development consisting of a public realm scheme will include the following:

i. Alterations works to the Clifden Town Centre area on Seaview Road, Main Street, Market Street, Market Hill, Bridgewell Lane, Bridge Street, and Hulk Street comprising:

- a. The reconfiguration and resurfacing of roads and realignment of parking spaces including removal of 58 no. On-street parking spaces leaving a total of 155 no. on street parking spaces,
- b. The widening and realignment of existing footpath areas, including the provision of new soft and hard landscaping,
- c. The installation of new and upgraded public lighting throughout the town,
- d. Relocation of The Beacon Statue,
- e. Installation of new public art,

ii. Alterations to and resurfacing of Beach Road Quay public realm comprising:

- a. The provision of pedestrian and seating areas on the quay side of Beach Road quay, including the installation of 6 no. seating areas, and ancillary paving and landscaping,
- b. Remedial works to the quay wall (NIAH reg no. 30325017), including the resetting of dislodged stones, the removal of vegetation, and remedial masonry works,
- c. The replacement of existing railings along the quay wall,
- d. The installation of public lighting along the roadside,

iii. Redevelopment of the Harbour Park area south of Beach Road and to the west of Clifden town centre.

- a. The demolition of the existing playground on site, and the construction of a new park including multi-age playground areas, including the provision of:
 - i. Cycle Parking,
 - ii. Timber Play Furniture,
 - iii. Picnic benches and seating areas,
 - iv. An Amphitheatre Performance Spaces,
 - v. Climbing Wall

- vi. Pump track,
- vii. Running Track,
- viii. Car Park,
- ix. Sports pitch,
- b. Resurfacing, paving and hard & soft landscaping of the park area,
- iv. All other associated and ancillary works

- 2.2. The proposed public realm scheme will include 3 no. separate areas within Clifden town, entailing the town centre, the Harbour Park located to the south of Beach Road and to the west of the town centre, and Beach Road Quay located to the southwest of Harbour Park. The overall site is 3.83 hectares.
- 2.3. The proposed **town centre** public realm scheme seeks to create a more pedestrian friendly town centre, retaining sufficient parking, and includes for expanding narrow pavements for outdoor dining, the integration of the Connemara Greenway, and reducing carriageway widths to improve pedestrian zones. The scheme also includes for an off-road cycleway, rain gardens, improved pedestrian zones, shared surfaces, better crossing points, upgraded public realm materials, improved lighting and new parking arrangements. The applicant outlines a separate Part 8 application for off street public parking will be progressed in parallel to the S.177AE application.
- 2.4. The **Harbour Park** element of the scheme entails a recreational area, which will include for viewing areas, an amphitheatre, community gardens, a 200m running track, sports pitch, accessible routes, playgrounds, car park, cycle parking facilities, the relocation of the 'Beacon' sculpture, flood prevention measures and sustainable drainage systems. This area of the project will also seek to remediate invasive plant species and manage asbestos found onsite.
- 2.5. The **Beach Road Quay scheme** will include for formal mooring bollards, seating areas, lighting, planting, and restrictions on parking by the quay wall while maintaining vehicle access.
- 2.6. Works are scheduled to last for 12-18 months.

Accompanying documents

This application for approval is accompanied by the following documents:

- AA Screening report and Natura Impact Statement (NIS)
- Environmental Impact Assessment Screening Report
- Planning Report
- Ecological Impact Assessment
- Construction Environmental Management Plan
- Site Lighting Report
- Cultural Heritage Impact Assessment
- Architectural Heritage Impact Assessment Report
- Flood Risk Assessment
- Stage 1 Road Safety Audit
- Car Parking Survey Report
- DMURS Compliance Statement
- Structural Inspection of Quay Wall
- A Preliminary Pre-Design Stage Asbestos Management Plan
- Cover Letter
- Planning application drawings
- Site notice and newspaper notice
- Copies of letters issued to prescribed bodies
- Letters of consent

3.0 **Site and Location**

- 3.1. The overall site is located within 3 no. separate areas in Clifden Town and is 3.83 hectares in area. The easternmost **town centre site** is located within Clifden town centre, entailing Main Street and Bridge Street and their intersection, Market Square, Market Hill, Market Street, Bridewell Lane, and part of Hulk Street and Seaview

Road. This area of the proposed site which is 1.95 hectares in area adjoins commercial, cultural and residential properties.

- 3.2. The **Harbour Park site** is located to the south and east adjacent Beach Road c.100m to the west of the Clifden town centre site, and is bounded by the banks of Clifden Bay and the Owenglin River to its south. The majority of the site is open and derelict with an existing playground and all weather pitch located within the western area of this site, with residential properties, a boatyard and pumping station located within its immediate vicinity.
- 3.3. The **Beach Road Quay site** is located to the southwest of Harbour Park site, and is used for leisure, fishing boats and operations, with residential and commercial properties and a lifeboat station adjacent this area of the site.
- 3.4. In relation to cultural heritage, the **town centre** and **Harbour Park sites** are located within the designated Clifden Town Architectural Conservation Area (ACA) in the Galway County Development Plan. The ACP Architectural Heritage Impact Assessment Report submitted dated September 2024 outlines there are 18 no. structures (Nos. 582, 814, 3286, 809, 810, 3293, 603, 811, 812, 813, 591, 803, 804, 600, 806, 807, 808, 597) on the Record of Protected Structures within the area of the proposed works as outlined in the CDP. The report outlines there are 11 no. structures (Nos. 30325016, 30325017, 30325005, 30325020, 30325006, 30325021, 30325007, 30325025, 30325026, 30325054, 30325027) recorded on the National Inventory of Architectural Heritage (NIAH) within the area of the proposed works, with 30325017 entailing Quay/Wharf, Beach Road. The proposed **town centre site** works are within 2 no. Sites and Monument Record Zones (RMP 35021 Prison and RMP 35017 Monumental Structure), with 11 no. sites and monuments recorded within the overall site vicinity.
- 3.5. The **town centre site** at Main Street traverses a culverted tributary of the Owenglin River, with the southern area of this site also lying adjacent the Owenglin River, which forms part of the Twelve Bens/Garraun Complex SAC and is a designated European site. Part of the site at this area lies within the SAC. The Owenglin River is also located within and adjacent to the Beach Road and Harbour Park areas of the proposed development site, with a tributary of the Owenglin River flowing through the

western margin of Harbour Park, running culverted through the park to Clifden Bay. In relation to flooding, the proposed site is located within flood risk zones.

- 3.6. The site is located within the Erriff-Clew Bay catchment and Bunnahowna sub catchment, and is located within the Clifden Marbles and Clifden Castlebar groundwater bodies.

4.0 Planning History

4.1. Town centre

- Part 8 LA5504 Ardbear Bridge - Approved
- Part 8 LA2602 Extension to Clifden Public Library – Approved

4.2. Harbour Park

- Reg.ref 12/146 - Construction of a new harbour side public amenity park for the town of Clifden incorporating the following : (1) a new off road public park (2) the demolition of part of the existing ball alley structure (3) the demolition of the roadside wall of the ball alley to within 0.9metres of existing ground level and retaining the remainder as a roadside wall (4) two new boccia/bowling courts (5) two new hand ball/ball wall courts (6) new out-door gym and recreation equipment (7) a new skate park (8) new public pathways and associated public lighting, viewing areas (9) a new teen zone recreational area (10) a new extension of existing playground (11) filling and draining of existing lands to create raised open parkland (12) the provision of new amenity woodland and associated walkway, and all associated landscaping and site development works to facilitate the above (gross floor space ball alley 260 sq m) - Granted.
- Reg.ref 161627 – Extension of duration granted for 12/146 on 02/02/2017, which expired 1st February 2022
- Reg.ref 091024 – All weather Pitch, ancillary fittings, fencing and lighting at the Ball Alley granted 2009

5.0 Legislative and Policy Context

5.1. Relevant legislative provisions

- 5.1.1. **The EU Habitats Directive (92/43/EEC):** This Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) and 6(4) require an appropriate assessment of the likely significant effects of a proposed development on its own and in combination with other plans and projects which may have an effect on a European Site (SAC or SPA).
- 5.1.2. **European Communities (Birds and Natural Habitats) Regulations 2011:** These Regulations consolidate the European Communities (Natural Habitats) Regulations 1997 to 2005 and the European Communities (Birds and Natural Habitats) (Control of Recreational Activities) Regulations 2010, as well as addressing transposition failures identified in CJEU judgements. The Regulations in particular require in Reg 42(21) that where an appropriate assessment has already been carried out by a 'first' public authority for the same project (under a separate code of legislation) then a 'second' public authority considering that project for appropriate assessment under its own code of legislation is required to take account of the appropriate assessment of the first authority.
- 5.1.3. **National nature conservation designations:** The Department of Culture, Heritage and the Gaeltacht and the National Parks and Wildlife Service are responsible for the designation of conservation sites throughout the country. The three main types of designation are Natural Heritage Areas (NHA), Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) and the latter two form part of the European Natura 2000 Network.

European sites located in proximity to the subject site include:

- Twelve Bens/Garraun Complex SAC (002031)
- Slyne Head Peninsula SAC (002074)
- Slyne Head Islands SAC (000328)
- West Connacht Coast SAC (002998)
- Connemara Bog Complex SAC (002034)
- Connemara Bog Complex SPA (004181)

- 5.1.4. **Planning and Development Acts 2000 (as amended)**

Part XAB sets out the requirements for the appropriate assessment of developments which could have an effect on a European site or its conservation objectives.

- 177(AE) sets out the requirements for the appropriate assessment of developments carried out by or on behalf of local authorities.
- Section 177(AE) (1) requires a local authority to prepare, or cause to be prepared, a Natura impact statement in respect of the proposed development.
- Section 177(AE) (2) states that a proposed development in respect of which an appropriate assessment is required shall not be carried out unless the Board has approved it with or without modifications.
- Section 177(AE) (3) states that where a Natura impact assessment has been prepared pursuant to subsection (1), the local authority shall apply to the Board for approval and the provisions of Part XAB shall apply to the carrying out of the appropriate assessment.
- Section 177(V) (3) states that a competent authority shall give consent for a proposed development only after having determined that the proposed development shall not adversely affect the integrity of a European site.
- Section 177AE (6) (a) states that before making a decision in respect of a proposed development the Board shall consider the NIS, any submissions or observations received and any other information relating to:
 - The likely effects on the environment.
 - The likely consequences for the proper planning and sustainable development of the area.
 - The likely significant effects on a European site.

5.2. Policy and Guidelines of Relevance

The following policy and guidelines are considered relevant to the proposed development:

- 5.2.1. **The Revised National Planning Framework - Project Ireland 2040** (February 2025) was approved in April 2025. The National Planning Framework – Project Ireland 2040 is a high-level strategic plan for shaping the future growth and

development of Ireland to 2040. Key objectives of the Framework are to ensure the promotion of compact urban development, sustainable mobility and transition to a low carbon and climate resilient society. Embedded in these objectives is the promotion of recreational infrastructure, and the promotion of more sustainable modes of transport, including walking and cycling.

In relation to community, **NPO 12** seeks to ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

In relation to rural towns, **NPO 26** seeks to continue to support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.

NPO 34 seeks to facilitate tourism development and **NPO 37** as it relates to Healthy Communities, seeks to ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.

NPO 22 outlines in urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.

5.2.2. **Climate Action Plan 2025**

Climate Action Plan 2025 builds upon the Climate Action Plan 2024 by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings and it should be read in conjunction with **Climate Action Plan 2024**. The Plan provides a roadmap for taking decisive action to halve Ireland's emissions by 2030 and achieve climate neutrality by no later than 2050, as committed to in the Climate Action and Low Carbon Development (Amendment) Act 2021. Actions outlined for 2025 include for the roll-out of walking/cycling infrastructure. The principle of the proposed works is considered to be in compliance with the principles and provisions of the Climate Action Plan 2025.

Climate Action Plan 2024

The Climate Action Plan 2024 (CAP 24) follows the commitment in the Climate Act 2015, as amended, and sets out the range of emissions reductions required for each sector to achieve the committed to targets. The document sets out Irelands plan to achieve a 51% reduction in greenhouse gas emissions from 2021-2030 and being carbon neutral by 2050. Section 15 of the Plan deals with transport and table 15.5 sets out the key actions to deliver abatement in transport for the period 2024-2025. Under the Active travel Infrastructure Programme for the cited 2 years, the advance roll-out of walking/cycling infrastructure are included for each year. The principle of the proposed works is considered to be in compliance with the principles and provisions of the Climate Action Plan 2024.

5.2.3. **National Biodiversity Action Plan 2023-2030**

The NBAP includes five strategic objectives aimed at addressing existing challenges and new and emerging issues associated with biodiversity loss. Section 59B(1) of the Wildlife (Amendment) Act 2000 (as amended) requires the Board, as a public body, to have regard to the objectives and targets of the NBAP in the performance of its functions, to the extent that they may affect or relate to the functions of the Board. The impact of development on biodiversity, including species and habitats, can be assessed at a European, National and Local level and is taken into account in our decision-making having regard to the Habitats and Birds Directives, Environmental Impact Assessment Directive, Water Framework Directive and Marine Strategy Framework Directive, and other relevant legislation, strategy and policy where applicable.

5.2.4. **Regional Spatial & Economic Strategy – Northern and Western Region**

The RSES for the **Northern and Western** region (2020-2032) provides a long-term, strategic development framework for the future physical, economic and social development of the region. Clifden is identified as a key seasonal destination town on the Wild Atlantic Way route.

RPO 3.4 seeks to support the regeneration and renewal of small towns and villages in rural areas.

RPO 3.13 seeks to support the role of smaller and medium sized towns, which demonstrate an important role in terms of service provision and employment for their catchments within the economic function of the county. Such settlements will be

identified through the Development Plan process as part of the Settlement Hierarchy and the Core Strategy.

RPO 4.4 outlines that the Wild Atlantic Way (WAW) touring network and visitor attractions within the region shall be upgraded and improved to cater for the growth in visitor cars, buses, and cyclists using the route.

RPO 4.5 seeks to enhance access to our tourist assets, including the development of a Coastal Walking/Cycling Route along the Western Seaboard, which extends generally along the Route of the WAW, and incorporates existing resources, such as beaches, ports, harbours, piers and marinas. This coastal route to be subject to a route option analysis, and feasibility study in Counties Galway, Mayo, Sligo, Leitrim and Donegal. Stakeholders will include Fáilte Ireland, NWRA, the relevant local authorities and the public.

RPO 3.6.13 states the Assembly supports the delivery of a strategic Greenway Network for the GTS to include National Dublin to Galway Cycleway, Oranmore to Bearna Coastal Greenway and the Galway to Clifden Greenway (S/M).

5.2.5. **Galway County Development Plan 2022-2028**

Clifden is identified as a Small Growth Town in Volume 2 of the Plan. The town centre areas of the site are zoned Transport Infrastructure, and Town Centre, with the Harbour Park area of the site zoned Community Facilities and constrained land use, with both located within an ACA. Beach Road Quay is zoned Transport Infrastructure, and Water/river/streams. The site is located within flood risk areas.

Land use Zoning Policy Objectives for Clifden include:

- *CSGT 1 Sustainable Town Centre* seeks to 'Promote the development of Clifden, as an intensive, high quality, well landscaped, human scaled and accessible environment, with an appropriate mix of uses, including residential, commercial, service, tourism, enterprise, public and community uses as appropriate, that provide a range of retail services, facilities and amenities to the local community and visitors. The town centre and associated main street shall remain the primary focus for retail and service activity within these plan areas'.

- *CSGT 2 Sustainable Residential Communities* seeks to 'Promote the development of appropriate and serviced lands to provide for high quality, well laid out and well landscaped sustainable residential communities with an appropriate mix of housing types and densities, together with complementary land uses such as community facilities, local services and public transport facilities, to serve the residential population of Clifden settlement plan. Protect existing residential amenities and facilitate compatible and appropriately designed new infill development, in accordance with the proper planning and sustainable development of the settlement plan. Specifically encourage living over the shop which can contribute to the vitality of the core and extend activity beyond business hours'.
- *CSGT 3 Community Facilities and Services* aims to encourage and support the expansion and development of existing community facilities and services to meet the needs of the local community
- *CSGT 4 Business & Enterprise* seeks 'to facilitate the expansion of businesses and enterprises uses in the plan area of Clifden where appropriate and to facilitate the provision of further local employment opportunities in accordance with the proper planning and sustainable development of the area'.
- *CSGT 5 Tourism Development* seeks to a) Promote and facilitate the further development of Clifden as a key tourist destination for the benefit of the town and its surrounding areas. b) To support and facilitate in co-operation with relevant bodies and landowners, the provision of tourism amenity routes around the town. c) Encourage and assist the development of the sustainable tourism potential within Clifden in a manner that respects, builds on, protects and enhances the cultural, built, architectural, archaeological and heritage significance of the town including natural heritage and biodiversity, and its local amenities.
- *CSGT 7 Public Infrastructure* seeks to 'Support and encourage infrastructural development and improvement works that benefit Clifden as SGT and the wider Conamara region'

- *CSGT 8 Pedestrian and Cycle Network* seeks to Encourage and support the development of a series of pedestrian and cycle routes linking the residential areas to the town centre and local community services where feasible.
- *CSGT 9 Amenity Network* aims to 'support the delivery of the Connemara Greenway Project as well as the establishment of an accessible network of greenway linkages and amenities that provide safe and attractive circulation routes for pedestrians and cyclists for the enjoyment and recreational use of the entire community and visitors to the town'.
- Section 4.4 Volume 2 Small Growth Towns outlines *Land Use zones* for Transport Infrastructure includes the policy objective to 'Facilitate the provision and maintenance of essential transportation infrastructure', 'to allow for the reservation of lands to facilitate public roads, foot paths, harbours, canals, cycleways, bus stops and landscaping together with any necessary associated works, as appropriate'.

Additional relevant provisions of the CDP are set out below:

Section 3.2 outlines the strategic aims for Placemaking, Regeneration and Urban Living include the following:

- To promote town and village centre living in a high-quality environment with good connectivity and access to local services;
- To facilitate town and village centre public realm improvement works, regeneration and infrastructure upgrades as deemed appropriate;
- To ensure the delivery of good quality public open space of varying scales for use by inhabitants and visitors;

Relevant objectives include:

- *PM 1 Placemaking* which seeks to 'promote and facilitate the sustainable development of a high-quality built environment where there is a distinctive sense of place in attractive streets, spaces, and neighbourhoods that are accessible and safe places for all members of the community to meet and socialise'.

- *PM 2 Regeneration* aims 'to prioritise projects and proposals which will result in both social and economic rejuvenation and regeneration within towns and villages'.
- *PM 4 Sustainable Movement within Towns* outlines 'it is a policy objective of the Planning Authority to encourage modal shift in our towns to more sustainable transport alternatives through mixed use development that enables local living and working which is well connected to sustainable transport infrastructure such as walking, cycling, public bus and rail transport'.
- *PM 13 Public Realm Opportunities* seeks to promote enhanced and increased public realm opportunities including the shared use of spaces, for outdoor experiences, with a priority on pedestrian uses
- *CTB 5 Destination Towns* aims to support the promotion of Clifden as the First Destination Town and as the principal visitor Services Centre and hub for Fáilte Ireland's Wild Atlantic Way in the County
- *MCT 2 Coastal Tourism and Recreation* seeks to facilitate sustainable tourism and recreation activities where appropriate, whilst encouraging the diversification and utilisation of existing facilities in accordance with environmental considerations.
- *ARC 4 Protection of Archaeological Sites* seeks to 'Protect archaeological sites and monuments their settings and visual amenity and archaeological objects.....'.
- *AH 1 Architectural Heritage* seeks to 'Ensure the protection of the architectural heritage of County Galway which is a unique and special resource, having regard to the policy guidance contained in the Architectural Heritage Protection Guidelines 2011 (and any updated/superseding document)'.
- *NHB 3 Protection of European Sites* No plans, programmes, or projects etc. giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from

any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects.*

- The landscape Character Assessment (Appendix 4) identifies the proposed development entails the Maritime Scenic Route, and is located to the west of the Galway Clifden Scenic Route. Viewpoints 03, 04, 05 are located within the vicinity of Clifden.
- *PVSR 1 – Protected Views and Scenic Routes seeks to ‘Preserve the protected views and scenic routes as detailed in Maps 8.3 and 8.4 from development that in the view of the Planning Authority would negatively impact on said protected views and scenic routes. This shall be balanced against the need to develop key infrastructure to meet the strategic aims of the plan’.*

5.2.6. Clifden Local Area Plan 2018-2024

The plan was adopted on 26th November 2018. The plan outlines it shall have effect from the date of adoption and shall cease to have effect at the expiration of 6 years from that date, unless the plan period is extended by resolution. The LAP has expired. The current CDP outlines settlements can be viewed on the Land Use Zoning Maps in Volume 2 of the CDP, and in Local Area Plans.

The town centre area of the site is zoned Transport Infrastructure and Town Centre, and includes zoned priority street frontage. The Harbour Park area of the site is zoned Community Facilities and constrained land use. Beach Road Quay is zoned Transport Infrastructure and river/streams/estuary. The site is located within flood risk areas.

5.2.7. National Planning Guidelines

- Architectural Heritage Protection Guidelines. Refers to the main features of the Planning and Development Act 2000, as amended and to the requirement for planning authorities (PA) to create a record of protected structures and to the responsibilities given to owners to maintain them and the additional powers given to PA's to ensure that protected structures are not endangered.
- Design Manual for Urban Roads and Streets

5.2.8. Town Centre First

Town Centre First aims to revive town centres making them vibrant places to live, work and visit.

6.0 Consultations

6.1. Consultees Circulated

The applicant outlines by way of further information received, that the application was circulated to the following bodies:

- Department of Housing, Local Government and Heritage
- Inland Fisheries Ireland
- The Heritage Council
- An Chomhairle Ealaíon
- Fáilte Ireland
- An Taisce
- National Transport Authority
- Córas Iompair Éireann

6.2. Responses Received from Consultees

No responses have been received from consultees.

6.3. Public Submissions and Applicants Response to Submissions

A total of 43 no. observations were received. The issues raised are summarised below. Submissions received are both in support of and not in favour of the overall public realm scheme. A response to submissions was received from the applicant as part of the further information request (Item 6). These are summarised below.

Public Submissions	Applicants Response to Submissions
<i>Town Centre Public Realm Works</i>	
<p><u>Car parking reduction</u></p> <p>Reduction and removal of 58 no. town car parking spaces (31.5%) where there is parking deficiency, negative impacts on business, town, parking for residents, customers, visitors. Outdoor dining usage of spaces, viability of scheme, impact on sustainable growth and development of town</p> <p>Discrepancies in documentation with car parking reduction detailed less than reduction shown in plans, with 98 spaces to be removed (39% reduction) and not 58 as outlined</p> <p>Removal of parking based on flawed parking survey, using private parking spaces and carried out in low season</p> <p>Alternative parking options unviable, new car park/Part 8 parking application not progressed</p> <p>Building usage in town centre exceeds existing parking available</p>	<p>Reduction in parking assessed according to best practice in Car Parking Survey Report, concludes spaces lost will be substituted by public parking locations outside the town centre and that there is sufficient parking. Availability of spaces is further enhanced by the provision of privately owned parking lots.</p>
<p><u>Car Parking Strategy, carriage widths</u></p> <p>Changing parking to parallel/reverse parking plan on one way system with footpath widening, adding of cycle lane, narrowing of throughfare to one lane will</p>	<p>Reduction in parking assessed according to best practice in Car Parking Survey Report</p>

<p>result in longer parking time and with topography, will worsen congestion.</p> <p>Bike lane, footpath widening not required, lane should be moved to road to facilitate reverse parking</p> <p>Traffic redirection, changes to reverse herring bone and parallel parking would create hazard given gradient, parking strategy is health and safety risk, concerns on loading/unloading, is untested.</p> <p>Road safety audit raises health and safety concerns, signage and road markings are required</p> <p>Carriageway reduction is insufficient for emergency services, impact on safety, deliveries, access, removal of traders from Square.</p> <p>Future parking strategy should include storey on town centre public car park, improved signage, parking displays, enforcement, alternative parking, education plan to park</p> <p>Reduction of spaces for elderly, those with poor mobility, disabilities, illness</p>	<p>Proposed road, footpath, and cycle lane widths are in line with DMURs standards. Concerns around emergency vehicle access are acknowledged, including the potential need for parking enforcement to discourage illegal parking, unloading, to support the proposed design.</p> <p>The safety of the proposed layout and use of reverse-in echelon parking was assessed as part of the Road Safety Audit, and this and loading bay sizes are addressed in Item 1 of the further information response.</p>
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and access to town centre, disability access	
<p><u><i>Public Realm Art, Market Square</i></u></p> <p>Beacon sculpture should be retained as forms part of towns character, history, is focal point, iconic piece, used as a Christmas Tree; or install statue of Connemara pony. Square lacks character</p> <p>Existing and new monuments should be relocated/located to James b Joyces/Whitethorn gallery/outside Stanley/Vaughans/outside Daly Jewellers/SuperValu/relocated within Square/to the Harbour/quay</p> <p>Ball sculpture created for Connemara in Galway 2020 Cultural year should be incorporated</p> <p>A fountain/climbable statue/structure in town square is proposed. Designated outdoor performance space would form artistic performance amphitheatre during Clifden Arts festival and throughout the year. Plans provision for regular market and performance events space in square</p>	<p>Regarding the relocation of the Beacon monument, during the consultation process monument artist expressed that the piece's relocation to the Harbour Park would be more fitting with its intended vision as a reference to beacons for passing ships, acknowledging the towns strong historic ties to the sea. It is considered that the new location is appropriate and retains the community value of the piece.</p> <p>Due the spatial constraints of the town centre a dedicated outdoor performance space in that area is not feasible. Note there will be space within the improved Market Square to hold small events. Further, an outdoor amphitheatre in the Harbour Park will provide a new hub of activity for the town and enable a greater event capacity.</p>
<u><i>Public Realm and Layout</i></u>	

<p>Native tree planting requested in square. Trees will block views</p> <p>Square canopies negatively impact on buildings</p> <p>Seating plan in front of Supervalu, seating in shade, insufficiency of existing seating in Square</p> <p>Paving materials be of low maintenance</p> <p>Bike park outside bike premises on Market Street – Bridwell Lane junction leaves no room to park hire bikes, should be relocated opposite in line with bike path, excessive amount of greenery</p> <p>Visual impact of footpaths, cycle lane, soft landscaping, landscaping at square taking up physical and visual space.</p> <p>Impact on events held in square</p> <p>Pedestrian park, street to front of building given aspect</p> <p>Pedestrian crossings be retained</p>	<p>The proposed design is in line with international best practice, universal accessibility standards, is based on the lessons learned from other Irish public realm projects and was designed to amplify and respect the existing character of the town. The plan proposes a significant increase in green infrastructure and space in the town centre, enhancing both the character of the area and its climate resiliency.</p> <p>The proposed road, footpath, and cycle lane widths are in line with the standards set out in DMURS. The materials requested by the Tidy Towns Team should be facilitated by the natural stone paving finish proposed.</p> <p>The public realm, including footpaths, has been specifically designed to activate the town centre and make it a more engaging and livelier place, which supports active and passive overlooking of the public realm and improve the feeling of safety. Access to Bridewell Lane is addressed as part of Item 1 of response. Antisocial behaviour in Bridewell Lane is being addressed through a detailed lighting plan, as well as by opening up the lane through scrub clearance, enabling a more open design.</p>
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<p>Consideration be given to campervans facilities</p> <p>Market Stall Spaces in Square not included, removal affects livelihoods, retail diversity, streetscape, needs to be provision within plan for Friday market, removal highlighted as problem in Road Safety Audit</p> <p>Limited access at junction of Market Street - Bridewell Lane</p> <p>Design of path treatment between Bridewell Lane and Ballyconneely Road, which is not overlooked, anti-social behaviour</p> <p>Investment should be spent on priorities such as flooding risks, access, boat facilities, museums, existing pavements, lighting, pedestrian crossings</p>	<p>Campervan facilities are not within the scope of the project, with parking provided on-street or serving Harbour-Park, and is not suitable for campervan usage.</p> <p>Space for the Friday Market on Main Street has been retained, enhanced as part of the public square, including via the provision of canopies to provide a more permanent and durable sheltered space. It will also minimise the effect the market has on the town's parking and enable safer, more accessible experience.</p> <p>The concerns of the Clifden Bike Shop are noted as regards the bike parking. This location was chosen to support the development of Clifden as a key hub along the Connemara Greenway and the wider region for cycling adventures. The Applicant will continue to consult with stakeholders during detailed design to find the best solution for the area.</p>
<p><u>Loading bays, Bus Stop layouts</u></p> <p>Reduction of loading bays which are essential to commercial viability</p> <p>Loading bay blocking window display on Market Street, diminishing presence on streetscape, reducing customer parking,</p>	<p>Concerns around loading bay sizes are addressed in Item 1 of response.</p> <p>The proposed bus stop area has been designed to NTA standards and includes sufficient set down and taper space. The bus stop will be a net positive due to the potential for increased footfall for</p>

<p>reduce natural light into shop, bay will obstruct vision for other traffic, difficulties with its usability</p> <p>Bus stop, trees, lighting at Market Street will block livelihood, business, remove parking, clarity sought on lighting bollard outside home, land use map identifies garage at end of Bridewell Lane as cultural</p> <p>Requirement for a second bus stop/bus stop extension on Market Street, greenery adjacent, as this is a drop off point, would save 4-5 car parking spaces, would negatively impact on residential and commercial premises. Bus stop is impractical on a slope. Plan required to deal with number of buses (2/3) coming into/exiting Market Street at the same time which causes traffic congestion, suggests alternative bus stop at Bus Park on Galway Road</p>	<p>business, and increased access for homeowners. As the area is set down only the visual impact of the stop should be temporary and minimal. The placement of the space on a hill should not hinder its operation, as evidenced by bus stops located on hills around the country.</p>
<p><u>Cycle Lane</u></p> <p>Cycle lane is welcome.</p> <p>Cycle lane inside parking area and its requirement, would reduce parking, cause hazards at Main Street where it joins pedestrian crossing. Path conflicts with main square, a Friday market</p>	<p>The importance of cohesive off-road connections for cyclists and gaining the full benefits of network effects are acknowledged, however the focus of and funding for the project is on public realm improvements to the town centre,</p>

<p>location/festival/event space. Start and stop point requires refinement.</p> <p>Cycle paths do not connect to Westport/ Galway/Sky Roads/schools, integration with Connemara Greenway via an off road connection with Clifden at beginning/end of Greenway. No clear route alignment, signage strategy, wayfinding plan to guide Greenway users into town, missed opportunity to elevate Greenway as central pillar of Clifdens tourism strategy. Without integration a risk to underutilising Greenways capacity to attract long stay visitors, increase town centre footfall, drive economic benefits. Sustainability oversight, linkage of two initiatives would strengthen towns position as leader in promoting active travel and low carbon tourism.</p> <p>Project include route mapping linking greenway to town with collaborate branding jointly promoting Greenway and Clifden as integral components of Wild Atlantic Way experience</p> <p>Cycle lane should connect to existing cycle path to schools, and include signage safety features along route,</p>	<p>and connections to locations outside are not within its funding remit. Additionally, given projects like the Connemara Greenway are still at the route selection stage, it was deemed to be pre-emptive to try and connect to an ultimately undecided route. The project has sought to provide projects such as the Connemara Greenway a direct and contiguous route into and through the town. Further projects under programmes like Safe Routes to School will also be able to tie into the proposed infrastructure.</p> <p>The proposed junction designs in the project are in line DMURS and have been assessed under the Road Safety Audit.</p>
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current layout is unsafe. Requirement for bike facilities at schools, encourage community involvement, education and awareness around cycling	
<i>Harbour Park scheme</i>	
<p>Support outlined for Harbour Park and Beach Road developments</p> <p>Playground should be enclosed, include sufficient number of activities, toilet facilities, equipment accessible to those with disabilities, disorders, and the elderly, and a sensory garden</p> <p>Existing playground should be incorporated, refurbished, with upgrade being cost effective and sustainable</p> <p>Given cost interim plan should be considered should general timeframe for delivery not be made available.</p> <p>Proposed entrance to Harbour Park area on Beach Road opposite dwellings would give risk of noise, pedestrian traffic and safety issues, impacts on residential amenity, concerns on public art installation at entrance giving rise to anti-social behaviour, may obscure view</p> <p>Entrance encroaches onto car parking area that observer uses, with no other space available without obstructing road traffic, additional parking in scheme not acceptable given health issues</p>	<p>Existing facilities do not serve all ages and do not meet universal accessibility standards. Desire in consultation and by applicant to enhance quality of the space. Combined with difficulties of refurbishing, relocating, and reinstalling the existing playground it was determined a new set was most appropriate. The new playground and spaces will cater to a variety of ages, with design in line with international best standards, and is partially enclosed.</p> <p>There is oversight of the space.</p> <p>Toilet facilities determined to be impractical due to maintenance, sewage, design requirements. Number of public toilets are available in the town centre.</p> <p>A community garden area, landscaped view point areas, expansive green spaces will be provided, and creating a universally accessible sensory and neurodiverse friendly space.</p> <p>In regard to concerns about the provision of new public art in the Harbour Park to attract anti-social behaviour and obstruct the view from a</p>

	<p>house, park is overlooked from a number of points and its use as a social space is not considered to be injurious to residential amenity. Proposal would assist in remedying the field being a prime location for anti-social behaviour. Provision of public art should have a minimal impact on the view of from the respondent's house, and landscape improvements associated with the park will enhance the quality and character of the view.</p> <p>A new public parking lot will be provided as part of the park, and there will be a direct and accessible path to the respondent's house.</p>
<i>Beach Road Quay scheme</i>	
<p>No car parking spaces in plans for Quay House guesthouse, new grain store at the harbour or any parking in the area, with harbour a working harbour for fishermen</p> <p>Clarity sought on what parking will be retained on Beach Road which serves Quay House and fishermen</p> <p>Additional parking required for visitors, fishermen, RNLI</p>	<p>The design of Beach Quay Road has prioritised the prevention of parking along the Quay to halt further structural damage to the quay wall and the remaining road width is not suitable to provide parking. The importance of parking for the homes and businesses is noted, and shared space proposed for the road will facilitate short-term door-to-door drop offs, there will be access to the Harbour Park car park, a continuation of existing arrangements to the south of the project site, and existing pull-in parking to the north of the residences on the quay will be retained.</p>

Removal of white bollards and chains on Beach Road Quay which are integral part of quay characteristics	Plans relating to Beach Road Quay Bollards are addressed under Item 2 of response.
<p><u>Land Ownership</u></p> <p>G.Stanley and Son Ltd - lands to gable of property to be developed appear to be proposed on their lands, used for family, customer parking</p> <p>J. Joyce - scheme will restrict access to property used in connection with business</p> <p>S. and R. Burke - impact on private property used for parking, parking in roadside space not viable for those with disability</p> <p>Mannion Aird and Co. Solicitors acting on behalf of Sean and Jim O'Malley - not possible to determine as to whether or not their right of access for pedestrian purposes along the lane way adjoining the Bridewell Building to rear of Market Street, is protected on foot of proposal. Clients, predecessors in title have used and enjoyed a right of way for pedestrian purpose along laneway adjoining Bridewell exterior wall.</p>	<p>With regards to the two locations identified by respondents as private property which are being utilised for car parking, it appears that both of these locations are part of the public footpath and have been unilaterally made into parking by the respondents. Respondents will benefit from the more formalized parking arrangements proposed, as well as the enhanced public space for both locations.</p> <p>Note that pedestrian and vehicular access to the back yard of Stanley and Son is maintained.</p> <p>There is more than sufficient parking to serve the town centre including EV charging</p>

<p>Provided rights are respected and not prejudiced, clients will on that basis withdraw objection</p> <p>T. and J. Cleary - scheme will not enable recharging of EV car outside residence, and areas of scheme in private property cannot be used</p>	
<p><u>Biodiversity</u></p> <p>Lightning scheme for proposed Bridewell Lane and Ballyconneely Road path has not been assessed for suitability of the local bat population</p>	<p>Existing scrub vegetation along boundaries of Bridewell Lane will be retained and protected. Areas of Wildflower Mix will be planted, potential linear commuting and foraging habitat for local bat species will be maintained and enhanced.</p> <p>Lighting at the detailed design stage will be designed with consideration given to guidelines. Mitigation measures for construction and operational phase lighting is provided in the NIS.</p>
<p><u>Cultural Heritage</u></p> <p>Documentation and cultural heritage impact assessment makes no substantive reference to historic bollards on Clifden Quay, doesn't carry weight in terms of assessment on town or arrive at definite conclusions</p>	<p>Plans relating to Beach Road Quay Bollards are addressed under Item 2 of response.</p>
<p><u>Other</u></p>	<p>Schedule of the construction work sequencing included in the CEMP, as well as measures on hours of working.</p>

Should be built in phases, outside of peak tourist season to avoid disruption	Applicant will liaise with the community to mitigate impacts during the construction stage
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7.0 Further Information Request

7.1. Further Information Sought

- 7.1.1. Further information was sought from the applicant on the 2nd May 2025. Further information was sought in relation to roads and traffic, cultural heritage, the NIS, plans, and prescribed bodies consulted, with the applicant also invited to respond to the submissions received.

7.2. Response to Request

- 7.2.1. A response to the further information request was received on 19th June 2025, with copies of revised public notices received on 18th July 2025. The response is accompanied by documents and drawings pertaining to the matters arising with the applicant addressing issues raised. In summary:

Item 1. Roads and Traffic

- Appendix 2 of the response includes for an RSA Response Tracker. The applicant outlines this indicates how the current scheme that was submitted has been updated to resolve the issues raised in the Road Safety Audit.
- It is outlined access from Market Street to Bridewell Lane is provided via a 5.8m wide access point, and the design has been auto-tracked and it is confirmed that vehicles up to the size of a box van can access the yard at Bridewell Lane.
- Drawing 11632-LUC-HP-XX-DR-L-0002 *Harbour Park Landscape GA* has been amended to indicate a pedestrian lane on Beach Road. It is outlined whilst the existing road isn't wide enough to accommodate a segregated kerbed footpath the white-lined pedestrian lane will provide safe refuge for pedestrians making their way to the park from the town centre. Additional

signage warning vehicles of potential pedestrians in the carriageway will also be provided, and the Stage 2 Road Safety Audit will assess this route in more detail.

- Drawing 11632-LUC-TC-XX-DR-L-0200 *Clifton Town Centre Hard Landscape Proposals* has been amended to replace the loading bay immediately to the south of Market Place with a new larger loading bay so that all loading bays now comply with DMURS guidance.
- The Car Parking Survey Report Section 1.3.3 Parking Gap Analysis identifies that the proposed draft Town Centre Enhancement Plan retains 150 no. car parking spaces in the Town Centre thereby, resulting in loss of 63 no. car parking spaces when deducted from the original 213 no. spaces.
- There are currently 3 no. EV charging spaces in the public car parks adjacent the Station House and south of the tourist information office. Additional spaces are not provided in the town centre project but 1 no. EV parking space is provided in the new car park in Harbour Park.

Item 2. Cultural Heritage

- Drawing 11632-LUC-BR-XX-DR-L-0603 *Beach Road Quay – Steel Railing Detail* provides traditional steel rail treatment for the paved area that surrounds the steps that lead down to the sea. The rails black polyurethane finish is in keeping with the historic character of the quay wall and will be resilient to erosion from salt laden air.
- Drawing 11632-LUC-BR-XX-DR-L-0200 - Beach Road Hardworks has been amended to indicate the location of all existing bollards that will be retained.
- Drawing 11632-LUC-BR-XX-DR-L-0604 Beach Road Quay – Pillar Mooring Bollard Detail provides detail for the proposed mooring bollards.

Item 3. NIS

- A number of the Site Specific Conservation Objectives (SSCO) documents were updated since the submission of 321144-24. The SSCO documents for the West Connacht Coast SAC [002998], Slyne Head Islands SAC [000328], The Inishbofin, Omey Island and Turbot Island SPA [004231], Illaunnaon

SPA [004221], High Island, Inishshark and Davillaun SPA [004144] were updated and these updates have been reflected in the NIS.

- An assessment of the potential impacts on otter from construction and operational phase lighting is provided in the NIS. Mitigation measures to prevent any adverse effects from lighting on otter is provided.
- The location of the site compound is included in Figure 6-1 in the NIS and is discussed in the mitigation measures in Section 6.2.1.1.2 under 'Site Setup'.

Item 4. Plans

- The Clifden Local Area Plan 2018-2024 has expired and been succeeded by the Galway County Development Plan 2022-2028 (GCDP).
- A copy of the Preliminary Pre-Design Stage Asbestos Management Plan with Appendix 1 is included.

Item 5. Prescribed Bodies

- Prescribed bodies notified of the application include An Chomhairle Ealaíon, An Taisce, Córas Iompair Éireann, Fáilte Ireland, Inland Fisheries Ireland, National Transport Authority, The Department of Housing, Local Government and Heritage, The Heritage Council

Item 6. Submissions

A response to submissions is outlined. This is detailed in Section 6.3.

7.3. Submissions on Further Information

7.3.1. Prescribed Bodies

Inland Fisheries Ireland

- The proposal site is located adjacent the Owenglin River which forms part of the Twelve Bens/Garraun Complex SAC, with Atlantic Salmon one of the qualifying interests, and gets good runs of salmon and sea trout each year and fishing rights are held by Clifden Trout Anglers Association. The Bradog Stream flows under Main Street adjacent the site and is a tributary of the Owenglin River providing fisheries habitat for juvenile brown trout. The Owenglin_030 and Clifden Bay waterbodies are currently both listed as good ecological status and not at risk under the WFD, a status that needs to be

protected. Clifden Bay is also a designated shellfish water under the European Communities (Quality of Shellfish Water) Regulations 2006 and is required to maintain specific water quality standards to support this fishery. Having regard to these environmental sensitivities, it is requested consideration be given to the following:

- Protection of water quality and fisheries habitat – The application includes mitigation measures to avoid impacts on water quality during construction, with measures set out in the CEMP and incorporated into the design of proposed works. Should the development be granted, it is requested the appointed contractor(s) are made aware of IFIs guidance document for reference regarding the protection of fisheries watercourses during construction works in and adjacent to waters before the construction phase of the project commences.
- IFI should also be consulted in relation to any development that could potentially impact on the aquatic ecosystems and associated riparian habitat, who can provide guidance on site specific measures to enhance, protect, rehabilitate or establish riparian and aquatic habitats, with IFI's Planning for Watercourses in the Urban Environment guidance available to view at: [IFIUrbanWatercoursesPlanningGuide](#)
- Invasive Species - Invasive species may drive local native species to extinction via competitive exclusion, niche displacement or hybridisation with related native species. Himalayan balsam, Giant hogweed and Japanese knotweed all compete with native bank vegetation undermining banks resulting in increased erosion and siltation of fish spawning beds. Landscaping proposals in the development should require the use of native species from local stock, with information can be found at [Home - invasives.ie](#)
- IFI welcomes the inclusion of an Invasive Species Management Plan (ISMP) for the Project which addresses the presence of invasive species which are present in the area, and recommend it receive advanced notification prior to the treatment of these species.

7.3.2. Observations

2 no. observations were received on foot of the further information

Edie Moran

- Concerns outlined by observer on car parking space loss from proposed entrance and position of sculpture at Beach Road, with health and living circumstances outlined. Concerns on parking in public car park and the necessity of repositioning of sculpture. Queries possibility of gentle gradient on pathway near starting point of park. Outlines pedestrians will use Beach Road to enter Harbour Park

Harry Joyce

- Application design and changes in further information are contrary to proper planning and sustainable development, not in accordance with objectives of GCDP, fails to meet requirements of the Clifden LAP
- Reiterates issues from original observation and on 40% car parking reduction; removal of large vehicle access at entrance to Bridewell Lane; bus stop on Market Street is impractical which is separate from NTA standards, existing bus stop is insufficient; path between Bridewell Lane and Ballyconneely Road not fully considered and may contribute to more frequent anti-social behaviour
- In Further information Item 1: Roads and Traffic subitem (i) not all issues raised in RSA have been resolved, including Item 2.1.6 space to accommodate local traders not shown, Item 2.1.17 existing loading bay not incorporated into design, Item 2.1.21 gradient of angled car parking bays. Concerns on format of RSA Response Tracker
- Item 1: Roads and Traffic subitem (ii), statement describing Bridewell Lane is incorrect. Crane and large truck access is required to property and commercial brewery (now closed) at Bridewell Lane. Lane is misspelled in application, notices.
- Item 1: Roads and Traffic subitem (v), response does not answer further information request and number of parking spaces to be removed from town centre is 100-103. Counting of retained parking spaces and existing spaces in car parking survey report is in two different areas and misleading. 213 spaces

in report does not include parking spaces on Seaview or Railway View, 5 spaces which double as market stall spaces, 12 spaces reserved for outdoor dining, and is inappropriate to not consider existing spaces. Tables are outlined showing parking spaces.

- Discrepancy between car parking survey and drawings, no proposals to provide replacement parking outside of the proposal area, with insufficiency of car parking during summer months leading to illegal parking with date and time outlined.
- Item 4: Plans subitem (i) - Proposed reduction in parking conflicts with objectives of GCDP: CSGT 1 Sustainable Town Centre, CSGT2 Sustainable Residential Communities, CSGT 3 Community Facilities and Services, CSGT 4 Business and Enterprise, CSGT 5 Tourism Development, CSGT 7 Public Infrastructure
- Item 6: Submissions - Parking Theme – Timing of the car parking survey, scope of streets considered, reduction in parking, applicant acknowledgement that reduction in parking will drive people from town centre contradicts CDP objective CSGT1. Bus Stop Theme – Location, and on location of second bus at bus stop. Footpaths Theme – Anti social behaviour at Bridewell Lane, low level lighting will not address this, and only encourage it in absence of passive surveillance

8.0 EIA Screening

- 8.1. The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2, in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

9.0 **Assessment**

9.1. The assessment will be undertaken in three parts as per the requirements of Section 177AE as follows:

- The likely effects on the environment.
- The likely consequences for the proper planning and sustainable development of the area.
- The likely significant effects on a European site.

9.2. **The likely effects on the environment**

Introduction

9.2.1. The proposed development includes for a public realm scheme. Details of the proposed development are set out in Section 2.0 of this report, and includes for proposed developments in three areas, which can be summarised as follows: In the **Town Centre** the reconfiguration and resurfacing of roads, realignment of parking spaces, widening and realignment of existing footpath areas, and provision of soft and hard landscaping; alterations to and resurfacing of **Beach Road Quay** public realm including remedial works to the quay wall; and the redevelopment of the **Harbour Park** area to include demolition of the existing playground, and construction of a new park including a range of facilities including playground areas and a car park. Works are scheduled to be carried out in 3 phases (1-Town Centre upgrades, 2-Harbour Park upgrades, 3-Beach Road upgrades) and will last for 12-18 months, with town centre works anticipated to last 6 months. I consider the anticipated phasing timelines are standard for a development of this nature.

9.2.2. Aspects of the proposed development that could have effects on the environment are addressed in this section of the inspector's report. The impact of the proposed development on European Site(s) is specifically considered in **section 10**.

Population and Human Health

9.2.3. In relation to Population and Human Health, the proposed development would have potential positive impacts, with the scheme seeking to prioritise pedestrian safety, reduce parking dominance and create a more walkable environment. The proposed

development of recreational facilities would also have a potential positive impact on local tourism and amenity. There is also a potential for impacts to arise on residential amenity. Having regard to the proximity of the proposed development to existing residential development, with residential properties located adjacent the site, I consider there is the potential for environmental impacts to arise during construction including potential pollution events, increased traffic, noise and disturbance, dust and air emissions, nuisance. I also note concerns have been raised in submissions in relation to the impact of the construction stage on existing businesses/town centre, with an observer outlining the scheme should be built in phases, outside of peak tourist season to avoid disruption. A Construction Environment Management Plan (CEMP) has been submitted which details the proposed developments phasing. The CEMP outlines the proposed development shall comply with BS 5228 “Noise Control on Construction and open sites Part 1: Code of practice for basic information and procedures for noise control”, with noise levels being kept below levels specified in the National Roads Authority – Guidelines for the Treatment of Noise and Vibration in National Roads Schemes. The CEMP also includes for dust mitigation measures and outlines a Traffic Management Plan is to be developed.

9.2.4. Having regard to the nature of the works and relatively limited construction duration, I do not consider that negative effects by way of noise, traffic, pollution and nuisance are likely to arise on the amenities of the area or businesses during the construction phase subject to the mitigation measures set out in the CEMP, and the implementation of a Traffic Management Plan.

9.2.5. In addition, it is outlined that asbestos is present in one area of the Harbour Park, and it not proposed to excavate this material but encapsulate it. Mapping submitted by way of further information (in Appendix 1) details 2 no. locations to the northeastern area of the site where asbestos was found in soil. It is outlined in a Preliminary Pre-Design Stage Asbestos Management Plan prepared by CACL, prior to works commencing on construction and demolition waste in this former historic landfill, the area is to be first covered by an asbestos warning/hazard membrane, and then by a constructed hard capping layer with hardstand. The plan outlines Health and Safety procedures and a site-specific method statement will be required, and suppressants should be sprayed on the asbestos containing materials while works take place. It is also outlined base line air monitoring should take place before

works commence, and air monitoring should take place during works after the works are completed. Subject to the implementation of the detailed mitigation measures set out in the Asbestos Management Plan and CEMP, I do not consider that negative effects by way of asbestos pollution are likely to arise on the environment.

Cultural Heritage

- 9.2.6. In relation to cultural heritage, the proposed town centre site works are within 2 no. Sites and Monument Record Zones (RMP 35021 Prison and RMP 35017 Monument Structure), with 11 no. sites and monuments recorded within the overall site vicinity. A cultural heritage impact assessment has been carried out by Moore Group (June 2024) which outlines there will be no likely impact on any recorded archaeological site by the proposed development, with the groundworks having a limited potential to impact on previously unrecorded archaeological remains, and no further archaeological mitigation is recommended. While I note the conclusion of the report, given the sites location relative to Monument Record Zones, I consider conditions including for archaeological monitoring of works and reporting to be appropriate and these issues can be addressed by condition, in the event of an approval.
- 9.2.7. Concerns are raised in submissions on the removal of white historic bollards and chains on Beach Road Quay which are an integral part of quay characteristics, that the cultural heritage impact assessment makes no substantive reference to the bollards, with the assessment not carrying weight in terms of the assessment on the town or arriving at any definite conclusions.
- 9.2.8. As highlighted the town centre and Harbour Park areas of the site are located within an ACA, with structures on the Record of Protected Structures and recorded on the NIAH being within the area of the proposed works. ACP have carried out an Architectural Heritage Impact Assessment Report for the proposal. Given the nature of the works, it is anticipated there will be positive impacts on the setting of the protected structures and those on the NIAH including Foyles Hotel (No.3286), and the Jail, Bridewell Lane (No.41), with the report outlining care must be taken during works to protect protected structures, including the historic fabric of Ardbear Bridge (No.46). Predicted impacts outline the proposed works will have a positive impact on the town and ensure the built heritage is retained and protected. In terms of materials and methods, it is outlined the use of natural stone within the streetscape

is appropriate in the historic setting. The report outlines the vast majority of the proposed alterations are minor in nature. A conclusion and suggested mitigation are set out to include any loss of fabric being retained by record and that works are supervised by a Building Conservation Accredited Surveyor.

- 9.2.9. In relation to the Wharf/quay (NIAH no. 30325017), remedial works are proposed including repair to stonework including the resetting of dislodged stones and repointing, with mortar to be placed between capping stones, in order to protect the integrity of the historic fabric of the quay. A Structural Condition Inspection report for Quay Wall carried out by Tobin Consulting Engineers, outlines a number of the conical shaped concrete stumps on the grass verge of the pier are broken. The ACP report outlines the replacement railing will be in keeping with 19th century design, and landscaping works adjacent the quay wall should ensure the historic fabric is not impacted i.e capping stones and granite bollards, and bollards should be appropriately repaired and any modern concrete bollards should be replaced with a more appropriate material. A request for further information sought details of the proposed replacement railing at Beach Road Quay, and details of bollard proposals. The applicant by way of further information outlines traditional steel rail treatment is proposed for the steps at the quay, with rails being of black polyurethane finish in keeping with the historic character of the quay wall, and which is outlined on plans. Steel mooring bollards are proposed to the quay, and it is also outlined that all existing bollards will be retained, and these are outlined on site layout drawings.
- 9.2.10. Observers have outlined concerns on the relocation of the Beacon sculpture from the town square to the Harbour Park, outlining it should be retained as it forms part of the towns character, with other observers outlining the Alcock and Brown monument should be relocated. Observers also outline their preference for new art/climbable statue/a central artistic performance amphitheatre. I note the applicant's response to submissions outlines the relocation of the Beacon art piece is appropriate with its reference to beacons for passing ships, and that due to the spatial constraints of the town centre a dedicated outdoor performance space is not feasible. I note the siting of the Beacon sculpture in the Harbour Park will enable for its retention in the town, and that this area of the site will also include for an amphitheatre performance space. In addition, the proposed layout of the town square will enable for its

continued use as a public space for activities/event/markets, and includes for the installation of public art.

- 9.2.11. I consider that the proposed development would have a positive impact on cultural heritage. Having regard to the nature of the works and development at this location, I consider the proposal would not give rise to negative effects on the character and settings of the ACA, protected structures or any structures on the NIAH. The remedial works to the Beach Road Quay area of the site would enable for the protection of the historic fabric of the quay. I consider subject to the mitigation measures as outlined, which can be addressed by way of condition in the event of an approval, negative effects on the cultural heritage of the site and area are not likely.

Soil

- 9.2.12. In terms of soil, it is outlined proposed works will reuse excavated materials in the reinstatement of and landscaping of areas where appropriate. Having regard to the nature of the works and development at this location, I consider effects on soil unlikely.

Land, Material Assets

- 9.2.13. In relation to Land and Material Assets, a large number of observations cite concerns that the public realm scheme will cause delays/impact on traffic congestion, with concerns raised in relation to the reduction on-street car parking spaces with 58 no. town car parking spaces (31.5%) to be removed, viability of parking alternatives, the car parking strategy with revised strategies outlined, siting and layout of bus stops and loading bays, narrowing of road widths to widen footpaths and accommodate a bike lane, a one way system, which in turn will negatively impact on the proper planning and sustainable development of the town, businesses, residents, visitors, custom.
- 9.2.14. In terms of the removal of on-street car parking spaces, submissions outline there are discrepancies in details submitted and public car park spaces will reduce by 71 spaces/98 spaces (existing car parking 251 – with 153 spaces to be retained) and not 58 spaces, and that the justification for the removal of on street car parking is based on a flawed parking survey, with private parking spaces used, the survey carried out in low season (November 2021) with traffic counter data outlined conceding survey timing would return low numbers, and effects of Covid-19 also

noted. Concerns are also outlined that alternative parking options are unviable, a number are privately owned and close to capacity, with no evidence of a separate part 8 application for off street public parking being progressed, and alternative parking is required before the scheme commences.

9.2.15. I note the proposal has been supported by a Car Parking Survey Report carried out by Tobin Consulting Engineers dated 2024. This outlines the survey, carried out in November 2021, resulted in a total of 225 no. on street parking spaces in the town centre site, with 12 spaces out of the total used for outdoor dining. The applicant, by way of further information outlines that the Car Parking Survey Report Section 1.3.3 Parking Gap Analysis identifies that the proposed draft Town Centre Enhancement Plan retains 150 no. car parking spaces in the Town Centre thereby, resulting in a loss of 63 no. car parking spaces when deducted from the original 213 no. spaces. I note the Survey Report outlines that TII traffic counter data on the N59 showed the Average Daily Traffic (ADT) in peak holiday season of July 2021 was 3,349 vehicles, with the ADT in November 2021 lower at 2,604 vehicles, with the ADT drop having a direct impact on occupancy levels in the parking areas.

9.2.16. The survey outlines some additional parking areas were identified and deemed essential to replace the car parking spaces expected to be lost, which included private establishments, government building complexes as well as on street locations. An additional car parking survey was carried out in October 2022 to include 8 additional car park sites to inform the car parking strategy. These include Tourist Information Office (57 spaces), The Church (43 spaces), Seaview Road (23 spaces), Station House (83 spaces), Supervalu (146 spaces), Diocese School Parking (32 spaces), Lower Bridge Street (3 spaces), Church Street (25 spaces). All sites are indicated to be within less than 7 minutes walk from the town centre, and also include a proposed car park of 53 spaces near the District Hospital. The report outlines the parking within close proximity to the town centre is observed to have sufficient capacity to absorb the lost spaces, with some parking lots being private and public establishments which can offer a much needed replacement option. The study concludes there is sufficient parking within the town centre and alternative car parking locations can be investigated should the need arise in the future.

9.2.17. While I note the timing of the car parking survey and its inclusion of private and public car parking spaces, I consider that it does give an adequate representation of

the existing parking occupancy within the town centre. While I have not identified a Part 8 proposal for a new car park in the town on the Local Authority website, the alternative parking options, entailing both existing public and private lots as indicated in the car parking survey, indicate parking options within close proximity to the town centre have sufficient capacity to absorb the lost spaces. These options indicate an availability of 412 total spaces.

- 9.2.18. In addition, I note that the number of car parking spaces to be removed relative to that outlined in the public notices is disputed, with an observer outlining there are 251 existing on street parking spaces for the area (which includes outdoor dining parking spaces, spaces at Railway View (Market Hill) and Seaview) and 98 spaces are to be removed. A submission received at further information stage outlines 100-103 spaces are to be removed, that the parking survey report counts of retained parking spaces and existing spaces are in two different areas and that existing parking spaces are not considered. I acknowledge that the car parking survey outlines that 63 no. spaces are expected to be lost. The application details submitted outline c.150-155 no. on street car parking spaces are to be retained in the town centre.
- 9.2.19. On the basis of the details submitted, I am of the view the town centre and alternative parking options in the town's vicinity have sufficient capacity to absorb the lost spaces. In addition, I note a Road Safety Audit has been prepared (see proper planning and sustainable development section of report below) and I do not consider the reduction of parking spaces would restrict access to the town centre for the elderly, those with poor mobility, disabilities, or illness.
- 9.2.20. I note a key objective of the scheme is to prioritise pedestrian safety, reduce parking dominance and resolve pedestrian–vehicle conflict, with the traffic management strategy seeking to reduce vehicle speeds to foster a more walkable environment. I also note that the planning report submitted outlines public consultation between Galway County Council and the community, schools, and businesses has taken place in relation to the scheme. I also consider that any impacts on the town and town centre parking and businesses, residents, and visitors, would also have to be weighed against the proposed developments promotion of pedestrian access, the public realm and traffic safety which align with local policy. These issues are further addressed in the proper planning and sustainable development section of this report.

On the basis of the above, I consider that negative effects on land and material assets would not arise by way of the car parking strategy, subject to the application of the outlined mitigation measures, which can be addressed by way of condition, in the event of an approval.

Water

- 9.2.21. In relation to Water, a Site-Specific Flood Risk Assessment has been prepared by Tobin Consulting Engineers, which has been undertaken having regard to The Planning System and Flood Risk Management – Guidelines for Planning Authorities. Harbour Park ground levels range from c.3.03OD at the southern boundary to c.11.18OD at the northeastern area of the site. Past flooding events are located within and adjacent the overall scheme site. The FRA outlines the Harbour Park and Beach Road Quay are identified as being within Flood Zone A in CDP mapping, with Harbour Park bisected by the Clifden Stream. The Harbour Park site is identified as being liable to flooding during a 0.5%AEP coastal flood event. The assessment outlines based on OPW modelling including PFRA and the Catchment Flood Risk Assessment and Management (CFRAM) Study, and the Clifden LAP Strategic Flood Risk Assessment, the town centre enhancements are located within Flood Zone C, outside the predicted 0.1% AEP fluvial flood extents. It is outlined under a mid-range future scenario for climate change, secondary town centre areas Hulk Street and Doonen Road may be liable to a 0.1% AEP fluvial flood event.
- 9.2.22. The report outlines the proposal is considered to be water compatible in terms of sensitivities to flooding under the guidelines, and the subject site is appropriately located in flood zones A and C in accordance with the guidelines. It is further outlined the proposal will not exacerbate flood risk elsewhere.
- 9.2.23. I note water compatible development as outlined in the guidelines includes for amenity open space, outdoor sports, recreation facilities, docks, marinas. Having regard to the nature and siting of the town centre development and its location within Flood Zone C, and the given the nature of the proposed development within the flood extents in the Harbour Park and Beach Road areas of the site, which are considered water compatible, I consider the proposed development is appropriate from a flood risk perspective. I am satisfied that sufficient detail has been provided and consider that the proposed development will not increase the risk of flooding elsewhere.

- 9.2.24. I note the receiving water body Owenglin_030 (Waterbody code IE_WE_32O0303000) is 'Good' status in the River Waterbody WFD Status 2016-2021 and 'Not At Risk'. The receiving water body Clifden Bay IE_WE_270_0100 is 'Good' status in the River Waterbody WFD Status 2016-2021 and 'Not At Risk'. The receiving coastal water body Western Atlantic Seaboard IE_WE_250_0000 is 'high' status in the Coastal Waterbody WFD Status 2016-2021 and 'Not At Risk'. The receiving ground water body Clifden Marbles IE_WE_G_0013 is 'Good' status in the Ground Waterbody WFD Status 2016-2021 and 'Not At Risk'. The receiving ground water body Clifden Casltebar IE_WE_G_0017 is 'Good' status in the Ground Waterbody WFD Status 2016-2021 and 'Not At Risk'. I also note the submission of IFI which outlines that the WFD status of waterbodies needs to be protected.
- 9.2.25. I have undertaken a WFD Assessment for the proposed development which is set out in Appendix 5 attached to this report. This assessment outlines that the proposed development, subject to the implementation of mitigation measures, complies with WFD Objectives. I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

Air and Climate

- 9.2.26. In relation to air and climate, as outlined an Asbestos Management Plan prepared for the Harbour Park will encapsulate the asbestos present onsite. Subject to mitigation measures in the CEMP being implemented at construction stage, I consider effects on air are not likely. Having regard to the nature and scale of the works, I consider likely effects on climate by way of emissions at construction and operation stage are not likely.

Landscape

- 9.2.27. In relation to landscape, the landscape Character Assessment (Appendix 4) of the CDP outlines Clifden is located within an *Urban Environs Landscape* type, with a *Coastal Landscape* adjacent to its south, west and north with an *Upands and Bog Landscape* adjacent to its east and north. Landscape sensitivity to the south, west

and north of the urban environs is designated *Special*, and designated *Iconic* to the east and north. The proposed development site entails the designated Maritime Scenic Route and is located to the west of the Galway Clifden Scenic Route. Protected viewpoints 03, 04, 05 are located within the vicinity of Clifden. Having regard to the nature of the works, which are partially located in derelict lands in the Harbour Park, and the landscape context, I consider the proposed development would not likely result in negative visual effects on receptors or on visual amenities, scenic routes or protected views in the area, and that any visual impacts arising on the landscape would be positive.

Biodiversity

- 9.2.28. In relation to Biodiversity, An Ecological Impact Assessment (EclA), an EIA Screening Report, CEMP, an AA Screening Report and Natura Impact Statement have been submitted. The EclA was informed by a desk study and field surveys. Surveys were conducted for badger, mammals and otter.

Habitats

- 9.2.29. Habitats occurring with the site include dry meadows and grassy verges, scrub, recolonising bare ground, spoil and bare ground, eroding/upland rivers, depositing lowland rivers, buildings and artificial surfaces with treelines and hedgerows outside and to the margins of the site. Details submitted outline while Annex I habitats [1130] Estuaries are mapped under Article 17 to the southern areas of Harbour Park and Beach Road Quay, ecological surveys undertaken have these areas including dry meadows, grassy verges, scrub, recolonising bare ground, and buildings and artificial surfaces, and do not conform to the Annex I habitat type. In addition, while Annex I habitat mapping for Wet Heath [4010] overlaps the proposed works site along Doonen Road in the town, surveys detail habitats recorded in this area includes buildings and artificial surfaces and the areas do not conform to this Annex I habitat. Blanket Bog, Dry Heath and Wet Heath are mapped c.430m northwest of the site. The nearest woodland mapped is Old Oak Woodlands, located c.260m to the southwest of Beach Road Quay. The report outlines there are 3 species of concern recorded on the NPWS Flora Order within the 10 km square in which the site is located, including Hydrilla, Pillwort and Slender Naiad. Table 4-3 of the report lists

the rare and protected species records obtained from NPWS for the relevant hectad (L65).

- 9.2.30. It is submitted that the habitats lost will include those of local importance (lower-higher value), and this loss is not considered significant. There will be the removal of scrub and 2 no. alder trees in the Harbour Park, and mitigation measures include for tree planting (total 221 trees) including for native tree planting in the Harbour Park. Given the abundance of these habitats in the wider area, their value, the presence of invasive species onsite, the ecological surveys undertaken, and with the implementation of mitigation measures to include for the protection of water quality as outlined in a CEMP, I consider that any effects arising on habitats or flora would be limited.

Aquatic Species, Habitats

- 9.2.31. The EclA report submitted outlines watercourses within and adjacent to the proposed works site, and Clifden Bay Estuary may be used by QI species of several European designated sites in the vicinity. The assessment of the proposed development on European Sites is addressed in Section 10 of this report. The EclA also outlines the Slyne Head Peninsula pNHA and Slyne Head Islands pNHA are key ecological receptors given their hydrological linkage to the site.
- 9.2.32. The report outlines aquatic species and habitats could potentially be affected at construction stage by earthworks, which may result in pollution to surface waters and groundwaters through pollutants including hydrocarbons, fuel and cement, and silt laden runoff into nearby watercourses. Mitigation measures to protect water include prevention pollution control measures entailing stockpiling controls, silt fencing, cement-based product control measures and dust controls. IFI have also requested appointed contractors are made aware of IFI's guidance document regarding the protection of fisheries watercourses during construction works in and adjacent to waters. Having regard to the water protection mitigation measures set out in the EclA and CEMP, and subject to their implementation, together with regard being had to IFI guidelines, which can be addressed by way of condition, I consider effects to aquatic species, habitats or pNHAs unlikely. In addition, IFI has requested they be consulted in relation to any development that could potentially impact on aquatic ecosystems,

where guidance can be provided. I consider this matter can be addressed by way of condition in any approval.

Invasive species

- 9.2.33. Invasive species including Japanese Knotweed, Giant Rhubarb, Butterfly Bush and Montbretia were recorded onsite in surveys, with invasive species also located on the boundaries and adjacent to the site. IFI outline Invasive species may drive local native species to extinction via competitive exclusion, niche displacement or hybridisation with related native species. An Invasive Species Management Plan has been prepared for invasive species listed on the Third Schedule of EC Regulations 2011, which has been welcomed by IFI. Measures outlined include for manual/mechanical removal, chemical treatment options, disposal options for treated plant material, and post treatment monitoring. I consider the above measures set out are satisfactory and accord with best practice in terms of controlling the management and spread of invasive species.

Bats

- 9.2.34. The EclA outlines the proposed works site does not provide suitable linear commuting, foraging or roosting features for local bat species, and that no bats/signs of bats, or bat roosts/suitable bat roosting features were identified during surveys within the proposed works boundary. It is outlined that treelines and hedgerow outside of the site boundary may be used for foraging and commuting bats, and these will be retained and protected during construction and will not be subject to artificial lighting during operational stage, and there is no potential for impact to local bat species during the construction or operational phases of the proposed works. An observer outlines concerns the lightning scheme for the proposed Bridewell Lane and Ballyconneely Road path has not been assessed for suitability of the local bat population. The applicant in their response to submissions outlines the existing scrub vegetation along the eastern and western boundaries of Bridewell Lane will be retained and protected, and with planting along Bridewell Lane the potential linear commuting and foraging habitat for local bat species will be maintained and enhanced. It is outlined lighting at design stage will be designed with consideration to the guidelines including Bat Conservation Ireland (Bats and Lighting: Guidance Notes for Planners, Engineers, Architects and Developers, BCI, 2010); The Bat

Conservation Trust (Guidance Note 08/23 Bats and Artificial Lighting at Night (BCT, 2023); and Dark Sky Ireland. It is stated the proposed lighting scheme will consider measures to help minimise the effect of artificial lighting on the local bat population.

- 9.2.35. I note the existing vegetation at the Bridewell Lane and Ballyconneely Road path which includes for a tree line to the west of the site which runs southeast-northwest with hedging also adjacent the existing path. Given the nature of the existing vegetation at this location and its retention, and the nature and location of the bollard lighting proposed, I consider that the proposed development would not give rise to any negative fragmentation of bat habitat or barrier effects on bats, and would not give rise to any negative effects on bats or their foraging habitat, subject to best practice bat/wildlife friendly lighting being installed.

Birds

- 9.2.36. In relation to bird species, surveys document there are a range of species including House sparrow and Robin within the proposed development site. Amber (Mallard, Black headed Gull, Ringed Plover) and Red (Redshank, Bar-tailed godwit, Oystercatcher) listed species were also observed in Clifden Bay. It is outlined the loss of 0.42 ha of scrub habitat in Harbour Park at construction stage may result in the loss of foraging and nesting habitat for local bird species, and result in disturbance and potentially causing mortality to juvenile nesting birds, which is considered significant at the local geographic scale. Mitigation set out includes for tree planting and where possible, vegetation cutting will be undertaken outside the bird nesting season (1st of March-31st of August), with any vegetation cutting required outside the season being supervised by an ecologist, and should nesting birds be encountered, trees will be left until nesting activity has concluded.
- 9.2.37. To ensure species are protected from harm, I consider any removal of vegetation in the period 1st March - 31st August should only occur with the written approval of the Ecological Clerk of Works. This issue can be addressed by way of condition, should the Commission be minded to approve the proposal. Having regard to the bird species and habitats recorded onsite and the abundance of suitable habitat in the area, I consider that any short-term displacement possibly occurring during construction would not lead to any long-term effects on bird species. Subject to the above, and the implementation of mitigation measures to include for the protection of

water quality as outlined in a CEMP, I consider that effects on birds are unlikely, subject to the application of appropriate mitigation measures during the construction phase.

Otter

- 9.2.38. No signs of otter including holts/couches/spraints were recorded along the artificially canalised section of the watercourse that runs culverted under Main Street, along Owenglin River or Clifden Bay Estuary. An assessment of the proposed development on European Sites and otter species is addressed in Section 10 of this report. Subject to the implementation of the mitigation measures set out in Section 10, I consider effects on otter unlikely. The EclA outlines no evidence of other protected species or habitats was recorded within the project site, with fox occurring in the general area.

Mitigation Measures

- 9.2.39. Mitigation measures are set out in Section 6 of the EclA and in the CEMP. I note that the construction works are temporary in nature. Having regard to the existing baseline, the EclA report and CEMP submitted and the mitigation measures as set out, I am satisfied that the mitigation measures are capable of being successfully implemented. This is a relatively common construction project of relatively limited construction phase duration and I do not consider that the proposed development would have an undue effect on the biodiversity of the site or area. In addition, it is outlined due to the project design, there is no potential for deterioration of water quality during the operational phase. Given the new surface water drainage system proposed, I do not consider that the proposed development would have an undue effect on the biodiversity of the site or area at operational stage by way of water quality.
- 9.2.40. Having regard to the foregoing, I consider that the proposed development is acceptable in principle, and it would not have any undue environmental effect. The design of the scheme is appropriate to its functions. Mitigation measures proposed as part of the AA process, as set out below, would also apply to biodiversity issues that may arise. I conclude that the proposed development would not have any likely negative effects on the environment, subject to the implementation of mitigation measures.

9.3. The likely consequences for the proper planning and sustainable development of the area

- 9.3.1. The proposed development consists of a public realm scheme entailing enhancements at 3 no. locations in Clifden, Co. Galway, entailing Clifden town centre, the Harbour Park and Beach Road Quay. Details of the proposed development are set out in Section 2.0 of this report.

Policy

- 9.3.2. The policies of the current Galway County Development Plan identify Clifden as a Small Growth Town. In Volume 2 of the CDP, the Clifden town centre areas of the site are zoned Transport Infrastructure, and Town Centre, with the Harbour Park area of the site zoned Community Facilities and constrained land use, with Beach Road Quay zoned Transport Infrastructure, and Water/river/streams.
- 9.3.3. I note the Clifden LAP was adopted on 26th November 2018, with the plan outlining it shall cease to have effect at the expiration of 6 years from that date, unless the plan period is extended by resolution. The applicant has clarified by way of further information that the Clifden Local Area Plan 2018-2024 has expired and has been succeeded by the Galway County Development Plan 2022-2028 (GCDP). The CDP is the relevant policy document for Clifden.

Principle of Proposal

- 9.3.4. In relation to the principle of the proposal, the applicant sets out the benefits of the proposal include a focus on enhancing public spaces to support local economies, improve quality of life and promote sustainable development, which will deliver a well-designed public realm within the town centre. It is outlined that by enhancing pedestrian infrastructure the open space of Wolfe Tone Square is more acceptable and safer, will provide additional opportunities within the area, and encourage multi use space. The applicant outlines that the objectives of the town centre element include seeking to resolve pedestrian-vehicle conflicts, reduce carriageway widths to improve pedestrian zones, reduce parking dominance, and expand narrow pavements for outdoor dining. It is outlined Beach Road Quay and Harbour Park proposals will enhance the aesthetic appeal of the town and provide accessible and enjoyable spaces for residents and visitors.

- 9.3.5. As highlighted, actions outlined in the Climate Action Plan 2025 include for the roll-out of walking/cycling infrastructure. The principle of the proposed works is considered to be in compliance with the principles and provisions of the Climate Action Plan 2025.
- 9.3.6. The NPF support for such schemes is set out in NPO 12, which seeks to ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities. NPO 26 seeks to continue to support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal. NPO 34 seeks to facilitate tourism development and NPO 37, as it relates to Healthy Communities, seeks to ensure the integration of safe and convenient alternatives to the car. The RSES in RPO 3.4 aims to support the regeneration and renewal of small towns and villages in rural areas.
- 9.3.7. At a local level, Section 3.2 of the CDP outlines the strategic aims for placemaking, regeneration and urban living are to include facilitation of town public realm improvement works, with objective PM 1 and PM 2 focusing on placemaking and regeneration. PM 4 aims to encourage a modal shift within towns, with PM 13 seeking to promote enhanced and increased public realm opportunities. Land use Zoning Policy Objectives for Clifden seek to promote the development of the town, aims to support the development of existing community facilities and promote and facilitate its development as a key tourist destination. Objectives also aim to support the development of pedestrian and cycle routes.
- 9.3.8. In terms of the schemes design, I consider the widening of pedestrian areas and spaces within the town centre, together with a revised road configuration and parking layout, would lead to improvements in pedestrian spaces and benefit pedestrian safety in the town centre. The provision of infrastructure benefitting both pedestrians and cyclists would enable for improved access and connectivity, facilitating the development of an improved public realm. I also consider alterations at Beach Road Quay and Harbour Park would benefit pedestrians, while also improving the outdoor recreational amenity offer. Having regard the layout and condition of the town centre, Beach Road Quay and Harbour Park as described in the application and following my site inspection, I consider the proposed development would improve the public realm at this location.

- 9.3.9. I consider the proposed development would be consistent with national and regionally policy and would support the relevant provisions of the CDP and accord with public realm policy. As set out in Section 10 of this inspectors report the proposed development would also be consistent with objective NHB 3 in that the proposed development is compliant with EU environmental directives in relation to the protection of European sites.
- 9.3.10. Observations have cited a range of concerns relating to the proposal, including that it would not accord with proper planning and sustainable development, and would impact on residential amenity. I consider negative effects arising from the scheme's layout unlikely, and issues raised are further addressed below and in the environmental section of this report.

Car Parking/Traffic Safety

- 9.3.11. The Town Centre proposal includes the reconfiguration and resurfacing of roads, realignment of parking spaces, widening and realignment of existing footpath areas, and provision of soft and hard landscaping. Observers outline the reverse car parking strategy with reduced carriageway widths on uneven topography will result in congestion and impact on safety, access, removal of traders from the Square, with alternative strategies proposed. It is further outlined the cycle lane will conflict with the main square. I note the proposal has been supported by a Stage 1 Road Safety Audit (RSA) and the town currently includes for an existing 1-way system. A range of problems were identified in the RSA, and recommendations are set out to address problems/observations made.
- 9.3.12. As a number of the RSA recommendations were not incorporated into the proposed development, the applicant was requested by way of a further information to outline their rationale for same. The applicant by way of a further information has set out an RSA Response Tracker (Appendix 2), and it is outlined this indicates how the current scheme that was submitted has been updated to resolve the issues raised in the Road Safety Audit. The RSA tracker outlines the following: tactile paving has been added to all crossing points and road markings have been applied, in accordance with guidance; signage drawings have been supplied in accordance with guidance, with priority of road users indicated; dimensions are added to drawings; footpath widths have been widened; tie-in details are indicated; lack of detail to aid visually

impaired road users will be resolved at detailed design stage and has been working in line with current gradients; for mobility impaired users at junction, a raised table gives greater pedestrian priority and every arm of junction has crossing point; adequate loading is provided; and tree layout has been adjusted to ensure visibility.

9.3.13. A submission received at further information stage outlines a number of RSA items have not been resolved and outlines concerns on the format of the RSA response tracker. On the basis of the details submitted, I consider that the proposal incorporates the RSA recommendations for the most part, and I note a Stage 2 Road Safety Audit is to be carried out. However, given the details outlined in the Stage 1 RSA and existing gradients at Market Street and in the interests of safety, I consider that the proposed echelon parking bays to the east of the bus stop should be replaced by forward parking bays. Furthermore, with the RSA outlining that the lack of boundary treatment along an active docking area may result in vulnerable road users falling into the water, in the interests of safety, I consider that a signage strategy for vehicles and pedestrians should be provided at this location, and at any other locations within the scheme, where appropriate.

9.3.14. In addition, a DMURs compliance statement has been prepared by Tobin Consulting Engineers which details the proposals compliance with design principles. I note minimum carriageway widths/lanes align with DMURS guidance which enable for access and traffic calming, and the scheme includes for reverse and parallel parking options, with loading bays provided for within the town centre scheme. I also note the scheme includes for a cycle verge to parking areas, and that the cycle lane runs along the perimeter of the Main Square and not through its central area.

Furthermore, the widening of footpaths along busy streets will benefit all footpath users/local businesses. Given the proposals compliance with recommendations in the Road Safety Audit for the most part, as outlined, I consider negative effects on the operation of the route network and Square would not arise. In addition, I note canopies are proposed for markets in Market Square, and the extent of the proposed Market Square area is conducive in terms of holding markets, events.

9.3.15. In relation to the design and layout of the scheme, observers outline elements of the scheme including the siting of loading bays, an extended bus stop and trees will impact on businesses on Market Street. Having regard to the details submitted, the temporary nature and use of loading bays and the layout of the scheme, I consider

negative effects arising from its layout on businesses and residential amenity unlikely. In relation to the proposals impact on access to the rear of a property fronting Market Street, and I note access at this location would be maintained. An observer has sought clarity on the proposed lighting bollard outside their residence, and I note the lighting plan indicates Atina lighting. In relation to the land use map identifying a garage at end of Bridewell Lane as cultural, I note this area of the site is within the zoned town centre.

- 9.3.16. Issues are raised on the requirement for a second bus stop/extended stop on Market Street and proposed greenery adjacent, and impacts on residential and commercial premises. The applicant in their response outlines the bus stop area has been designed to NTA standards. Given the low volume of buses to be facilitated at this location, temporary nature of its use and vehicle tracking set out, I consider negative effects arising from the bus stop layout on residential and commercial premises unlikely. In terms of its siting on a slope being impractical, I note the scheme has been subject of a road safety audit. I also note that loading bays, bus stops and landscaping are a standard feature within existing town centres.
- 9.3.17. An observer has outlined the size of loading bays appear to be reduced from existing, with the scheme entailing the removal and addition of bays, which are essential to commercial viability. I note the scheme plans indicates the reduction in the size of existing bays, and the plans indicate the removal of existing bays at Market Hill and Bridge Street, with the provision of a new bay on Market Street. Given the retention of the existing number of bays in the main thoroughfares I consider negative effects by way of a bay removal unlikely. The applicant by way of further information and revised plans submitted outlines all loading bays comply with DMURS guidance. I note from the revised plans that all proposed loading bay widths would not appear to comply with DMURS loading bay dimensions. This can be addressed by way of condition in any approval.
- 9.3.18. Observers outline the proposal entails limited access at the junction of Market Street-Bridewell Lane. The applicant by way of further information outlines access from Market Street to Bridewell Lane is provided via a 5.8m wide access point, and the design has been auto-tracked and it is confirmed that vehicles up to the size of a box van can access the yard at Bridewell Lane. I note auto track analysis has not been submitted to demonstrate access/egress at this location for existing/proposed

vehicular traffic, including large vehicles. I consider plans should be revised at this junction location to ensure for adequate access/egress for vehicles/commercial vehicles, and this can be addressed by way of condition, should the Commission be minded to approve.

- 9.3.19. An observer outlines concerns on impacts to an EV charging space. The applicant outlines by way of further information that there are currently 3 no. EV charging spaces in the public car parks adjacent the Station House and south of the tourist information office. It is outlined that additional spaces are not provided in the town centre project, but 1 no. EV parking space is provided in the new car park in Harbour Park. I consider EV charging space provision within the town is addressed by the existing and proposed EV spaces, as set out.
- 9.3.20. Having regard to the above and details in the Environmental Section of this report, I am of the view the proposed town centre road reconfiguration and parking layout, which are being sought to enable for public realm, pedestrian access and traffic safety improvements, would accord with the proper planning and sustainable development of the area, and are acceptable from a parking/traffic viewpoint, subject to the implementation of the outlined measures, which can be addressed by way of condition.

Pedestrian/Public Realm

- 9.3.21. The proposal includes for the widening and realignment of existing footpath areas and landscaping within the town centre, alterations to Beach Road Quay public realm, with a new park and car park at Harbour Park.
- 9.3.22. In relation to the town centre, issues are raised by observers in relation to pedestrian/public realm areas, seating, canopies, impact on a bike hire premises on Market Street – Bridwell Lane junction, excessive greenery, a park, and visual and physical impacts. Requests are made for native planting species and low maintenance paving materials. The applicant in their response outlines the location of the bike parking at Clifden Bike Shop was chosen to support the development of Clifden as a key hub along the Connemara Greenway and the wider region for cycling.
- 9.3.23. I consider the proposed widening and realignment of existing footpath areas will enable for improvements in pedestrian areas/spaces, and pedestrian and cyclist

connectivity within the town centre. I note the scheme entails a range of standard seating options within the town centre and also note the sizeable separation distances from the bike premises to bike stands within paving areas. Given the proposed layout and range of hard and soft landscaping proposed, I consider negative visual impacts arising from the scheme unlikely. Having regard to the proposed layout, its design, surface treatment, landscaping, and amenity provision, I consider that it would enable for a well-designed public realm which would enable for improvements in the public space and contribute to the regeneration and renewal of the town, while also according with relevant CDP policy.

9.3.24. Observers outline the scheme does not entail car parking provision on Beach Road which serves commercial premises, the RNLI, the quay, fishermen. The applicant in their response outlines the importance of parking at this location is noted, and shared space proposed for the road will facilitate short-term door-to-door drop offs, there will be access to the Harbour Park car park, a continuation of existing arrangements to the south of the proposal, and existing pull-in parking to the north of residences will be retained. I note this area of the site does not currently entail marked parking spaces, and the Harbour Park area of the site includes for the provision of a car park.

9.3.25. Observers outline the entrance to the Harbour Park area of the site on the Beach Road, including the public art installation, would give rise to impacts on residential and visual amenity on dwellings located opposite, would give risk to anti-social behaviour, noise, pedestrian traffic and safety issues, and impact on existing parking arrangements. In relation to car parking, the applicant in their response notes a new public parking lot will be provided, and that there will be a direct and accessible path to a respondent's house at this location. While I acknowledge that the scheme will impact on existing residential parking arrangements, it makes provision for car parking at the Harbour Park. I consider negative residential or visual amenity effects arising from the pedestrian entrance and art installation at this roadside location unlikely. I note the existing public road, proposed entrance, and dwelling opposite would enable for observation of this space. While the art installation would interrupt views, I consider it would not block existing views of the Harbour Park or Clifden Bay. To address the potential for any pedestrian safety issues to arise at the northeastern entrance to Harbour Park on the Beach Road area of the site, the applicant by way of further information has indicated a pedestrian lane on Beach

Road on Drawing 11632-LUC-HP-XX-DR-L-0002 Harbour Park Landscape GA. The applicant outlines whilst the existing road is not wide enough to accommodate a segregated kerbed footpath, the white-lined pedestrian lane will provide safe refuge for pedestrians making their way to the park from the town centre. Additional signage warning vehicles of potential pedestrians in the carriageway will also be provided, and it is outlined the Stage 2 Road Safety Audit will assess this route in more detail. In the interests of pedestrian safety, I consider appropriate warning signage should be installed at this location. This measure can be addressed by way of condition, should the Commission be minded to approve. A submission received queries the possibility of an altered gradient on the pathway near the starting point of park. I consider the proposed levels set out, which are similar to that of Beach Road at the pathway starting point, are acceptable.

- 9.3.26. Issues are raised by observers on the absence of toilet facilities in the Harbour Park, playground design, existing playground not being incorporated, cost effectiveness, absence of motorhome/campervan fatalities. In response the applicant states the new playground and spaces will cater to a variety of ages, with the playground design in line with international best standards. It is also outlined a new playground was appropriate given difficulties in refurbishing, relocating, and reinstalling the existing playground. I note the Harbour Park will include for a large range of public recreational and amenity facilities on what is mostly an existing derelict site, and will include accessible play areas and trails with sensory planting. Enclosed play/timber play equipment areas are not proposed (with the MUGA enclosed), and given their numerous locations spread throughout the site this is considered standard practice. While I note the existing playground will not be incorporated, and note observations cite investment should be directed towards other local priorities, I consider costs are a matter for the local authority. I consider the range of facilities and amenity and recreational provision at this location, and its layout, will benefit the local community and visitors to the area, and aligns with the relevant provisions of the CDP. The applicant in their response outlines campervan facilities are not within the scope of the project, with parking provision on-street or is intended to serve Harbour-Park, and as such is not suitable for campervan usage. While the scheme does not include motorhome or toilets facilities, I note there are commercial motorhome facilities in the Clifden vicinity, and there are public toilet facilities located within the town.

9.3.27. The design of the proposed path between Bridewell Lane and Ballyconneely Road has been raised. I consider the proposed lighting of the pathway, and opening up of this space, together with the partial visibility of the pathway from the adjacent Ballyconneely Road and adjacent residential property, would enable for improvements in the observation of this pathway space, and act as a deterrent in relation to anti-social behaviour.

9.3.28. Having regard to the above, I am of the view the proposed development would give rise to improvements within the public realm and would align with the relevant provisions within the CDP.

Tourism and Connectivity

9.3.29. In terms of tourism and connectivity, observers outline the cycle paths do not connect to Westport, Galway or Sky Roads, town schools, and that its integration with Connemara Greenway is via an off road connection with Clifden at the beginning/end of Greenway. It is highlighted that there is no strategy/plan to guide Greenway users into the town on an off-road route, with the proposal a risk to economic benefits, and linkage to the greenway would strengthen the towns position in promoting active travel and low carbon tourism. The applicant in their response outlines the focus and funding for the project is on public realm improvements, and connections to locations outside are not within its funding remit. It is further outlined that projects like the Connemara Greenway are still at the route selection stage, it was deemed to be pre-emptive to try to connect to an undecided route. It is outlined the project has sought to provide projects such as the Connemara Greenway a direct and contiguous route into and through the town, and further projects under programmes like Safe Routes to School will also be able to tie into the proposed infrastructure. I note CDP objectives aim to support the promotion of the town as a hub for the Wild Atlantic Way and to facilitate sustainable tourism and recreation activities where appropriate. I consider the above issues raised could be addressed by way of a dedicated signage and cycle lane marking plan, which would enable visibility of the active travel facility and its onward connectivity/linkage. This would also enable for linkage to the Wild Atlantic Way, Connemara Greenway and school facilities. This issue can be addressed by way of condition, should the Commission be minded to approve.

Ownership

9.3.30. It appears there is some dispute with regard to the ownership of a number of areas of the site. I consider these to be civil matters between the applicant and landowners.

Biodiversity/Cultural heritage

9.3.31. In relation to concerns raised on the proposed lighting schemes impacts on biodiversity, and impacts on cultural heritage, these issues are further addressed in the Environment Section of this report and I consider the proposal would be consistent with and support the relevant provisions of the CDP and comply with relevant legislation.

9.3.32. Having regard to the foregoing, I consider that the proposed development would be consistent with the relevant planning framework and would accord with the proper planning and sustainable development of the area.

10.0 The likely significant effects on a European Site

10.1. The areas addressed in this section are as follows:

- Compliance with Articles 6(3) of the EU Habitats Directive
- The Natura Impact Statement
- Appropriate Assessment

10.2. Compliance with Articles 6(3) of the EU Habitats Directive

10.2.1. The Habitats Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) of this Directive requires that any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. The competent authority must be satisfied that the proposal will not adversely affect the integrity of the European site.

10.3. The Natura Impact Statement

- 10.3.1. The application was accompanied by an NIS which describes the proposed development, the project site and the surrounding area, European Sites within the zone of influence, includes an assessment of potential effects, an in-combination assessment, mitigation and a conclusion. An updated NIS was submitted at further information stage, which takes into account the updated Site Specific Conservation Objectives documents for a number of European Sites, which were updated since the submission of the application. The updated NIS also includes for an updated assessment on a QI species of a European site.
- 10.3.2. The NIS contained a Stage 1 Appropriate Assessment Screening which concluded that Appropriate Assessment was required. The NIS outlined the methodology used for assessing potential impacts on the habitats and species within several European Sites that have the potential to be affected by the proposed development. It predicted the potential impacts for these sites and their conservation objectives, it suggested mitigation measures, assessed in-combination effects with other plans and projects and it identified any residual effects on the European sites and their conservation objectives.
- 10.3.3. The NIS was informed by a desk study, ecological surveys and invasive species survey. The report concluded that, subject to the implementation mitigation measures, the proposed development, individually or in-combination with other plans and projects, would not adversely affect the integrity of any European site.
- 10.3.4. Having reviewed the NIS, as updated and the supporting documentation, I am satisfied that it provides adequate information in respect of the baseline conditions, does clearly identify the potential impacts, and does use best scientific information and knowledge. Details of mitigation measures are provided and they are summarised in Section 6 of the NIS, the CEMP and in an Invasive Species Management Plan. I am satisfied that the information is sufficient to allow for appropriate assessment of the proposed development. See further analysis below.

10.4. **Appropriate Assessment**

Appropriate Assessment Screening – Stage 1

- 10.4.1. Consideration is given to European Sites in the *AA Screening Determination - Test for Likely significant effects*, set out in Appendix 3.

- 10.4.2. I consider that the proposed development of a public realm scheme is not directly connected with or necessary to the management of any European site.
- 10.4.3. Having regard to the information and submissions available, nature, size and location of the proposed development and its likely direct, indirect and cumulative effects, the source pathway receptor principle and sensitivities of the ecological receptors, the following European Sites are considered relevant to include for the purposes of initial screening for the requirement for Stage 2 appropriate assessment on the basis of likely significant effects.
- 10.4.4. These include the Twelve Bens/Garraun Complex SAC [002031], Slyne Head Peninsula SAC [002074], West Connacht Coast SAC [002998], and Slyne Head Islands SAC [000328], Connemara Bog Complex SAC (002034), Inishbofin And Inishshark SAC (000278), Slyne Head to Ardmore and Point Islands SPA (004159), High Island, Inishshark and Davillaun SPA (004144), Cruagh Island SPA (004170) and Connemara Bog Complex SPA [004181].
- 10.4.5. Based on my examination of the NIS report and supporting information, including the EclA, the NPWS website, aerial and satellite imagery, the scale of the proposed development and likely effects, separation distance and functional relationship between the proposed works and the European sites, their conservation objectives and taken in conjunction with my assessment of the subject site and the surrounding area, I would agree with the applicants screening for AA for the majority of European Designated sites and conclude that a Stage 2 Appropriate Assessment is required for the Twelve Bens/Garraun Complex SAC [002031], Slyne Head Peninsula SAC [002074], West Connacht Coast SAC [002998], and Slyne Head Islands SAC [000328] European Sites. However, the applicant has screened out the Connemara Bog Complex SAC [002034] and I am of the view that likely significant effects to arise on this site cannot be ruled out and a Stage 2 Appropriate Assessment is also required for this site. This relates to potential for ex-situ impacts on the SACs QI Lutra lutra (Otter) [1355].
- 10.4.6. The remaining European Sites in the wider area can be screened out from further assessment because of the nature and scale of the proposed works, the nature of the Conservation Objectives, Qualifying and Special Conservation Interests, the

separation distances and the lack of a substantive linkage between the proposed works and the European sites.

Screening Determination

Significant effects cannot be excluded

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development alone or in combination with other plans and projects, could result in significant effects on the European Sites Twelve Bens/Garraun Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), and Slyne Head Islands SAC (000328), and the Connemara Bog Complex SAC (002034) in view of the sites conservation objectives. Appropriate Assessment is required. This determination is based on:

- The nature and scale of the works
- The hydrological connections and potential hydrological connections to the European Sites and the potential for significant effects on QI habitats and QI species by way of pollution and deterioration of water quality
- The potential for significant ex-situ impacts on QI
- Potential spread of invasive species.

It is therefore determined that Appropriate Assessment (stage 2) [under Section 177AE of the Planning and Development Act 2000] of the proposed development is required.

Appropriate Assessment - Stage 2

10.4.7. Consideration is given to the above European designated sites in Appendix 4 - AA and AA Determination.

Appropriate Assessment Conclusion: Integrity Test

In screening the need for Appropriate Assessment, it was determined that the proposed development could result in significant effects on the Twelve Bens/Garraun Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), Slyne Head Islands SAC (000328), and the Connemara Bog

Complex SAC (002034) in view of the conservation objectives of those sites and that Appropriate Assessment under the provisions of 177AE was required.

Following an examination, analysis and evaluation of the NIS, and all associated material submitted including further information and an updated NIS, I consider that adverse effects on site integrity of the Twelve Bens/Garraun Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), Slyne Head Islands SAC (000328), and the Connemara Bog Complex SAC (002034) can be excluded in view of the conservation objectives of these sites and that no reasonable scientific doubt remains as to the absence of such effects.

My conclusion is based on the following:

- Detailed assessment of construction and operational impacts.
- Effectiveness of mitigation measures proposed including supervision and monitoring and integration into CEMP ensuring transition of obligations to eventual contractor.
- Application of planning conditions to ensure application of these measures.
- The proposed development will not affect the attainment of conservation objectives for the Twelve Bens/Garraun Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), Slyne Head Islands SAC (000328), and the Connemara Bog Complex SAC (002034)

11.0 Recommendation

On the basis of the above assessment, I recommend that the Commission approve the proposed development subject to the reasons and considerations below and subject to conditions including requiring compliance with the submitted details and with the mitigation measures as set out in the NIS.

12.0 Reasons and Considerations

- (a) the EU Habitats Directive (92/43/EEC),

- (b) the European Union (Birds and Natural Habitats) Regulations 2011, as amended,
- (c) Revised National Planning Framework - Ireland 2040
- (d) The Climate Action Plan 2025.
- (e) National Biodiversity Action Plan 2023-2030
- (f) Regional Spatial & Economic Strategy for the Northern and Western Region
- (g) The policies and objectives of the Galway County Development Plan 2022-2028
- (h) the likely consequences for the environment and the proper planning and sustainable development of the area in which it is proposed to carry out the proposed development and the likely significant effects of the proposed development on European Sites,
- (i) the conservation objectives, and qualifying interests for the Twelve Bens/Garraun Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), Slyne Head Islands SAC (000328), and the Connemara Bog Complex SAC (002034)
- (j) the nature and extent of the proposed works as set out in the application for approval,
- (k) the information submitted in relation to the potential impacts on habitats, flora and fauna, including the Natura Impact Statement, and the information submitted at further information stage including the updated Natura Impact Statement,
- (l) the submissions received in relation to the proposed development, and
- (m) the report and recommendation of the person appointed by the Commission to make a report and recommendation on the matter

Appropriate Assessment

The Commission agreed with and adopted the screening assessment and conclusion carried out in the Inspector's report that the Twelve Bens/Garraun

Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), Slyne Head Islands SAC (000328), and the Connemara Bog Complex SAC (002034) are the only European Sites in respect of which the proposed development has the potential to have a significant effect.

The Commission considered the Natura Impact Statement and updated Natura Impact Statement and associated documentation submitted with the application for approval, the mitigation measures contained therein, the submissions on file, and the Inspector's assessment. The Commission completed an appropriate assessment of the implications of the proposed development for the affected European Sites, namely the Twelve Bens/Garraun Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), Slyne Head Islands SAC (000328), and the Connemara Bog Complex SAC (002034) in view of the site's conservation objectives. The Commission considered that the information before it was adequate to allow the carrying out of an appropriate assessment. In completing the appropriate assessment, the Commission considered, in particular, the following:

- i. the likely direct and indirect impacts arising from the proposed development both individually or in combination with other plans or projects,
- ii. the mitigation measures which are included as part of the current proposal, and
- iii. the conservation objectives for the European Sites.

In completing the appropriate assessment, the Commission accepted and adopted the appropriate assessment carried out in the Inspector's report in respect of the potential effects of the proposed development on the integrity of the aforementioned European Sites, having regard to the site's conservation objectives.

In overall conclusion, the Commission was satisfied that the proposed development, by itself or in combination with other plans or projects, would not adversely affect the integrity of the European Sites, in view of the site's conservation objectives.

Proper Planning and Sustainable Development/Likely effects on the environment

It is considered that, subject to compliance with the conditions set out below, the proposed development would not have significant negative effects on the environment or the community in the vicinity, would not give rise to a risk of pollution, would not be detrimental to the visual or landscape amenities of the area, would not seriously injure the amenities of property in the vicinity, would not adversely impact on the cultural, archaeological and built heritage of the area, would not interfere with the existing land uses in the area and would not interfere with traffic and pedestrian safety. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

13.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars received by An Coimisiún Pleanála, except as may otherwise be required in order to comply with the following conditions. Where any mitigation measures set out in the updated Natura Impact Statement or any conditions of approval require further details to be prepared by or on behalf of the local authority, these details shall be placed on the file and retained as part of the public record.

Reason: In the interest of clarity and the proper planning and sustainable development of the area and to ensure the protection of the environment.

2. The mitigation and monitoring measures identified in the updated Natura Impact Statement shall be implemented in full. Prior to the commencement of development, details of a time schedule for implementation of mitigation measures and associated monitoring shall be prepared by the local authority and placed on file and retained as part of the public record.

Reason: In the interest of protecting European Sites.

3. The mitigation and monitoring measures identified in the Ecological Impact Assessment submitted with the application shall be implemented in full. Prior to the commencement of development, details of a time schedule for implementation of mitigation measures and associated monitoring shall be prepared by the local authority and placed on file and retained as part of the public record.

Reason: In the interest of protecting the environment.

4. A suitably qualified ecologist shall be retained by the local authority to oversee the site set up and construction of the proposed development and implementation of mitigation measures relating to ecology. The ecologist shall be present during the works. Upon completion of works, an ecological report of the site works shall be prepared by the appointed ecologist to be kept on file as part of the public record.

Reason: In the interest of nature conservation and biodiversity.

5. Prior to the commencement of development, the local authority, or any agent acting on its behalf, shall prepare in consultation with the project ecologist and relevant statutory agencies, a Construction Environmental Management Plan (CEMP), incorporating all mitigation measures indicated in the Natura Impact Statement and Ecological Impact Assessment and demonstration of proposals to adhere to best practice and protocols. The CEMP shall include:
 - a. all mitigation measures indicated in the updated Natura Impact Statement and Ecological Impact Assessment,
 - b. location and extent of silt fencing to be installed on site.
 - c. specific proposals as to how the measures outlined in the CEMP will be measured and monitored for effectiveness,
 - d. a traffic management plan
 - e. mitigation measures indicated in the Asbestos Management Plan

Reason: In the interest of protecting the environment and the European Sites, and in the interest of public safety and health.

6. The following nature conservation requirements shall be complied with:
- a. Prior to the commencement of development, details of measures to protect fisheries and water quality of the river system shall be outlined and placed on file. Full regard shall be had to Inland Fisheries Ireland's published guidelines for construction works near waterways (Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Waters, 2016). A programme of water quality monitoring shall be prepared in consultation with the contractor, the local authority and relevant statutory agencies and the programme shall be implemented thereafter.
 - b. No vegetation removal shall take place during the period of the 1st day of March to the 31st day of August (inclusive) without the written approval of the Ecological Clerk of Works. Such approval shall be placed on the public file.
 - c. A pre-construction otter survey by a suitability qualified ecologist shall be carried out before works commence.
 - d. Inland Fisheries Ireland shall be notified prior to the treatment of invasive species.
 - e. Prior to the commencement of development, Inland Fisheries Ireland shall be consulted in relation to any construction works near waterways.

Reason: In the interests of biodiversity, nature conservation and protecting European Sites.

7. The Local Authority and any agent acting on its behalf shall ensure that all plant and machinery used during the works should be thoroughly cleaned and washed before delivery to the site to prevent the spread of hazardous invasive species and pathogens.

Reason: In the interest of the proper planning and sustainable development

of the area and to ensure the protection of the European sites.

8. (a) The developer shall engage a suitably qualified archaeologist to monitor (licensed under the National Monuments Acts) all site clearance works, topsoil stripping, groundworks associated with the development. Should archaeological remains be identified during the course of archaeological monitoring, all works shall cease in the area of archaeological interest pending a decision of the planning authority, in consultation with the National Monuments Service, regarding appropriate mitigation. The developer shall facilitate the archaeologist in recording any remains identified. Any further archaeological mitigation requirements specified by the planning authority, following consultation with the National Monuments Service, shall be complied with by the developer.
- (b) Following the completion of all archaeological work on site and any necessary post-excavation specialist analysis, the planning authority and the National Monuments Service shall be furnished with a final archaeological report describing the results of the monitoring and any subsequent required archaeological investigative work/excavation required. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation of places, caves, sites, features or other objects of archaeological interest.

9. The mitigation measures making provision for recording and supervision of works as set out in the Architectural Heritage Impact Assessment Report submitted shall be implemented.

Reason: In order to conserve the archaeological heritage of the site and to secure its preservation and protection.

10. Prior to commencement of development, a dedicated signage and cycle lane strategy detailing the proposed schemes connectivity to the Connemara Greenway, Wild Atlantic Way, scenic routes, and town schools shall be placed on file and retained as part of the public record.

Reason: In the interest of public and recreational amenities.

11. (a) The site shall be landscaped in accordance with the details submitted.

(b) All planting shall be adequately protected from damage until established. Any plants which die, are removed, or become seriously damaged or diseased, within a period of five years from the completion of the development shall be replaced within the next planting season with others of similar size and species, unless otherwise agreed in writing with the planning authority.

Reason: In the interest of visual amenity.

12. Prior to commencement of development, plans shall be revised for the following requirements:

a) The proposed echelon/reverse parking bays to the east of the bus stop on Market Street shall be replaced by forward parking bays.

b) All loading bays shall comply with DMURS dimensions.

c) The rain garden planting areas at the junction of Market Street and Bridewell Lane shall be withdrawn to maintain existing access/egress for vehicles.

d) A signage strategy for pedestrians and vehicles shall be provided at the Beach Road, at the Beach Road Quay, and at any other locations, where appropriate.

These details shall be placed on the file and retained as part of the public record.

Reason: In the interests of proper planning, road and public safety.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

David Ryan
Senior Planning Inspector

22nd August 2025

Appendix 1 - Form 1 - EIA Pre-Screening

Case Reference	321144-24
Proposed Development Summary	<p>Proposed development of a public realm scheme including:</p> <p>Alterations works to the Clifden Town Centre area on Seaview Road, Main Street, Market Street, Market Hill, Bridgewell Lane, Bridge Street, and Hulk Street including reconfiguration and resurfacing of roads and realignment of parking spaces, widening and realignment of existing footpath areas; Alterations to and resurfacing of Beach Road Quay public realm; Redevelopment of the Harbour Park area south of Beach Road and to the west of Clifden town centre to include construction of a new park</p>
Development Address	Seaview Road, Main Street, Market Street, Market Hill, Bridgewell Lane, Bridge Street, and Hulk Street, Beach Road Quay, Harbour Park, Clifden, Co. Galway
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2. <input type="checkbox"/> No, No further action required.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
<input type="checkbox"/> Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	

<input type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
<input checked="" type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	<p>Relevant classes include:</p> <p>Class 10(b)(iv) of Part 2 of Schedule 5 of the P&D Regulations 2001 as amended which includes “(iv) <i>Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere</i>”.</p> <p>Class 14. <i>Works of Demolition Works of demolition carried out in order to facilitate a project listed in Part 1 or Part 2 of this Schedule where such works would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.</i></p> <p>Class 15. <i>Any project listed in this Part which does not exceed a quantity, area or other limit specified in this Part in respect of the relevant class of development but which would be likely to have significant effects on the environment, having regard to the criteria set out in Schedule 7.</i></p> <p>In addition, Section 50(1)(a) of the Roads Act, 1993 (as amended), lists road developments in respect of which there is</p>

	<p>a mandatory requirement to carry out Environmental Impact Assessment (EIA) as follows-</p> <ul style="list-style-type: none"> (i) the construction of a motorway, (ii) the construction of a busway, (iii) the construction of a service area, or (iv) any prescribed type of proposed road development consisting of the construction of a proposed public road or the improvement of any existing public road. <p>With regard to category (iv), I note that Article 8 of the Roads Regulations 1994 (S.I. 119 of 1994) states that: "The prescribed types of proposed road development for the purpose of subsection (1)(a)(iii) of section 50 of the Act shall be –</p> <ul style="list-style-type: none"> a) the construction of a new road of four or more lanes, or the realignment or widening of an existing road so as to provide four or more lanes, where such new, realigned or widened road would be eight kilometres or more in length in a rural area, or 500m or more in length in an urban area; b) the construction of a new bridge or tunnel which would be 100m or more in length." <p>Section 68(1) of the Roads Act references a cycleway and states that a 'cycleway' means "a public road or proposed public road reserved for the exclusive use of pedal cyclists or pedal cyclists and pedestrians". As outlined the town centre scheme include for a bike lane.</p>
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4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input type="checkbox"/>	Screening Determination required (Complete Form 3)
No <input checked="" type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Appendix 2- Form 2 - EIA Preliminary Examination

Case Reference	321144-24
Proposed Development Summary	<p>Proposed development of a public realm scheme including:</p> <p>Alterations works to the Clifden Town Centre area on Seaview Road, Main Street, Market Street, Market Hill, Bridgewell Lane, Bridge Street, and Hulk Street including reconfiguration and resurfacing of roads and realignment of parking spaces, widening and realignment of existing footpath areas; Alterations to and resurfacing of Beach Road Quay public realm; Redevelopment of the Harbour Park area south of Beach Road and to the west of Clifden town centre to include construction of a new park</p>
Development Address	Seaview Road, Main Street, Market Street, Market Hill, Bridgewell Lane, Bridge Street, and Hulk Street, Beach Road Quay, Harbour Park, Clifden, Co. Galway
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
Characteristics of proposed development (In particular, the size, design, cumulation with existing/ proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).	<p>The proposed development includes for an overall site of 3.83 hectares, with the works in the town centre on an area of 1.95 hectares in area, both of which are below the relevant thresholds for urban development.</p> <p>There would be cumulative impacts with other projects in the vicinity of the site/in town centre.</p> <p>There is the proposed demolition of a playground.</p> <p>There will be limited use of natural resources, production of waste at construction stage.</p> <p>There would be a potential for pollution and nuisance arising at construction stage.</p> <p>There is no potential for major disasters / accidents to result from the development.</p>
Location of development (The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	<p>The site is located within Clifden town which is zoned in the Galway CDP, with the town centre development located within a built-up area.</p> <p>The site is located within an ACA, where there is a presence of Recorded Protected Structures, structures on the NIAH, and Sites and Monument Record Zones, with monuments recorded within the overall site vicinity.</p> <p>The town centre site traverses a tributary of the Owenglin River, and lies adjacent the Owenglin River, which forms part of the Twelve Bens/Garraun Complex SAC and is a designated European site. A tributary of the Owenglin River flows though the western margin of Harbour Park. The Owenglin River and Clifden Bay are also located within and adjacent the site.</p>

	<p>Slyne Head Peninsula SAC, Slyne Head Islands SAC, West Connacht Coast SAC, Connemara Bog Complex SAC, Connemara Bog Complex SPA are also located within the site vicinity. The pNHAs Slyne Head Peninsula, Slyne Head Islands, Connemara Bog Complex, and The Twelve Bens/Garraun Complex are also located within the site vicinity.</p>
<p>Types and characteristics of potential impacts</p> <p>(Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).</p>	<p>The potential for pollution, wastes and nuisances arising at construction stage on the population would be controlled and mitigated by way of the implementation of a CEMP. The extent of the impact will be limited to the geographical area of scheme for population.</p> <p>It is considered that the proposed development would have a potential positive impact on population and human health.</p> <p>Having regard to the nature and location of the development and planting outlined no significant impacts on landscape are anticipated.</p> <p>Wastes will be recycled and encapsulated.</p> <p>Works will reuse excavated materials in the reinstatement of landscaping where appropriate.</p> <p>It is considered the nature of environmental impacts is not complex/intense.</p> <p>While there is a potential for impacts on European Sites and water bodies within the site vicinity, given the waterbodies onsite/adjacent, potential runoff of pollutants from works would be mitigated by way of measures in the CEMP and NIS.</p> <p>Potential impacts on the cultural heritage of the area are considered to be low given the nature of the works, their location and implementation of mitigation measures. No potential significant impacts on cultural heritage are anticipated.</p> <p>There will be no transboundary impacts.</p> <p>The construction phase will be short term.</p> <p>The site is zoned and the Development plan has been subject to Strategic Environmental Assessment.</p> <p>Subject to mitigation significant cumulative effects are not anticipated.</p> <p>Concern is expressed in an observation in relation to the impacts of the proposed development on bat species. Environmental impact assessment assesses the potential for significant environmental effects. There is no potential for significant environmental effects. Impacts on bats are considered by the applicant in the EclA and addressed in section 9 of the planning assessment.</p>
<p>Conclusion</p>	

Likelihood of Significant Effects	Conclusion in respect of EIA
There is no real likelihood of significant effects on the environment.	EIA is not required.

Inspector: _____ **Date:** _____

DP/ADP: _____ **Date:** _____

(only where Schedule 7A information or EIAR required)

Appendix 3 - AA Screening Determination

Test for likely significant effects

Screening for Appropriate Assessment Test for likely significant effects

Step 1: Description of the project and local site characteristics Case File 321144-24

Brief description of project	<p>Public Realm Scheme consisting of alterations works to the Clifden Town Centre area, alterations to and resurfacing of Beach Road Quay public realm and redevelopment of the Harbour Park area.</p>
Brief description of development site characteristics and potential impact mechanisms	<p>The site includes 3 no. separate areas on an overall site of 3.83 hectares. Town centre works will take place within an existing town centre, with works at Harbour Park including construction of a new park on a derelict site, with works also proposed to the existing Beach Road Quay public realm.</p> <p>A detailed description of the proposed development is included in Section 2.0 of Inspector Report and detailed specifications of the proposal are provided in the NIS and other planning documents provided by the applicant. In summary the public realm scheme entails: Alterations works to the Clifden Town Centre area including the reconfiguration and resurfacing of roads and realignment of parking spaces, widening and realignment of existing footpath areas, provision of new soft and hard landscaping, lighting; Alterations to and resurfacing of Beach Road Quay public realm comprising the provision of pedestrian and seating areas, paving, landscaping, remedial works to the quay wall, replacement of railings, lighting along the roadside; Redevelopment of the Harbour Park area to include demolition of the existing playground, construction of a new park including multi-age playground areas, including the provision of cycle parking, play furniture, seating areas, amphitheatre performance spaces, climbing wall, pump and running track, car park, sports pitch, resurfacing, paving and hard & soft landscaping.</p> <p>Surface water drainage is proposed within the 3 areas, with a gully connection pipe and new gullies proposed throughout Harbour Park, with filter drains, silt trap and precast manholes, and a surface water pipe also proposed. A surface water pipe and gullies are also proposed at Beach Road. A gully connection pipe and</p>

	<p>new gullies are proposed in Clifden Town, and the proposed new surface water network will connect to the existing surface water system.</p> <p>The town centre site traverses a culverted tributary of the Owenglin River, with the southern area of this site also lying adjacent the Owenglin River, which forms part of the Twelve Bens/Garraun Complex SAC, and the town centre site is partially located within this designated European site. The tributary discharges into the Owenglin River and SAC. The Owenglin River discharges into Clifden Bay. The Owenglin River is also located within and adjacent to the Beach Road and Harbour Park areas of the proposed development site, with a tributary (Clifden Stream) of the Owenglin River flowing through the western margin of Harbour Park, running culverted through the park to Clifden Bay. In relation to flooding, the proposed site is located within flood risk zones.</p> <p>Asbestos present in Harbour Park is proposed to be encapsulated, by way of an asbestos warning/hazard membrane, and then by a constructed hard capping layer with hardstand.</p> <p>Works are scheduled to take 12-18 months.</p>
Screening report	Y
Natura Impact Statement	Y - An updated NIS was submitted at further information stage, which takes into account the updated Site Specific Conservation Objectives documents for a number of European Sites, which were updated since the submission of the application.
Relevant submissions	IFI outline the proposal site is located adjacent the Owenglin River which forms part of the Twelve Bens/Garraun Complex SAC, with Atlantic Salmon one of the qualifying interests. Requests consideration be given to the protection of water quality and fisheries habitat, and IFIs guidance regarding the protection of fisheries watercourses during construction works in and adjacent to waters. Also requests consideration be given to invasive species.
<p>Step 2. Identification of relevant European sites using the Source-pathway-receptor model</p> <p>10 no. European sites were identified as being located within a potential zone of influence of the proposed development as detailed in Table 1 below. I note that the applicant included a greater number of European sites in their initial screening consideration with sites within 15km of the development site considered. There is no ecological justification for such a wide consideration of</p>	

sites, and I have only included those sites with any possible ecological connection or pathway in this screening determination. In addition, the applicant has screened out the Connemara Bog Complex SAC [002034] and I am of the view likely significant effects cannot be excluded and a Stage 2 Appropriate Assessment is required for this site.

European Site (code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections ²	Consider further in screening ³ Y/N
Twelve Bens/Garraun Complex SAC [002031]	<p>Freshwater Pearl Mussel, Salmon, Otter, Slender Naiad, Oligotrophic waters containing very few minerals of sandy plains, Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea, Alpine and Boreal heaths, Blanket bogs, Depressions on peat substrates of the Rhynchosporion, Siliceous scree of the montane to snow levels, Calcareous rocky slopes with chasmophytic vegetation, Siliceous rocky slopes with chasmophytic vegetation, Old sessile oak woods with Ilex and Blechnum in the British Isles</p> <p>https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO002031.pdf</p>	Within the site	Yes, proposed development site is within the SAC site, and there is a hydrological connection to the site	Y
West Connacht Coast SAC [002998]	<p>Common Bottlenose Dolphin, Harbour Porpoise</p> <p>https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO002998</p>	4.7km	Yes there is a hydrological connection to the site	y

	pdf			
Slyne Head Peninsula SAC [002074]	<p>Coastal lagoons, Large shallow inlets and bays, Reefs, Annual vegetation of drift lines, Perennial vegetation of stony banks, Atlantic salt meadows, Mediterranean salt meadows, Embryonic shifting dunes, Shifting dunes along the shoreline with Ammophila arenaria, Machairs, Oligotrophic waters containing very few minerals of sandy plains, Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea, Hard oligo-mesotrophic waters with benthic vegetation of Chara spp, European dry heaths, Juniperus communis formations on heaths or calcareous grasslands, Semi-natural dry grasslands and scrubland facies on calcareous substrates, Molinia meadows on calcareous, peaty or clayey-silt-laden soils, Lowland hay meadows, Alkaline fens, Common Bottlenose Dolphin, Petalwort, Slender Naiad</p> <p>https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO002074.pdf</p>	2.5km	Yes there is a hydrological connection to the site	y

Slyne Head Islands SAC [000328]	Reefs, Common Bottlenose Dolphin, Grey Seal https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000328.pdf	7.9km	Yes there is a hydrological connection to the site	Y
Connemara Bog Complex SAC [002034]	Coastal lagoons, Reefs, Oligotrophic waters containing very few minerals of sandy plains, Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea, Natural dystrophic lakes and ponds, Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation, Northern Atlantic wet heaths with Erica tetralix, European dry heaths, Molinia meadows on calcareous, peaty or clayey-silt-laden soils, Blanket bogs, Transition mires and quaking bogs, Depressions on peat substrates of the Rhynchosporion, Alkaline fens, Old sessile oak woods with Ilex and Blechnum in the British Isles, Marsh Fritillary, Salmon, Otter, Slender Naiad https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/	0.7 km	Yes, proximity and potential ex-situ connections	Y

	CO002034.pdf			
Inishbofin And Inishshark SAC [000278]	Coastal lagoons, Oligotrophic waters containing very few minerals of sandy plains, Northern Atlantic wet heaths with Erica tetralix, European dry heaths, Grey Seal https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000278.pdf	15km	Yes there is a hydrological connection to the site	y
Connemara Bog Complex SPA (004181)	Cormorant, Merlin, Golden Plover, Common Gull https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004181.pdf	2.2km	Yes, proximity and potential ex-situ connections	y
Slyne Head to Ardmore and Point Islands SPA (004159)	Barnacle Goose, Sandwich Tern, Arctic Tern, Little Tern https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004159.pdf	8.5km	Yes, proximity and potential ex-situ connections	y
High Island, Inishshark and Davillaun SPA (004144)	Fulmar, Barnacle Goose, Arctic Tern https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO004144.pdf	15 km	Yes, proximity and potential ex-situ connections	y
Cruagh Island SPA (004170)	Manx Shearwater, Barnacle Goose https://www.npws.ie/sites/default/files/protected-sites/conservation	12.1km	Yes, proximity and potential ex-situ connections	y

	_objectives/ CO004170.pdf			

¹ Summary description / **cross reference to NPWS website** is acceptable at this stage in the report

² Based on source-pathway-receptor: Direct/ indirect/ tentative/ none, via surface water/ ground water/ air/ use of habitats by mobile species

³if no connections: N

A dedicated Otter survey was conducted on the 20th of September 2023, along the unmapped EPA watercourse, along the accessible sections of the Owenglin River and Clifden Bay Estuary. No signs of Otters were recorded along the surveyed sections of the watercourses.

Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

The proposed development will not result in any direct effects on any SAC or SPA. However due to the size and scale and proximity of the proposed development to SACs and SPAs, impacts generated by the construction of the development require consideration. Sources of impact and likely significant effects are detailed in the Table below.

AA Screening matrix

Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
Site 1: Twelve Bens/Garraun Complex SAC [002031]	<p>Direct - The site is partially within the SAC. No works are proposed within the SAC and there will be no direct impact on the SAC.</p> <p>Indirect - Release of silt and sediment during site works, release of construction related pollution including hydrocarbons to surface and ground waters</p> <p>Spread of invasive plant species which was recorded on the development site</p> <p>Increased human disturbance at this site, particularly during the construction/ installation phase</p>	<p>Potential damage to riparian and river habitats associated with inadvertent spillages of hydrocarbons and/or other chemicals during construction phase;</p> <p>Potential damage to the habitats and freshwater qualifying interest species dependent on water quality, an impact of sufficient magnitude could undermine the sites conservation objectives</p> <p>Potential negative effect on prey availability</p> <p>Potential disturbance risks to Otter, a qualifying</p>

		<p>interest species for the SAC, which could be associated with increased noise, increased human activity at both construction and post construction phases;</p> <p>Potential spread of invasive species associated with ground disturbance activities during the construction phase.</p>
	Likelihood of significant effects from proposed development (alone): Y	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects?	
	Possibility of significant effects (alone) in view of the conservation objectives of the site* Possibility of significant effects cannot be ruled out without further analysis and assessment	
	Impacts	Effects
Site 2: West Connacht Coast SAC [002998]	Indirect - Release of silt and sediment during site works, release of construction related pollution including hydrocarbons to surface and ground waters	<p>Potential damage to habitats associated with inadvertent spillages of hydrocarbons and/or other chemicals during construction phase;</p> <p>Potential damage to the habitats of qualifying interest species dependent on water quality</p>
	Likelihood of significant effects from proposed development (alone): Y	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects?	
Possibility of significant effects (alone) in view of the conservation objectives of the site* Possibility of significant effects cannot be ruled out without further analysis and assessment		
	Impacts	Effects
Site 3: Slyne Head Peninsula SAC [002074]	Indirect - Release of silt and sediment during site works,	Potential damage to QI habitats associated with

	release of construction related pollution including hydrocarbons to surface and ground waters	inadvertent spillages of hydrocarbons and/or other chemicals during construction phase; Potential damage to the habitats of qualifying interest specie dependent on water quality
	Likelihood of significant effects from proposed development (alone): Y	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects?	
Possibility of significant effects (alone) in view of the conservation objectives of the site*		
Possibility of significant effects cannot be ruled out without further analysis and assessment		
	Impacts	Effects
Site 4: Slyne Head Islands SAC [000328]	Indirect - Release of silt and sediment during site works, release of construction related pollution including hydrocarbons to surface and ground waters	Potential damage to QI habitats associated with inadvertent spillages of hydrocarbons and/or other chemicals during construction phase; Potential damage to the habitats of qualifying interest species dependent on water quality
	Likelihood of significant effects from proposed development (alone): Y	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects?	
Possibility of significant effects (alone) in view of the conservation objectives of the site*		
Possibility of significant effects cannot be ruled out without further analysis and assessment		
	Impacts	Effects
Site 5: Connemara Bog Complex SAC [002034]	Ex-situ disturbance and displacement during the construction phase	Potential disturbance risks to Otter, a qualifying interest species for the SAC, which could be associated with increased noise, and increased human activity at both construction and post construction phases

	Indirect - Release of silt and sediment during site works, release of construction related pollution including hydrocarbons to surface and ground waters	Potential damage to the habitats of qualifying interest specie dependent on water quality
	Likelihood of significant effects from proposed development (alone): Y	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects?	
Possibility of significant effects (alone) in view of the conservation objectives of the site*		
Possibility of significant effects cannot be ruled out without further analysis and assessment		
	Impacts	Effects
Site 6: Inishbofin And Inishshark SAC [000278]	Indirect - Release of silt and sediment during site works, release of construction related pollution including hydrocarbons to surface and ground waters	Given the nature and scale of the proposed development, the separation distance of the proposed development from this site, the length of the hydrological link, the dilution and dispersion action of watercourses and waterbodies, the potential for significant effects on this site to arise from the proposed development is unlikely.
	Likelihood of significant effects from proposed development (alone): N	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? N	
Possibility of significant effects (alone) in view of the conservation objectives of the site*		
Possibility of significant effects can be ruled out without further analysis and assessment		
	Impacts	Effects
Site 7: Connemara Bog Complex SPA (004181)	Potential impact on SCI species by way of ex-situ habitat loss and disturbance /displacement	Given that SCI species were not recorded in habitats within or adjacent the works site during surveys carried out, the nature of the Special Conservation Interests, the separation distances, the lack of a substantive linkage between the proposed works and the European site, the abundance of

		habitat in the area which will be lost to the scheme, and the extent of artificial surfaces onsite, it is considered that ex situ impacts by way of habitat loss and disturbance/displacement of SCI for the identified site would be unlikely. See also further commentary outlined.
	Likelihood of significant effects from proposed development (alone): N	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? N	
Possibility of significant effects (alone) in view of the conservation objectives of the site*		
Possibility of significant effects can be ruled out without further analysis and assessment		
	Impacts	Effects
Site 8: Slyne Head to Ardmore and Point Islands SPA (004159)	Potential impact on SCI species by way of ex-situ habitat loss and disturbance /displacement	Given that SCI species were not recorded in habitats within or adjacent the works site during surveys carried out, the nature of the Special Conservation Interests, the separation distances, the lack of a substantive linkage between the proposed works and the European site, the abundance of habitat in the area which will be lost to the scheme, and the extent of artificial surfaces onsite, it is considered that ex situ impacts by way of habitat loss and disturbance/displacement of SCI for the identified site would be unlikely. See also further commentary outlined.
	Likelihood of significant effects from proposed development (alone): N	

	If No, is there likelihood of significant effects occurring in combination with other plans or projects? N	
Possibility of significant effects (alone) in view of the conservation objectives of the site*		
Possibility of significant effects can be ruled out without further analysis and assessment		
	Impacts	Effects
Site 9: High Island, Inishshark and Davillaun SPA (004144)	Potential impact on SCI species by way of ex-situ habitat loss and disturbance /displacement	Given that SCI species were not recorded in habitats within or adjacent the works site during surveys carried out, the nature of the Special Conservation Interests, the separation distances, the lack of a substantive linkage between the proposed works and the European site, the abundance of habitat in the area which will be lost to the scheme, and the extent of artificial surfaces onsite, it is considered that ex situ impacts by way of habitat loss and disturbance/displacement of SCI for the identified site would be unlikely. See also further commentary outlined.
	Likelihood of significant effects from proposed development (alone): N	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? N	
Possibility of significant effects (alone) in view of the conservation objectives of the site*		
Possibility of significant effects can be ruled out without further analysis and assessment		
Site 10: Cruagh Island SPA (004170)	Potential impact on SCI species by way of ex-situ habitat loss and disturbance /displacement	Given that SCI species were not recorded in habitats within or adjacent the works site during surveys carried out, the nature of the Special Conservation Interests, the separation distances, the lack of a substantive linkage between the proposed works and the

		European site, the abundance of habitat in the area which will be lost to the scheme, and the extent of artificial surfaces onsite, it is considered that ex situ impacts by way of habitat loss and disturbance/displacement of SCI for the identified site would be unlikely. See also further commentary outlined.
	Likelihood of significant effects from proposed development (alone): N	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? N	
Possibility of significant effects (alone) in view of the conservation objectives of the site*		
Possibility of significant effects can be ruled out without further analysis and assessment		
Further Commentary / discussion		
<p>No direct habitat loss will occur within the Connemara Bog Complex SAC (002034) given the distance (0.7km) of the proposed development site from the SAC site. The proposed development site is located downstream of the SAC. The AA Screening outlines the proposed development site is located within the same ground water bodies (Clifden Marbles, Clifden Castlebar) as the SAC, and as per EPA mapping the majority of the proposal site is located within an area of moderate Groundwater Vulnerability, with sections within areas of extreme vulnerability and in areas of rock at or near the surface. It is outlined the GSI report for the groundwater bodies states groundwater will discharge locally to streams and rivers crossing the aquifer, and groundwater flow directions are expected to follow local topography, overall in a westerly direction. It is outlined there is no potential for indirect impacts on the SAC from groundwater pollution due to the buffering distance and the nature (including discharge and direction flow) of the groundwater bodies. On the basis of the separation distance and nature of the groundwater bodies, I consider the potential for impacts on the SAC from groundwater pollution unlikely. However I consider the potential for significant effects to arise on this SAC site cannot be ruled out, which relates to potential for ex-situ impacts on the SACs QI Lutra lutra (Otter) [1355], with a hydrological connection between the SAC and proposed site, that the Connemara Bog Complex SAC (002034) adjoins the Twelve Bens/Garraun Complex SAC (002031), and that Otter are known to travel significant distances from streams and lakes in search of new territory and feeding areas.</p> <p>In relation to the Connemara Bog Complex SPA (004181), the AA Screening outlines the proposed development is located c.2.2km northwest of this SPA, and is within the core foraging ranges of the Golden Plover (3km) and Merlin (5km), however none of the SCI species associated with the SPA were recorded utilizing the proposed site/lands adjacent during surveys undertaken. It is outlined dry meadows and grassy verges located within Harbour Park and along Beach Road may potentially provide suitable terrestrial foraging habitat for invertebrates for Golden Plover and Common Gull. however due to the widespread occurrence of this habitat within surrounding lands.</p>		

the loss of small areas of this habitat to facilitate the scheme will not result in significant impact to the SCI species by way of ex-situ habitat loss or disturbance/ displacement. It is further outlined the proposed site does not provide significant suitable ex-situ supporting habitat for Cormorant and Merlin, which are SCI species for the SPA. It is outlined due to the absence of a complete source-pathway receptor chain and buffering distance of approx.2.2km, there is no potential for ex situ disturbance or displacement related impacts on the SCI species during the construction phase of the scheme. I note this SPA overlaps with Connemara Bog Complex SAC (002034) and is adjacent to Maumturk Mountains SAC (002008) and Kilkieran Bay and Islands SAC (002111).

I consider the **Connemara Bog Complex SPA (004181)** can be screened out from further assessment because of the nature and scale of the proposed works, the nature of the Special Conservation Interests, the separation distances and the lack of a substantive linkage between the proposed works and the European site. Given the abundance of habitat in the area which will be lost to the scheme, and the extent of artificial surfaces onsite, it is considered that ex situ impacts by way of habitat loss and disturbance/displacement of SCI for the identified site would be unlikely.

It is further outlined in the AA Screening that the site is within the core foraging range of the Barnacle Goose which is an SCI of **Slyne Head to Ardmore and Point Islands SPA (004159)**, **High Island, Inishshark and Davillaun SPA (004144)** and **Cruagh Island SPA (004170)** and may potentially use the dry meadows and grassy verges onsite for foraging during the winter. It is outlined this species were not recorded in habitats within or adjacent the site during surveys carried out, and due to the widespread occurrence of this habitat within surrounding lands, the loss of small areas of this habitat to facilitate the scheme will not result in significant impact to the SCI species by way of ex-situ habitat loss or disturbance/ displacement during construction. It is outlined given the separation distances from the proposed site to the SPAs there is no potential for impacts on its SCI species. Given the abundance of habitat in the area which will be lost to the scheme, the extent of artificial surfaces onsite, and separation distances from the site to the SPAs, I considered that ex situ impacts by way of disturbance/displacement of SCI for the identified sites would be unlikely, and that these European sites can be screened out from further assessment.

Step 4 Conclude if the proposed development could result in likely significant effects on a European site

Based on the information provided in the AA screening report, site visit, review of the conservation objectives and supporting documents, I consider that in the absence of mitigation measures, the proposed development has the potential to result in significant effects on the Twelve Bens/Garraun Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), Slyne Head Islands SAC (000328), and the Connemara Bog Complex SAC (002034) from effects associated with public realm scheme including potential damage to QI habitats and QI species by way of pollution and deterioration of water quality, potential disturbance risks to QI, and potential spread of invasive species. An appropriate assessment is required on the basis of the possible effects of the project 'alone'.

Screening Determination

Significant effects cannot be excluded

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development alone or in combination with other plans and projects, could result in significant effects on the European Sites Twelve Bens/Garraun Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), and Slyne Head Islands

SAC (000328), and the Connemara Bog Complex SAC (002034) in view of the sites conservation objectives. Appropriate Assessment is required. This determination is based on:

- The nature and scale of the works
- The hydrological connections and potential hydrological connections to the European Sites and the potential for significant effects on QI habitats and QI species by way of pollution and deterioration of water quality
- The potential for significant ex-situ impacts on QI
- Potential spread of invasive species.

It is therefore determined that Appropriate Assessment (stage 2) [under Section 177AE of the Planning and Development Act 2000] of the proposed development is required.

Appendix 4 - AA and AA Determination

Appropriate Assessment				
<p>The requirements of Article 6(3) as related to appropriate assessment of a project under part XAB, S.177AE of the Planning and Development Act 2000 (as amended) are considered fully in this section.</p>				
<p>Taking account of the preceding screening determination, the following is an appropriate assessment of the implications of the proposed public realm development in view of the relevant conservation objectives of the Twelve Bens/Garraun Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), Slyne Head Islands SAC (000328), and the Connemara Bog Complex SAC (002034) based on scientific information provided by the applicant.</p> <p>The information relied upon includes the following:</p> <ul style="list-style-type: none"> • Natura Impact Statement prepared by MKO • Further information submitted which includes an updated NIS, taking into account updated Site Specific Conservation Objectives documents for a number of European Sites, which were updated since the submission of the application. The updated NIS also includes for an updated assessment on a QI species Otter of the Twelve Bens/Garraun Complex SAC, and details the location of the proposed site compound. • NPWS data <p>I am satisfied that the information provided is adequate to allow for Appropriate Assessment. I am satisfied that all aspects of the project which could result in significant effects are considered and assessed in the NIS and mitigation measures designed to avoid or reduce any adverse effects on site integrity are included and assessed for effectiveness.</p>				
<p>Submissions/observations</p> <p>IFI outline the proposal site is located adjacent the Owenglin River which forms part of the Twelve Bens/Garraun Complex SAC, with Atlantic Salmon one of the qualifying interests. Requests consideration be given to the protection of water quality and fisheries habitat, and IFIs guidance regarding the protection of fisheries watercourses during construction works in and adjacent to waters. Also requests consideration be given to invasive species.</p>				
<p>Twelve Bens/Garraun Complex SAC (002031)</p> <p>Summary of Key issues that could give rise to adverse effects (from screening stage):</p> <p>(i) Water quality degradation (construction and operation) (ii) Disturbance of mobile species (iii) Spread of invasive species</p> <p>See Table 5.1 NIS</p>				
Qualifying Interest features likely to be affected	Conservation Objectives	Potential adverse effects	Mitigation measures (summary)	

	Targets and attributes (summary)		NIS SECTION 6.2	
1029 Freshwater Pearl Mussel <i>Margaritifera margaritifera</i>	Restore favourable conservation condition Distribution - Maintain distribution	Water quality degradation and/or alteration of habitat quality would undermine conservation objectives	Best practice pollution control measures Application of industry standard controls CEMP	
1106 Salmon <i>Salmo salar</i>	Maintain favourable conservation condition Water Quality Q4, No decline in number and distribution of spawning redds due to anthropogenic causes	Water quality degradation and/or alteration of habitat quality would undermine conservation objectives Spread of invasive Species would negatively effect supporting habitat of salmon	Supervision by Ecological Clerk of Works Invasive Species Management Plan Environmental Monitoring	
1355 Otter <i>Lutra lutra</i>	Maintain favourable conservation condition Fish biomass available	Potential for disturbance and displacement and a significant degradation of water quality may adversely affect foraging/ fish biomass Spread of invasive Species would negatively effect supporting habitat of otter	As listed above	
Other QI's				
1833 Slender Naiad <i>Najas flexilis</i>	Not at risk	Rationale for exclusion: No viable pathway No viable pathway		

<p>3110 Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae)</p> <p>4060 Alpine and Boreal heaths</p> <p>7150 Depressions on peat substrates of the Rhynchosporion</p> <p>8110 Siliceous scree of the montane to snow levels (Androsacetalia alpinae and Galeopsietalia ladani)</p> <p>8210 Calcareous rocky slopes with chasmophytic vegetation</p> <p>8220 Siliceous rocky slopes with chasmophytic vegetation</p> <p>91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles</p> <p>3130 Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or</p>		<p>Due to terrestrial nature of the habitat and no viable pathway</p> <p>No viable pathway</p> <p>Due to terrestrial nature of the habitat and no viable pathway</p> <p>Due to terrestrial nature of the habitat and no viable pathway</p> <p>Due to terrestrial nature of the habitat and no viable pathway</p> <p>Due to terrestrial nature of the habitat and no viable pathway</p> <p>No viable pathway</p>	
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Isoeto-Nanojuncetea		Due to terrestrial nature of the habitat and no viable pathway		
Blanket bogs (* if active bog)				
The above table is based on the documentation and information provided on the file, NPWS data, and I am satisfied that the submitted NIS and NPWS data identifies the relevant attributes and targets of the Qualifying Interests.				
<p>Assessment of issues that could give rise to adverse effects view of conservation objectives</p> <p>(i) Water quality degradation</p> <p>Good quality water is necessary to restore and maintain the populations of the QI species listed. The NIS outlines there is a hydrological connection between the proposed development site and the River Owenglin, Clifden Bay Estuary and the SAC, and it is therefore considered in the NIS there is a potential for receiving surface and groundwater bodies to be impacted as a result of water pollution such as siltation/contaminants during the construction phase of the proposed development, and this could potentially impact on protected species and their habitats. I also consider this could lead to a degradation of habitat including spawning habitat, and with resultant impacts decreasing food availability for QI, and impacts on breeding QI. I note the conservation objective to restore the favourable conservation condition of the freshwater pearl mussel applies to the Dawros River freshwater pearl mussel, which is located within a separate catchment to the project site, and I note the mapping outlined in the CO documentation. However, I note salmonid fish are host to the larval stage of the freshwater pearl mussel and, thus, are essential to completion of the life cycle, and that pollutants arising from the project could contribute towards adverse effects on the host salmonid population occurring in the Owenglin catchment, with associated impacts to the salmonid stocks occurring within the Dawros River catchment relied upon by freshwater pearl mussel. While no signs of Otters were recorded along the surveyed sections of the watercourses, the habitats within and adjacent to the proposed works boundary may provide ex-situ supporting foraging, commuting and breeding habitat for this aquatic QI Species. No operational phase impacts are anticipated.</p> <p>Mitigation measures and conditions</p> <p>The focus of mitigation measures proposed are at preventing ingress of pollutants and silt into surface water and receiving watercourses. This is to be achieved via design (avoidance), and the application of specific mitigation measures. Detail is provided on sediment control, concrete and hydrocarbon control, dust control. An Emergency Response Plan is included in the CEMP. Measures include:</p> <ul style="list-style-type: none"> Excavated spoil being stockpiled a minimum of 50m from watercourses, silt fencing to be used around stockpiles, at the construction compound 				

- Any de-watering of excavations will use a pump equipped with a silt bag on outlet, with discharge area entailing silt fencing
- Earthworks and excavations will not be carried out during periods of heavy rainfall.
- Management of construction pollutants in terms of standard practice (storage, fuelling, management of machinery, concrete management, dust controls)
- Measures in the CEMP to be implemented
- Design of the proposed development

I am satisfied that the preventative measures which are aimed at interrupting the source-pathway-receptor are targeted at the key threats to protected aquatic species and by arresting these pathways or reducing possible effects to a non-significant level, adverse effects can be prevented. Mitigation measures related to water quality are captured in Planning conditions of the Inspectors Report.

(ii) Disturbance of mobile species

While no signs of Otters were recorded along the surveyed sections of the watercourses, the NIS outlines it is likely that Otters occur within the wider study area. Given habitats within and adjacent to the proposed works boundary may provide ex-situ supporting foraging, commuting and breeding habitat for this aquatic QI Species, there may be some temporary disturbance during the daytime during the construction period from increased human presence. In addition, the updated NIS outlines potential construction phase lighting may result in adverse disturbance effects on otters, and that the proposed additional permanent lighting for the operational phase has potential to result in adverse disturbance effects on otter populations that may be present within the nearby watercourses. However, the proposed development will not result in any temporary or permanent barriers to movement and no holts or resting areas (couches) were recorded during surveys.

Mitigation measures and conditions

Measures as set out in the CEMP will include:

- The proposed development shall comply with BS 5228 “Noise Control on Construction and open sites Part 1: Code of practice for basic information and procedures for noise control”.
- During works, exhaust and silencer systems on plant will be maintained in a satisfactory condition, with plant and equipment complying with European Communities (Construction Plant and Equipment) (Permissible Noise Levels) Regulations;
- Working hours will be 08:00 – 18:00 Monday to Friday, with any deviation only allowed in exceptional circumstances where written approval has been received from the planning authority

Mitigation measures as set out in the updated NIS include:

- Work will be completed during daylight hours. If lighting is required at construction stage it will be limited and will face downwards, with no lighting focussed onto trees, linear features, or any waterbodies or coastal areas
- Lighting mitigation at operational stage will include the following:
 - Lighting will be restricted to artificial surfaces and infrastructure areas. No lighting will be directed towards any linear habitats, trees, watercourses or wetlands. No lighting will be directed towards the SAC.
 - Light shields and cowls will be utilized along the proposed footpaths and amenity areas within the Harbour Park to prevent any unnecessary upward light spillage and to ensure light is directed on artificial surfaces only.
 - All lux levels on sensitive habitats will be below 2 lux.
 - Astro-turf pitches lighting will be downwards directed with a maximum 5% tilt to avoid horizontal light spill.
 - All lighting within proximity of the identified potentially suitable habitat for otter will be at a maximum tilt of 5%
- In addition, there will be no light directed towards any of the identified potentially suitable habitat for Otter, including SAC, the Owenglin River or the unmapped watercourse at the Northwest boundary of Clifden town. Lighting mitigation within these areas will involve the following:
 - There will be no light spillage towards coastal habitats or the culverted section of the Owenglin River which travels below the western side of Harbour Park.
 - Lighting along the proposed footpaths along the shoreline to the south of the Harbour Park will be directed away from the shoreline. The lux levels will drop to 0.1 prior to reaching the shoreline.
 - Lighting along the Beach Road will be directed away from Clifden Bay and towards the public road. Maximum Lux levels along the shoreline will be between 0.1-0.5 lux.
 - Lighting along the shoreline south of Clifden town will be directed towards the hard standing surfaces only. The light spill drops to a lux level of 0.1 before reaching the Owenglin River/Clifden Bay. Therefore there will be no light spill to these habitat areas.
 - Lighting along Bridge and Hulk Street, running parallel to the unmapped watercourse on the northwest side of Clifden Town will have a 0% tilt and be directed onto the roadway, away from the watercourse. The road is separated from the unmapped watercourse by a line of businesses and houses. The maximum lux levels behind the strip of houses/shops and away from the roadway will drop to between 0.5-2 lux. The section of the unmapped watercourse that flows beneath Main Street is culverted beneath in Clifden Town centre, and therefore there will be no light spill to this section of the river.

I am satisfied that the measures proposed are adequate and will be effective in ensuring that the attributes required to maintain the favourable conservation condition for Otter will not be adversely affected and that the proposed development will not prevent the attainment of the conservation objective to maintain favourable conservation condition. I also consider a pre-construction otter survey by a suitability qualified ecologist be carried out before works commence, and this can be addressed by way of condition. Mitigation measures are captured in planning conditions of the Inspectors Report.

(iii) Spread of invasive species

The spread of Giant rhubarb and Japanese knotweed may undermine conservation objectives for QI by way of impacts on the habitats of QI species, with the site adjacent to and within the SAC. Invasives may outcompete native species that would ordinarily form the riparian habitat, negatively effecting supporting habitat of QI species.

Mitigation measures and conditions

An invasive species plan with measures specific to Giant rhubarb and Japanese knotweed is included in an Invasive Species Management Plan (ISMP) submitted with the application. This plan is referenced in the NIS and included in the EclA. I have considered the ISMP in the AA, and I am satisfied that the measures proposed can be implemented, supervised effectively and will be effective in preventing the spread of invasive species. Mitigation measures are captured in Planning conditions of the Inspectors Report.

In-combination effects

Plans and projects that could act in combination with the proposed development are detailed. This includes for PA. Reg. Ref. 2460018 for a residential care home which was subject to Appropriate Assessment (Stage 2). I am satisfied that in-combination effects has been assessed adequately in the NIS. The applicant has demonstrated satisfactorily that no significant residual effects will remain post the application of mitigation measures and there is therefore no potential for in-combination effects.

Findings and conclusions

The applicant determined that following the implementation of mitigation measures the construction and operation of the proposed development alone, or in combination with other plans and projects, will not adversely affect the integrity of this European site.

Based on the information provided, I am satisfied that adverse effects arising from aspects of the proposed development can be excluded for the European site **Twelve Bens/Garraun Complex SAC (002031)** considered in the Appropriate Assessment. No direct impacts are predicted. Indirect impacts would be temporary in nature and mitigation measures are described to prevent ingress of silt laden surface water and other construction related pollutants. To ensure compliance and effective management of control measures all works and monitoring of same shall be carried out under the supervision of an ecologist, with regard also had to IFI guidelines (2016), which can be addressed by way of condition. A pre-construction otter survey can also be addressed by way of condition. I am satisfied that the mitigation measures proposed to prevent adverse effects have been assessed as effective and can be implemented.

Reasonable scientific doubt

I am satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

The proposed development will not affect the attainment of the Conservation objectives of the **Twelve Bens/Garraun Complex SAC (002031)**. Adverse effects on site integrity can be excluded and no reasonable scientific doubt remains as to the absence of such effects.

Slyne Head Peninsula SAC (002074)

Summary of Key issues that could give rise to adverse effects (from screening stage):

(i) Loss/degradation of habitat by way of water quality degradation (construction and operation)

(i) Water quality degradation (construction and operation)

See Table 5.6 NIS

Qualifying Interest features likely to be affected	Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures (summary)	
1150 Coastal lagoons	Restore favourable conservation condition Distribution - No decline, subject to natural processes	Water quality degradation and/ or alteration of habitat quality would undermine conservation objectives	Best practice pollution control measures Application of industry standard controls	
1160 Large shallow inlets and bays	Maintain favourable conservation condition Habitat area- The permanent habitat area is stable or increasing, subject to natural processes	Water quality degradation and/ or alteration of habitat quality would undermine conservation objectives	CEMP Environmental Monitoring	
1170 Reefs	Maintain favourable conservation condition Distribution - The distribution of reefs is stable or increasing, subject to natural processes	Water quality degradation and/ or alteration of habitat quality would undermine conservation objectives	As listed above	
1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae)	Restore favourable conservation condition	Water quality degradation and/ or alteration of habitat quality would undermine	As listed above	

	Habitat distribution - No decline or change in habitat distribution	conservation objectives		
1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>)	Restore favourable conservation condition Habitat distribution - No decline, subject to natural processes	Water quality degradation and/ or alteration of habitat quality would undermine conservation objectives	As listed above	
7230 Alkaline fens	Maintain favourable conservation condition Habitat distribution - No decline, subject to natural processes	Water quality degradation and/ or alteration of habitat quality would undermine conservation objectives	As listed above	
Other QI's				
1210 Annual vegetation of drift lines 1220 Perennial vegetation of stony banks 1395 Petalwort <i>Petalophyllum ralfsii</i> 2110 Embryonic shifting dunes 2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) 21A0 Machairs (* in Ireland)	Not at risk	Rationale for exclusion: Terrestrial nature of habitat, separation distance, and absence of viable pathway		

1833 Slender Naiad flexilis		Separation distance, absence of suitable ex-situ habitat, and absence of viable pathway	
3110 Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae)		Separation distance, and absence of viable pathway	
3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp.		Separation distance, and absence of viable pathway	
4030 European dry heaths			
3130 Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea			
5130 Juniperus communis formations on heaths or calcareous grasslands		Terrestrial nature of habitat, and absence of viable pathway	
6210 Semi-natural dry grasslands and scrubland facies			

<p>on calcareous substrates (Festuco-Brometalia) (* important orchid sites)</p> <p>6410 Molina meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)</p> <p>6510 Lowland hay meadows Alopecurus pratensis, Sanguisorba officinalis)</p>				
<p>Common Bottlenose Dolphin [1349]</p>	<p>NOTE: Details of S.I. No. 525 of 2021 is not set out.</p> <p>I note Conservation Objective for QI 1349 under other European Sites is to: Maintain favourable conservation condition.</p> <p>Attribute and target for QI 1349 under other European Sites is: Disturbance- Human activities should occur at levels that do not adversely affect the Bottlenose Dolphin population at the site</p>	<p>Water quality degradation and/ or alteration of habitat quality would undermine conservation objectives</p>	<p>Best practice pollution control measures</p> <p>Application of industry standard controls</p> <p>CEMP</p> <p>Environmental Monitoring</p>	
<p>The above table is based on the documentation and information provided on the file, and NPWS data. I note the updated NIS has not identified all species as outlined in S.I. No. 525 of 2021 and I have included these details and referenced relevant conservation objectives in the above table. I am satisfied that the submitted NIS and NPWS data enables for the identification of the relevant attributes and targets of the Qualifying Interests.</p>				

Assessment of issues that could give rise to adverse effects view of conservation objectives

(i) Loss/degradation of habitat by way of water quality degradation

Good quality water is necessary to restore and maintain the favourable conservation condition of QI habitats listed. The NIS outlines there is a hydrological connection between the proposed development site and the River Owenglin, Clifden Bay Estuary and the SAC, and it is therefore considered in the NIS there is a potential for receiving surface water bodies to be impacted as a result of water pollution such as siltation/contaminants during the construction phase of the proposed development, and this could potentially impact on protected habitats, leading to degradation of habitats. Having regard to the separation distance to the SAC (c.2.5km), I consider that the effects of dilution and dispersion would serve to reduce this potential indirect effect on the SAC QI habitats. No operational phase impacts are anticipated.

Mitigation measures and conditions

The focus of mitigation measures proposed are at preventing ingress of pollutants and silt into surface water and receiving watercourses. This is to be achieved via design (avoidance), the application of specific mitigation measures. Detail is provided on sediment control, concrete and hydrocarbon control, dust control. An Emergency Response Plan is referenced and included in the CEMP. Mitigation measures include:

- Excavated spoil being stockpiled a minimum of 50m from watercourses, silt fencing to be used around stockpiles, at the construction compound
- Any de-watering of excavations will use a pump equipped with a silt bag on outlet, with discharge area entailing silt fencing
- Earthworks and excavations will not be carried out during periods of heavy rainfall.
- Management of construction pollutants in terms of standard practice (storage, fuelling, management of machinery, concrete management, dust controls
- Measures in the CEMP to be implemented
- Design of the proposed development

(ii) Water quality degradation

Good quality water is necessary to maintain the favourable conservation condition of the QI species listed. The NIS outlines there is a hydrological connection between the proposed development site and the River Owenglin, Clifden Bay and the SAC, and it is therefore considered in the NIS there is a potential for receiving surface and groundwater bodies to be impacted as a result of water pollution such as siltation/contaminants during the construction phase of the proposed development, and this could potentially impact on protected species and their habitats. Having regard to the separation distance to the SAC

(c.2.5km), I consider that the effects of dilution and dispersion would serve to reduce this potential indirect effect on the SAC QI species. No operational phase impacts are anticipated.

Mitigation measures are outlined at (i) above.

I am satisfied that the preventative measures which are aimed at interrupting the source-pathway-receptor are targeted at the key threats to protected habitats and species and by arresting these pathways or reducing possible effects to a non-significant level, adverse effects can be prevented. Mitigation measures related to water quality are captured in planning conditions of the Inspectors Report.

In-combination effects

Plans and projects that could act in combination with the proposed development are detailed. This includes for PA. Reg. Ref. 2460018 for a residential care home which was subject to Appropriate Assessment (Stage 2). I am satisfied that in-combination effects has been assessed adequately in the NIS. The applicant has demonstrated satisfactorily that no significant residual effects will remain post the application of mitigation measures and there is therefore no potential for in-combination effects.

Findings and conclusions

The applicant determined that following the implementation of mitigation measures the construction and operation of the proposed development alone, or in combination with other plans and projects, will not adversely affect the integrity of this European site.

Based on the information provided and NPWS data, I am satisfied that adverse effects arising from aspects of the proposed development can be excluded for the European site **Slyne Head Peninsula SAC (002074)** considered in the Appropriate Assessment. No direct impacts are predicted. Indirect impacts would be temporary in nature and mitigation measures are described to prevent ingress of silt laden surface water and other construction related pollutants. To ensure compliance and effective management of control measures all works and monitoring of same shall be carried out under the supervision of an ecologist, with regard also had to IFI guidelines (2016), which can be addressed by way of condition. I am satisfied that the mitigation measures proposed to prevent adverse effects have been assessed as effective and can be implemented.

Reasonable scientific doubt

I am satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

The proposed development will not affect the attainment of the Conservation objectives of the **Slyne Head Peninsula SAC (002074)**. Adverse effects on site integrity can be excluded and no reasonable scientific doubt remains as to the absence of such effects.

West Connacht Coast SAC (002998)

Summary of Key issues that could give rise to adverse effects (from screening stage):

(i)Water quality degradation (construction and operation)

See Table 5.14 NIS

Qualifying Interest features likely to be affected	Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures (summary)
1349 Common Bottlenose Dolphin Tursiops truncatus	Maintain favourable conservation condition Disturbance-Human activities should occur at levels that do not adversely affect the Bottlenose Dolphin population at the site	Water quality degradation and/or alteration of habitat quality would undermine conservation objectives	NIS SECTION 6.2 Best practice pollution control measures Application of industry standard controls CEMP Environmental Monitoring
1351 Harbour Porpoise Phocoena phocoena	Maintain favourable conservation condition Human activities should occur at levels that do not adversely affect the Harbour Porpoise community at the site	Water quality degradation and/or alteration of habitat quality would undermine conservation objectives	

The above table is based on the documentation and information provided on the file, NPWS website. I am satisfied that the submitted NIS and NPWS data enables for the identification of the relevant attributes and targets of the Qualifying Interests.

Assessment of issues that could give rise to adverse effects view of conservation objectives

(i) Water quality degradation

Good quality water is necessary to maintain the favourable conservation condition of the QI species listed. The NIS outlines there is a hydrological connection between the proposed development site and the River Owenglin, Clifden Bay and the SAC, and it is therefore considered in the NIS there is a potential for receiving surface and groundwater bodies to be

impacted as a result of water pollution such as siltation/contaminants during the construction phase of the proposed development, and this could potentially impact on protected species and their habitats. Having regard to the separation distance to the SAC (c.4.7km) and the receiving waters, I consider that the effects of dilution and dispersion would serve to reduce this potential indirect impact. No operational phase impacts are anticipated.

Mitigation measures and conditions

The focus of mitigation measures proposed are at preventing ingress of pollutants and silt into surface water and receiving watercourses. This is to be achieved via design (avoidance), the application of specific mitigation measures. Detail is provided on sediment control, concrete and hydrocarbon control, dust control. An Emergency Response Plan is referenced and included in the CEMP. Mitigation measures include:

- Excavated spoil being stockpiled a minimum of 50m from watercourses, silt fencing to be used around stockpiles, at the construction compound
- Any de-watering of excavations will use a pump equipped with a silt bag on outlet, with discharge area entailing silt fencing
- Earthworks and excavations will not be carried out during periods of heavy rainfall.
- Management of construction pollutants in terms of standard practice (storage, fuelling, management of machinery, concrete management, dust controls
- Measures in the CEMP to be implemented
- Design of the proposed development

I am satisfied that the preventative measures which are aimed at interrupting the source-pathway-receptor are targeted at the key threats to protected aquatic species and by arresting these pathways or reducing possible effects to a non-significant level, adverse effects can be prevented. Mitigation measures related to water quality are captured in planning conditions of the Inspectors Report.

In-combination effects

Plans and projects that could act in combination with the proposed development are detailed. This includes for PA. Reg. Ref. 2460018 for a residential care home which was subject to Appropriate Assessment (Stage 2). I am satisfied that in-combination effects has been assessed adequately in the NIS. The applicant has demonstrated satisfactorily that no significant residual effects will remain post the application of mitigation measures and there is therefore no potential for in-combination effects.

Findings and conclusions

The applicant determined that following the implementation of mitigation measures the construction and operation of the proposed development alone, or in combination with other plans and projects, will not adversely affect the integrity of this European site.

Based on the information provided, I am satisfied that adverse effects arising from aspects of the proposed development can be excluded for the European site **West Connacht Coast SAC (002998)** considered in the appropriate Assessment. No direct impacts are predicted. Indirect impacts would be temporary in nature and mitigation measures are described to

prevent ingress of silt laden surface water and other construction related pollutants. To ensure compliance and effective management of control measures all works and monitoring of same shall be carried out under the supervision of an ecologist, with regard also had to IFI guidelines (2016), which can be addressed by way of condition. I am satisfied that the mitigation measures proposed to prevent adverse effects have been assessed as effective and can be implemented.

Reasonable scientific doubt

I am satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

The proposed development will not affect the attainment of the Conservation objectives of the **West Connacht Coast SAC (002998)**. Adverse effects on site integrity can be excluded and no reasonable scientific doubt remains as to the absence of such effects.

Slyne Head Islands SAC (000328)

Summary of Key issues that could give rise to adverse effects (from screening stage):

(i) Loss/degradation of habitat

(ii) Water quality degradation (construction and operation)

See Table 5.18 NIS

Qualifying Interest features likely to be affected	Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures (summary)
			NIS SECTION 6.2
1170 Reefs	Maintain favourable conservation condition Distribution- The distribution of reefs is stable or increasing, subject to natural processes	Water quality degradation and/ or alteration of habitat quality would undermine conservation objectives	Best practice pollution control measures Application of industry standard controls CEMP Environmental Monitoring
1349 Common Bottlenose Dolphin <i>Tursiops truncatus</i>	Maintain favourable conservation condition Disturbance-Human activities should occur at levels that do not adversely affect the Bottlenose	Water quality degradation and/ or alteration of habitat quality would undermine conservation objectives	

	Dolphin population at the site		
1364 Grey Seal Halichoerus grypus	Maintain favourable conservation condition Disturbance-Human activities should occur at levels that do not adversely affect the grey seal population at the site	Water quality degradation and/ or alteration of habitat quality would undermine conservation objectives	As above

The above table is based on the documentation and information provided on the file, NPWS data. I am satisfied that the submitted NIS and NPWS data enables for the identification of the relevant attributes and targets of the Qualifying Interests.

Assessment of issues that could give rise to adverse effects view of conservation objectives

(i) Loss/degradation of habitat

Good quality water is necessary to maintain the favourable conservation condition of the QI habitat listed. The NIS outlines there is a hydrological connection between the proposed development site and the River Owenglin, Clifden Bay and the SAC, and it is therefore considered in the NIS there is a potential for receiving surface water bodies to be impacted as a result of water pollution such as siltation/contaminants during the construction phase of the proposed development, and this could potentially impact on protected habitats.

Having regard to the separation distance to the SAC (c.7.9km) and the receiving waters, I consider that the effects of dilution and dispersion would serve to reduce this potential indirect impact. No operational phase impacts are anticipated.

Mitigation measures and conditions

The focus of mitigation measures proposed are at preventing ingress of pollutants and silt into surface water and receiving watercourses. This is to be achieved via design (avoidance), the application of specific mitigation measures. Detail is provided on sediment control, concrete and hydrocarbon control, dust control. An Emergency Response Plan is referenced and included in the CEMP. Mitigation measures include:

- Excavated spoil being stockpiled a minimum of 50m from watercourses, silt fencing to be used around stockpiles, at the construction compound
- Any de-watering of excavations will use a pump equipped with a silt bag on outlet, with discharge area entailing silt fencing
- Earthworks and excavations will not be carried out during periods of heavy rainfall.
- Management of construction pollutants in terms of standard practice (storage, fuelling, management of machinery, concrete management, dust controls)

- Measures in the CEMP to be implemented
- Design of the proposed development

(ii) Water quality degradation

Good quality water is necessary to maintain the favourable conservation condition of the QI species listed. The NIS outlines there is a hydrological connection between the proposed development site and the River Owenglin, Clifden Bay and the SAC, and it is therefore considered in the NIS there is a potential for receiving surface water bodies to be impacted as a result of water pollution such as siltation/contaminants during the construction phase of the proposed development, and this could potentially impact on protected species and their habitats. Having regard to the separation distance to the SAC (c.7.9km) and the receiving waters, I consider that the effects of dilution and dispersion would serve to reduce this potential indirect impact. No operational phase impacts are anticipated.

Mitigation measures are outlined at (i) above.

I am satisfied that the preventative measures which are aimed at interrupting the source-pathway-receptor are targeted at the key threats to protected habitats and aquatic species and by arresting these pathways or reducing possible effects to a non-significant level, adverse effects can be prevented. Mitigation measures related to water quality are captured in Planning conditions of the Inspectors Report.

In-combination effects

Plans and projects that could act in combination with the proposed development are detailed. This includes for PA. Reg. Ref. 2460018 for a residential care home which was subject to Appropriate Assessment (Stage 2). I am satisfied that in-combination effects has been assessed adequately in the NIS. The applicant has demonstrated satisfactorily that no significant residual effects will remain post the application of mitigation measures and there is therefore no potential for in-combination effects.

Findings and conclusions

The applicant determined that following the implementation of mitigation measures the construction and operation of the proposed development alone, or in combination with other plans and projects, will not adversely affect the integrity of this European site.

Based on the information provided, I am satisfied that adverse effects arising from aspects of the proposed development can be excluded for the European site Slyne Head Islands SAC (000328) considered in the Appropriate Assessment. No direct impacts are predicted. Indirect impacts would be temporary in nature and mitigation measures are described to prevent ingress of silt laden surface water and other construction related pollutants. To ensure compliance and effective management of control measures all works and monitoring of same shall be carried out under the supervision of an ecologist, with regard also had to IFI guidelines (2016), which can be addressed by way of condition. I am satisfied that the mitigation measures proposed to prevent adverse effects have been assessed as effective and can be implemented.

Reasonable scientific doubt

I am satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

The proposed development will not affect the attainment of the Conservation objectives of the **Slyne Head Islands SAC (000328)**. Adverse effects on site integrity can be excluded and no reasonable scientific doubt remains as to the absence of such effects.

Connemara Bog Complex SAC (002034)

Summary of Key issues that could give rise to adverse effects (from screening stage):

(iv) Water quality degradation (construction and operation)

(v) Disturbance of mobile species

Qualifying Interest features likely to be affected	Conservation Objectives Targets and attributes (summary)	Potential adverse effects	Mitigation measures (summary)	
1355 Otter Lutra lutra	Maintain favourable conservation condition Fish biomass available	Potential for ex-situ disturbance and displacement effects and a degradation of water quality may adversely affect foraging/ fish biomass	Best practice pollution control measures Application of industry standard controls CEMP Environmental Monitoring	
Other QI's				
1065 Marsh Fritillary Euphydryas aurinia 1106 Salmon Salmo salar 1150 Coastal lagoons	Not at risk	Rationale for exclusion: Separation distance, and absence of viable pathway		

1170 Reefs				
1833 Slender Naiad Najas flexilis				
3110 Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae)				
3130 Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto- Nanojuncetea				
3160 Natural dystrophic lakes and ponds				
3260 Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho- Batrachion vegetation				
4010 Northern Atlantic wet heaths with Erica tetralix				
4030 European dry heaths				

6410 Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)				
7130 Blanket bogs (* if active bog)				
7140 Transition mires and quaking bogs				
7150 Depressions on peat substrates of the Rhynchosporion				
7230 Alkaline fens				
91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles				
The above table is based on the documentation and information provided on the file, and the NPWS website. I am satisfied that the submitted NIS and NPWS data enables for the identification of the relevant attributes and targets of the Qualifying Interests.				
Assessment of issues that could give rise to adverse effects view of conservation objectives (i) Water quality degradation <p>Good quality water is necessary to maintain the populations of the QI species listed. The NIS outlines there is a hydrological connection between the proposed development site and the River Owenglin, Clifden Bay Estuary and the Twelve Bens/Garraun Complex SAC, and it is therefore considered in the NIS there is a potential for receiving surface and groundwater bodies to be impacted as a result of water pollution such as siltation/contaminants during the construction phase of the proposed development, and this could potentially impact on protected species (1355 Otter) and their habitats. While no signs of Otters were recorded along the surveyed sections of the watercourses, the habitats within and adjacent to the proposed works boundary may provide ex-situ supporting foraging, commuting and breeding habitat for this aquatic QI species. I note</p>				

this species (1355 Otter) are also a QI of the **Connemara Bog Complex SAC (002034)**, which is located in close proximity (over land 0.7km, hydrological connection c.4.0 km) to the proposed development site. I therefore consider the above listed potential effects also apply to the QI otter species of the **Connemara Bog Complex SAC (002034)**. No operational phase impacts are anticipated.

Mitigation measures and conditions

The focus of mitigation measures proposed are at preventing ingress of pollutants and silt into surface water and receiving watercourses. This is to be achieved via design (avoidance), the application of specific mitigation measures. Detail is provided on sediment control, concrete and hydrocarbon control, dust control. An Emergency Response Plan is referenced and included in the CEMP. Mitigation measures include:

- Excavated spoil being stockpiled a minimum of 50m from watercourses, silt fencing to be used around stockpiles, at construction compound
- Any de-watering of excavations will use a pump equipped with a silt bag on outlet, with discharge area entailing silt fencing
- Earthworks and excavations will not be carried out during periods of heavy rainfall.
- Management of construction pollutants in terms of standard practice (storage, fuelling, management of machinery, concrete management, dust controls
- Measures in the CEMP to be implemented
- Design of the proposed development

I am satisfied that the preventative measures which are aimed at interrupting the source-pathway-receptor are targeted at the key threats to protected aquatic species and by arresting these pathways or reducing possible effects to a non-significant level, adverse effects can be prevented. Mitigation measures related to water quality are captured in Planning conditions of the Inspectors Report.

(ii) Disturbance of mobile species

While no signs of Otters were recorded along the surveyed sections of the watercourses, the NIS outlines it is likely that Otters occur within the wider study area. I note this species are a QI species of the **Connemara Bog Complex SAC (002034)**, which is located in close proximity (over land 0.7km, hydrological connection c.4.0 km) to the proposed development site. Given the habitats within and adjacent to the proposed works boundary may provide ex-situ supporting foraging, commuting and breeding habitat for this aquatic QI Species, there may be some temporary disturbance during the daytime during the construction period from increased human presence. In addition, the updated NIS in its assessment of qualifying features of the Twelve Bens/Garraun Complex SAC potentially affected, outlines potential construction phase lighting may result in adverse disturbance effects on otters, and that the proposed additional permanent lighting for the operational phase has potential to result in adverse disturbance effects on otter

populations that may be present within the nearby watercourses. I consider these potential effects also apply to the QI otter species of the **Connemara Bog Complex SAC (002034)**. However, the proposed development will not result in any temporary or permanent barriers to movement and no holts or resting areas (couches) were recorded during surveys.

Mitigation measures and conditions

Measures as set out in the CEMP will include:

- The proposed development shall comply with BS 5228 “Noise Control on Construction and open sites Part 1: Code of practice for basic information and procedures for noise control”.
- During works, exhaust and silencer systems on plant will be maintained in a satisfactory condition, with plant and equipment complying with European Communities (Construction Plant and Equipment) (Permissible Noise Levels) Regulations;
- Working hours will be 08:00 – 18:00 Monday to Friday, with any deviation only allowed in exceptional circumstances where written approval has been received from the planning authority

Mitigation measures as set out in the updated NIS include:

- Work will be completed during daylight hours. If lighting is required at construction stage it will be limited and will face downwards, with no lighting focussed onto trees, linear features, or any waterbodies or coastal areas
- Lighting mitigation at operational stage will include the following:
 - Lighting will be restricted to artificial surfaces and infrastructure areas. No lighting will be directed towards any linear habitats, trees, watercourses or wetlands. No lighting will be directed towards the SAC.
 - Light shields and cowls will be utilized along the proposed footpaths and amenity areas within the Harbour Park to prevent any unnecessary upward light spillage and to ensure light is directed on artificial surfaces only.
 - All lux levels on sensitive habitats will be below 2 lux.
 - Astro-turf pitches lighting will be downwards directed with a maximum 5% tilt to avoid horizontal light spill.
 - All lighting within proximity of the identified potentially suitable habitat for otter will be at a maximum tilt of 5%
 - In addition, there will be no light directed towards any of the identified potentially suitable habitat for Otter, including SAC, the Owenglin River or the unmapped watercourse at the Northwest boundary of Clifden town. Lighting mitigation within these areas will

<p>involve the following:</p> <ul style="list-style-type: none"> - There will be no light spillage towards coastal habitats or the culverted section of the Owenglin River which travels below the western side of Harbour Park. - Lighting along the proposed footpaths along the shoreline to the south of the Harbour Park will be directed away from the shoreline. The lux levels will drop to 0.1 prior to reaching the shoreline. - Lighting along the Beach Road will be directed away from Clifden Bay and towards the public road. Maximum Lux levels along the shoreline will be between 0.1-0.5 lux. - Lighting along the shoreline south of Clifden town will be directed towards the hard standing surfaces only. The light spill drops to a lux level of 0.1 before reaching the Owenglin River/Clifden Bay. Therefore there will be no light spill to these habitat areas. - Lighting along Bridge and Hulk Street, running parallel to the unmapped watercourse on the northwest side of Clifden Town will have a 0% tilt and be directed onto the roadway, away from the watercourse. The road is separated from the unmapped watercourse by a line of businesses and houses. The maximum lux levels behind the strip of houses/shops and away from the roadway will drop to between 0.5-2 lux. The section of the unmapped watercourse that flows beneath Main Street is culverted beneath in Clifden Town centre, and therefore there will be no light spill to this section of the river. <p>NOTE: I note the mitigation measures set out in the CEMP and NIS applicable to the Twelve Bens/Garraun Complex SAC. I consider these measures can also apply to the Connemara Bog Complex SAC.</p> <p>I am satisfied that the measures proposed are adequate and will be effective in ensuring that the attributes required to maintain the favourable conservation condition for Otter will not be adversely affected and that the proposed development will not prevent the attainment of the conservation objective to maintain favourable conservation condition. I also consider a pre-construction otter survey by a suitability qualified ecologist be carried out before works commence, and this can be addressed by way of condition. Mitigation measures are captured in Planning conditions of the Inspectors Report.</p>	
<p>In-combination effects</p> <p>Plans and projects that could act in combination with the proposed development are detailed. This includes for PA. Reg. Ref. 2460018 for a residential care home which was subject to Appropriate Assessment (Stage 2). I am satisfied that in-combination effects has been assessed adequately in the NIS. The applicant has demonstrated satisfactorily that no significant residual effects will remain post the application of mitigation measures and there is therefore no potential for in-combination effects.</p>	
<p>Findings and conclusions</p> <p>Based on the information provided and NPWS data, I am satisfied that adverse effects arising from the proposed development can be excluded for the European site Connemara Bog Complex SAC (002034). 1355 Otter Lutra lutra is a QI of the Twelve Bens/Garraun Complex SAC and Connemara Bog Complex SAC (002034), and the mitigation measures set out in the NIS for the Twelve Bens/Garraun Complex SAC would also apply to the Connemara Bog Complex SAC for Otter.</p>	

No direct impacts are predicted. Indirect impacts would be temporary in nature and mitigation measures are described to prevent ingress of silt laden surface water and other construction related pollutants. To ensure compliance and effective management of control measures all works and monitoring of same shall be carried out under the supervision of an ecologist, with regard also had to IFI guidelines (2016), which can be addressed by way of condition. A pre-construction otter survey can also be addressed by way of condition. I am satisfied that the mitigation measures proposed to prevent adverse effects have been assessed as effective and can be implemented.

Reasonable scientific doubt

I am satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

The proposed development will not affect the attainment of the Conservation objectives of the Connemara Bog Complex SAC (002034). Adverse effects on site integrity can be excluded and no reasonable scientific doubt remains as to the absence of such effects.

Appropriate Assessment Conclusion: Integrity Test

In screening the need for Appropriate Assessment, it was determined that the proposed development could result in significant effects on the Twelve Bens/Garraun Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), Slyne Head Islands SAC (000328), and the Connemara Bog Complex SAC (002034) in view of the conservation objectives of those sites and that Appropriate Assessment under the provisions of 177AE was required.

Following an examination, analysis and evaluation of the NIS, and all associated material submitted including further information and an updated NIS, I consider that adverse effects on site integrity of the Twelve Bens/Garraun Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), Slyne Head Islands SAC (000328), and the Connemara Bog Complex SAC (002034) can be excluded in view of the conservation objectives of these sites and that no reasonable scientific doubt remains as to the absence of such effects.

My conclusion is based on the following:

- Detailed assessment of construction and operational impacts.
- Effectiveness of mitigation measures proposed including supervision and monitoring and integration into CEMP ensuring transition of obligations to eventual contractor.
- Application of planning conditions to ensure application of these measures.
- The proposed development will not affect the attainment of conservation objectives for the Twelve Bens/Garraun Complex SAC (002031), Slyne Head Peninsula SAC (002074), West Connacht Coast SAC (002998), Slyne Head Islands SAC (000328), and the Connemara Bog Complex SAC (002034)

Appendix 5 – WFD Assessment

WFD IMPACT ASSESSMENT STAGE 1: SCREENING			
Step 1: Nature of the Project, the Site and Locality			
Ref. no.	321144	Townland, address	Townlands of Clifden, County Galway
Description of project	<p>Proposed development of a public realm scheme summarised as follows: Alterations works to the Clifden Town Centre area including reconfiguration and resurfacing of roads and realignment of parking spaces, widening and realignment of existing footpath areas; Alterations to and resurfacing of Beach Road Quay public realm comprising the provision of pedestrian and seating areas, paving, landscaping, remedial works to the quay wall, replacement of railings, lighting along the roadside; Redevelopment of the Harbour Park area to include demolition of the existing playground, construction of a new park including multi-age playground areas, including the provision of cycle parking, play furniture, seating areas, amphitheatre performance spaces, climbing wall, pump and running track, car park, sports pitch, resurfacing, paving and hard & soft landscaping.</p>		
Brief site description, relevant to WFD Screening	<p>The town centre site traverses a culverted tributary of the Owenglin River, with the southern area of this site also lying adjacent the Owenglin River. The Owenglin River is also located within and adjacent to the Beach Road and Harbour Park areas of the proposed development site, with a tributary of the Owenglin River flowing through the western margin of Harbour Park, running culverted through the park to Clifden Bay. The site is located within the Clifden Marbles and Clifden Castlebar groundwater bodies. In relation to flooding, the proposed site is located within flood risk zones.</p>		
Proposed surface water details	<p>Surface water drainage is proposed within the 3 development areas, with a gully connection pipe and new gullies proposed throughout Harbour Park, with filter drains, silt trap and precast manholes, and a surface water pipe also proposed. A surface water pipe and gullies are also proposed at Beach Road. A gully connection pipe and new gullies are proposed in Clifden Town, and the proposed new surface water network will connect to the existing surface water system.</p>		
Proposed water supply source & available capacity	n/a		
Proposed wastewater treatment system & available capacity, other issues	n/a		

Others?			n/a			
Step 2: Identification of relevant water bodies and Step 3: S-P-R connection						
Identified water body	Distance to (m)	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater)
Owenglin_030	Onsite	IE_WE_320030300	Good	Not at risk		Works proposed within river system, surface water runoff, drainage
Clifden Bay	Onsite	IE_WE_270_0100	Good	Not at risk		Works proposed within transitional waterbody, surface water runoff, drainage
Western Atlantic Seaboard	5.3km	IE_WE_250_0000	High	Not at risk		Works proposed within a transitional waterbody, Surface water runoff, drainage
Clifden Marbles Ground Waterbody	Underlying site	IE_WE_G_0013	Good	Not At Risk		GSI areas mapped outlines subsoil permeability is low
Clifden Casltebar Ground Waterbody	Underlying site	IE_WE_G_0017	Good	Not At Risk		GSI areas mapped outlines subsoil permeability is low
Step 4: Detailed description of any component of the development or activity that may cause a risk of not achieving the WFD Objectives having regard to the S-P-R linkage.						
CONSTRUCTION PHASE						

No.	Component	Water body receptor (EPA Code)	Pathway (existing and new)	Potential for impact/ what is the possible impact	Screening Stage Mitigation Measure*	Residual Risk (yes/no) Detail	Determination** to proceed to Stage 2. Is there a risk to the water environment? (if 'screened' in or 'uncertain' proceed to Stage 2.
1.	Works proposed within river system, surface water runoff, drainage	IE_WE_32 O030300	Existing and new pathway	Impact on water quality by way of sediment loading, hydrocarbon pollution	<p>Mitigation measures will include:</p> <p>Implementation of CEMP; Excavated spoil being stockpiled a minimum of 50m from watercourses; silt fencing to be used around stockpiles, at the construction compound; Any de-watering of excavations will use a pump equipped with a silt bag on outlet, with discharge area entailing silt fencing; Earthworks and excavations will not be carried out during periods of heavy rainfall; Management of construction pollutants in terms of standard practice (storage, fuelling, management of machinery, concrete management; dust control</p>	No	Screened out
2.	Works proposed within, transitional	IE_WE_27 O_0100	Existing and new pathway	As above	As above	As above	Screened out

	waterbody, surface water runoff, drainage						
3.	Works proposed within a transitional waterbody, Surface water runoff, drainage	IE_WE_250_0000	As above	As above	As above	As above	As above
4.	As above	IE_WE_G_0013, IE_WE_G_0017	As above	As above	As above	As above	As above
OPERATIONAL PHASE							
5	Drainage System	IE_WE_320030300, IE_WE_270_0100, IE_WE_250_0000, IE_WE_G_0013, IE_WE_G_0017	New surface water pathway		Drainage design	No	Design of proposal does not present risk to the water environment-screened out