An Bord Pleanála

Inspector's Report ABP-321474-24.

Development	Inis Cealtra Visitor Experience - Proposed upgrade and enhanced visitor facilities at Inis Cealtra (Holy Island) and Mountshannon Village, Co Clare.
Location	Inis Cealtra (Holy Island), Lough Derg and Mountshannon Village, Co Clare.
Local Authority	Clare County Council
Type of Application	Application for approval made under Section 175 (3) and Section 177AE of the Planning and Development Act, 2000 (local authority development requiring environmental impact assessment and appropriate assessment)
Prescribed Bodies	1. An Taisce. 2. Department of Housing Local Government and Heritage (DHLGH)

3. Department of Transport
4. TII

Observer(s)

1. Annie Dinner
2. Ciara and Colm Madden
3. Colm Porter and Michelle Hogan
4. Fiona Levie
5. Hugo Zyderlaan and Ageeth Hup
6. Joe Griffin
7. John Cleary
8. John O Rourke
9. Knockaphort Mermaids
10. Marina Muller
11. Mel White
12. Michael and Patricia O Rourke
13. Molly Lynch O Mara
14. Mountshannon Angling Club and Others
15. Mountshannon Community Council
16. Nicki Griffin
17. Noel and Josephine Lyons
18. Nuala Dooley and Others
19. Patricia Donnellan
20. Paul Bugler
21. Paul Patrick Murphy
22. Peggy Boyle and Pearse O'Sheil
23. Roisin Bugler
24. Shulagh Colleran

25. The Committee of Mountshannon Arts
26. Veronica McKenna

Date of Site Inspection	09.04.2025
Inspector	Fiona Fair.

Contents

1. Introduction

Clare County Council is seeking approval from An Bord Pleanála to undertake a proposed upgrade and enhanced visitor facilities at Inis Cealtra (Holy Island) and Mountshannon Village, Co Clare.

The application is being made by Clare County Council pursuant to Section 175 (3) and Section 177AE of the Planning and Development Act, 2000 (as amended). Accordingly, an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development.

Before making a decision on the proposed development, the Board shall consider the EIAR, any submissions or observations and any other information relating to (i) the likely effects on the environment of the proposed development, and (ii) the likely consequences for proper planning and sustainable development in the area in which it is proposed to situate the proposed development. The Board shall also consider the NIS and the likely effects on a European site/s in respect of Appropriate Assessment.

2. Site and Location

The proposed development provides for an upgrade and enhanced visitor facilities on lands measuring approximately 20.3 hectares located at Inis Cealtra (Holy Island) in Lough Derg, and at two locations in Mountshannon Village, in the Townland of Mountshannon. The two sites in Mountshannon Village include:

- Lands within the curtilage of the 'Old Rectory' (a Protected Structure, RPS No. 464) and extending south to encompass a section of Harbour Road (L-4034) and Mountshannon Harbour car park, and
- Lands to the north of Aistear Park on the north side of Main Street (R352).

3. Proposed Development

The proposed upgrade and enhanced visitor facilities development will consist of:

Inis Cealtra Island

(a) Demolition of an existing concrete shelter (16sq.m) at Inis Cealtra adjacent to the existing pier at the north-west of the island;

(b) Installation of a new L-shaped floating access jetty and walkway at the north-west of Inis Cealtra Island at the location of the existing pier, consisting of a floating breakwater jetty, a stone and concrete causeway connected by a steel access ramp and a canoe launch jetty with access ramp;

(c) A series of new mown grass pedestrian paths on Inis Cealtra facilitating enhanced access to the island's main monuments and natural landscape;

(d) Provision of three staff and public welfare facility 'pods' including a weather shelter (20sq.m), WCs (15sq.m) and a staff rest room (25sq.m), principally made up of prefabricated timber components;

(e) Removal of foul waste from a holding container forming part of a proposed dry toilet system on Inis Cealtra Island, and its transportation by tanker to an off-site licenced wastewater treatment facility;

Mainland – Mountshannon

(f) Construction of a public car park on the north side of Main Street, incorporating 169 total car parking spaces including 105 standard car parking spaces, 11 accessible car parking spaces and 53 overflow car parking spaces on reinforced grass in the northern part of the site, together with 6 coach parking spaces and 40 secure bicycle parking spaces;

(g) To facilitate the new car park in Main Street, it is proposed to remove two sections of an existing mound/wall (approx. 155m combined length) extending south to north through the site, together with the access gate and a 7.8m section of the existing masonry wall at the site's frontage to Main Street on the southern boundary;

(h) Construction of a new part one-storey, part two-storey Visitor Centre with a gross floor area of 1,594sq.m to the south of the existing 'Old Rectory' building (RPS No. 464), incorporating a series of interpretation, exhibition, and education spaces, together with a café and ancillary supporting spaces;

(i) Removal of two sections of the existing stone wall (approx. length 45m combined total) at the south and south-west boundary of the 'Old Rectory' site at its frontage to Harbour Road, to enhance access from Harbour Road and provide a visual connection between the new Visitor Centre and Lough Derg;

(j) Reconfiguration of the existing Mountshannon Harbour car park, providing for 49 total car parking spaces, including 46 standard spaces and 3 accessible spaces, together with public realm enhancements;

(k) All ancillary infrastructure and site development works above and below ground level including undergrounding of an existing ESB overhead line at the site of the new car park in Mountshannon Village, public lighting, drainage, connections to public services, site access, traffic calming, hard and soft landscaping, public realm works and boundary treatments.

Accompanying documents

This application for approval is accompanied by the following documents:

- **EIAR**
- **NIS**
- **Architectural Design Statement.**
- **Accessibility Audit**
- **Arboriculture**
- **Photomontages**
- **Visitors Management Plan**
- **Flood Risk Assessment**

4. Planning History

There is no planning history attached to the proposed greenfield village car park site or Inish Cealtra. The Part 8 approval for the Old Rectory granted in 2023 is substantially complete.

The Old Rectory Mountshannon, Co. Clare, V94 P66V

Reg. Ref. 21253, Permission Granted 23rd Jun 2021. Permission was granted to retain all demolition and alterations to existing out-buildings and the as constructed works, incorporating garages and storage sheds.

Reg. Ref. 218000, Granted 10th May 2021. Alterations, modifications and partial change of use of the existing Old Rectory (a Protected Structure, RPS No. 464) on a site measuring 1.17ha, consisting of:

i. Construction of a 57sq.m single-storey ground floor extension to the north-west of the building (double height space) with a maximum height of 6.4m (and lift height 7.8m) above ground level to facilitate Education/ Enterprise space of 30sq.m and new internal stair access;

ii. At ground floor level change of use from existing residential to;

• Education / Enterprise Facilities (2 no. rooms with a cumulative GFA of 79sq.m)

• Reception Area (26 sq.m)

• Welfare Facilities (5sq.m)

• Store Room (2sq.m)

• Plant (3sq.m)

iii. At first floor level, partial change of use from existing residential to incorporate;

• Community Facility / Co-working Space (16sq.m)

• Welfare Facilities (7sq.m)

iv. A 1-bedroom apartment (87sq.m) at first floor level with associated private amenity space (garden area) of 50sq.m at ground level to the

north-west of the Protected Structure;

v. A new lift within the footprint of the existing building to provide for universal access to the Community Facility/Co-working Space and apartment;

vi. At ground floor level, a new opening in the northern and western wall of the existing building to provide access to the proposed extension, new and enlarged openings to internal walls between the existing kitchen and utility room and between the existing hallway and lounge;

vii. At first floor level, new openings and removal of internal partitions, together with an opening in the roof to provide access to the lift and a new opening in northern wall at first floor level to provide access to new apartment.

viii. Cleaning and repointing works to the existing brickwork, repair and replacement of any damaged roof slates with natural slate, replacement of PVC windows with double glazed timber sash windows and the removal of modern internal additions (flooring and cornices) to reveal the existing historic fabric;

ix. Resurfacing of the existing vehicular access and construction of a new vehicle passing bay;

x. Construction of a 1.8m wide pedestrian footpath to the west of the existing vehicular access.

xi. Demolition of new build section of existing splayed entrance to provide for dedicated pedestrian and vehicular access points and reinstatement of splayed entrance.

xii. Regrading existing levels to the front (south side) of the building to achieve universal access consistent with Part M of the Building Regulations;

xiii. Provision of 7 no. total car parking spaces and inclusion of a set down area to the east of the building, to provide for 1 no. dedicated residential space and 6 no. dedicated spaces for non-residential uses;

xiv. Provision of 2 no. secure resident bicycle parking spaces to the rear (north-west) of the building and 10 no. secure bicycle parking spaces for visitors at the front (south-east) of the building; and

xv. All ancillary site works including public lighting, landscaping, drainage, connections to public services and undergrounding of existing ESB overhead line.

Reg. Ref. 238001, Permission Granted 10th July 2023. Alterations, modifications and change of use of the existing Old Rectory, Mountshannon (a Protected Structure, RPS No. 464) from Residential to Tourism Interpretive Centre and Café uses, on a site measuring 1.35ha.

Note: This development is at an advanced stage of construction, with anticipated completion in Q1 2025.

5. Legislative and Policy Context

5.1 Relevant legislative provisions

EU EIA Directive (2014/52/EU)

The Environmental Impact Assessment Directive (EIA Directive) means Directive 2014/52/EU of the European Parliament and of the Council of 16th April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment.

European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018

These Regulations transpose the requirements of the 2014 Directive into Irish legislation setting out the requirements for planning consent procedures.

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).

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.

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:

- Lough Derg (Shannon) SPA (004058)
    - Inis Cealtra is located entirely within the SPA.
    - Southern corner of Visitor Centre site is located 0.03 km northwest of SPA.
    - New Mountshannon Village public car park is located 0.15 km northeast of SPA.
- Slieve Aughty Mountains SPA (004168)
    - New Mountshannon Village public car park located 0.3 km southwest of SPA.
    - Inis Cealtra is 1.7 km south of SPA.
- Lough Derg, North-east Shore SAC (002241)
    - Visitor Centre site is 10.2 km southwest of SAC
    - Inis Cealtra is 12.4 km southwest of SAC

- Lower River Shannon SAC (002165)
    - Inis Cealtra is located 11.7 km north of SAC.
    - Mountshannon Harbour is located 13.3 km north of SAC.
- River Shannon and River Fergus Estuaries SPA (004077)
    - Inis Cealtra is located 30.5 km northeast of SPA.
    - Mountshannon Harbour is located 32.8 km northeast of SPA.

Planning and Development Acts 2000 (as amended)

Part X of the Act sets out the requirements for the environmental impact assessment of developments which necessitate the preparation of an EIAR.

- Section 175 (1) sets out the requirements for the environmental impact assessment of developments carried out by or on behalf of local authorities.
- Section 175 (1) requires a local authority to prepare, or cause to be prepared, an Environmental Impact Assessment Report in respect of the proposed development.
- Section 175 (2) states that a proposed development in respect of which an EIAR is required shall not be carried out unless the Board has approved it with or without modifications.
- Section 175 (3) states that where an EIAR has been prepared pursuant to subsection (1), the local authority shall apply to the Board for approval of the proposed development.
- Section 175 (6) states that before making a decision in respect of a proposed development, the Board shall consider the EIAR and any other information furnished and relating to the likely effects on the environment; the likely consequences for proper planning and sustainable development in the area; the views of any other Member State of the European Communities or a state which is a party to the Transboundary Convention to which a copy of the EIAR was sent; the report and any recommendations of the person conducting an oral hearing.
- Under Section 175(9)(a), the Board shall make its decision on the application within a reasonable period of time and may, in respect of such application:

- approve the proposed development,
- make such modifications to the proposed development as it specifies in the approval and approve the proposed development as so modified,
- approve, in part only, the proposed development (with or without specified modifications of it of the foregoing kind), or
- refuse to approve the proposed development,
- and may attach to an approval under subparagraph (i), (ii) or (iii) such conditions as it considers appropriate.

Section 175 (12) states that the Board shall have regard to the provisions of any special amenity order relating to the area; the area or part of the area is a European site or an area prescribed for the purposes of section 10(2)(c), that fact; where relevant, the policies of the Government, the Minister or any other Minister of the Government, and the provisions of this Act and regulations under this Act where relevant.

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:

- National Planning Framework – Project Ireland 2040
- The Regional Spatial and Economic Strategy (RSES) for the Southern Region
- Climate Action Plan 2015, as amended
- National Biodiversity Action Plan 2023–2030
- The Water Framework Directive (WFD) Directive 2000/60/EC
- The Clare County Development Plan (CCDP) 2023-2029

National Planning Framework Project Ireland 2040

The National Policy Position establishes the fundamental national objective of achieving transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050.

Managing the challenges of future growth is critical to regional development. A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs and addressing the legacy of rapid growth, must be prioritised.

Key future planning and development and place-making policy priorities for the Eastern and Midland Region include:

- Tourism development and promotional branding to ensure that areas like the Midlands and Lakelands areas are developed and promoted in such a way as to play their full part in tapping the economic potential of regional and rural areas in the region.

The NPF sets the context for the Regional Spatial Economic Strategies (RSES) through 10 National Strategic Outcomes (NSO's) and the following are of relevance to this subject proposal;

- **Strengthened Rural Economies and Communities (NSO 3)** are a strong part of the identity of the Southern Region. Rural areas play a key role in the Region's economy, environment and quality of life, which is reflected by the objectives of the Action Plan for Rural Development.
- **Enhanced Amenities and Heritage (NSO 7)** enriches and nurtures our community life. By acting as custodians of our wealth of culture, heritage and the arts, we are safeguarding it for future generations. Increased emphasis on attractive place-making will require ease of access to amenities and services supported by integrated transport systems and green modes of movement such as pedestrian and cycling facilities.

National Policy Objective 22 states:

'Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level'.

The NPF highlights the importance of protecting Ireland's built heritage assets as a non-renewable resource in a manner appropriate to their significance as an aid to understanding the past, contributing to community well-being and quality of life as well as regional economic development.

The NPF highlights under a section titled 'Ireland's Rural Fabric' that promoting new economic opportunities arising from inter alia tourism is a priority.

Note: The Revised NPF was approved in April 2025. The updated Revised National Planning Framework highlights that rural areas in Ireland play a key role in both work and recreation, particularly through the agri-food and tourism sectors, which employ over 430,000 people (18% of the national workforce). However, it is acknowledged that rural Ireland has faced challenges such as the decline of traditional industries, emigration, and poor connectivity.

The policy update focuses on:

- Strengthening rural communities and supporting their future growth.
- Addressing rural decline and revitalising smaller towns and villages.
- Encouraging job creation in the rural economy while tackling connectivity gaps.

The update highlights that since the NPF's launch in 2018, complementary policies like Our Rural Future 2021-2025 have been introduced.

- Our Rural Future aims to create a thriving rural Ireland by supporting vibrant communities, developing rural towns and villages, and promoting sustainable environmental practices. It recognises that outdoor activity tourism is a key growth sector worldwide and states Ireland is well-placed to capitalise on this trend. It highlights that the development and promotion of this sector provides opportunities for employment growth in rural areas in particular, through local businesses and entrepreneurs using the tourism assets in their area in a sustainable way to support recreational activities such as walking and canoeing.

As regards heritage, Our Rural Future identifies that Ireland's rich heritage is a significant asset for the country's tourism industry, particularly in rural areas. Heritage plays a central role in sustaining and regenerating rural communities, with Ireland's relatively unspoilt environment offering some of the most spectacular landscapes and biodiversity in the world. The new Heritage Ireland 2030 plan will

highlight the importance of heritage to Ireland's communities, economy, and society, setting out strategic priorities for the heritage sector over the next decade.

The Regional Spatial and Economic Strategy (RSES) for the Southern Region

The RSES for the Southern Region emphasises the need to further promote and develop tourism attractions while enhancing the capacity to harness the untapped potential of tourism and local enterprises. This strategy is recognised as crucial for the region's sustainable growth. The Strategy outlines a plan to create a robust, resilient, and sustainable region, with the protection and enhancement of culture and heritage identified as a key objective. Section 7.3.3 sets out the importance of safeguarding built heritage. The key Regional Policy Objectives (RPOs) that are relevant to the proposed development include:

- RPO 26 strongly supports strengthening the viability of villages, securing investment, and the sustainable delivery of holistic infrastructure in villages.
- RPO 50: Supports developing a diverse range of economic specialisms in rural areas, including tourism, to take advantage of opportunities presented by the Wild Atlantic Way and other regional brands.
- RPO 53: Aims to (a) improve tourism and leisure amenities to meet the needs of an increasing population, (b) promote activity-based tourism, and (c) develop sustainable facilities and connectivity networks to enhance visitor access and encourage longer stays.
- RPO 54: Emphasises that developing new tourism facilities must include relevant environmental assessments and reporting.
- RPO 203: This objective encourages the revitalisation of historic areas in cities, towns, and villages through the efforts of local authorities, the Heritage Council, communities, heritage property owners, and other stakeholders. Local authorities are tasked with ensuring that increased tourism does not negatively affect local services (e.g., water, wastewater) or facilities like parking. Heritage-led initiatives should consider the historical setting and potential visitor impact, ensuring that

environmental assessments, including impacts on protected species and other environmental receptors, inform decision-making for heritage-related projects.

- RPO 204: Better Public Access: aims to enhance public access for both abled and disabled visitors to historic, built, and natural environments. Local authorities are encouraged to ensure that decisions on projects or developments to improve access and facilities are based on a suitable level of environmental assessment.
- RPO 207: Archaeological Investigation emphasises that for developments potentially impacting archaeological sites or zones, local authorities must ensure decisions are informed by appropriate archaeological investigations conducted by qualified professionals.

Climate and Low Carbon Development Act: the Climate and Low Carbon Development Act 2015 as amended (the Climate Act).

I note that the EIAR refers to CAP2024 and that this has now been updated with CAP2025. The Climate Action Plan 2025 (CAP25) is the third annual statutory update to Ireland's Climate Action Plan 2015 under the Climate Action and Low Carbon Development (Amendment) Act 2021. CAP25 builds on previous Climate Action Plans by refining and updating the measures required to deliver carbon budgets and sectorial emission ceilings. It provides a roadmap for taking action to reduce greenhouse gas emissions by 51% by 2030 and achieve climate neutrality by no later than 2050. The CAP has six vital high impact sectors where the biggest savings can be made: renewable energy, energy efficiency of buildings, transport, sustainable farming, sustainable business and change of land-use.

Section 15(1) of the 2015 Act (as substituted by section 17 of the Climate Action and Low Carbon Development (Amendment) Act 2021 (the "2021 Act")) provides that:

"A relevant body shall, in so far as practicable, perform its functions in a manner consistent with—

(a) the most recent approved climate action plan,

(b) the most recent approved national long term climate action strategy,

(c) the most recent approved national adaptation framework and approved sectoral adaptation plans,

(d) the furtherance of the national climate objective, and

(e) the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.''

National Biodiversity Action Plan (NBAP) 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 Commission, 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 Commission. 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.

The Water Framework Directive (WFD) Directive 2000/60/EC

The Water Framework Directive (WFD) Directive 2000/60/EC focuses on ensuring good qualitative and quantitative health, i.e. on reducing and removing pollution and on ensuring that there is enough water to support wildlife at the same time as human needs.

Ireland is required to comply with four main obligations under the environmental objectives of Article 4 of WFD, namely to:

- Prevent deterioration of the status of all bodies of surface water and groundwater.
- Protect, enhance and restore all bodies of surface water and groundwater with the aim of achieving at least good status by the end of 2027 at the latest.

- Protect and enhance all artificial and heavily modified bodies of water, with the aim of achieving at least good ecological potential and good surface water chemical status.
- Achieve compliance with the standards and requirements for designated protected areas.

The Clare County Development Plan (CCDP) 2023-2029

The following sections of the CCDP are of relevance to the subject proposal:

Chapter 8 Rural Development and Natural Resources

Chapter 9 Tourism

Chapter 14 Landscape

Chapter 15 Biodiversity, Natural Heritage and Green Infrastructure

Chapter 16 Architectural and Cultural Heritage

Chapter 19 Land Use and Zoning

Volume 3C Killaloe Municipal District- Clare County Development Plan 2023 - 2029 (Interim Version, April 2023) of the CCDP establishes specific

objectives for Mountshannon settlement.

Mountshannon Objectives

General Objectives pg. 58

Tourism Objectives pg. 59

The tourism objectives, for Mountshannon, are:

• To work with relevant stakeholders to support the implementation of the Visitor Management and Sustainable Tourism Development Plan for Inis Cealtra (Holy Island),including the development of a visitor centre in the village (and associated facilities);

• To support and promote the trail head on the Lough Derg Blueway and the provision of associated infrastructure and facilities at Mountshannon;

• To consolidate the existing village, support the tourism industry in the area and encourage the development and enhancement of a range of amenities and services for both permanent residents in the village and surrounding hinterland as well as visitors to the area.

UT1

UT1 is land zoned as utilities and would facilitate the provision of a car park/bus park to serve the Inis Cealtra Visitor Experience. Access should be provided for in a location which minimises the flow of traffic through/along the Main Street of the village. Any such development and areas of car parking must ensure pedestrian permeability and connectivity with the village core and the Inis Cealtra Visitor Centre.

Transport, Active Travel and Connectivity Objectives pg. 60
HAR1 Mountshannon Harbour Area pg. 61

Architectural Conservation Area (ACA) pg. 61

The centre of the village has been designated as an Architectural Conservation Area (ACA). ACAs are places, areas, groups of structures or a townscape which are of special interest or contribute to the appreciation of a protected structure. The aim is to retain the overall special historic or architectural character of an area or place.

Flooding and Flood Risk pg. 61

The Clare County Development Plan (CCDP) 2023-2029 designates Inis Cealtra for tourism development, identifying the island as a major opportunity to grow the tourism industry and encourage visitors to East Clare. The plan promotes Inis Cealtra as a tourism destination and supports the sustainable expansion of tourist facilities on the island, as set out in policy objective CDP9.27:

It is an objective of Clare County Council:

a) To identify the tourism function of the county's islands and address the functional, planning and environmental impacts of additional visitors in order to facilitate increased access to the islands in a sensitive and appropriate manner;

e) To promote the sustainable tourism development and management of Inis Cealtra (Holy Island) as part of the overall Visitor Management and Sustainable Tourism Development Plan.

In addition, the settlement plan for Mountshannon in Volume 3c of the CCDP 2023-2029 contains objectives which promote tourism development on Inis Cealtra as follows:

'To encourage a sustainable tourism industry based on the amenities of Lough Derg and Inis Cealtra (Holy Island) and the White Tailed Eagle (General Objective)…'

CDP9.23 'To work with relevant stakeholders to support the implementation of the Visitor Management and Sustainable Tourism Development Plan for Inis Cealtra (Holy Island), including the development of a visitor centre in the village' (and associated facilities) (Tourism Objective)

Inis Cealtra is located outside the settlement boundary and is not zoned in the CCDP 2023-2029.

Two land use zoning designations apply to the proposed Village Car Park site. The southern portion of the site is zoned Mixed Use. This zoning designation is described in the CCDP 2023-2029 as follows:

'The use of land for 'mixed use' developments shall include the use of land for a range of uses, making provision, where appropriate, for primary and secondary uses e.g. commercial/retail development as the primary use with residential development as a secondary use. Secondary uses will be considered by the local authority having regard to the particular character of the given area.

'On lands that have been zoned 'mixed-use' in or near town or village centres, a diverse range of day and evening uses is encouraged and an over-concentration of any one use will not normally be permitted'.

The northern part of the lands is zoned Utilities (UT1) in the CCDP 2023-2029,

with the following zoning objective:

'UT1 is land zoned as utilities and would facilitate the provision of a car park/bus park to serve the Inis Cealtra Visitor Experience. Access should be provided for in a location which minimises the flow of traffic through/along the Main Street of the village. Any such development and areas of car parking must ensure pedestrian

permeability and connectivity with the village core and the Inis Cealtra Visitor Centre'.

The zoning matrix in the development plan confirms that a car park is acceptable in principle on lands zoned Mixed Use, and the UT1 zoning designation aims to facilitate a car park to serve the Inis Cealtra Visitor Experience.

The new Visitor Centre is proposed to be situated within the 'Old Rectory' site which is zoned for Tourism in accordance with the CCDP 2023-2029. The Tourism zoning objective is stated as:

'Land zoned for tourism development shall be used for a range of structures and activities which are primarily designed to facilitate tourism development and where uses are mainly directed at servicing tourists/holiday makers and visiting members of the public'.

Mountshannon Harbour including the car park area is zoned Maritime/Harbour (HAR1) in the CCDP 2023-2029, with the following zoning objective:

HAR1 incorporates the existing marina area and associated facilities and adjoining carpark area. Development compatible with the existing use of the lands and associated lakeshore for marina/harbour/recreational uses will be favourably considered in this area subject to appropriate design and environmental criteria.

The land use zoning matrix identifies a car park as an Open for Consideration use in this zone.

The stated vision for County Clare in the CCDP is:

"That County Clare would develop as a place to be part of and proud of, where urban and rural communities enjoy a high quality of life, work practice choice, inclusivity and service access and so that the county is a dynamic, resilient, connected and internationally competitive location for innovation and investment and is a national leader in climate action, creativity, culture, heritage, tourism and environmental management."

Each chapter identifies a key goal supported by strategic aims and objectives to achieve this vision. Chapter 9, Tourism includes Goal IX:

“A county in which tourism growth continues to play a major role in its future development. A county which is the gateway to the west, delivering tourism experiences which reflect our strong commitment to sustainability, connectivity, innovation and new approaches to doing business. A place that is globally recognised as a sustainable destination and where the benefits of tourism are spread across the county throughout the seasons.”

Section 9.2.3 of the CCDP contains policy objective CDP9.4 which relates to the provision of tourism developments and tourist facilities. The policy strikes a balanced approach between promoting tourism development and protecting environment and community interests.

It is an objective of Clare County Council:

a) To permit tourism-related developments and facilities inside existing settlements where the scale and size of the proposed development is appropriate and in keeping with the character of the settlement, subject to normal site suitability considerations;

b) To permit tourism-related developments outside of settlements where there is a clear need for the specific location and the benefits to the local community are balanced with any potential environmental impact;

c) To ensure that development of new or enhanced tourism infrastructure and facilities include an assessment of the environmental sensitivities of the area including an Environmental Impact Assessment (EIA); Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) if required in order to avoid adverse impacts on the receiving environment;

d) To work with the relevant authorities to develop specific monitoring protocols for visitor pressure on the county's natural, archaeological and built heritage asset and to ensure that tourism activities are maintained within sustainable limits for the European sites in the county.

Section 9.3.3 of the CCDP identifies that East Clare boasts diverse tourism resources, particularly along Lough Derg, with significant growth potential through

initiatives like the Ireland's Hidden Heartlands and the Shannon Tourism Masterplan (2020–2030). It is stated:

'…The Council will seek to address this issue and also to ensure that East Clare reaches its full potential through initiatives such as the development of a gateway visitor facility in Mountshannon as part of the Inis Cealtra Visitor Management and Sustainable Tourism Development Plan for which Clare County Council has received funding of almost €4 million through the Rural Regeneration and Development Fund and the promotion of the 'High Towers and High Powers' theme.'

It is noted that the County Clare Tourism Strategy 2030 highlights fragmentation in the tourism sector, particularly between East Clare and the western/northern parts of the county. To address this, the Council plans to develop a gateway visitor facility in Mountshannon as part of the Inis Cealtra Visitor Management and Sustainable Tourism Development Plan. Additionally, opportunities exist to expand niche tourism offerings in the region, including bird watching, water sports, wellness, spa facilities, and agri-tourism.

Visitors Management and Sustainable Tourism Development Plan (VMSTDP), published in 2017. Prepared for Care County Council by Solearth Architecture with input from Clare Planning Department, is of relevance.

The Plan's vision is: "*Inis Cealtra will be protected for future generations through exemplary conservation management and interventions and through a balanced and sustainable management approach to providing access for visitors and the local community. The visitor experience, enjoyment and respect for the island`s living and built cultural heritage and that of the greater area will be expanded, and the long-term, socio-economic benefits to both the local community and the wider region will be increased".*

The over-arching aims are:

- *to ensure a balance is struck between attracting the maximum number of visitors to Inis Cealtra and protection of the natural and built heritage of the*

island, above and below ground, which should not negatively be impacted by an unsustainable volume of visitors;

- *to ensure that the unique ambience and character of the island is not placed at risk through increased visitor numbers;*
- *to maximise the socio-economic benefits from increased visitor numbers to the island and the wider Lough Derg area to support a sustainable rural economy.*

Key Objectives:

a) *that, in accordance with best international practice, there should be little or no physical intervention on the island itself, this being the most fundamental key objective;*

b) that, in order to attract greater numbers of visitors to Inis Cealtra and the wider area, while also improving access and ensuring a quality and authentic experience at both, it is critical that appropriate new visitor facilities are provided. Failure to provide formal, safe and easy access to the island, coupled with an increase in visitor information, services and facilities, will limit the potential for the sustainable growth in visitor numbers and therefore in realising the full tourism potential to the local economy. Similarly, any potential increase in visitor numbers to the island, without a comprehensive visitor management and development plan in place, addressing visitor access, provision of appropriate modern visitor facilities, etc. is likely to have a detrimental impact on the built heritage and natural environment of Inis Cealtra.

Specific Objectives:

Objective 1 To commence the nomination of Inis Cealtra, in combination with the other significant early medieval monastic sites, as a serial World Heritage Site, in the near term.

Objective 2 To restrict access to the island to a maximum number at any one time of 100 persons (excluding guides and staff), no more than 400 in any day and a maximum of 45,000 over the course of the year. These numbers should be taken as the maximum number of persons arriving on the island for all subsequent studies, projections, models and projects.

Objective 3 To have primary visitor access to the island via a ferry from a new visitor centre on the mainland with a small access charge, and to allow the local community continue accessing the island free of charge with established local tourism businesses using a discounted permit system.

Objective 4 To procure a new visitor centre on the mainland to serve the needs of visitors seeking to learn more about the island.

Objective 5 To develop the new visitor centre for Inis Cealtra at the south end of the community park in Mountshannon (site 2) with views to the island and access from the main street via the Aistear park. Alternative options assessed for the development of a visitor centre, including the Old Rectory and the Aistear Centre, can be explored further should the new-build option prove unfeasible.

Objective 6 To engage a professional interpretation design company to design and develop an interpretative experience for the visitor centre, taking account of the wealth of academic, social and anecdotal information assembled in this Plan (including Appendix 2)

Objective 7 To provide a new visitor centre which may include a range of services and facilities for visitors, including audio visual auditorium, exhibition, visitor information and ticketing, café, retail, toilets, meeting rooms, spiritual space, pilgrim traveller facilities, connection to ferry point and drop off points with limited parking facilities.

Objective 8 To have access across the lake to Inis Cealtra from Mountshannon.

Objective 9 To construct a new landing facility at a location that allows both a safe passage to and safe landing and embarkation on/from the island. This will become the main landing point for visitors to the island.

Objective 10 To introduce new visitor facilities on Inis Cealtra comprising pathways around monuments and the island, suitable orientation signage, new pods to provide for emergency, toileting and staff facilities, wastewater management, benches and improved landing points for kayaks.

Objective 11 To remove, or if necessary relocate, the OPW shed and wooden fencing and let the shed's functions be served by one of the new 'pods' which will

provide spaces necessary to meet a minimum level of accommodation required of a public facility with employees.

Objective 12 To develop an Accessibility Plan that facilitates accessing the monuments, protecting their condition and preserving the character and ambience of the setting.

Objective 13 To install a sustainable natural toilet system on the island.

Objective 14 To limit impacts on archaeology, ecology and the character of Inis Cealtra, the island will be closed to visitors during winter and at any other time the maximum numbers of visitors will not be exceeded.

Objective 15 To develop an interpretative approach that focuses on the heritage of Inis Cealtra and endeavours to broaden visitor interest to also encompass other important heritage sites in the region,and to have this holistic focus reflected in all interpretative activities of the Plan. Objective 16 To develop a comprehensive presentation and communication strategy grounded in the human interaction of guides rather than signage (on the island) and relying on both traditional and modern means and technologies (at the visitor centre).

Objective 19 To seek the assistance of the OPW in the management of Inis Cealtra. Objective 20 To develop a landscape management plan in consultation with an archaeologist, an ecologist and an agricultural consultant or farmer, and to include active management of vegetation by sheep.

Objective 21 To create a community forum representing the interest of the local communities in the development and managing of the island's future, including a local access provision**.**

Objective 22 To discourage and, if persistent, prohibit camping, unaccompanied tours and fishing on the island and to prohibit dogs except companion dogs and sheep dogs being used for management purposes.

Objective 23 To commission a conservation management plan focusing on Inis Cealtra's archaeology and monuments prior to any works being initiated on or for the island.

6. Consultations

6.1 Consultees Circulated

The application was circulated to the following bodies:

- The OPW
- Waterways Ireland (WWI)
- National Parks and Wildlife Service (NPWS)
- Uisce Eireann
- An Taisce
- An Chomhairle Ealaíon
- Failte Ireland
- Department of Housing, Local Government and Heritage
- The National Monument Service (NMS)
- Department of Environment, Climate and Communications.
- Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media.
- Department of Agriculture, Food and Marine
- Inland Fisheries Ireland
- The Heritage Council
- EPA
- Department of Transport, DAU
- NTA
- Birdwatch Ireland
- Tipperary County Council

- Limerick County Council
- Galway County Council
- Southern Regional Assembly.

6.2 Responses Received from Consultees

Responses were received from the following bodies, they are summarised as follows:

Department of Housing, Local Government and Heritage

- The EIAR contains errors and erroneous statements.
- Concern of screw piling, (quantity and dimensions) to form paths and to construct pods – lack of information in the EIAR.
- No details have been included on the methodology to be employed in installing the proposed aggregate surfaces or details of its maintenance, and no appropriate archaeological assessment has been presented.
- Concern of impacts of construction of the proposed 2no. raised boardwalks on Inis Cealtra – EIAR deficient.
- The Department has significant concerns with respect to the proposed WC pod.
- Submits that the WC facility, if shown to be necessary in the first instance, should be reduced in scale to provide one no. emergency WC unit only.
- Concern of use of WC pods during operational phase – should be emergency only.
- Concern is raised regarding the design and height of the Pods.
- 11 Archaeological Conditions are recommended with Conditions C3, C5 and C6 as set out in OPR Practice Note PN03: Planning Conditions (October 2022), with appropriate site-specific additions/adaptations based on the particular characteristics of this development and informed by the findings of the EIAR.

- Notes that Inis Cealtra is renowned as an internationally important complex of medieval ecclesiastical archaeological sites and monuments, its attendant underwater cultural heritage also adds considerably to its overall significance and the underwater archaeological diver and geophysical surveys conducted to inform the design and mitigation strategy for the proposed project have added a considerable body of new knowledge of the site's submerged cultural heritage.
- The site's underwater cultural heritage includes the probable location(s) of the medieval harbour and areas of former land that were submerged following the raising of lake levels.
- Sets out 6 detailed recommendations and mitigation measures in relation to underwater and terrestrial archaeology. Requests that compliance with this condition shall require a formal statement in writing from the Department to An Bord Pleanala that all mitigation measures have been implemented and approved.

An Taisce:

- Concern of proposed visitor numbers, to local village and Inis Cealtra.
- Concern of disturbance to visual amenity.
- Concern of disturbance of ecological receptors.
- Concern of absorption capacity of visitor numbers.
- Concern of impact upon the important monastic quality of the Island.
- Concern of impact upon important built and natural heritage features requiring careful conservation.
- Concern of car park size (exceeding 200 spaces) beside a sensitive lakeshore location.
- Importance of retaining the integrity and amenity of the lakeshore.

Department of Transport

- Request that 20% of the total car parking spaces are EV
- Note the Climate Action Plan.

- Suggest engagement and consultation with bus operators be carried out to determine their needs.
- Highlight, accessible public transport for all, and especially for Disabled People, Persons with Disabilities, Persons with Reduced Mobility and Older People.

TII

- No specific observations to make.

6.3 Public Submissions

26 observations were received from Annie Dinner, Ciara and Colm Madden, Colm Porter and Michelle Hogan, Fiona Levie, Hugo Zyderlaan and Ageeth Hup, Joe Griffin, John Cleary, John O Rourke, Knockaphort Mermaids, Marina Muller, Mel White, Michael and Patricia O Rourke, Molly Lynch O Mara, Mountshannon Angling Club and Others, Mountshannon Community Council, Nicki Griffin, Noel and Josephine Lyons, Nuala Dooley and Others, Patricia Donnellan, Paul Bugler, Paul Patrick Murphy, Peggy Boyle and Pearse O'Sheil, Roisin Bugler, Shulagh Colleran, The Committee of Mountshannon Arts, Veronica McKenna the issues raised are summarised as follows:

- OH Requested.

Impact Upon Mount Shannon Village & Local Community

- It is an asset to Mountshannon Village to have the Old Vickerage renovated, but work should stop here.
- It is important that any public investment works to respect and support the local community and businesses, enhance the beauty of the area, safeguard all development, and honour the great history and legacy of Inis Cealtra.
- Supportive of sustainable investment in Mountshannon Village and the environs which facilitates the enhancement of Mountshannon as a place to live, work and visit.
- Clare Co Council are to be commended on their work with respect to this project to date. The repurposing as the Iniscealtra Visitor Centre of the Old

Church of Ireland Edwardian Rectory offers new purpose and life to in many ways a landmark building that had been unfortunately falling into disrepair.

- Concern of impact of footfall on Aistear Park.
- Concern of 75,000 visitors per year and impact upon the village.
- The size and design of the proposed Visitor Centre will feel out of place in a small village. Mountshannon is special because it still feels connected to nature and history.
- Concern a large modern building, built for busloads of tourists, will change that character. Instead of blending into the village, it will be imposing.

Scale of the Visitors centre

- Concern of size, scale, visibility and impact upon the village and community of Mountshannon.
- Concern economic benefits have not been made clear and unambiguous.
- Phase 2 of the current application is premature and should not be granted permission now. Instead that aspect of the current application should be submitted for planning consent closer to the proposed date for commencement of the Phase 2 works, when a proper business case has been assessed and the impacts of the development can be determined at that time.
- Premature - Concern of impact of proposed Phase 2 Project on existing Part 8 consented development.
- Concern that the number of visitors being planned (up to 75,000 pa eventually), concentrated through the summer months, will significantly negatively impact quality of life and place for the residents of Mountshannon and surrounding areas.
- There is no detail about what will become of the Old Rectory once Phase Two is embarked upon.
- Recommend that a visitors Management Plan is put in place – establish a limit on bus arrivals, conduct independent reviews, reconsider overall scale.

- Need to adopt a sustainable tourism strategy.

Holy Island and the Jetty

- Inis Cealtra has for centuries been a place of pilgrimage – a spiritual journey to a sacred place.
- No consultation has taken place with Ger Madden the OPW appointed care taker of Inis Cealtra for over 35 years. Who is a well-respected historian and author.
- Concern of impact upon Holy Island Tours during the construction of the pier – it will effectively put the company out of business.
- The proposed Jetty on Holy Island is disruptive, unsafe, too extensive and intrusive.
- Local residents should always have free and unobstructed access to the Island, particularly when using their own transport.
- The jetty's height prevents the current small ferry and the traditional coffin boat from docking, therefore endangering established local practices.
- Concern of ecological impact from a deepened navigation channel.
- Concern that the boat used to bring coffins for burial will not be able to dock at the new jetty, - too high.
- Concern of attraction of jet skies and boat users to moor.
- Concern of impact upon local swimmers and kayaks.
- Health and safety concern for swimmers.
- Concern local access to Holy Island will be restricted / controlled, which is not aligned with cultural heritage.
- Concern a large pier facilitates, a commercial type project, is totally contrary to the serenity of this location.

Concern of demolition of the Angler's Club hut.

- The hut provides shelter for fishermen.
- Strongly opposed to demolition of the Anglers hut.

- New staff pods are located too close to the existing Fisherman's Hut, potentially obstructing views, access and privacy.
- Proposed demolition is contrary to policy and objectives stated in Clare County Development Plan & the Inis Cealtra Visitors Management Plan.

Visual Concerns

- Concern of impact upon views, from 4 Harbour View Mountshannon, neighbouring property.
- Concern of tree planting to the front of the visitor centre will hamper views.

Concern of Impact to adjoining Property

- Concern the proposed new visitors centre will impact upon the Rectory, a beautiful historic building overlooking the harbour.
- Concern of impact upon property adjoining the proposed car park. Issues raised of security, privacy and inadequate boundary treatments proposed.
- Concern existing natural boundary to the car park is not suitable for its intended use. Security / privacy concerns raised.
- Concern of problems with drainage.
- Concern of right of way from the entrance of the proposed car park to the gateway of a rear adjoining garden.

Car Parks and Traffic

- Concern the car park is too big off Main Street.
- Parking should be free.
- Concern of reduction in car parking at the harbour.
- Management of the proposed car park in the village needs to be addressed to ensure no over night parking or long stay unauthorised parking.
- Concern of impact upon car parking for residents along the main street.
- Concern of surface water issues and drainage through the car park site and impact to properties.
- The entrance to the car park is located just east of a very bad bend.

- Concern of impact of a new pier and traffic / activity from Knockaphort to Holy Island.

Environmental Concerns

- The lake, the wildlife, and the natural beauty of this place are irreplaceable.
- Concern of negative impact upon ecosystems, ecology, local habitats and wildlife.
- Changes to the shoreline, increased boat traffic, and possible dredging could all have serious consequences for the delicate balance of the ecosystem.
- Interference with the lake bed, disturbance of wildlife species and the particular location choice of the access pier may have a detrimental effect on the ecological balance of the surroundings. A smaller passenger ferry and minimal work on the existing pier would cause less disturbance and give a more authentic experience.
- It's not just about protecting what we have for now–it's about making sure that future generations will still be able to experience the unspoiled beauty of Mountshannon and Holy Island.
- Need for a conservation management plan.
- Mountshannon sewerage plant is near capacity.
- Concern what water level of service the village will receive in lieu of demand placed on water capacity, which is deemed by Uisce Eireann as insufficient, as of Dec 2024.
- There is a need to further review the adequacy of the environmental assessments submitted. Inaccuracies and errors in the NIS and EIAR.
- This island is an SAC (special area of conservation) and is in close proximity to a nesting area of the White -Tailed Sea Eagle. These birds have been reintroduced in the last number of years after a 100yr lapse.
- Concern of introduction of solar panels for power. The reflection off these panels has been proven to have a negative environmental impact particularly on reclusive birds such as White-Tailed Sea Eagle.

- Concern of sanitary facilities on the island with the projected numbers, how is this going to be managed and not cause pollution.

Archaeological and Cultural Heritage Concerns

- Not enough consideration has been given to importance of Holy Island as a historical burial ground.
- No mention of safeguarding the tradition of burial.
- It is of great importance that the Church of St. Michael and the Children's graveyard be acknowledged, honoured and grave markers be returned and put right again.
- Concern the high volume of people projected to visit the island will negatively impact the ancient infrastructure of the site.

Concern of Impact Upon Tradition of Burials

- Concern burials may become a tourism spectacle.
- Community should not be made to feel unwelcome visiting their loved one's graves.

Other Concerns

- Concern no site notices erected on Holy Island or at Knockaphort.
- Concern consultation was inadequate – more meaningful public engagement required.
- Concern of the duration of the consent sought from ABP, which is at least a 17 year permission until the proposed second phase of the Part 10 works is completed (in 2042).
- Query whether it is possible for ABP to grant a 17 year permission, when the normal statutory permission is for 5 years, or 10 years in exceptional cases.
- Concerns of impact of Visitors Centre on capacity of infrastructure for future local development, such as more housing and businesses.
- Concern construction phase will negatively impact upon businesses in the village and the Mountshannon Arts Festival.

6.4 Response of Applicant to Submissions

A response to Observations was received on the 23rd May 2025 the report provides a detailed response to matters raised during the consultation process. Contributors to the responses include:

- Tourism Department, Clare County Council
- Archaeological Projects Ltd
- Malachy Walsh and Partners
- McCullough Mulvin Architects
- McCutcheon Halley Planning
- Mitchell + Associates Landscape Architects
- Susan Heffernan Marketing & Project Management Consultant

Section 2 of the response addresses the individual observations made by statutory authorities.

Section 3 contains a response to issues raised by members of the public, including individuals and local community groups. Many issues raised by the public are thematically similar. For ease of reference and to avoid duplication, these observations are addressed according to themes – with reference to an issue or a clustered summary of the issues, followed by a response. The themes are set out under the following headings:

- Community Consultation
- Community Impact
- Economic Rationale
- Environmental Protection
- Existing Residential Amenities
- Heritage & Cultural Impacts
- Visitor Centre Design
- Proposed Jetty & Boat Traffic
- Services Capacity

• Traffic & Accessibility

I note the applicant's response in section 3.2.4 of this report. It addresses the submission made by the Mountshannon Angling Club. The submission highlights the social, cultural and historic importance of the existing 'Fisherman's Hut' (weather shelter) on Inis Cealtra to the local community.

It is submitted that the applicant has examined the matters raised in collaboration with the design team and has decided that the Fisherman's Hut should be retained in its current location. The design team has reviewed the current layout and confirmed that retention of the Fisherman's Hut can be accommodated by amending the location and size of the proposed staff pod and shelter pod in this part of the island. The applicant respectfully requests that An Bord Pleanála facilitate this modest revision to the proposal in its decision.

The response is detailed and is referred to throughout my planning assessment of the key issues. I note, inter alia, the following points submitted in the response to observations:

- The EIAR incorrectly states no excavation works are proposed on the island in connection with the new paths and construction of the welfare pods, however, screw piling for the pods is proposed. It is acknowledged that this does constitute excavation, albeit very limited in scale.

- Mitigation for the piles has been outlined in Chapter 14, in that each pile location is to be excavated in advance by a licensed archaeologist to subsoil prior to completion of the pile.

- The size of the pods will be substantially reduced as a result of the revised design, which in turn, will reduce the number of piles.

- As documented within the application, OPW provided consent to Clare County Council for inclusion of the lands within their control in the application boundary. As key stakeholders, the OPW have also been consulted throughout the life of this project.

- Notwithstanding that the WC pods are intended for emergency use only, following extensive deliberation by the applicant and design team, the requirement for two WC pods was deemed the minimum necessary to ensure dignified conditions for visitors.

- The proposed mitigation measures recommended by the Department are noted, and are in agreement with the mitigation measures outlined in chapters 13 and 14 of the EIAR, to be implemented in full as a condition and in accordance with an application for Ministerial Consent under the provision of Section 14 of the National Monuments Act 1930-2014, as amended, and outlined as Archaeological Requirements 1-11 of the Department's Response.

- The overarching vision for Inis Cealtra is articulated in section 1.2 of the Inis Cealtra Visitor Management and Sustainable Tourism Development Plan (VMSTDP), published in 2017.

- The proposal is plan-led.

- Reconfiguration of the existing Mountshannon Harbour car park will improve vehicular circulation around the harbour and by extension, the whole village.

- The traffic and transport assessment confirms that implementation of the measures set out in the VMP which will limit visitor capacity and restrict visitor access by way of a pre-booking system, and a timed visitor entry system to stagger visitor arrivals. These measures in the VMP will control visitor traffic generation volumes and timing as part of the proposal, ensuring that the absorption capacity of Mountshannon with respect to traffic is not exceeded.

- There will be no significant impact by the proposed development on the public water supply.

- Uisce Éireann has also given confirmation of feasibility and confirmed there is capacity at the Mountshannon Wastewater Treatment Plant

- Ecological receptors - including habitats, flora and fauna - of conservation importance located within the study area have been identified in Sections 10.7.2 and 10.7.3 of Chapter 10, Biodiversity, in Volume II of the EIAR. All those classified as Important Ecological Features (IEFs) were deemed to be most vulnerable to any potentially significant impacts that the construction and operation of the proposal may give rise to. Similarly, the Qualifying Interest (QI) species and habitats – ecological receptors - of the Lower River Shannon SAC [002165] and the Lough Derg (Shannon) SPA [004058] are listed in Sections 7.2 and 7.3 of the Natura Impact Assessment (NIS).

- The proposed development on Inis Cealtra is consistent with the approach of minimal intervention.

- The proposed Village Car Park for the proposed development will be a public daytime car park, with a total of 169 car parking spaces, six coach/bus parking spaces and bicycle parking spaces. The 169 car parking spaces include 11 accessible spaces, 105 standard spaces and 53 overflow spaces. EV charging points will be provided for 20% of the car parking spaces.

- Clare County Council proposes to develop the Inis Cealtra Visitor Experience as a sustainable tourism destination experience that brings economic and social benefit for the local community.

- The aim of the Clare Tourism Strategy 2030 is to increase the benefit of tourism across the towns and villages of County Clare.

- Proposed arrangements regarding unrestricted and free access to Inis Cealtra for locals is outlined in Section 3.1.2 above. Specific arrangements will apply to facilitate funerals, ensuring there will be no disturbance to current practice. In the event of a funeral taking place on the island, access for locals, grave diggers and mourners is a priority.

- The phased approach to the project's development is explicitly designed to:

    1. Limit Phase 1 visitor numbers to stay within 'Levels of Acceptable Change' thresholds.

    2. Allow visitor number growth to be absorbed by the visitor centre in Mountshannon over time.

    3. Ensure only a portion of total visitors (estimated 60%) actually travel to the island, with others content with the interpretive experience at the visitor centre.

    - With respect to the timeline for delivery of the proposed Phase 2 Visitor Centre in 2042, the project is being planned in this manner due to three key drivers:

        1. Visitor Number Projections

        2. Planning and Statutory Timelines

3. Funding Requirements

- The reference to a "wind farm" was a typographical error and should refer to the proposed project. While the White-tailed Eagle was recorded during avian surveys, it is not a Qualifying Interest species of the relevant SPA – Lough Derg (Shannon) SPA - and is therefore discussed in detail within the Biodiversity Chapter rather than the NIS.
- There will be no dredging required to accommodate larger boats nor is offshore dredging for construction of the proposed Inis Cealtra jetty anticipated.
- The new jetty has been designed to break the crest of waves thereby ensuring a safer mooring experience on the inner jetty area than the existing jetty can provide. A deepened navigation channel will not be required to facilitate larger vessels and no dredging is necessary.
- Waterways Ireland have provided the design of the proposed new jetty, and it have been located carefully, after exhaustive underwater archaeological study, at the existing jetty location. Its size has been increased to accommodate larger boats than currently bring visitors to the island.
- The installation of a silt curtain will prevent sediment dispersal during in-stream works within Lough Derg, electrofishing to relocate aquatic species from within the silt curtain area prior to construction, and strict biosecurity protocols will be observed.
- Detailed procedures will be put in place for the management of fuel, oil, and concrete particularly on the mainland to prevent contamination of the aquatic environment.
- There is no registered right of way across the car park site.
- The detailed design stage will present a further opportunity for review of the proposed boundary treatments, including consultation with adjoining neighbours.
- The Landscape and Visual Impact Assessment (LVIA) in the EIAR further demonstrates that the visual impact of the proposed Visitor Centre will be neutral to positive.

- A Landscape and Conservation Management Plan for Inis Cealtra has been prepared on behalf of Clare County Council, appended to the Landscape Design Report that was submitted with the application.
- To set the modest scale of the proposed Visitor Centre in context, at 7.8m tall, it is significantly lower than the existing Old Rectory, a domestically-scaled building which stands at 9.5m in height.
- The height of the visitor centre, has been carefully calibrated so that the impact on views from the Old Rectory to Lough Derg are mitigated.
- It is considered the design and layout of the proposed Visitor Centre will enhance the 'natural flow' and connectivity in Mountshannon Village.
- The proposed finishes of the visitors centre have been carefully considered as noted in the Architectural Design Statement.
- The design of the new Visitor Centre responds sensitively to the historic character of Mountshannon through its careful placement within the Old Rectory site, its modest height and through its materiality.
- A letter of confirmation of feasibility from Uisce Eireann has been included with civil utilities report.

7.0 Assessment

Having regard to the requirements of the Planning and Development Act, 2000 (as amended), this assessment is divided into three main parts:

- The likely consequences for the proper planning and sustainable development of the area;
- The likely effects on the environment (Environmental Impact Assessment);
- The likely significant effects on a European site (Appropriate Assessment).

In each assessment, where necessary, reference is made to issues raised by all parties. There is an inevitable overlap between the assessments, for example, with matters raised falling within both the planning assessment and the environmental impact assessment. In the interest of brevity, matters are not repeated but such overlaps are indicated in subsequent sections of the report.

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

As outlined above, consent is sought by Clare County Council for works to upgrade and enhance visitor facilities across two key areas in East Clare: Inis Cealtra Island (Holy Island) in Lough Derg and Mountshannon Village.

The works at Inis Cealtra will involve constructing a new floating jetty and walkway, enhancing pedestrian paths and installing welfare and storage facilities.

In Mountshannon village, there are two proposed development sites: a greenfield site to the north of Main Street, which will accommodate a new public car park. To the south of Main Street within the 'Old Rectory Site' it is proposed to develop a Visitor Centre together with public realm enhancements.

This proposed development has its origins in the 2017 Inis Cealtra Visitor Management and Sustainable Tourism Development Plan, which has the following stated objective:

"This Plan seeks to ensure the long-term conservation, preservation and presentation of this unique cultural site to international standards, while expanding its attractiveness and ability to cope with significantly increased numbers of visitors."

The Inis Cealtra Action Plan 2017-2022 outlines a framework for achieving the objectives outlined in the plan. This long-term, evolving development strategy for Inis Cealtra and Mountshannon aims to preserve the island's heritage, raise visitor awareness, and generate economic benefits for the local community.

The Clare County Development Plan (CCDP) 2023-2029 includes an objective CDP9.23 to implement this Plan. It states: *"It is an objective of Clare County Council:*

b) To work with relevant stakeholders to implement the Inis Cealtra (Holy Island) Visitor Management and Sustainable Tourism Development Plan including the development of an associated visitor centre in Mountshannon."

I agree that the proposed development is justified in terms of increasing visitor numbers in order to bring more tourism, and socioeconomic benefits, to the local region. There is capacity to increase the numbers of visitors significantly, while ensuring protection of the built and natural heritage of the island within the context of a number of management strategies and new facilities.

I agree that the rich heritage and history of the site is of such importance that it justifies broadening access to it for more visitors. It is important that such a significant example of our cultural heritage will be shared beyond those currently familiar with it.

As is clear from the land use zoning of the subject site and the policy context, as set out in section 5.2 of this report above, the proposed development complies with the zoning objectives, is plan-led, has cognisance to and complies with the Clare County Development Plan, specifically, volume 3C Killaloe Municipal District - Clare County Development Plan 2023 - 2029 (objectives for Mountshannon settlement) and to the vision, over-arching aims and key objectives of the Visitors Management and Sustainable Tourism Development Plan, 2017.

The Plan's vision is: "*Inis Cealtra will be protected for future generations through exemplary conservation management and interventions and through a balanced and sustainable management approach to providing access for visitors and the local community. The visitor experience, enjoyment and respect for the island`s living and built cultural heritage and that of the greater area will be expanded, and the long-term, socio-economic benefits to both the local community and the wider region will be increased".*

It is submitted by the applicant that this vision has informed all aspects of the project, particularly the aim to protect Inis Cealtra for future generations through exemplary conservation management and sustainable management of access for visitors and the local community.

I consider section 9.3.3 of the CCDP, notable, it identifies that East Clare boasts diverse tourism resources, particularly along Lough Derg, with significant growth potential through initiatives like the Ireland's Hidden Heartlands and the Shannon Tourism Masterplan (2020–2030). It is stated:

> '…The Council will seek to address this issue and also to ensure that East Clare reaches its full potential through initiatives such as the development of a gateway visitor facility in Mountshannon as part of the Inis Cealtra Visitor Management and Sustainable Tourism Development Plan for which Clare County Council has received funding of almost €4 million through the Rural Regeneration and

Development Fund and the promotion of the 'High Towers and High Powers' theme.'

The proposed development has in my opinion been developed to align with the policy and recommendations of the VMSTDP and is the result of several years of preparation and consultation.

I note that the recommendations on visitor capacity at Inis Cealtra within the VMSTDP were determined by the findings of a comprehensive 'Limits of Acceptable Change' assessment undertaken to inform the Plan. It recommends that there be no more than 100 persons on Inis Cealtra at any one time, 400 per day, and 45,000 annually, and crucially, recommends that these figures be taken as the maximum number of persons arriving on the island for all subsequent studies, models and projections. The proposed development is in line with this recommendation.

The Visitor Management Plan submitted with the planning application complies with key objectives set out in the VMSTDP 2017 (Masterplan) to ensure that visitor numbers are managed. The proposal indicates a threshold of 45,000 visitors to the experience annually in Phase 1, scaling to 75,000 visitors to the experience in Phase 2, while at the same time, managing the total numbers of people accessing the island within the 45,000 limit annually. This number includes kayakers, local community, anglers and burials. The specific strategies to be employed in the operational phase of the project are outlined in Section 4.1 of the Visitor Management Plan (p31-33). The measures proposed will ensure that visitor access is managed in line with the restrictions (max. 100 at any one time/400 per day). It is noted that the advance online booking system will be a key aspect of the visitor management strategy.

I agree that in order to increase visitor numbers, specific amenities must be provided to allow effective management of such growth in numbers. Therefore, the principle and need for a visitor facility, as proposed, is acceptable as a gateway to receive, inform and filter access to the island. The proposed visitors centre comprises high quality facilities for visitors. Without significant investment in such a facility, the island cannot withstand the impact of increased visitor numbers, nor could the whole experience be considered to be of the quality expected of comparable historical site destinations nationally and internationally. I also agree with the principle that some new facilities to enhance the visitor experience, provide ease of access, safety and

information on the island's heritage, will be needed on the island. These it is stressed will be the minimum facilities necessary to allow the growth of visitor numbers that a site of such cultural value deserves and could absorb. I note that having considered a number of alternatives that Mountshannon Old Rectory site was considered the most fitting location to receive and manage a new visitor centre; it is the lakeshore village closest to the island, has a deep cultural connection to it and has enough infrastructure potential to accommodate an increase in visitors. The local area would also benefit greatly from increased tourism economy at this location.

Overall, I consider that the principle of the proposed development is acceptable. The proposal is plan led, complies with zoning matrix, policy and tourism objectives for Mountshannon and Inis Cealtra in the CCCDP 2023 - 20229, and is acceptable in terms of nature, scale and impact upon the local area.

7.2 Response to Observations from the DHLGH

I note the issues raised by the DHLGH summarised in detail in section 6.0 of this report, above. I also note the applicant's response and acknowledgement that excavation for screw piling and construction methodology for the raised boardwalk, welfare pods and installation of the aggregate based paths proposed on the Island constitute 'works'.

I consider that the applicant's response to the issue of errors and deficiencies in the EIAR and associated documents is acceptable. As stated in my EIAR assessment, which should be read in conjunction with this report, Chapter 13 & 14 Cultural Heritage – Built Heritage & Cultural Heritage Archaeological Heritage, it is clear from the information submitted that drilling, mini-pile foundations, screw piling constitute 'works'. However, it is my opinion that the impact would be slight and not significant upon Cultural Heritage: Built heritage or Cultural Heritage: Archaeological heritage, given the mitigation proposed and minimal impact / intervention. I consider that the proposed siting, design and construction technique represents a sustainable approach to the development that is aligned with the overarching aim of minimal intervention.

The applicant's response is clear that screw-piling is a replacement piling technique whereby steel piles are rotated into the ground with minimal vibration and noise. It is a fast and easy installation with minimal site disturbance and environmental impact.

This is due to the fact that there is no requirement for pile caps or beams and there is no excavation or spoil generated. Section 3.6.8.2 of the CEMP refers to the use of screw piles for the pod foundations. Mitigation for the piles has been outlined in Chapter 14, in that each pile location is to be excavated in advance by a licensed archaeologist to subsoil prior to completion of the pile. I consider the method proposed acceptable and in line with the process of least intervention.

It is submitted that regarding the consideration of alternatives in Chapter 3 of the EIAR, section 3.3.4.3 addresses an alternative scenario that was considered in respect of path type. The image of a timber boardwalk in Figure 3-9, together with the images in Figures 3-10 and 3-11, are included for illustrative purposes only. I note that it is intended to utilise a combination of path types, the EIAR indicates that mown grass as the main path type is preferred.

It is notable that, the applicant has determined that the existing 'Fisherman's Hut' on Inis Cealtra should be retained. The design team has reviewed the current layout and consider that retention of the Fisherman's Hut can be accommodated via an amendment to the location and size of the proposed staff pod and shelter pod. This layout change will in turn, result in a reduction to the length of the raised boardwalks connecting the two pods, by approximately 8m. This is acceptable. I note the response to issues raised submits if requested, the spans between the piles for the boardwalks can also be extended so as to reduce the number of screw-piles. Any ground intrusion arising from installation of the boardwalks during construction, while considered minimal, will be subject to archaeological monitoring in advance. The quantity and dimensions of screw piles required for the proposed construction of the 3 no. pods on the island can be dealt with by Clare County Council during the finalization of the CEMP prior to any construction taking place on Inis Cealtra. This is considered standard construction practice.

I have considered the proposal, as originally submitted and as amended, for the construction details of the pods and associated boardwalks, the fisherman's hut, seating arrangements on the island, impacts upon National Monuments and mown paths through out the Island.

As stated above and in the mitigation section, the location of each pile at the location of the welfare pods and W.C will be subject to hand excavation in advance by the

licenced archaeologist to the project. Initial test excavation in this part of the island in 2024 has indicated that there are no remaining features here. As stated throughout this report the proposed development is plan – led, some new facilities to enhance the visitor experience are necessary. I consider what is proposed are in line with the minimum facilities necessary to allow the growth of visitor numbers and will be absorbed with no significant negative impact. I note the specific objectives of the Inis Cealtra VMSTDP 2017, in particular:

- Objective 9 of the VMP To construct a new landing facility at a location that allows both a safe passage to and safe landing and embarkation on/from the island. This will become the main landing point for visitors to the island.
- Objective 10 To introduce new visitor facilities on Inis Cealtra comprising pathways around monuments and the island, suitable orientation signage, new pods to provide for emergency, toileting and staff facilities, wastewater management, benches and improved landing points for kayaks.
- Objective 12 To develop an Accessibility Plan that facilitates accessing the monuments, protecting their condition and preserving the character and ambience of the setting.
- Objective 13 To install a sustainable natural toilet system on the island.

I agree that retention of the Fisherman's Hut is desirable given its nature, use and location. This will alleviate concerns raised by third parties in particular the Mountshannon Angling Club's. The proposed design of the welfare pods is a process of minimal intervention given the archaeological and ecological significance of the island. A series of mini-pods at the base of the new structures and boardwalk is considered to be the preferable method of construction for archaeological, ecological and flooding risk purposes. As stated in mitigation all areas will be subject to advance excavation by the licensed archaeologist to the project. I consider that the proposal has cognisance to Condition Ref. No. C3, planning permission with condition requiring pre-development archaeological testing (following consultation with NMS). Planning Condition C5, provision in the CEMP for the implementation of identified Archaeological/ Cultural Heritage mitigation measures (following consultation with NMS) and C6 mitigation strategy contained in AIA, UAIA or EIAR is specifically tailored to development (following consultation with NMS) as set out in

the OPR Practice Note PN03 Planning Condition, October 2022. This issue raised by the DHLGH can adequately be dealt with by way of condition and compliance, the applicant has acknowledged and notes that the conditions proposed are in line with mitigation set out in the EIAR.

With respects to the concern raised by the DHLGH and third parties to the WC pod and welfare pods size and design. I note that the WC pods are intended for emergency use only, following extensive deliberation by the applicant and design team, the requirement for two WC pods was deemed the minimum necessary to ensure dignified conditions for visitors. This I deemed appropriate, as previously stated above facilities are necessary to allow the growth of visitor numbers and will be absorbed with no significant negative impact. The proposed WC facilities are dry toilets with all foul to be collected and transported off-site to an UE treatment facility under a tankard agreement, I agree that there will be no greater impact from two WCs on the island, rather than the one WC recommended. Consideration of the dry toilet system proposed is dealt with and assessed in the EIAR. Dry toilets were deemed an appropriate solution from an environmental impact perspective. During this process, the manufacturer confirmed that a dry toilet system is available which can be installed completely above ground level, ensuring that the WCs could be installed without the need for excavation, thereby reducing potential risks to land and soils and water quality.

Having considered the plans and drawings submitted and as altered to retain the Fisherman's Hut, supplementary information, the photomontages and having carried out a site visit I am of the opinion the visual impacts of the proposed pods, given their location on the island, screening and topography was carefully considered and acceptable from a visual amenity and landscape impact perspective. The selected location is completely screened from the monastery, and they are sited below a steep shelf which continues around the west side of the island, screened by the natural topography of the bluff and by vegetation which will be retained.

With respect to underwater Cultural Heritage: Archaeological Heritage I note the DHLGH states:

'Whilst Inis Cealtra is renowned as an internationally important complex of medieval ecclesiastical archaeological sites and monuments, its attendant underwater cultural heritage also adds considerably to its overall significance and the underwater

archaeological diver and geophysical surveys conducted to inform the design and mitigation strategy for the proposed project have added a considerable body of new knowledge of the site's submerged cultural heritage'.

The applicant acknowledges the response of the Underwater Archaeology Section of National Monuments, and the specific conditions which the UA Section recommend be applied to this development, namely Recommendations 1-6 of their report. The applicant agrees the recommendations should be implemented in full.

The project archaeologist, on behalf of the applicant, also acknowledges the contribution of the UA Section to this project, including their technical expertise and wealth of knowledge. This matter can be dealt with by way of condition and compliance.

For the development to proceed, some intervention is necessary and it is my opinion as set out in my EIAR assessment that the impact and effects proposed are, subject to mitigation, not material or such a significant impact upon Cultural Heritage: Built Heritage, Cultural Heritage: Archaeological Heritage that the proposed development should be refused planning permission.

7.3 Community Consultation, Planning and Statutory Timelines and Funding:

I note the applicant response to the issues raised around community consultation, planning and statutory timelines required to development the overall project and funding matters.

The applicant sets out that the time required to bring this project to the operational stage is best viewed through the information set out in the Inis Cealtra Visitor Management and Sustainable Tourism Development Plan, which was published in 2017 following several years of preparation and consultation. It is submitted that '*Considering this, the journey from initial plan development to lodging the current planning application has taken at least 11 years, demonstrating the long lead-in and strategic planning required for projects of this scale and significance. The visitor centre is anticipated to open in 2042, with construction expected to commence in 2040, allowing for an 18-month build period. This timeline, approximately 15 years from now, aligns with standard planning practices. In private development, it is*

common to secure planning permissions with a 10-year duration, extendable by 5 years—a total of 15 years. The same principles apply here'.

I consider that the response and reasoning is coherent and reasonable. I note that community consultation for the VMSTDP was structured as a series of local in person meetings and workshops involving the plan team and members of the local community. The events were arranged with support from Mountshannon Community Council and were announced in the local media, via parish newsletters, a Facebook and website. Appendix 2, Section 8 of the Development Plan states, that over 150 people participated in the consultation process. The plan was subject to a Strategic Environmental Assessment (SEA). As part of this the draft Inis Cealtra Visitor Management & Sustainable Development Tourism Development Plan was also subject to statutory public exhibition and consultation in which the public was invited again to express their views and concerns which were taken into consideration for the final version of the Plan.

In addition to engagement with the public and statutory bodies, other agencies were also consulted in the plan making process, both formally and during meetings, site inspections, reviews and site surveys. Numerous bodies incl. prescribed bodies were consulted.

I note the applicant's response that following the adoption of the Inis Cealtra Visitor Management & Sustainable Development Tourism Development Plan and during the project design phase of the subject application Clare County Council and the project team engaged in extensive stakeholder consultation between the years 2022 to 2024. This included numerous reoccurring engagement meetings with Waterways Ireland, National Monument Service, Irish Water, the Office of Public Works, Fáilte Ireland and the National Parks and Wildlife Service.

Non statutory consultation meetings were held. Firstly, in relation to the Part 8 application for an Interpretive Centre and more recently (2024) regarding the emerging plans for the Inis Cealtra Visitor Experience to ensure the views of the community were heard as the design was in development. The proposed development was also presented to the Mountshannon Community Council.

In response to the observation regarding site notices, it is highlighted that a total of five site notices were erected at key locations relevant to the application. As shown

on the Site Location map submitted with the application, these included one at the entrance to the car park site in Main Street, one at the main entrance to the Old Rectory site and another at its western boundary where access will be provided from Aistear Park, as well as two notices at the harbour.

I agree that there is no statutory obligation on the local authority to erect site notices for a Part X application, only to publish a notice in one or more newspapers circulating in the area. Notwithstanding, site notices were erected at the key public entrance points to the application site.

Overall, I note that some 30 submissions were received in relation to the subject application. I consider this indicates that the public and relevant prescribed bodies were afforded to opportunity to engage with the process. I am of the opinion that the stakeholder engagement with statutory bodies and non-statutory consultation has been adequately dealt with and does not constitute a reason for refusal of the proposal.

Clare County Council submit that by including the visitor centre (Phase 2) at this stage in the planning process, the Council is acting responsibly and proactively — creating the conditions necessary to attract future investment while embedding the project within a coherent, approved development framework. This forward planning ensures that the project is not delayed when the time comes for implementation of Phase 2.

I highlight third party concerns raised around timelines, however, I consider the approach is justifiable, logical and reasonable. The applicant's reference to projects such as the Cliffs of Moher Visitor Experience and tourism infrastructure along the Wild Atlantic Way, is noted and evidence based that such projects have all required early planning consents — often a decade or more in advance — to ensure alignment with funding cycles, stakeholder coordination, and long-term strategic delivery.

7.4 Impact Upon Mount Shannon Village & Local Community

A number of submissions incl. An Taisce raise concern of absorption capacity of visitor numbers to the local village and Inis Cealtra, concern of disturbance to visual amenity, concern of disturbance of ecological receptors, concern of impact upon the important

monastic quality of the Island, concern of impact upon important built and natural heritage features requiring careful conservation and concern of importance of retaining the integrity and amenity of the lakeshore.

It is clear from the visitor management plan (VMP), the CEMP, Traffic Management Plan that the local community, local services, amenities and facilities are fully considered as part of the ongoing management of the visitor experience.

Proposed arrangements regarding unrestricted and free access to Inis Cealtra for locals is outlined in the Visitors Management Plan. Specific arrangements will apply to facilitate funerals, ensuring there will be no disturbance to current practice. In the event of a funeral taking place on the island, access for locals, grave diggers and mourners is a priority. During burials access for visitors will be restricted. Visitors will be advised at the time of booking that funerals and burials on the island will take priority and therefore bookings may be cancelled at short notice. Online visitor bookings for island access during burial times will be cancelled and refunded once a burial is confirmed. This means that no tours will access the island during a funeral. Members of the local community and members of Lough Derg Anglers will be able to land for free with a permit-style approach. Overnight camping will be discouraged. The access system will ensure members of the local community will have regular and ongoing access to the island, including to visit family graves. Guided tours on the island will be operated by Clare Tourism Development DAC, staffed by Inis Cealtra Visitor Experience. Their role will also include monitoring and surveying of visitor impacts.

The proposed new jetty will have a section designed to accommodate local boats for funerals, meaning no change in access for funerals to the island. The Inis Cealtra Visitor Experience boat tour will operate with 25-seater boats which will also include wheelchair accessibility, ensuring access to the island for those with limited mobility.

The EIAR has considered all of these issues in detail and I again highlight that this planning report should be read in conjunction with the EIAR, I do not intend to repeat the EIAR assessment here. The EIAR assesses the main significant direct and indirect effects of the proposed development on the environment would be primarily mitigated by environmental management measures, as appropriate.

I believe that the Inis Cealtra Visitors Experience promotes Inis Cealtra as a tourism destination and supports the sustainable expansion of tourist facilities on the island of

Inis Cealtra and at Mountshannon Village, in line with policy, it is considered that the impact upon Mount Shannon Village and Local Community is positive and concerns raised, in this regard, would not warrant refusing permission for the development.

7.5 Economic Rationale

Third party concerns are expressed that the visitors centre is too large and it is unjustified. That the projected visitor numbers are unrealistic and that Phase 2 is premature and it would impact the viability and use of the Old Rectory once phase two is operational.

I note that Clare County Council propose to develop the Inis Cealtra Visitor Experience as a sustainable tourism destination experience that brings economic and social benefit for the local community. The aim of the Clare Tourism Strategy 2030 is to increase the benefit of tourism across the towns and villages of County Clare.

Failte Ireland Clare Key Tourism Facts 2023 cites that the average spend per capita of visitors to Clare was €357, rising to €530 per capita for overseas tourists. In bringing greater visitor numbers to East Clare, that spend also reaches the region, through accommodation, restaurants, coffee shops, bars and retail in the towns and villages of the region. This presents a significant opportunity for local communities and tourism businesses to harness.

It is submitted that the Inis Cealtra Visitor Experience in its current or future phase will play a crucial role in strengthening Mountshannon's appeal as a destination, thus incentivising private investment for the expansion of overnight stays in this area. This then will provide visitors with the opportunity to fully experience distinctive culture, heritage and history of the environs of Mountshannon village. By cultivating and promoting this visitor attraction, this encourages visitors to explore further and to extend their trips beyond the attraction and more importantly to within the neighbouring towns and villages.

In terms of sustaining the future for small and medium businesses and aside from the visitor attraction, it is submitted, that there will be a concerted effort from state agencies and the local authority to ensure that a buoyant marketing and promotional plan is sustained throughout the year, which encapsulates all that Mountshannon,

and the local area has to offer. This I consider is plan – led and in line with policy and sustainable economic growth of the area by competent authorities.

The project proposed uses the evidence-based carrying capacity for Inis Cealtra, recommended in the 2017 Inis Cealtra Visitor Management and Sustainable Tourism Development Plan (VMSTDP) as a foundation for the visitor experience development. Building on this plan-led approach, the comprehensive Visitor Management Plan (2024) that accompanies this application was prepared to ensure that the project is delivered in alignment with the core vision and objectives of the VMSTDP.

The phased approach to the project's development is explicitly designed to:

1. Limit Phase 1 visitor numbers to stay within 'Levels of Acceptable Change' thresholds.

2. Allow visitor number growth to be absorbed by the visitor centre in Mountshannon over time.

3. Ensure only a portion of total visitors (estimated 60%) actually travel to the island, with others content with the interpretive experience at the visitor centre.

The plan also incorporates ongoing monitoring and adaptive management, allowing for adjustments based on real-time visitor data (using counters), a programme of impact assessments and ongoing monitoring and feedback from tour guides and local stakeholders. With respect to the timeline for delivery of the proposed Phase 2 Visitor Centre in 2042, the project is being planned in this manner due to visitor number projections, planning and statutory timelines and funding requirements.

The visitor experience will operate under sustainable procurement policies that prioritise local suppliers and producers, supporting local artisan and craft producers and create opportunities for new and emerging small to medium enterprises in the area. All recruitment opportunities will be advertised locally, and members of the local community are encouraged to apply.

Overall, I consider that the economic rationale for the project is justified, it will contribute positively to the local economy and supports strategic goals.

7.6 Environmental Protection

Concerns have been raised that the lake, the wildlife, and the natural beauty of Inis Cealtra and Mountshannon which are irreplaceable will be negatively impacted. Concern of negative impact upon ecosystems, ecology, local habitats and wildlife. Changes to the shoreline, increased boat traffic, location choice of the access pier and possible dredging / interference with the lake bed, could all have serious consequences for the delicate balance of the ecosystem's wildlife species. It is submitted that there is need for a conservation management plan. Concern is expressed to the adequacy of the environmental assessments submitted. The DHLGH and third party submissions have pointed to inaccuracies and errors in the NIS and EIAR. This island is an SAC (special area of conservation) and is in close proximity to a nesting area of the White -Tailed Sea Eagle. These birds have been reintroduced in the last number of years after a 100yr lapse. Concern is also expressed of sanitary facilities on the island with the projected numbers, how is this going to be managed and not cause pollution.

As is evident, the number of concerns raised by members of the public, including individuals and local community groups is extensive, see section 6.2 and 6.3 of this report above. Many issues raised are thematically similar and there is a cross over of issues between themes.

The application is accompanied by an EIAR (which includes inter alia, landscape and visual, biodiversity, material assets, population and human health, cultural heritage and archaeological assessments) and NIS prepared by qualified and competent experts, who conclude that subject to mitigation, there will likely be no significant residual environmental effects from the proposed development's construction or operational stages.

I consider that the applicant's response to the issue of errors and deficiencies in the EIAR and associated documents is acceptable. This is dealt with in my assessment of 'Observations by the DHLGH', set out above and also in the EIAR Assessment and NIS Assessment which accompanies this report. For ease of reference all should be read in conjunction with one another, to avoid duplication. The Biodiversity Chapter of the EIAR assesses sites designated for nature conservation, habitats and species, determining ecologically significant effects on key ecological receptors and should be

read in conjunction with ‘Template 2: Standard AA Screening Determination and template test for likely significant effects’ and ‘Template 3: Standard AA template and AA determination’, which form part of the overall assessment of the proposed project. Both are attached as appendices to this report.

I note and accept that the reference to a "wind farm" was a typographical error and should refer to the proposed project in the NIS. This I consider, has been acknowledged, is not a material error and or a reason for refusal of the application. The matter of screw piling has been dealt with in the EIAR assessment and in the preceding section of this report. While it constitutes ‘works’ I have concluded it is not a material error and the matter can be resolved through the CEMP and on-site Archaeological monitoring prior to and during construction.

I also note and accept that the while the White-tailed Eagle was recorded during avian surveys, it is not a Qualifying Interest species of the relevant SPA – Lough Derg (Shannon) SPA - and is therefore discussed in detail within the Biodiversity Chapter rather than the NIS. This is considered acceptable. The impact of solar panels on birds is accessed separately, in the ‘Other Concerns’ section of this report.

The basis and role of AA, NIS and EIAR is set out in each report. An NIS is solely concerned with ascertaining whether a project will adversely affect the integrity of a Natura 2000 site with respect to the function and structure of the Conservation Objectives for the site’s Qualifying Interest (QI) species and habitats. The EIAR is a report of the effects, if any, which the proposed project, if carried out, would have on the environment.

The EIAR includes designed in mitigation measures and monitoring to address potential adverse effects identified in technical studies. (See measures outlined in Table 16-1 of the EIAR which will be incorporated into the design of the proposed development for the Demolition & Construction and Operational Stage for each chapter).

Each chapter of the EIAR provides a summary of Significant Effects on the Environment and the proposed mitigation, with summary of proposed mitigation measures summarised in Chapter 16. These measures are from pre-commencement phase to construction and operational phase. Chapter 16, Table 16-2 & Table 16-3

provides a summary of Demolition & Construction Phase Mitigation and Summary of Operational Phase Mitigation, it also provides details of the monitoring measures contained within the EIAR. The table indicates monitoring measures will be included in the Construction Environmental Management Plan (CEMP), Waste Management Plan (WMP), Surface Water Management Plan (SWMP), Construction Traffic Management Plan (CTMP), Construction Dust Management Plan (CDMP), Archaeological Heritage Monitoring, Built Heritage monitoring and a Visitors Management Plan (VMP) frequency of monitoring, reporting period and responsibility. Mitigation measures comprise standard good practices and site-specific measures and are capable of offsetting significant adverse effects identified in the EIAR.

The Inis Cealtra-Knockaphort area does indeed support a diverse range of wildlife including 'kingfishers, herons, curlews, and White-Tailed Eagles', and it is for this reason that an extensive programme of ornithological surveys was undertaken on Inis Cealtra and on the mainland at Mountshannon Harbour and Knockaphort Pier from March 2021 to March 2024. Counts were also carried out from within agricultural fields overlooking the northern and southern shores of Scariff Bay. Section 10.6.3.9.4 of Chapter 10, Biodiversity, sets out the results of the ornithological surveys which formed the baseline data to ensure thorough and detailed impact assessments could be made with regards local bird populations and the proposed development's design, construction and operation. It is clearly acknowledged in the EIAR and supporting documents, incl. the VMSDP 2017 that the village is home to Ireland's White-tailed eagles. It is an attractive scenic village close to the marina and provides visitors with a view of Lough Derg and its islands. The Eagles nest near Mountshannon attracting bird watchers from all over Ireland. I highlight that the new visitor centre will include a range of uses and facilities providing for interpretation, exhibition and education, flexible café/event space and a research centre for the white-tailed sea eagle project. The new jetty will be installed at the same location as the existing jetty on the north-eastern side of Inis Cealtra. There will be no dredging required to accommodate larger boats nor is offshore dredging for construction of the proposed Inis Cealtra jetty anticipated. Instead, there will be some limited excavation of the lakebed required

involving the removal of approximately 2 m^3 of material on the southern end of the proposed breakwater jetty. Once removed, the excavated material will be placed into a skip on a pontoon raft, removed from site and disposed of correctly.

Section 10.10 of the Biodiversity Chapter and Section 8 of the NIS set out comprehensive mitigation measures to minimise potential impacts on the aquatic habitats and sensitive wildlife of Lough Derg during the proposed inwater works. A suitably qualified and experienced Ecological Clerk of Works (ECoW) will be present at the Lough Derg works area to oversee the implementation of all environmental safeguards and mitigation strategies. This I consider should be a condition of any forthcoming planning permission to ensure compliance.

To control sediment disturbance and to contain any suspended solids released during excavation of the lakebed, a continuous, joint-free silt curtain will be installed around the area to be excavated. Prior to commencement of any works, electrofishing (under the required licence) will be carried out within the area enclosed by the silt curtain to safely capture and relocate any fish species that may remain within. The minimal lakebed excavation will be carefully managed using clean machinery and the strict enforcement of biosecurity protocols, with soft sediments removed and replaced by clean quarry-run rock fill to stabilize the slipway footprint.

Mitigation measures to minimise water turbidity during instream works will be implemented. These measures will include the drying and bunding of excavated materials, run-off containment, and the daily monitoring of turbidity and pH levels both inside and outside the silt curtain. Visual inspections and photographic records will support the daily monitoring, and if water discolouration is detected beyond containment, there will be an immediate cessation of all work until the source of discolouration is discovered and rectified. Additional management protocols include the correct handling of fuels, oils, and concrete to prevent contamination.

Having regard to the examination of environmental information provided in respect of biodiversity (Habitats and Flora – Birds, Bats, Badger, Otter, Mink) I am satisfied that sufficient information has been provided to inform the consideration of effects in respect of Biodiversity.

The EIAR acknowledges that the proposed jetty extension will result in a small loss of common habitats, such as Limestone-marl lakes and Reed and large sedge

swamp. These habitats do not provide important feeding or resting areas for waterbirds, and surveys show no significant populations of these species at the site.

Therefore, the loss of habitat is expected to have only minor, short-term effects on waterbirds. During construction, some disturbance to birds in the surrounding area may occur due to noise and human activity, but these effects are likely to be temporary and minor. Overall, I believe that the project has been designed to balance development with protecting the wildlife and peaceful character of Lough Derg. I would agree with the conclusions reached in Chapter 10 of the EIAR that the proposed development, subject to mitigation and enhancement measures would not give rise to significant direct nor indirect environmental adverse impacts on biodiversity, over the longer term, relative to the current condition of the site, or any important Ecological Feature (IEF) at any scale.

7.7 Existing Residential Amenities

Concern is raised of impact upon property adjoining the proposed car park. Issues raised of security, privacy and inadequate boundary treatments proposed. Concern expressed that the existing natural boundary to the car park is not suitable for its intended use. Concern of problems with drainage and a concern of right of way from the entrance of the proposed car park to the gateway of a rear adjoining garden.

With respect to the matter of privacy and security to properties adjoining the proposed village car park, I note the applicant's response that:

'The proposed boundary treatments at the new village car park site have been selected to provide appropriate privacy and security while also maintaining existing features such as trees and hedgerows, where possible. The detailed design stage will present a further opportunity for review of the proposed boundary treatments, including consultation with adjoining neighbours.'

Regard being had to Drg. No. 120, 'Visitor Car Parking Layout and Section'. I consider that the proposals for hedgerow retention and an increase the levels of tree and hedgerow planting are welcomed. However, I would also have concern that the existing natural boundary, albeit, reinforced, in segments, with additional trees and hedging is sufficient given the backland location and scale (incorporating 169 total car parking spaces, together with coach parking and bicycle). I too would have

concern that a natural boundary, as proposed, would be insufficient to adequately address security and privacy issues raised by adjoining properties. I note the overgrown nature of the boundaries and gaps in the boundary on my site visit. I recommend that a natural local stone boundary wall of 1.8m in height be constructed along the boundary of the village car park site reinforced with natural planting and hedging where it abuts adjacent property. This matter can be resolved by way of condition and compliance with Clare County Council.

With respect to the matter of right of way raised by Noel and Josephine Lyons. The observation submits that there is an existing gateway into their garden at the upper end of the proposed car park. Their observation states there is an existing Right of Way from the entrance of the proposed car park to the gateway, required to facilitate machinery to access their garden. No maps to support the submission have been submitted.

From my site visit I observed a gate opening in the western boundary of the proposed village car park. The applicant's response submits 2 Folio Maps for the car park lands at Mountshannon Folio 1 CE 1277F and Folio 2 CE9818. It is their response that there is no right of way across the proposed village car park lands. I have checked www.landdirect.ie with the Folio numbers provided by the applicant. I can confirm that the maps submitted are as per the landdirect website. There is no RoW across the lands and the RoW from the adjoining lands to the west does not directly abut the proposed development site boundary. This being said, I observed a gate access from adjoining lands, into the proposed car park site, on the ground. Regard being had to the foregoing, I consider that the matter of property rights is a civil issue between the parties. Give the evidence in the form of folio maps submitted by the applicant it does not appear that a right of way exists across the car park lands. I consider that there is sufficient evidence on file to indicate adequate legal interest in the lands to seek and obtain planning permission. The applicant has submitted the relevant consents as required to indicate sufficient compliance with the requirements of the 2001 Regulations as regards ownership / consent. The issue of right of way via the gateway is a civil matter between the parties and is outside the remit of this planning application. I note that, a grant of permission does not amount to a determination of title, and that the Board is entitled to rely on the prima facie evidence before it.

I highlight that Chapter 7 of the EIAR deals with Material Assets: Built Services and Waste. An assessment of Likely Significant Effects of Built Services & Waste is set out in the EIAR Assessment I do not propose to repeat this assessment here, see detailed assessment of site drainage, storm drainage, SuDs features and proposed village car park storm drainage management regime set out in the EIAR report, incl. mitigation measures outlined in the CEMP. Having regard to the examination of environmental information provided in respect of material assets and waste, in particular in Chapter 7 of the EIAR it is considered that there is no potential for significant environmental effects. I am satisfied that the drainage management regime for the proposed village car park is acceptable, subject to mitigation and monitoring measures, which respond to the concerns raised by observers and prescribed bodies.

With respect to the concern raised of impact upon views, from 4 Harbour View Mountshannon, a neighbouring property. I note that under Irish planning legislation and case law, a private individual does not have a legal right to a view over adjoining land. Therefore, interference with No. 4's existing view is not in itself a valid ground for refusing planning permission.

Having reviewed and assessed the planning documents submitted with the application including the Architectural Design Statement and Landscape Design Report. I am of the opinion it has been demonstrated that the design approach for the Visitor Centre has been carefully considered to ensure its sensitive integration within the Old Rectory site and wider harbour setting.

The Landscape and Visual Impact Assessment (LVIA) in the EIAR further demonstrates that the visual impact of the proposed Visitor Centre will be neutral to positive.

7.8 Archaeological Heritage & Cultural Impacts

Prescribed bodies and third parties have expressed concern that not enough consideration has been given to importance of Holy Island as a historical burial ground. Concern has also been expressed of impact upon the tradition of burials. Concern burials may become a tourism spectacle. Concern is raised that the community should not be made to feel unwelcome visiting their loved one's graves.

Concerns are expressed by An Taisce and third parties that the high volume of people projected to visit the island will negatively impact the ancient infrastructure of the site. The DHLGH raise the importance of underwater archaeology and express concern that adequate protection is afforded to archaeological heritage on the Island of Inis Cealtra, incl. underground archaeology.

The matter of privacy for burials and access to the island for locals has already been dealt with in this report. As noted above the DHLGH sets out 6 detailed recommendations and mitigation measures in relation to underwater and terrestrial archaeology. The DHLGH requests that compliance with archaeological conditions shall require a formal statement in writing from the Department to An Bord Pleanala that all mitigation measures have been implemented and approved.

Justification and need for the project, the plan – led approach and compliance with policy and guidelines, have been considered under paragraph 7.1 above, 'the likely consequences for the proper planning and sustainable development of the area'. Paragraph 7.2 response to observations from the DHLGH addresses conditions to be attached to address impact upon terrestrial archaeology, underwater archaeology, cultural heritage: built heritage and cultural heritage: archaeological heritage impacts. I highlight the EIAR assessment, in particular, Chapter's 13 and 14 cultural heritage: built heritage and cultural heritage: archaeological heritage. With respect to Built Heritage, the history of Inis Cealtra is set out in section 13.6.1 of the EIAR, Main Phases of Building – section 13.6.3, Description of Monuments – section 13.6.4, Mitigation – section 13.9, Residual Impact Assessment – section 13.10. With respect to Cultural heritage the history of Inis Cealtra is set out in section 14.6.1 of the EIAR, Burials – section 14.6.6, Potential Significant Effects - section 14.8, Mitigation – section 14.9, Residual Impact Assessment – section 14.10 and Monitoring – section 14.14. See section 8.6.10 of this report, 'The likely significant effects on the environment EIA', for potential effects, mitigation and evaluation and assessment of direct and indirect effects.

None of the works to the island are to take place in the zone of the monastic buildings, with impact only on the stone jetty at the north-west side of the island and the 1960s concrete built Fisherman's Hut, which is now proposed to be retained. In terms of potential effects, the EIAR sets out that the monuments, churches and ecclesiastic buildings will not be directly affected by the proposed development, the

pier and welfare pods being sited on the north- west side of the island. It is submitted that this location was selected being down slope, and out of view of the main group of monuments, in an area which has limited potential for archaeological remains.

Test pits under Ministerial Consent were excavated in September 2024 in the proposed location of the Welfare and Staff pods on the north-eastern part of the island, close to the jetty. No finds or features of archaeological significance were recovered.

As stated in my assessment of Chapter 13 and 14 of the EIAR which accompanies this report. I am satisfied that the information submitted in the EIAR adequately demonstrates an understanding of the potential impacts on Cultural Heritage: Built heritage & Cultural Heritage: Archaeological Heritage.

In relation to the conclusions of the EIAR, I would generally concur with the conclusions of same. The most direct impact to the cultural heritage lies in the construction of the new jetty at the north-west side of the island. I agree that the impact will be low, as the construction of the stone and concrete jetty here in the 19th century or earlier will have resulted in the removal of any earlier material if such was present. I note the applicant's agreement to carry out the recommendations and specific conditions of the Underwater Archaeology Section of National Monuments.

Increased visitor numbers will result in the presence of staff on the island, to inform and guide the visitors, to maintain the landscape and in part improve it with additional planting of native species and removal of the encroaching scrub. I believe that the impact to the Built Heritage from increased visitor numbers will be positive.

Proposals for the maintenance and improvement of the landscape are outlined in the Landscape and Conservation Management Plan. Establishment of improved visitor facilities, both in Mountshannon and on Inis Cealtra, will bring increased awareness of this important island monastic site, which ranks in significance with sites such as Clonmacnoise and Glendalough. I believe renewed focus on Inis Cealtra will result in an increase of research and study of this important resource.

I note the VMP submitted with the proposed development and the applicant's response to observations with respect to access to Inis Cealtra for locals and access and impact upon funerals.

I am satisfied that subject to implementation of the recommended mitigation measures during the construction phase to protect archaeology and with implementation of the visitor management strategies and conservation measures and mitigation set out in the VMP, impact of the project will not result in a significant impact upon archaeological heritage or cultural heritage, such that the proposal should be refused planning permission.

7.9 Visual Impact, Scale and Design.

Concern is raised that the proposed new visitors centre will impact upon the Rectory, a beautiful historic protected structure overlooking the harbour. It is submitted that the size and design of the proposed Visitor Centre will feel out of place in a small village. Mountshannon is special because it still feels connected to nature and history. Concern a large modern building, built for busloads of tourists, will change that character. Instead of blending into the village, it will be imposing.

Again, I highlight the cross over in issues raised and the justification and need assessment for the proposed development set out in the preceding sections of this report. I note that Mitchell + Associates prepared a Landscape and Visual Impact Assessment (LVIA) and were also appointed as the Landscape Architect for the proposed development. I also note the Architectural Design Statement prepared by McCullough Mulvin Architects Chapters 5 (LVIA) and chapter 13 (Built Heritage) of the EIAR together with the photomontages by Digital Dimensions.

I have reviewed the planning documents and drawings, including the Architectural Design Statement, the Landscape Design Statement and supplementary information available in the Inis Cealtra Landscape and Conservation Management Plan appended to the Landscape Design Statement. I note that the client's stated objective in undertaking the visitors centre development is two – fold:

a) To conserve Inis Cealtra (Holy Island) as a significant historical, ecclesiastical, archaeological and cultural site and

b) to expand its attractiveness as a sustainable tourism destination, and in so doing, address population decline and rural deprivation by providing social and economic benefits derived from tourism for East Clare and the wider Mid-West Region.

Section 9.2.3 of the CCDP contains policy objective CDP9.4 which relates to the provision of tourism developments and tourist facilities. The policy strikes a balanced approach between promoting tourism development and protecting environmental and community interests.

It is an objective of Clare County Council:

a) To permit tourism-related developments and facilities inside existing settlements where the scale and size of the proposed development is appropriate and in keeping with the character of the settlement, subject to normal site suitability considerations.

I consider that the key aspects that are relevant to this assessment are the potential effects on the landscape and visual character of the village of Mountshannon, Lough Derg and Inis Cealtra. This includes the visual effects of the proposals to and from those locations, and beyond. Notable aspects include, the proposed Visitor Centre, its function, scale, massing and finishes, the proposed car park, its uses, generation of footfall, and its presence on the main street of Mountshannon and the proposed jetty, pods and paths on Inis Cealtra.

As stated above, I consider that the proposed development provides only the minimum facilities necessary to ensure the health and safety of both visitors and staff, as well as the management and protection of the island. The infrastructure improvements are specifically designed to minimise any negative impact on Inis Cealtra's and Mountshannon from a visual impact perspective. Once operational there will be a cap on the maximum visitor numbers, in line with the Visitor Management and Sustainable Development Plan which informed the Clare County Development Plan.

<u>'The Visitors Centre Site and Old Rectory'</u>

With regard to building siting, levels and access of the visitors centre at Mountshannon I note that it is proposed that a part-one-storey, part-two-storey structure (GIFA 1594 m2) be constructed to the south of the rectory site, near the lake edge, facing the harbour and establishing a strong visual link with Lough Derg and Inis Cealtra Island. The ground floor level of the visitor centre is at +32.83m OD, which is above the 1:100 year flood level and which will tie in with the existing harbour and harbour car park level (approx. +32.00m OD). This will allow an easy

connection for visitors between the village car park, Main Street, Aistear Park, the Old Rectory building (which is a protected structure and has recently been renovated), the new visitor centre, the new public realm space to the front facing the Harbour and the Harbour itself.

The change in level across the site means that the external ground level proposed is level with the internal ground floor of the visitor centre along its front elevation to the south, while the external ground level is level with the roof terrace level along its northern boundary. This allows the building to read as a single storey building with ‘pop - ups’ at first floor from the harbour side, while from the elevated level of the rectory, only the first floor pop-ups will be visible. This strategy, I agree, helps to reduce the massing of the building when seen from the elevated position of the Old Rectory protected structure, helping to retain the strong visual connection between the rectory and the lake below.

I am of the opinion that the design and scale of the proposed Visitor Centre within the ‘Old Rectory Site’ respects the setting of the existing Protected Structure, regard being had to its recent renovation. I believe that the design of the infrastructure elements, connectivity and finishes proposed within Mountshannon are all of the highest quality and will enhance the public realm and lake-side areas of the village. The proposed Visitor Centre will include a series of acceptable contemporary spaces and facilities to serve visitors, staff and community members. The uses proposed within the Visitor Centre comprise a series of areas for interpretation, exhibition, and education, together with supporting spaces and ancillary café. Its sensitive design and scale with local stone finish contributes to its seamless integration into the natural landscape. See Photomontages View 3 and View 6 Existing and Proposed. It complements the Old Rectory site and adds to the heart of the village centre. It will be a positive addition to Mountshannon village from a tourism use, visual amenity and connectivity perspective. The area to the front of the new building, in front of its main façade, has been designed as a semi-circular plaza. The generous space will provide a comfortable place for people to wait to board a boat, to gather after they have returned from the island, or to sit out and enjoy the views, beauty and ambiance of Mountshannon. The area will be paved in natural stone, care has been taken to retain many of the existing mature trees that form part of the southern boundary of the rectory site, and these will remain in place in new concrete retaining

structures. Two mounded large, planted areas are proposed to the plaza to maintain part of the existing trees on the site, while trees right in front of the centre of building are removed to allow for a generous access as well as open the view towards the island.

The Harbour Car Park

I agree that the reconfiguration of the existing carpark at the harbour is acceptable. It will enhance the amenity and aesthetic value of this area, see photomontage View 1 existing and proposed.

The Village Car Park

The proposal submits that the design of the car park seeks to create a densely planted space with a variety of surface materials so that it feels like a soft- edged, rural space which is suited to its surroundings. I acknowledge that the car park site is surrounded by an existing natural boundary of trees and hedgerows, with as much as possible being retained. New trees and planting will be introduced to the site to compensate for those which are removed.

I note my earlier recommendation to require a 1.8m high local stone boundary wall to be constructed along the boundary of the car park to its northern, eastern and western boundaries, while maintaining the natural boundary, in order to provide security and privacy to neighbouring properties. The southern boundary proposed to main street with stone boundary wall similar to the existing boundary is considered acceptable. I note in particular the site layout plan and landscape plans submitted and Photomontage View 28 and View 29 Existing and Proposed.

The Welfare Pods on Inis Cealtra

In tandem with the provision of the new jetty and paths on the island, three new staff and public welfare facility “pods” will be provided to meet the minimum needs of staff and visitors to the island by providing a weather shelter, WCs and a rest room for island staff. A description of the proposed pods is set out in section 3.0 of this report, above, ‘Proposed Development’ and in numerous of the supporting documents submitted with the application. I note, in particular, the description of the proposed pods set out in the Architectural Design Statement and Conservation Report.

The chosen location for the pods alongside the existing (and new) jetty has a number of existing trees, an existing shelter (Fisherman's Hut), an enclosed clearing and dense scrub around this. This area is categorised as Oak-Ash-Hazel woodland according to surveys undertaken. The presence of the shelter and clearing means that minimal vegetation needs to be cleared for the construction of the new staff and shelter pods, with the consequent loss of habitat that this would entail. The pods have been positioned, and their foundations designed, so that no trees need to be removed for their construction. The existing trees and vegetation provide natural visual screening of the structures from all sides. It is clear that when developing the design of the pods, considerations of archaeology, ecology and careful integration into the landscape was of utmost importance. While each pod serves a distinct function, they share a similar architecture and method of construction. The pods are lightweight, freestanding, timber pavilions, raised on timber legs so that their contact with the ground will be minimal, reducing the risk of disturbing sensitive archaeology. The pods will have new timber walkways to provide level access into them and these too will be of timber construction resting on micropile foundations. This raised form of construction also serves to lift the pods and walkways above the 1:100 year flood level, helping to mitigate against the risk to persons and property in a flooding event and to reduce water displacement caused by their construction to negligible levels.

In terms of materiality, given the heritage and archaeological significance of the context, the use of stone and oak timber is considered an appropriate choice for the pods, so as not to be incongruous. It is indigenous to the area, is structurally strong and inherently durable.

All pod and walkway components will be assembled on the island to minimise the impact of their construction and are designed to be dismantled and removed if required, with little trace left on the landscape. Photovoltaic (PV) panels will be installed on all roofs to power essential equipment, including lighting and a small pump in the WCs. I note that the scale and location of the pods has altered slightly on foot of the retention of the Fisherman's Hut, the second pod is proposed to be reduced in length to sit beside the fisherman's hut.

Having carried out a site visit and viewed the plans, drawings and photomontages submitted, cognisance being had to siting, design and natural screening. I agree that the proposed design of the welfare pods adheres to the principle of minimal visual

impact. There construction also adheres to the principle of minimal intervention given the archaeological significance, cultural and built heritage significance, natural beauty significance and idyllic setting of the island. The pods are located discretely, well away from the monuments on the Island, on lower ground, well screened by trees and in an area deemed to have no archaeological significance.

New Pedestrian Mown Paths

A series of 2m wide mown grass pathways is proposed to allow visitors to explore the island, its archaeological features and natural beauty. I consider that the design of the paths is in line with the principles of minimal intervention to archaeological and natural heritage, and seeks to find a balance between accessibility, wayfinding, readability of the landscape and protection of archaeology and nature.

Having reviewed the drawings and documentation submitted, regard being had to accessibility, potential archaeological impact and visual impacts of the proposed materials. I consider that the proposal for new pedestrian paths is well justified and will not have a significant negative impact upon underground archaeology, with monitoring and mitigation as proposed. I consider that the path of least intervention has been chosen for the proposal - the paths are all proposed as mown paths to existing ground levels for minimum visual impact and to avoid impact on the archaeology underground. Cognisance is had to proposals for aggregate to be used on some more well-walked, travelled paths, if required. I consider such proposals acceptable in principle subject to ongoing monitoring and mitigation, as proposed.

Proposed Jetty & Boat Traffic

It is submitted that the existing concrete jetty to the northwest of Inis Cealtra is no longer considered fit for purpose and is unlikely to have been significantly modified since the 1960’s. It is severely constrained by its extension into the lake of only ten metres resulting in relatively shallow waters around the landing point where only smaller boats can successfully land. The new jetty has been designed to break the crest of waves thereby ensuring a safer mooring experience on the inner jetty area than the existing jetty can provide. A deepened navigation channel will not be required to facilitate larger vessels and no dredging is necessary.

Waterways Ireland have provided the design of the proposed new jetty, which extends into deeper water, will allow safer and more convenient passage between the

mainland and the island. I note that the site of the new proposed jetty has been located carefully, after exhaustive underwater archaeological study, at the existing jetty location. Its size has been increased to accommodate larger boats than currently bring visitors to the island.

The structure is made up of four principal parts: a floating breakwater jetty, a stone and concrete causeway, a steel access ramp connecting the two, and a smaller canoe launch jetty with access ramp. The new floating jetty is L- shaped in plan and extends out into the lake approximately 53m. This distance means that the jetty can be constructed without the need for dredging of the lakebed, which would have been required were it to have been constructed in shallower waters, mitigating its risk to potential archaeology. It is designed as a breakwater jetty that breaks most of a wave's crest and provides a safer mooring to the inner jetty area. The floating jetty is 4m wide and is held in position using 4no. (max) 800mm diameter steel piles. It's construction as a floating jetty means that it only requires the 4no. piles described, further mitigating any potential risk archaeology which may have been present were it to be constructed as a fixed pier.

The causeway, which is constructed over the existing concrete jetty (which will remain in place) on the shore of the island, comprises a concrete anchor platform, held in place by 4no. 203mm H- piles, around which stone gabions are placed, built up to provide a level surface, 3m wide, which will be paved with stone. A 1.5m wide steel access ramp will be fitted between the two, being fixed to the causeway at one end and resting on the jetty at the other, allowing it move up and down with the rise and fall of the lake level. A new, smaller access jetty for canoe launches will be constructed to the east of the fixed causeway. This jetty will be floating and held in place using 4no. H-Piles vibrated into the lake bed, and will also be connected back to the causeway by a floating access ramp.

I note the LVIA submitted with the application documents includes view 14 which addresses the view from Knockaphort. The visual effect of the proposed development in this view is assessed as moderate to slight, neutral. The LVIA submits that while it is considered that the immediate experience of the engineering and safety signage at the jetty itself will change the perception of arriving on the island, it should be considered that the arrival is not welcoming at present.

I note that an assessment of boat traffic is set out in Section 6.9.11 of Chapter 6, Traffic and Transport, boat traffic volumes carrying visitors from Mountshannon Harbour to Inis Cealtra. This is dealt with in the EIAR Assessment which accompanies this report. I highlight that the navigation route was chosen to facilitate the required navigation depth for vessels to access the jetty, whilst ensuring minimal or no bed alteration will be required on the proposed navigation corridor. Waterways Ireland require a 1.8m depth in the river sections and 2.2m in lake sections of the Shannon. Therefore, bathometric surveys have been completed to identify the proposed new navigation channel and ensure there is sufficient depth on the channel. I consider that the justification for the navigation route is acceptable and justified. I note also other factors relevant to the selection process included avoiding protected habitat and underwater areas of sensitivity.

The EIAR, CEMP, TMP and VMP sets out, operational measures will be implemented to manage boat traffic responsibly, limiting disturbance to wildlife and preserving the quiet, pristine character of the area. I note ongoing monitoring and adaptive management will ensure that the ecological integrity and scenic qualities of Lough Derg are maintained throughout the project's lifespan.

Overall, I have reviewed the drawings and documents prepared by Waterways Ireland (WWI) and I consider that the visual impact, scale, design and construction of the Jetty as proposed is acceptable. It is not incongruous in the landscape and will blend with the existing pier and landing point on Inis Cealtra over time.

7.10 Services Capacity

Third party concern has been expressed that the Mountshannon sewerage plant is near capacity. Third party concern is also expressed of demand upon water supply capacity for the village and possible curtailment of much needed future housing supply.

I note that a Confirmation of Feasibility (COF) from Uisce Éireann (dated 12 September 2024) is included with the application. It confirms that, based on the anticipated visitor numbers, a water connection is feasible without an infrastructure upgrade. A wastewater connection is also confirmed as feasible without an upgrade.

The COF confirms that Uisce Éireann has completed optimisation works at the Mountshannon wastewater treatment plant.

I see no reason to refuse planning permission on grounds of lack of services capacity given the information on file.

7.11 Traffic & Accessibility

I note that An Taisce and third parties have raised concerns of car park size (exceeding 200 spaces) beside a sensitive lakeshore location. I note the Department of Transport request that 20% of the total car parking spaces are EV, that the Climate Action Plan is considered and adhered to. It is suggested that the applicant engage with and consult with bus operators. Their submission also highlights accessibility. I note the observation parking should be free. Also concern of reduction in car parking at the harbour and management of the proposed car parking areas. It is submitted that the entrance to the car park is located just east of a very bad bend. The TII observations states they have no observations to submit.

The car park has been designed to provide 169 total car parking spaces, together with coach and bicycle parking facilities, as follows:

- 6 coach parking spaces
- 11 accessible car parking spaces
- 105 car parking spaces
- 53 overflow car parking spaces on reinforced grass to the northern part of the site.
- 40 secure bicycle parking spaces.

A full description of the proposed access arrangements is contained in the Architectural Design Statement and Civil Utilities Planning Report that accompanies the application. A Road Safety Audit also accompanied the application.

The proposed village car park provides for 34no. EV charging points (20% of total spaces) with a further 18no. spaces (10% of total spaces) ducted for future provision of EV chargers. New drainage and utilities works, site lighting, payment kiosks and

new metal vehicular and pedestrian gates to Mountshannon main street will also be provided.

The applicant submits that the village car park is designed as part of the overall masterplan for the Inis Cealtra Visitor Experience, the public car park is intended to serve both phases of the project development. The ‘slow tourism’ approach of the new visitor experience means that visitors will spend on average 2.5 hours at the visitor experience and in Mountshannon. On a practical level, this car park capacity is required in order to turn over 3.2 times per day in low season and 4.6 times per day in peak season, given the extended length of stay for visitors.

Vehicular access to the car park will be via a lifting barrier. Access to parking for those with pre-booked admission tickets for the visitor experience is provided by number plate recognition as part of their overall admission fee. This will encourage visitors to use this car park as their parking fee is discounted as part of their overall admission fee. For all remaining car park users, payment via pay kiosk will be required for use of the facility. The design proposed will ensure public transport accessibility for disabled persons and those with reduced mobility.

I note in particular:

- Drg. No. 21760 MWP 00 00 DR C 015 Village Carpark Bus Swept Path Analysis Eastern Approach.
- Drg. No 21760 MWP 00 VC DR-0153 Village Carpark Bus Swept Path Analysis Eastern Approach.
- Drg. No 21760 MWP 00 VC DR C 015 P01 Village Carpark Bus Swept Path Analysis Western Approach.
- Dr. No. 21760 MWP 00 VC DR C 01 Site Layout Master Sheet and
- Drg. No. 21760 MWP 00 VC DR C Village Car Park Sightlines (45m sightline indicated)

I note the Stage 1 RSA (October 2024) on file. Sections 2 and 3 of this report present the findings of the Stage 1 Road Safety Audit on the proposed Inis Cealtra Visitor Tourism Experience Project Village Car Park entrance junction on Main Street and Visitor Centre entrance junction on Harbour Road, respectively. Paragraph 2.3 sets out the problem of potential restricted junction visibility splay

and a recommendation that clear visibilities should be provided for all locations within the entrance junction visibility splays, for the appropriate Main Street urban design speed, with reference to DMURS, in consultation with Clare County Council.

It is noted in the Stage 1 RSA for the proposed village car park: The build out of the footways, locally, and the removal of recessed car parking would relocate the Stop location and could facilitate an enhanced arrangement for pedestrians along the Main Street footway, including a raised surface across the junction, at-grade with the footway.

It is noted that the Village Car Park Sight Lines drawing provided for audit shows visibility splays for a distance of 45 metres along Main Street, both east and west of the junction. This is shorter than the 49 metres recommended by DMURS for a 50 km/hour urban design speed, along streets with a bus route. The applicant submits that the sightlines (45m to the east and west) at the entrance of the car park with the main street have been developed taking cognisance of the traffic calming measures, speed cushions, pedestrian crossings, carriageway narrowing etc., which have been installed on the Main Road in Mountshannon which is understood to reduce the design speed to 30km/hr.

I acknowledge that the swepth path analysis drawings indicate that large vehicles can enter the car park and leave the car park whilst cars are parked within the car parking zones. Section 6.93 of the Traffic and Transport Assessment details the access restrictions to the carpark. I consider that the landscape plan has taken cognisance of visibility requirements at the entrance to the village car park, in terms of planting and buildouts. Overall, it is my opinion that the entrance to the car par, located in the village, north of main street and Aistear Park to be the optimum location from a connectivity viewpoint. I consider that the justification provided is acceptable and that it will not give rise to a traffic hazard or danger to pedestrians.

The Harbour Cark Park has been reconfigured to improve the circulation around the Harbour area and to create a shared space. This shared space has been designed to allow for vulnerable road users to traverse between the Visitor Centre and Mountshannon Harbour. Traffic calming features will be implemented

to reduce the risk to vulnerable road users. The speed limit in this area will be reduced to accommodate this development to 30km/hr. The loss of some car parking at the harbour car park has been accounted for and compensated for within the sizing of the new car park.

I highlight that the Harbour Car Park reconfiguration has been subjected to a swept path analysis of a jeep and boat trailer. This is to verify that the difficulty of vehicles accessing the slip way to launch boats has not been negatively impacted by the proposed reconfiguration.

I note that the existing access track serving the Rectory Centre will be realigned as a result of the proposed development to accommodate the Visitor Centre. This revised internal road layout of the Visitor Centre site has been subjected to a swept path analysis of a bin lorry and a fire engine. The new Visitor Centre will allow for pedestrian access directly to the shared space being created in the Harbour Car Park.

Chapter 6 of the EIAR assesses Traffic and Transport for both the construction and operational phases. Overall, having regard to the information on file it is my opinion that the proposed development is acceptable from a traffic safety and impact perspective. I do not consider that the proposed development would endanger public safety by reason of traffic hazard. It is considered that the additional traffic movements which would be generated would not interfere with the free flow of traffic and would not compromise the level of service and carrying capacity of, the local road network at this location.

Overall, I consider that there will be no significant negative effects on traffic and accessibility of the area The proposed development is acceptable from a traffic safety and access perspective.

7.12 Other Concerns

- Site notices

  I note that there is no statutory obligation on the local authority to erect site notices for a Part X application, only to publish a notice in one or more

newspapers circulating in the area. Notwithstanding, 5 site notices were erected at the key public entrance points to the application site.

Given the foregoing, I do not consider that permission should be denied for this procedural matter raised.

- Concern of the duration of the consent sought from ABP, which is at least a 17 year permission until the proposed second phase of the Part 10 works is completed (in 2042).

  I note that it is submitted that with respect to the timeline for delivery of the proposed Phase 2 Visitor Centre in 2042, the project is being planned in this manner due to three key drivers: (i) visitor number projections, (ii) planning and statutory timelines and (iii) funding requirements.

  I highlight that this matter has been dealt with earlier in this report under Economic Rationale section. The applicant's response states:

  'While the length of the timeframe for phase 2 is anticipated to open in 2042, with construction expected to commence in 2040, allowing for an 18-month build period. This timeline, approximately 15 years from now, aligns with standard planning practices. In private development, it is common to secure planning permissions with a 10-year duration, extendable by 5 years—a total of 15 years. The same principles apply here'.

  Therefore, while I note the applicant's response and consider the justification reasonable, I also note that this is a Part 10 development for a large scale public infrastructure Local Authority project, which has no set statutory time limit for the construction period.

  It would not be reasonable to refuse permission on this ground.

- Concern of introduction of solar panels for power. Third party concern is raised that the reflection off these panels has been proven to have a negative environmental impact particularly on reclusive birds such as White-Tailed Sea Eagle.

  The White-tailed Eagle was recorded during avian surveys (both winter and summer), as already noted, it is not a Qualifying Interest species of the relevant SPA – Lough Derg (Shannon) SPA, also no evidence was recorded

of it nesting on the island. As set out in my EIAR assessment, while localised loss of foraging / resting habitat, for white-tailed eagles is likely, it is not significant. Also disturbance /displacement from noise / human activity / water quality, to white-tailed eagles, is likely, however it is not significant and temporary to short term.

The application documentation states: 'It is proposed to install photovoltaic (PV) panels on all roofs to power essential equipment, including lighting and a small pump in the WC'. I note the PV Panels indicated on the architectural and planning drawings submitted. I consider given the location and scale of the PV panels, that risk to birds, and particularly the White-tailed eagle (i.e collision risk) is low. I note that solar panels generally pose less risk to birds than wind turbines or fossil fuel infrastructure. Given this is an island with no services or utilities, I consider the proposal for inclusion of solar panels, of the scale and nature proposed, is acceptable and would not give rise to a significant negative impact that they should be omitted.

8.0 The likely effects on the environment (Environmental Impact Assessment)

8.1 Statutory Provisions

This section of the report deals with the potential environmental impacts of the proposed development during the construction and operation phases.

Since the design life of all elements of the proposed development is greater than 60 years, the development is considered permanent. Consequently, a decommissioning phase is not assessed in the EIAR report.

The Inis Cealtra Visitor Experience is to be developed on Inis Cealtra (Holy Island) and on the mainland, in two principal locations within Mountshannon Village. The project is comprised of different elements as set out below.

Inis Cealtra Island

- Demolition of an existing concrete shelter adjacent to the existing pier at the north-west of the island.
- Installation of a new L-shaped floating access jetty and walkway at the north-west of the island, consisting of a floating breakwater jetty, a stone and concrete

causeway connected by a steel access ramp and a canoe launch jetty with access ramp.

- A series of new mown grass pedestrian paths to allow for enhanced access to the main monuments and natural landscape on the island.
- Provision of three staff and public welfare facility 'pods' including weather shelter, WCs and a rest room for island staff.

Mainland – Mountshannon

- Construction of a new public car park in Mountshannon Village, on the north side of Main Street, incorporating 169 total car parking spaces, together with coach parking and bicycle parking facilities.
- A Visitor Centre in the southern part of the 'Old Rectory Site'. It is a part-one-storey, part-twostorey semi-circular building incorporating a series of spaces for interpretation, exhibition and education associated with the Inis Cealtra Visitor Experience, together with a café and ancillary supporting spaces. Public realm works in front of the main façade, paved in natural stone, will continue the curved geometry of the building, creating a comfortable space for visitors to meet, relax and take in views of Lough Derg and Inis Cealtra.
- Reconfiguration of the existing Mountshannon Harbour car park, providing for 49 total car parking spaces and public realm enhancements.

Application for approval made under Section 175 (3) and Section 177AE of the Planning and Development Act, 2000 (local authority development requiring environmental impact assessment and appropriate assessment).

- Section 175 (3) states that where an EIAR has been prepared pursuant to subsection (1), the local authority shall apply to the Board for approval of the proposed development.
- Section 175 (1) states that where development belonging to a class of development, identified for the purposes of *section 176** , is proposed to be carried out—

(* identifying development which may have significant effects on the environment…)

Therefore, the development is subject to EIA.

8.2 EIA Structure

This section of the report comprises the environmental impact assessment of the proposed development in accordance with the Planning and Development Act 2000 (as amended) and the associated Regulations, which incorporate the European Directives on environmental impact assessment (Directive 2011/92/EU as amended by 2014/52/EU). Section 171 of the Planning and Development Act, 2000 (as amended) defines EIA as:

> a. Consisting of the preparation of an EIAR by the applicant, the carrying out of consultations, the examination of the EIAR and relevant supplementary information by the Board, the reasoned conclusions of the Board and the integration of the reasoned conclusion into the decision of the Board, and
>
> b. Includes an examination, analysis and evaluation, by the Board, that identifies, describes and assesses the likely direct and indirect significant effects of the proposed development on defined environmental parameters and the interaction of these factors, and which includes significant effects arising from the vulnerability of the project to risks of major accidents and/or disasters.

Article 94 of the Planning and Development Regulations, 2001 and associated Schedule 6 set out requirements on the contents of an EIAR.

This EIA section of the report is therefore divided into two sections. The first section assesses compliance with the requirements of Article 94 and Schedule 6 of the Regulations. The second section provides an examination, analysis and evaluation of the development and an assessment of the likely direct and indirect significant effects of it on the following defined environmental parameters, having regard to the EIAR and relevant supplementary information:

- Population and human health,
- Biodiversity, with particular attention to species and habitats protected under the Habitats Directive and the Birds Directive,

- Land, soil, water, air, climate, noise and vibration,
- Material assets, cultural heritage and the landscape,
- The interaction between the above factors, and
- The vulnerability of the proposed development to risks of major accidents and/or disasters.

It also provides a reasoned conclusion and allows for integration of the reasoned conclusions into the Boards decision, should they agree with the recommendation made.

8.3 Issues Raised in Respect of EIA

Issues raised in respect of EIA by Prescribed Bodies and Third-Party Observers are discussed in detail in Section 3.0 and Section 6.0 of this report and include the following:

- Archaeology & Cultural Heritage Impact
- Impact on Biodiversity
- Landscape and Visual Effects
- Traffic, Car Parking and Accessibility
- Climate
- Population and Human Health

The issues raised will be assessed under the relevant sections in this report.

8.4 Compliance with the Requirements of Article 94 and Schedule 6 of the Regulations 2001

The applicants EIAR comprises of the EIAR (Main Text Vol II) including Chapters 1 – 16. A stand-alone Non-Technical Summary (NTS) Vol I and a standalone EIAR Appendices - Vol III, Photomontages (Viewpoints 01 – 29), a Visitors Management Plan, Accessibility Audit and Arboricultural Assessment.

I assess below compliance with the requirements of Article 94 and Schedule 6 of the Planning and Development Regulations 2001(as amended).

Table 1 Article 94 (a) Information to be contained in an EIAR (Schedule 6, paragraph 1)

A description of the proposed development comprising information on the site, design, size and other relevant features of the proposed development (including the additional information referred to under section 94(b))

A description of the proposed development site location and setting (including maps) is contained in Chapter 1 - Paragraph 1.5.1 – 1.5.3. The chapter includes details on the proposed development site location and setting, the surrounding area, land use zoning objectives.

Chapter 2 provides a description of the development, landscape management, water and drainage (storm water, wastewater and water supply), the proposed village car park, access parking and circulation, drainage, public lighting, services. It also provides details of the proposed visitors centre, siting and design of the building, building form, uses and facilities, materials and elevational treatment, landscape, access, public lighting, drainage water supply. It details amendments proposed to Mountshannon Harbour car park and public realm. Operating hours, staffing, visitor numbers. Island tours and boat services and management structures. Phasing of the development (Phase 1 and Phase 2), Construction hours, construction traffic, construction waste, Health and Safety, monitoring, commissioning and decommissioning.

Chapter 6 provides a further detailed description of the development components, access, traffic and transportation details, community liaison proposals, and Construction and Environmental Management Plan (CEMP), proposed Construction Traffic Management Plan (CTMP), and Visitors Management Plan. It also includes a Risk of Major Accidents or Disasters.

The description is adequate to enable decision making.

A description of the likely significant effects on the environment of the proposed development (including the additional information referred to under section 94(b).

Chapter 5 to Chapter 16 of the EIAR describes the significant effects on the environment as follows;

Table 2 – Summary Table of Adequacy of Information on Likely Significant Impacts

Technical Chapter	Description of Likely Significant Impacts	Adequacy

		of Info (Y/N)
Chapter 3 **Alternatives Considered**	The assessment of alternatives is considered under the following headings: 'Do Nothing' Alternative - section 3.3.1 Alternative Locations - section 3.3.2 Alternative Uses - section 3.3.3 Alternative Layouts & Design - section 3.3.4 Alternative Processes - section 3.3.5	Y
Chapter 4 **Population & Human Health**	Potential Significant Effects – section 4.8 Cumulative Impacts – section 4.8.3 Mitigation Measures – section 4.9 Residual Impact Assessment -section 4.10	Y
Chapter 5 **Landscape & Visual**	Magnitude of Change to the View / Visual Amenity – section 5.4.8 Landscape and Visual Impact Assessment – Section 5.4.16 Potential Significant Effects – section 5.8 Mitigation - Section 5.9 Residual Impact Assessment – section 5.10 Summary of Mitigation and Monitoring – section 5.15	Y
Chapter 6	CEMP – Section 6.8.1 CTMP – section 6.8.2	Y

Material Assets: Traffic &Transport	Phase 1 Construction Impact Significance and Duration – section 6.8.8 Phase 1 Operational Mitigation – section 6.9.12 Phase 1 Operational Impact Significance and Duration – section 6.9.13 Phase 2 Construction Impact Significance and Duration – section 6.10.7 Phase 2 Operational Impact – section 6.11 Phase 2 Operational Mitigation – section 6.11.12 Monitoring – section 6.14		
Chapter 7 **Material Assets: Built Services & Waste**	Potential Significant Effects – section 7.9 Mitigation and Monitoring Measures – section 7.10 Residual Impact Assessment – section 7.11 Monitoring Measures – section 7.15 Summary of Mitigation and Monitoring – section 7.16	Y	
Chapter 8 **Land & Soils**	Potential Significant Effects – section 8.8 Mitigation – section 8.9 Residual Impact Assessment – section 8.10 Monitoring – section 8.14	Y	
Chapter 9 **Water and Hydrology**	Potential Significant Effects – section 9.7 Mitigation – section 9.8 Residual Impact Assessment – section 9.9 Risk of Major Accidents or Disasters – section 9.10 Monitoring – section 9.11	Y	
Chapter 10	Potential Significant Effects – section 10.9	Y	

Biodiversity	Mitigation – section 10.10 Residual Impact Assessment – section 10.11 Monitoring – section 10.12 Enhancement – section 10.13		
Chapter 11 **Noise & Vibration**	Potential Significant Effects – section 12.8 Mitigation – section 12.9 Residual Impact Assessment – section 12.10 Monitoring – section 12.14	Y	
Chapter 12 **Air Quality and Climate**	Potential Significant Effects – section 11.11 Mitigation – section 11.12 Residual Impact Assessment – section 11.13 Monitoring – section 11.15	Y	
Chapter 13 **Cultural Heritage: Built Heritage**	History of Inis Cealtra – section 13.6.1 Main Phases of Building – section 13.6.3 Description of Monuments – section 13.6.4 Mitigation – section 13.9 Residual Impact Assessment – section 13.10	Y	
Chapter 14 **Cultural Heritage: Archaeological Heritage**	History of Inis Cealtra – section 14.6.1 Burials – section 14.6.6 Potential Significant Effects - section 14.8 Mitigation – section 14.9 Residual Impact Assessment – section 14.10 Monitoring – section 14.14	Y	

Chapter 15 Interactions of the Foregoing	Table 15.1 Interactions with Potential for Significant Impacts before the Implementation of Mitigation Measures.	Y
Chapter 16 Summary of Mitigation Measures	Summary of Proposed Mitigation Measures – section 16.0 Table 16-1 Summary of Incorporated Design Phase Mitigation Table 16-2 Summary of Demolition & Construction Phase Mitigation Table 16-3 Summary of Operational Phase Mitigation	Y

Interactions are considered in EIAR Chapter 15, and a Schedule of Mitigation and Monitoring Proposals is presented in EIAR Chapter 16. An assessment of the likely significant effects of the development is carried out for each of the technical chapters of the EIAR. I am satisfied that the assessment of significant effects is comprehensive and robust and enables decision making.

A description of the reasonable alternatives studied by the person or persons who prepared the EIAR, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the proposed development on the environment (including the additional information referred to under section 94(b).

The consideration of Reasonable Alternatives was analysed in Chapter 3 of the EIAR. The EIAR describes those reasonable alternatives that have been studied. The Alternatives considered related to The Do-Nothing Alternative, Alternative Site Locations, Alternative Uses, Alternative Layouts and Design and Alternative Processes.

It concluded that the Do-Nothing Alternative was considered but discounted on the basis that the 'Do Nothing' scenario is an inappropriate alternative as it is counter to strategic planning objectives that seek to address rural deprivation, revitalise rural villages and towns, and provide for enhanced conservation management of a rich cultural heritage resource.

Figure 3-1 identifies potential visitor centre sites in Mountshannon and Table 3.2 shows, there was only a slight difference in the scores associated with potential environmental impacts and flood risk, with Site 5 scoring 5 points and Sites 1 and 2 scoring 7 points.

The multidisciplinary design team and EIAR team have placed respecting the existing environment at the centre of the design development process, driven by the underlying design philosophy of minimal intervention on the island while simultaneously seeking to create a series of high quality tourist facilities that meets visitor's needs. Chapter 3.0 demonstrates that the proposed preferred

option performs better than other alternatives considered. The preferred option protects and enhances biodiversity locally, mitigates the visual impact of the proposed development on the island's unique natural heritage, landscape character and protected monuments, protects subsurface archaeology and avoids adverse impacts to land and soils and water quality.

The proposed development sites in Mountshannon Village are zoned under the CCDP 2023-2029. In each case, the land use zoning designates the subject lands for the use which is currently proposed. The site of the proposed new Visitor Centre is zoned Tourism, designated for tourism development that shall be used for a range of structures and activities which are primarily designed to facilitate tourism development and where uses are mainly directed at servicing tourists/holiday makers and visiting members of the public. Having regard to the land use zoning objectives applicable to the proposed Village Car Park and Visitor Centre, there are limited alternative use scenarios available. It is contended that a different approach to land uses on this site would not be considered a viable alternative and would not be consistent with the planning policy context pertaining to the lands – a plan lead approach.

Table 3-3 Indicates iterations of revisions to size of pods proposed on the Island. The proposed network and type of paths on the island has also been selected in conjunction with discussion with NMS to avoid more ecologically sensitive habitats and will be located in Improved Agricultural Grassland (GA1) and Amenity Grassland (GA2) habitat.

Table 3-4 sets out a summary of alternative options considered for Island toilet facilities.

I consider that the EIAR contains a description of reasonable alternatives, which is thorough, and which includes decisions being made on a strategic and specific site selection process. I consider that the legislative requirement to provide information relating to the reasonable alternatives which were considered, has been met.

Article 94(b) Additional information, relevant to the specific characteristics of the development and to the environmental features likely to be affected (Schedule 6, Paragraph 2).

A description of the baseline environment and likely evolution in the absence of the development.

A description of the location is contained within Chapter 1.

A description of the baseline environment is contained in each technical chapter of the EIAR as follows; Sections 4.6 (Population and Human Health), 5.6 (Landscape and Visual), 6.6 (Material Assets: Traffic and Transport), 7.6 (Materials Assets: Built Services and Waste), 8.6 (Land and Soils), 9.6 (Water and Hydrology), 10.6 (Biodiversity), 12.6 (Air Quality & Climate), 13.6 (Cultural Heritage and Built Heritage), 14.6 (Cultural Heritage and Archaeological Heritage) 11.8 (Noise and Vibration).

A description of the forecasting methods or evidence used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information, and the main uncertainties involved.

The methodology employed in carrying out the EIA, including the forecasting methods is set out in each of the individual chapters assessing the environmental effects. The applicant has indicated in the different chapters of where difficulties have been encountered (technical or otherwise) in compiling the information to carry out EIA. I comment on these, where necessary in the Summary Table below and for the reasons stated, I am satisfied that forecasting methods are adequate as outlined below.

A description of the expected significant adverse effects on the environment of the proposed development deriving from its vulnerability to risks of major accidents and/or disasters which are relevant to it.

This issue is specifically dealt with in Chapter 4 (Population and Human Health), Chapter 5 (Landscape and Visual), Chapter 6 (Materials Assets: Traffic and Transport), Chapter 7 (Material Assets: Built Services and Waste), Chapter 8 (Land and Soils), Chapter 9 (Water & Hydrology), Chapter 12 (Air Quality and Climate), Chapter 13 (Cultural Heritage: Built Heritage), Chapter 14 (Cultural Heritage: Archaeological Heritage).

No major accidents or disasters are envisaged that are relevant to the LVIA. Vehicle traffic, boat traffic and pedestrians generated by the proposed development could be involved in collisions, resulting in potential material damage and injuries, including fatal injuries. The mitigation measures inherent in the proposal, including as detailed in the CEMP and VMP, would however reduce the risk of collisions. When the construction contractor is appointed, an updated Construction Traffic Management Plan will be submitted to Clare County Council, for approval, prior to the commencement of construction, which would reduce the risk of collisions.

With respect to Chapter 14 (Cultural Heritage: Archaeological Heritage) paragraph 14.11 of the EIAR notes that the risk of major accidents or disasters is not considered a likely event in relation to this project. However increased rainfall as a result of climate change may result in deterioration of pedestrian paths on the island, resulting in negative impacts to archaeological features. It is noted, however, that with implementation of the visitor management strategies and conservation measures set out in the VMP, adverse impacts are likely to be avoided.

It is noted that the proposed development is not subject to the requirements of the COMAH Regulations.

All risks are reasonable and are assessed in my report.

Article 94 (c) A summary of the information in non-technical language.

This information has been submitted as a separate standalone document entitled Non-Technical Summary (NTS). I have read this document, and I am satisfied that the document is concise and comprehensive and is written in a language that is easily understood by a lay member of the public.

Article 94 (d) Sources used for the description and the assessments used in the report

The sources used to inform the description, and the assessment of the potential environmental impact are set out both within the specific chapter and they are also listed in references throughout Volume III 'Appendices to Environmental Impact Assessment Report'. I consider the sources relied upon are generally appropriate and sufficient.

Article 94 (e) A list of the experts who contributed to the preparation of the report

Details of the assessment team as well as their respective inputs to the EIAR is presented in Chapter 1, Section 1.10 Format and Structure of the EIAR. Table 1-2 provides details of companies and staff responsible for EIAR compilation. In addition, contributors have had regard to other relevant discipline-specific guidelines, these are noted in individual chapters of the EIAR. I am satisfied that the EIAR has been prepared by competent experts within the various chapters of the EIAR.

Table 3 – Summary Table of Adequacy of Forecasting Methods Used

Chapter 4 (Population and Human Health)

Description of Forecasting Method Used

The assessment relies on the assessments and draws on the findings of the following chapters to assess the impacts on human health: Chapters 8 Land, Soils, Chapter 9 Water & Hydrology, Chapter 12 Air Quality & Climate, Chapter 11 Noise & Vibration, Chapter 6 Material Assets: Traffic & Transport and Chapter 7 Material Assets: Built Services & Waste.

Adequacy/Omissions/Difficulties

Omissions/Difficulties

With respect to Chapter 6 – It is noted that the Road Safety Authority (RSA) are in the process of reviewing their road traffic collision (RTC) data sharing policies and procedures. Record-level RTC

data cannot be shared until this review is complete. Accordingly, current RSA collisions data for the proposed development local road network was unavailable for the preparation of this chapter.

With respect to Chapter 8 – Land & Soils – It is noted that no geotechnical SIs have been completed to date for the harbour, village car park site or Inis Cealtra. Pre-commencement activities including site investigation work and pre-construction surveys will occur on Inis Cealtra Island, village car park, harbour car park and the visitor centre.

With respect to Chapter 12 Air Quality & Climate it is noted that it is not possible to quantify exactly what effect the proposed development will have on Climate and Air Quality beyond the site boundary.

Adequacy of Forecasting

I have reviewed the adequacy of forecasting of individual chapters which feed into the Population and Human Health Chapter as outlined above.

I am satisfied that the forecasting carried out is adequate.

Chapter 5 (Landscape and Visual)	
Description of Forecasting Method Used	**Adequacy/Omissions/Difficulties**
The methodology for assessment of the landscape and visual effects is informed by the following key guidance documents: • 'Guidelines for Landscape and Visual Impact Assessment', prepared by the Landscape Institute and the Institute of Environmental Assessment, published by Routledge, 3rd Edition 2013. • Visual Representation of Development Proposals Technical Guidance Note 06/19 published by the Landscape Institute on 17th September 2019. • Environmental Protection Agency (EPA) (May 2022). Guidelines on the Information	**Assumptions and Limitations:** No difficulties were encountered in the course of the assessment. **Adequacy of Forecasting** I am satisfied that Landscape and Visual Assessment is adequate based on the methodology used by the applicant.

to be Contained in Environmental Impact Assessment Reports. An initial evaluation was undertaken as a desk study of the subject site and its immediate environs in relation to its local and broader significance using the information gathered from the site visits, studying aerial photography, historic and Ordnance Survey mapping. The study included a review of relevant guidance, policies and objectives particular through two iterations over the course of the study of the Clare and Tipperary County Development Plans. A further exercise was undertaken to determine the locations of potential views that will inform the assessment. Subsequently, the area was visited with the initial findings in order to gain a further understanding of the environs. Multiple visits to Mountshannon and Inis Cealtra were undertaken throughout the course of this assessment from April 2021 to September 2024, including a broader reconnaissance of the shoreline of Lough Derg in counties Clare and Tipperary.	
Chapter 6 (Material Assets: Traffic and Transport)	
Description of Forecasting Method Used	**Adequacy/Omissions/Difficulties**
PICADY (Priority Intersection CApacity and DelaY) was used to calculate the average	The Road Safety Authority (RSA) are in the process of reviewing their road traffic collision

queue length on each approach and the average delay per vehicle. The report adopts the guidance for set out by Transport Infrastructure Ireland, or TII, in the PE-PDV-02045 'Traffic and Transport Assessment Guidelines, May 2014'. And the TII's Project Appraisal Guidelines for National Roads Unit 5.3 – Travel Demand Projections PE-PAG-02017 October 2021; The R352/L034 Harbour Road/L4032 junction, R352 Main Street/L4034 Harbour Road/L8078 junction and proposed R352 Main Street/Village Car Park junction have been analysed using the computer programme PICADY for priority controlled junctions. Site Surveys/Investigations and Forecasting Methods are set out in section 6.4.1 and 6.4.2 of the EIAR. Table 6.3 of the EIAR sets out Predicted Weekday and Weekend Peak Hour Link Traffic Volumes With TII Growth Construction Phase The proposed Phase 1 construction includes the upgrade works at Inis Cealtra island and the new Village Car Park at Mountshannon, north of Aistear Park. The Phase 1 construction is scheduled for 12 months. The proposed development Phase	(RTC) data sharing policies and procedures. Record-level RTC data cannot be shared until this review is complete. Accordingly, current RSA collisions data for the proposed development local road network was unavailable for the preparation of this chapter. **Adequacy of Forecasting** I am satisfied that Traffic Forecasting is adequate based on the TII methodology used by the applicant.

1 peak construction year is 2027. Table 6.8 of the EIAR sets out PICADY Junction Capacity Analysis with TII Growth. The analysis confirms that all junctions operate within a Ratio to Capacity (RFC) for the predicted traffic growth 2032 and 2046.	
Chapter 8 (Land and Soils)	
Description of Forecasting Method Used	**Adequacy/Omissions/Difficulties**
As there are no excavations on Inis Cealtra Island, and excavations within the development in Mountshannon will be relatively shallow, no consultation with the GSI has been sought. No geotechnical SIs have been completed to date for the harbour, village car park site or Inis Cealtra. A Screening for Appropriate Assessment (Stage 1) and Natura Impact Statement (Stage 2) were completed for the proposed development and determined that there will be no adverse impacts on any qualifying species of protected Natura 2000 sites. Additionally, mitigation measures will be implemented as part of the EIAR and the CEMP to ensure that there will be no significant adverse effects on the land and soils pertaining to the development site. Having considered the implementation of good construction practice and design for	Pre-commencement activities including site investigation work and pre-construction surveys will occur on Inis Cealtra Island, village car park, harbour car park and the visitor centre. **Assumptions and Limitations:** **Adequacy of Forecasting** There is potential for land and soils to interact with water and hydrology. With removal of ground cover during construction work increasing surface water run-off and potential of impact to surface water drainage. Any contamination of soils has potential to reach groundwater. Demolition works in the village car park require site clearance which will include clearing, grubbing and removing any required trees, hedgerows and the mound/wall using an excavator and dump truck. Removal of the vegetation has a potential impact on biodiversity. Provided that all mitigation measures that are detailed in the CEMP are followed the impacts are considered to be not significant.

the proposed development and other development in the surrounding area, no cumulative effects are anticipated.	Pollution control and other preventative measures have been incorporated into the project design to minimise adverse effects on soil quality. Mitigation by design has been the principal means which will reduce suspended sediment run-off arising from construction activities. Preventative measures also include fuel, concrete, and waste management, which are incorporated into the project CEMP. I am satisfied that no significant effects on the land, soil and geology of the proposed development site will occur during the demolition, construction and operational phase due to the correct procedures and outlined mitigations being implemented.
Chapter 10 (Biodiversity)	
Description of Forecasting Method Used	**Adequacy/Omissions/Difficulties**
No forecasting carried out for this chapter	N/A All areas directly affected could be accessed. It is considered that there were no constraints to the surveys, as the surveys were coordinated, carried out in suitable weather conditions and focused on areas of potentially suitable habitat for protected flora and fauna species.
Chapter 11 (Noise & Vibration)	
Description of Forecasting Method Used	**Adequacy/Omissions/Difficulties**
Operational Phase - Noise No noise monitoring will be required during the operational phase. As boat trips are not predicted to increase significantly on existing boat traffic	None identified. **Adequacy of Forecasting** Methodology and Assumptions are described in Chapter 11 of the EIAR.

activities, no significant effects are predicted. Similar to road traffic, a significant increase in boat traffic volumes compared with existing volumes would be required for a significant increase in dB levels. **Construction Phase – Noise** The construction noise assessment has been undertaken using the BS 5228 guidance. The prediction of construction noise levels was undertaken using the calculation methodology presented in ISO 1996-1: 2017. As part of the detailed design of the development, plant items with appropriate noise ratings and, where necessary, appropriately selected remedial measures (e.g. enclosures, silencers etc.) will be specified in order that the adopted plant noise criteria is achieved at the facades of sensitive properties, including those within the development itself. Screening though use of hoarding. Enclose driving system in acoustic Shroud. Conduct piling works in early autumn or late spring to avoid the main breeding and wintering periods for bird activity. An indicative construction timetable is set out in Chapter 4 of the EIAR.	I am satisfied that the forecasting methodology used are adequate in respect of the likely significant effects in relation to construction and operational phase noise and construction phase vibration. I am satisfied that operational phase vibration can be scoped out of further assessment.

Operational Phase – Vibration There will be no significant, sources of vibration during the operational phase. **Construction Phase - Vibration** Vibration from demolition and construction activities will be imperceptible. The main source of vibration from works at Inis Cealtra Island will result from piling works proposed for construction of the new floating access jetty at the location of the existing concrete landing point to the north-west of the island. In terms of vibration effecting structures, the nearest residential buildings to the location of piling works are located over 500m away and are located on the mainland. The distance and water between piling area and houses mean no vibration effects are predicted. The existing buildings on the island are at a distance of approximately 300m from piling works areas and therefore no vibration effects are predicted to buildings on the island. There are no significant vibrations anticipated during construction of the Mountshannon Village Car Park. In addition, vibration levels will be controlled to levels outlined in Section 11.5.3.2.	

Chapter 12 (Air Quality & Climate)	
Description of Forecasting Method Used	
No forecasting carried out for this chapter. Section 12.4.3 notes a baseline air monitoring study has been undertaken. A review of the most applicable standards and guidelines has been reviewed. Predictive calculations and impact assessments relating to the likely Construction Phase air quality impacts have been undertaken at the nearest sensitive locations to the construction work area associated with the Proposed Scheme. Predictive calculations have been performed to assess the potential air quality impacts and a schedule of mitigation measures has been incorporated where required, to reduce, where necessary, the identified potential air quality impacts associated with the Proposed Scheme. Table 12.11: Sensitivity Classification of Project Elements, sets out elements of the proposal and impact upon Human Receptor and Ecological Receptor. Table 12.13: sets out Sensitivity of the Area to Human Health Impacts. The risk of impact of dust emissions from earthwork activities is defined in Table 12-17. There are some demolition works being proposed in Inis Cealtra. The scale is small (16sq.m.) and will be done with hand tools	**Adequacy/Omissions/Difficulties** No limitations or difficulties were recorded during the preparation of this Chapter of the EIAR. Section 12.5 of the EIAR notes that it is not possible to quantify exactly what effect the proposed development will have on Climate and Air Quality beyond the site boundary. The assessment is based on the project details that were made available at the time of writing. **Adequacy of Forecasting** Assessment Methodology and Modelling Methodology are described in 12.4.2 and 12.4.3 of the EIAR. I am satisfied that the forecasting methodology used are adequate in respect of the likely significant effects in relation to air quality and climate during construction and operational phases.

minimising generation of dust. The new Mountshannon car park will involve the removal of a wall/mound along the south-north boundary and along the road front (253sq.m) Phase 2 will involve the demolition of a stone wall approx. 45m in total. Demolition volumes will be relatively low and excavated earthworks volumes from the island will be minimal. The additional boat traffic generated during the operational phase will not be significant therefore the overall potential impact during the operational phase will be long-term, not significant and a negative impact on air quality from dust emissions.	

Chapter 13 (Cultural Heritage: Built Heritage)	
Description of Forecasting Method Used	**Adequacy/Omissions/Difficulties**
No further survey or investigation of the Built Heritage of Inis Cealtra has been undertaken as part of the EIAR. The buildings on the island are National Monuments in State Care, and no intervention as part of the Visitor Plan is intended for these buildings. However the non-invasive surveys such as the LIDAR and the Geophysics, provide additional context for the setting and below ground archaeology of the Built Heritage of the island. A series of underwater surveys (Appendix 14.3, 14.4. and 14. 5) were undertaken. The first survey 14.3, confirmed the presence of log boats off the	No limitations or difficulties were recorded during the preparation of this Chapter of the EIAR. **Adequacy of Forecasting** The Baseline Environment, History of Inis Cealtra, Sites included in the Built Heritage, main phases of building and description of monuments is set out in Chapter 13 of the EIAR I am satisfied that the forecasting methodology used are adequate in respect of the likely significant effects in relation to

north-east side of the island, and provisionally identified the probable site of the harbour on the north-east part of the island in the medieval period. The main site of archaeological and cultural significance is Inis Cealtra. This chapter discusses the evidence from the archaeological excavations of the 1970s, the results from geophysics as it pertains to interpretation of the main features and provides a description of the built heritage. Given the significance of the island monastery and the quality of the archaeological finds, it is of necessity succinct. The new Visitor Centre is within the curtilage of the Old rectory, a protected structure. There is an ACA within the village core, and it includes the south portion of the car park site.	Cultural heritage: Built heritage during construction and operational phases.
Chapter 14 (Cultural Heritage: Archaeological Heritage)	
Description of Forecasting Method Used	**Adequacy/Omissions/Difficulties**
No forecasting carried out for this chapter. The assessment is informed by the following surveys and investigations undertaken by Clare County Council. Appendix 14.1 Geophysical survey Preliminary Report 21R0095 Appendix 14.2. Inis Cealtra Co Clare Lidar and Geophysical Report Appendix 14.3 Inis Cealtra Co Clare Underwater Archaeological Impact Assessment	No particular difficulties were recorded during the preparation of this Chapter of the EIAR. **Adequacy of Forecasting** The Baseline Environment, History of Inis Cealtra, Sites included in the Built Heritage, main phases of building and description of monuments is set out in Chapter 13 of the EIAR

Appendix 14.4 Inis Cealtra Archaeo-geophysical Survey Appendix 14.5 Underwater Archaeological Impact Assessment Appendix 14.6 Old Rectory Mountshannon, Archaeological Impact Assessment Appendix 14.7 Excavation of Archaeological Test pits at Inis Cealtra Many site visits and on- site discussions with other members of the Design Team The main source of Information on Inis Cealtra is the report on the excavation which took place between 1970 and 1980 under the direction of Liam de Paor. The report submitted to National Monuments in 1997 was made available, as was updates on the post-excavation programme under the stewardship of Matthew Seaver, NMI and Professor Aidan O'Sullivan, UCD. The source material supplied by Clare County Council includes a detailed analysis of the island prepared by a researcher on the stone sculpture of the island, Cliodhna O' Leary, along with Dr Bernadette Mc Carthy and Dr Pat Wallace. Additional surveys of archaeological relevance were commissioned by Clare County Council. Paragraph 14.6.9 Main Features uncovered in the Excavations is set out in the EIAR	I am satisfied that the forecasting methodology used are adequate in respect of the likely significant effects in relation to Cultural heritage: Archaeological Heritage during construction and operational phases.

8.5 Consultations

The application has been submitted in accordance with the requirements of the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended) in respect of public notices.

Consultations are described in Chapter 1.14 and in other chapters of the EIAR. The applicant, Clare County Council consulted with Prescribed Bodies and the Community.

The application was circulated to the following bodies:

- The OPW
- Waterways Ireland (WWI)
- National Parks and Wildlife Service (NPWS)
- Uisce Eireann
- An Taisce
- An Chomhairle Ealaíon
- Failte Ireland
- Department of Housing, Local Government and Heritage (DHLGH)
- The National Monument Service (NMS)
- Department of Environment, Climate and Communications.
- Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media.
- Department of Agriculture, Food and Marine
- Inland Fisheries Ireland
- The Heritage Council
- EPA
- Department of Transport, DAU
- NTA
- Birdwatch Ireland
- Tipperary County Council
- Limerick County Council
- Galway County Council

- Southern Regional Assembly.

Responses were received from the following body's; they are summarised in detail in section 6.2 of the Planning report:

- Department of Housing, Local Government and Heritage
- An Taisce
- Department of Transport
- TII
- A standalone Visitor Management Plan (VMP) has been prepared and submitted. It sets out the envisaged structure and responsibilities for the management of the proposed development during operation.
- Clare County Council, via Clare Tourism DAC, will manage and operate the Inis Cealtra Visitor Experience, inclusive of the Visitor Centre, new car park facilities off Main Street, and the welfare facilities on Inis Cealtra. Boat tour operators will be licenced, awarded by tender by Clare County Council on a 3-year basis. The café in the Visitor Centre will be operated by lease.
- The measures in the VMP include establishment of the Inis Cealtra Management Group, to have oversight both in terms of the strategic management of the island and the operational management of the island. This group, led by Clare County Council, will include the Office of Public Works (OPW), National monuments Service (NMS), Waterways Ireland (WWI) and Department of Housing, Local Government and Heritage.
- The Inis Cealtra Community Forum will be established to represent the local community in the management of the island and visitor experience, including local access provision.

I am satisfied, therefore, that appropriate consultations have been carried out and that third parties have had the opportunity to comment on the proposals in advance of decision making.

Conclusion on compliance with the requirements of Article 94 and Schedule 6 of the Planning and Development Regulations 2001(as amended)

Having regard to the foregoing, I am satisfied that the information contained in the EIAR, and supplementary information provided by the developer is sufficient to comply with Article 94 of the Planning and Development Regulations, 2001(as amended).

8.6 Assessment of Likely Significant Effects

This section of the report sets out an assessment of the likely environmental effects of the proposed development under the following headings, as set out Section 171A of the Planning and Development Act 2000, as amended:

- Population and human health.
- Landscape and Visual.
- Material Assets: Built Services and Waste Management.
- Land & Soils.
- Water & Hydrology.
- Biodiversity, with particular attention to the species and habitats protected under the Habitats and Birds Directives (Directive 92/43/EEC and Directive 2009/147/EC respectively).
- Noise & Vibration
- Air Quality & Climate.
- Cultural Heritage: Built Heritage
- Cultural Heritage: Archaeological Heritage

In accordance with section 171A of the Act, which defines EIA, this assessment includes an examination, analysis and evaluation of the application documents, including the EIAR and submissions received and identifies, describes and assesses the likely direct and indirect significant effects (including cumulative effects) of the development on these environmental parameters and the interaction of these. Each topic section is therefore structured around the following headings:

- Issues raised.
- Examination of the EIAR.
- Potential Effects
- Evaluation and Assessment: Direct and Indirect effects.
- Conclusion.

8.6.1 Population and Human Health

Issues Raised

Third-party submissions raise issues with respect to increased visitor numbers, community impact, environmental protection, existing residential amenities, integration with Mountshannon, services capacity, traffic and accessibility and safety.

Chapter 4 of the EIAR describes the environmental effects that are likely to arise during the construction and operation of the proposed development. Section 4.9 sets out the mitigation measures required to alleviate identified effects of:

- Land Use
- Population
- Employment & Economy
- Residential & Visitor Amenity
- Health

Specific effects with respect to matters such as air quality, noise, traffic, visual impact etc. are dealt with in the respective assessments in the EIAR.

Examination of the EIAR

Context

Chapter 4 considers 'Population and Human Health'.

According to Census 2022, the population of Mountshannon ED is 463 persons and the total population of the study area is 2,913.

It is noted that the area surrounding Mountshannon and Inis Cealtra (the project site) is a mosaic of greenfield sites, single dwellings, multi-residential developments, and commercial developments that make up the village of Mountshannon. Aistear Park sits between the Main Street and the harbour. It features a maze, a children's playground, outdoor exercise machines, seating and picnic area, together with an outdoor library called the 'Wee Library'. A tourist information office operates in the centre of the park during the summer months.

Mixed- use properties line the main artery (R352) through Mountshannon Village along the main street comprising single and two-storey residential and commercial

buildings. Located centrally within the village is a bar, restaurant and café, and further to the west there is a petrol station, community childcare centre and St Caimin's Church. Other commercial uses are also present within the village and there is also evidence of some vacancy.

There are a number of newer residential estates south of Main Street. Beyond the urban core, residential properties are more scattered, consistent with their rural setting. The village is also home to several tourist accommodation sites, including holiday homes, camping facilities, and a B&B. Aistear Park provides a pedestrian connection between the village main street and the marina further south.

The island of Inis Cealtra is uninhabited, although it is occupied by a significant number of historic monuments, including its distinctive round tower and several church ruins. The island is still used for burials and also attracts tourists/visitors who mainly travel there by tour boats.

Scarriff/Tuamgraney

Located c. 8km south-west of Mountshannon, Scarriff/Tuamgraney are identified as Service Towns in the settlement hierarchy and provides an important range of services to the community, the surrounding rural area and visitors to the area.

Scarriff offers a range of administrative, service, social and community facilities, whereas Tuamgraney is a historic village with monastic origins, providing a more limited range of retail facilities. The centres of both settlements have been designated as Architectural Conservation Areas (ACA).

Whitegate

Whitegate is a large village c. 5km to the north-east of Mountshannon. The village has a predominantly rural character and offers a range of services to local residents such as shops, post office, a number of local pubs and a national school.

Killaloe/Ballina

Killaloe is the largest town in the Municipal District and a linked settlement with Ballina, Co. Tipperary. Located on the south bank of Lough Derg c. 25km from Mountshannon, Killaloe is considered the 'Gateway to East Clare' in which tourism is a central element of the local economy. Killaloe and Ballina provide essential

services to local residents and visitors to the area, along with convenient access from the national motorway network.

Potential Effects

Human Health & Safety

Measures to address such human health considerations will be mitigated through the implementation of a Contractor's Construction and Environmental Management Plan (CEMP) and will be subject to Regulations and the relevant Health and Safety codes.

The EIAR also deals with the potential effects on human health during the construction phase, including the more specific topics of air, traffic, water, and noise.

During construction, visitor access to the island will be restricted, however, burials will be allowed to take place and will be managed by the Clare County Council Burials Unit.

The level of disturbance and impacts are predicted to be commensurate with the normal disturbance associated with the construction industry, where a site is efficiently and properly managed having regard to neighbouring activities.

It is noted that the risk of health and safety-related accidents is unlikely during the demolition and construction phases of the proposed development, and no significant impacts on population and human health are identified. With best-practice health and safety procedures in place, construction activities will have a **negligible, neutral, short-term** impact on health and safety.

Population

It is estimated that Phase 1 construction works will take approximately 12 months to complete, and there will be 40 people employed during the peak of construction activity. In Phase 2, the duration of construction work is estimated to be 18 months, with 50 people employed during peak construction.

In addition to direct employment on-site, there will be off-site employment and economic activity associated with the supply of construction materials and the provision of services such as professional firms supplying financial, architectural, engineering, legal and other professional services to the project.

The overall predicted impacts associated with the construction phase on the working population and local economy **are likely** and will have a **positive, short-term, moderate** effect.

During operation the proposed development is expected to generate 19 new jobs in peak periods. It is not anticipated that this will generate any marked increase in population locally, as it is envisaged that employees will likely travel to the site from their existing place of residence. The likely impact on the population is thus neutral.

The proposed development will provide a **positive long-term impact** in terms of providing additional employment.

The proposed development will increase tourist and visitor activity in Mountshannon and on the island, contributing to greater demand for tourism services (e.g. sightseeing and recreational opportunities) and businesses such as shops, cafes/restaurants and holiday accommodation, thereby supporting additional employment opportunities in the Study Area.

The overall effect on employment locally is **slight - moderately positive** and **permanent**.

Land-Use

Inis Cealtra is uninhabited and therefore, in the absence of mitigation, the anticipated likely effects on the amenities of residents and visitors will mainly be confined to disruptions in Mountshannon Village as a result of increased construction traffic movements on the local road network, noise, dust and visual impacts arising from plant and construction activities (e.g. cranes, hoarding etc) necessary to complete the development.

Upon completion the proposed development will contribute to the consolidation and growth of established tourist and commercial uses such as shops, cafes/restaurants and holiday accommodation in Mountshannon and the wider area, consistent with the NPF policy objectives which support appropriately designed development in rural towns that will contribute to their regeneration and renewal.

It is anticipated that the proposed development will result in a **likely significant positive impact** with a **permanent** duration.

Residential & Visitor Amenity

Visual, traffic, noise and dust effects are considered in Chapters 5, 6, 11 and 12 respectively. These chapters conclude that there will be no significant effects on residential amenities or community facilities attributed to the operational phase.

Local residents and members of the community may experience some impacts to amenity as a result of increased visitor numbers to Mountshannon and the island. However, the visitor projections contained in the Visitor Management Plan show that the increase will be incremental, distributed over two distinct phases spanning 2028 (Phase 1, Year 1) through to 2046 (Phase 2, Year 5).

Access to Inis Cealtra will be controlled to ensure effective management of the island's archaeological and built heritage, and sensitive ecological receptors. In the absence of mitigation, this may adversely impact members of the local community who currently enjoy unrestricted access to the island.

Local residents and visitors will benefit from the enhanced infrastructure and facilities that are to be delivered by the project, including the upgraded island jetty, welfare pods on the island, new village car park and harbour reconfiguration and public realm improvements.

Overall, the anticipated impact on residential and visitor amenity will be **long-term, slight** and **positive** both locally and nationally.

Inspector's Evaluation and Assessment: Direct and Indirect Effects

I have examined, analysed and evaluated Chapter 4 of the EIAR and all of the associated documentation and submissions on file in respect of population and human health. I am satisfied that the information submitted in the EIAR adequately demonstrates an understanding of the potential impacts and provides suitably comprehensive range of mitigation and monitoring measures to reduce any potential impacts. Air and noise emissions, emissions to water and from traffic associated with day to day activities will be addressed later within this assessment

In relation to the conclusions as set out in the EIAR, I concur with the conclusions of same, in that the proposed visitors centre would not adversely impacted on human health or population and would resulted in overall beneficial impact upon human health and population, in terms of supporting employment, noting that the site will

employ up to 19 no. persons on site. Also the local community will benefit from the revenue generated by increased tourism and the boost in visitor activity which will contribute to revitalisation and renewal in the region's rural settlements, particularly Mountshannon. As such, I conclude that, overall, the development would have a **positive impact** in terms of supporting the local community and benefit local employment, although I would not define this impact as 'significant'.

Conclusion: Direct and Indirect Effects

Having regard to the examination of environmental information provided in respect of population and human health, in particular in Chapter 4 of the EIAR it is considered that there are no potential for significant environmental effects on population and human health.

8.6.2 Landscape and Visual

Issues Raised

I note third party concerns with respect to landscape and visual impact. Ciara and Colm Madden, residents of the property adjoining The Old Rectory (the proposed Visitor Centre site), submit they are concerned that the proposed development will severely impact the landscape and views they currently enjoy. They suggest planting of native shrubs or other plants be considered in place of Oak trees.

Examination of the EIAR

Context

Chapter 5 considers Landscape and Visual. The chapter uses the pre-Development landscape as a baseline for the assessment.

The study comprises three sites, two of which are in the village of Mountshannon on the shores of Lough Derg, and Inis Cealtra, or Holy Island, which is approximately 1.75km to the southwest of the village. Both are in the tourism area know as the 'Hidden Heartlands', which indicates that the area is somewhat underexplored in terms of tourism. Lough Derg is part of the Shannon river system, and is designated as an Special Protection Area (SPA) for its ecological importance.

Mountshannon has the status of 'Large Village', the core of which is designated as an Architectural Conservation Area (ACA) described in the Clare County development Plan.

Inis Cealtra is a drumlin- or dome shaped island close to the Lough Derg shoreline that is known as a setting for its ecclesiastical heritage, most visibly the round tower and church of St Caimín.

The sites of the proposed Visitor Centre and car park sit within the Mountshannon settlement boundary and the designated Heritage Landscape of the Clare CDP 2023-2029 as seen in the extract of the mapping of Areas of Special Control in Figure 5.19 below. Inis Cealtra and other islands are included in this designation, which is reinforced by the identification of scenic routes along the R352 from Mountshannon heading towards Scarriff and Tuamgraney. The scenic route designation continues in a loop to the soth of Lough Derg, along the R463 to Ogonnelloe. The shorelines around Lough Derg are therefore environmentally, culturally, and visually sensitive and are protected scenic routes in the Clare CDP 2023-2029. The designations continue into County Tipperary, along the R494

as V44 ‘Views west and sections of the Road to the east of the R494’, and along smaller shoreline roads, notably V45 ‘Views along lakeside roads north of Portroe’.

Potential Effects

Potential impacts during the construction phase are related to temporary works across each of the individual sites (The visitor centre, car park, and Island), site activity, and vehicular movement within and around the subject sites. Vehicular movement may increase in the immediate area, and temporary vertical elements such as cranes, scaffolding, site fencing, gates, plant and machinery etc., will be

required and put in place. The works will be carried out across three sites; the rectory site and Harbor area (for the visitor centre), the car park site and on Inis Cealtra. Most of the construction impacts will be temporary.

Where trees are to be felled these effects will be permanent, however any proposed new planting will offset such impacts, increasingly so as the proposed development matures.

In terms of potential landscape effects on Lough Derg or its margins, it is noted they are very likely to be avoided or obviated, primarily by the introduction of and adherence to the provisions of the approved Construction Management Plan for the construction scheme as appropriate.

The Village Car Park

The car park is an insertion into the linear plots to the north of the main street of Mountshannon. As such, the scale of the car park is hidden beyond the proposed entrance area. The entrance area is characterised by a newly defined street edge, maintaining part of the stone boundary wall, reinstating a green area of tree planting. The impact to the public street is therefore in the streetscape edge, which is similar to other access gateways to the backlands along the main street, and the likely signage and road markings that control the access and egress. The route to the proposed visitor centre is through Aistear Park. The design intention of this route is to encourage footfall, activate and link the main street to visitors centre and public park.

The visual impact from the public realm will be restricted to the entrance area on the main street.

Inis Cealtra

The proposed scheme for the island is primarily the insertion of 3 ‘pods’ (consisting of a public shelter, wc, and staff welfare) at the northern edge of the island, on pile foundations to minimise their footprints and are placed amongst existing vegetation. The requirement for an improved jetty or landing stage at this location is likely a more impactful development whose engineering aesthetic and likely associated signage is more difficult to mitigate. The proposed mown grass pathways in general follow the existing path network, and introduce a larger loop around the island that will allow the visitor numbers to be distributed and absorbed. Incidental tree trunks are proposed for resting points, enabling greater access. The implementation of the Landscape and Conservation Management Plan, which is an appendix to the Landscape Design Statement will improve the management of vegetation and habitats on the island.

The visual impact will be limited to the northern end of the island when seen from the shoreline at Knockaphort, and when approached by boat. The pods will facilitate shelter and welfare, whilst the proposed jetty facilitates safe access.

The Rectory and Harbour

The proposed development will consist of the insertion of a visitor centre along the southern boundary of the rectory site and associated public realm works in the form of footpaths, and a forecourt and upgrade works to the Harbor. This will require two sections of the existing stone boundary wall (45m in total) to be removed and necessitate the removal of some trees.

In terms of potential visual impacts, there is a clear change of building scale between what is currently there and what is proposed, however it is set back from the existing boundary wall giving a forecourt that addresses the Harbor, and is settled into the topography as demonstrated by the rising ground that is the setting for the former rectory, and the adjacent residential developments which look out over the proposed building. The potential for visual impact, experienced by people visiting, or living in Mountshannon, is therefore reasonably high in the immediate vicinity of the Harbor, but diminished when seen in context of the topography and urban structure of the town, and from the lough. The selected viewpoints for the preparation of photomontages takes this into account by taking views from corresponding locations.

The assessment of visual effects, using comparative ‘before’ and ‘after’ photomontages assists in identifying the nature and magnitude of the proposed change on the visual environment. The photomontages submitted adequately take into account the views to and from each of the sites as appropriate. A total of 29 viewpoints has been selected for which photomontages (verified views) have been prepared - these are included in the submission documents, within a separate A3 report prepared by Digital Dimensions Ltd. They illustrate the visual effect of the proposed development on the selected views taken from the surrounding landscape. The views deal with the three parts to the proposal covering the proposed visitor centre, proposed Inis Cealtra works, and the proposed car park in Mountshannon.

In general, the changes to the visual environment created by the proposed development will produce noticeable visual effects upon a range of receptors. However, the actual visual penetration into the sites varies from limited to the small Harbor of Knockaphort in the case of Inis Cealtra, and to close to the streetscape entrance of the car park. The proposed Visitor Centre addresses Mountshannon Harbor and therefore has greater visual effect at this vantage point.

The landscape and Conservation Management Plan sets out operations relating to the protection and enhancement of the setting, the monuments and habitats on Inis Cealtra. The maintenance and management specifications for the car park and visitor centre are less sensitive but require ongoing attention to maintain the quality of the envisaged scheme.

The retention of existing trees and other planting, where possible and proposed, coupled with the effective use of new planting to screen and/or integrate the built elements of the proposal into the existing landscape, are important and integral aspects of the proposed scheme design.

Evaluation and Assessment: Direct and Indirect Effects

I have examined, analysed and evaluated the information provided in Chapter 5 and all the associated documents including the proposed construction management plan. I have inspected the site and the surrounding area. I am satisfied that the information submitted in the EIAR adequately demonstrates an understanding of the magnitude of change for Inis Cealtra, the proposed car park and at the visitor centre and Harbour sites. The protection of the qualities of the Island through sensitive siting of pods, boardwalk and jetty, sensitive use of materials and implementation of landscape and conservation management plan. The activation of the public realm, connectivity with the main street and Aistear Park, tree retention and replacement, new planting, sensitive use of materials, quality of architectural language and materials on the main land in Mountshannon at the visitors centre site, Harbour and village car park will mitigate the effects of the development on landscape and visual impact.

In relation to the conclusions of the EIAR, I concur with same. I would note that the pods proposed on Inis Cealtra, are generally screened from surrounding views, by virtue of the topography and vegetation, save for the visibility afforded towards the pier from the west at Knockaphort and views to the Visitors centre from the Harbour. While there will be change at a very localised level, by virtue of the visitors centre, I would agree that that the overall impact on the wider landscape is as described in the EIAR (i.e. Inis Cealtra – ‘Positive’, Car Park – ‘Positive’ and Visitors Centre - ‘Positive’- see Table 5.10 of the EIAR). I concur that the visual impact of the development, is ‘neutral to positive’, ‘neutral’ and ‘neutral to positive’, respectively, for Inis Cealtra, the Car Park and Visitors Centre.

8.6.3 Material Assets – Traffic and Transport

Issues Raised

Third-party submissions raise issues of concern that the car park proposed off Main Street is too big and concern is raised in respect of its future management. Concern is raised of impact upon car parking for residents along the main street. It is submitted that the proposed entrance to the car park is located just east of a very bad bend. Surface water issues and drainage through the car park site and impact to adjoining properties is raised. As is concern of impact of a new pier and traffic / activity from Knockaphort to Holy Island. An Taisce have raised concern of car park size (exceeding 200 spaces) beside a sensitive lakeshore location. The Department of Transport request that 20% of the total car parking spaces are EV, recommend engagement with bus operators and that CAP is had regard to. TII have no observations.

Examination of the EIAR

Context and Potential Effects

Chapter 6 considers Traffic and Transport. It is acknowledged that increased construction traffic movements on the local road network during the construction phase may give rise to noise, dust, and road safety impacts.

Clare County Council's Visitor Management Plan for the proposed Inis Cealtra Visitor Experience indicates that Inis Cealtra generates circa 10,000 visitors annually. The Visitor Management Plan (VMP) for the proposed Inis Cealtra Visitor Experience indicates that a limited visitor experience and visitor facilities will be provided in the Old Rectory Interpretive Centre, which is scheduled to open in 2025, and will include car and cycle parking facilities located off Harbour Road (12 car parking spaces, a vehicle set down space and 20 bicycle parking spaces). Pedestrian access will be provided on Main Street, via Aistear Park, and on Harbour Road. It is projected to attract up to 15,000 visitors annually, including new visitors and existing Inis Cealtra visitors. It is envisaged that future baseline visitors to East Clare would increase by circa 3% annually. The proposed Phase 1 development would increase projected visitors by 5,000 annually in Year 1 and by 25,000 by Year 5. This would equate to an average of 33 additional daily visitors in Year 1 and an average of 162 additional daily visitors by Year 5.

Phase 1 of the proposed development is scheduled to be open and operational in Q1 2028; and Phase 2 of the proposed development is scheduled to be fully complete and operational in Q3 2042. The proposed development Phase 1 peak construction year is 2027 and the Phase 2 peak construction year is 2041. The proposed development Phase 1 peak operational initial year is Phase 1 Year 5, 2032. The proposed development ultimate peak operational initial year is Phase 2 Year 5, 2046.

TII in their Project Travel Demand Projections PE-PAG-02017, October 2021, envisage that car and light vehicle volumes on Clare national roads would increase by an annual factor of 1.0156 during the period to 2030, and by a factor of 1.0417 for heavy vehicles, based on their central growth rates. The equivalent factors for the periods 2030 to 2040 and 2040 to 2050 are 1.0038 and 1.0029, respectively, and 1.0157 and 1.0197, respectively.

The existing weekday and weekend morning peak hour and evening peak hour traffic volumes on the existing Mountshannon local road network, in the vicinity of the proposed development, have been factored to 2027, 2028, 2032, 2041 and 2046 levels on the basis of TII's predicted growth rates, and are provided in Tables 6-3, 6-4 and 6-5 of the EIAR.

I note that PICADY identifies a Ratio to Capacity (RFC) of 0.90 as the practical capacity of a priority controlled junction.

The analysis confirms that the R352/L034 Harbour Road/L4032 junction and R352 Main Street/L4034 Harbour Road/L8078 junction would operate well within practical capacity, for the predicted 2032 and 2046 weekday and weekend morning and evening peak hour traffic volumes with TII's predicted traffic growth, with no significant traffic queues and delays. The R352/L034 Harbour Road/L4032 junction would operate with a highest RFC of up to 0.100, in 2046, and highest delays per vehicle of 0.13 minutes. The R352 Main Street/L4034 Harbour Road/L8078 junction would operate with a highest RFC of 0.228, in 2046, and highest delays per vehicle of 0.13 minutes. All well within capacity.

It is envisaged that future baseline visitors to East Clare would increase by circa 3% Annually and that future boat activity on Lough Derg would typically increase at a similar annual rate. During high season, the Old Rectory Interpretive Centre will have

a peak daily capacity of 372 visitors, which is significantly higher than the projected typical daily visitors during high season of 258 visitors. In order to consider a worst case traffic impact during high season, it is envisaged that the peak daily capacity of 372 visitors would visit on certain days. This would equate to 276 additional daily visitors compared to the permitted projected typical visitors.

As the permitted Old Rectory Interpretive Centre is projected to attract up to 15,000 visitors annually, including new visitors and existing Inis Cealtra visitors. Accordingly, the proposed Phase 2 development would increase projected visitors by 25,000 visitors annually in Year 1 and by 60,000 visitors by Year 5. This would equate to an average of 162 additional daily visitors in Year 1 and an average of 388 additional daily visitors by Year 5.

Table 4 Projected Phase 2 Operational Visitors

Phase 2 Operational Development	Annual Visitors Typical	Daily Visitors High Season
Opening Year (Year 1, 2042)	40,000	258
Peak Year (Year 5, 2046)	75,00	484 (1)
Note (1): Daily maximum during high season.		

The maximum daily capacity on the Inis Cealtra island will be 400 persons, with no more than 100 people permitted on the island at any one time. The VMP will control visitor traffic generation volumes and times.

A full Construction Traffic Management Plan will be completed prior to the works commencing and this will be agreed between the main contractor and Clare County Council to ensure that traffic is managed during the works safely and with least impact.

The proposed Village Car Park for the proposed development will be a public daytime car park, with a total of 169 car parking spaces, six coach/bus parking spaces and bicycle parking spaces. The 169 car parking spaces include 11 accessible spaces, 105 standard spaces and 53 overflow spaces. EV charging points will be provided for 20% of the car parking spaces. The car park has been

designed to accommodate sufficient parking for the projected staff and visitor numbers, considering that full capacity will not be required year-round, with a split between permanent and overflow parking. Access to the car park will be restricted by barrier out of hours, prohibiting overnight parking.

Mitigation

Mitigation measures are proposed in the CTMP and CEMP. The proposed outline the commitments and mitigation measures to be implemented during the construction phase of the proposed development, and are part of the proposal assessed in this Traffic and Transport chapter. When the construction contractor is appointed, an updated Construction Traffic Management Plan will be submitted to Clare County Council, for approval, prior to the commencement of construction.

The proposed development includes a detailed Visitor Management Plan (VMP). The VMP provides a comprehensive description of projected visitor numbers, types, times, travel modes, parking, management and mitigation measures. The VMP also includes details of staff types, numbers and times.

Evaluation and Assessment: Direct and Indirect Effects

I have examined, analysed and evaluated the information provided in Chapter 6 and all the associated documents and submissions on file in respect of Traffic. I have inspected the site and the surrounding area. I am satisfied that the information submitted in the EIAR adequately demonstrates an understanding of the potential impacts generated by the development and provides a suitable range of mitigation and monitoring measures, which respond to the concerns raised by observers and prescribed bodies.

In relation to the conclusions of the EIAR, I concur with same.

I note that the design of all junctions have been completed in accordance with TII guidelines. The junctions have been audited by TII approved auditors. All best practice measures have been incorporated into the design. The design is safe and consistent with TII best practice measures. The proposed layouts pay cognizance

of the predicted volumes of users for the development, pedestrian connectivity and car park management.

The local road network will accommodate the increase in traffic generated without significant incidents, including insignificant impacts on the carrying capacity of the road network, creation of hazard, interference with traffic flows and junction capacity. In light of this, I consider that it is reasonable to conclude that the impact, in traffic and transportation terms, of Phase 1 and Phase 2 of the visitors centre which are the subject of this application are not likely to result in any significant environmental impact.

Having regard to the examination of environmental information provided in respect of traffic, in particular in Chapter 6 of the EIAR it is considered that there is no potential for significant environmental effects on traffic.

8.6.4 Material Assets: Built Services & Waste

Issues Raised

Third-party submissions raise issues of concern with respect to impact of increased demand on water and wastewater services in Mountshannon and impact on Level of Service (LoS) for future housing. The impact of the proposed car park on the existing drainage regime has been raised as a concern.

Examination of the EIAR

Context and Potential Effects

Chapter 7 deals with Material Assets: Built Services and Waste. 'Built services' (i.e. built services networks including electricity, telecommunications, gas, water supply infrastructure and sewerage) and 'waste management'. Traffic and transport is assessed separately. It is acknowledged that excavation during the construction phase may give rise to risks to human health as a result of any excavation work in areas where built services exist through coming into contact with live electricity lines or damaging watermains.

It is notable that the proposed Village car park storm drainage management regime will be served by both hard and soft engineering solutions. It is proposed to integrate

a traditional stormwater sewer system with a combination of SuDS measures to manage the stormwater runoff generated by the proposed site. The site has been split into multiple sub-catchments within the main catchment of the overall car park development. Surface water runoff from these sub-catchments will be captured via a combination of stormwater gullies and filter drains. The SuDS features such as filter drains have been designed and integrated within the car park development while taking cognisance of the four main pillars of SuDs which are water quantity, water quality, amenity and biodiversity.

The storm water management system will tie into a combined public sewer that is located on the R352 which runs east-west at the entrance to the Village Car Park. Discharge from the site will be limited to Greenfield runoff rates.

It is proposed that reinforced Grasscrete paving will be utilised in the overflow car parking section of the car park. This system allows for infiltration of the rainfall in this area into the ground. Any overflow that would occur would be catered for by the proposed access road to car park area which has been sloped towards the east of the site where a dry swale has been positioned to allow surface runoff to infiltrate into the ground naturally.

The site drainage will consist of the installation of suitable protection (e.g., silt curtain) around the site boundaries to control and treat any run-off during the construction works. Best practice and practical experience on other similar projects suggest that in addition to the above outlined drainage plans, there are additional site-based decisions and plans that can only be made in the field through interaction between the Construction Manager, the Design Engineer and the Environmental staff. In relation to decisions that are made on site, it is important to stress that these will be implemented in line with the associated drainage control measures recommended. When dealing with concrete pouring during the construction covers will be made available for freshly placed concrete to avoid the surface washing away into storm drains during heavy rain. Details of the storm drainage proposals are included in the Civil Utilities Planning Report showing proposed site services in Appendix C and the design calculation report is present in Appendix D.

There is an existing storm water system on the visitor centre site attenuating the discharge from the Old Rectory. The proposed system is to attenuate flows that are being generated from the impermeable surfaces within the Visitor Centre

development. This will utilise a separate attenuation system with a hydrobrake downstream restricting flows to the greenfield runoff rate. The proposed drainage network will incorporate sumps within manholes for silt removal and a bypass petrol interceptor prior to discharge.

The Harbour Car Park is designed with SuDS features to attenuate and treat surface water reducing the amount of suspended solids and potential drain blockages.

The civil utilities report includes confirmation from Irish water that both water and wastewater connections are feasible. The applicant submits that the Uisce Eireann requirements have been fully integrated into the design following a collaborative approach with the utility provider.

Mitigation

All mitigation measures outlined in the CEMP shall be implemented during installation of water supply and wastewater infrastructure. Any temporary water supply for the temporary site compound will be agreed with Uisce Éireann. To enable leak detection, a water meter will be installed for the temporary water supply. The water meter will monitor consumption of water and will be used to help confirm potential leaks.

Effluent generated on site from the contractors sanitary facilities will be discharged to a holding tank and removed off site to a licensed removal contractor. Temporary discharge utilising the existing, or permitted sewerage network will be in agreement with Uisce Éireann. All necessary health and safety measures will be undertaken to ensure the safety and welfare of construction personnel, the public and road users during construction of the foul infrastructure.

Once the proposed development is complete, the water supply network and wastewater network will be vested to Uisce Éireann who will have responsibility for operation and maintenance of the water supply.

A contractor will be appointed to manage the maintenance of the foul system and waste removal from the site.

The island will be operated on a leave no trace principle and visitors will be tasked with taking their waste away with them, similar to other island etiquettes.

Evaluation and Assessment: Direct and Indirect Effects

I have examined, analysed and evaluated the information provided in Chapter 7 and all the associated documents and submissions on file in respect of material assets and waste. I have inspected the site and the surrounding area. I am satisfied that the information submitted in the EIAR adequately demonstrates an understanding of the potential impacts generated by the development and provides a suitable range of mitigation and monitoring measures, which respond to the concerns raised by observers and prescribed bodies.

In relation to the conclusions of the EIAR, I concur with same.

I note that no significant effects on the material assets of the proposed development will occur during the demolition, construction and operational phase due to the correct procedures and outlined mitigations being implemented. Pollution control and other preventative measures have been incorporated into the project design to minimise adverse effects on the material assets. Mitigation by design has been the principal means which will reduce suspended sediment run-off arising from construction activities. Preventative measures are also included which are incorporated into the project CEMP.

The proposed development does not pose a significant risk to the existing local electricity infrastructure, water, wastewater or waste infrastructure.

The assessment also confirms that there will be no significant cumulative effects on the material assets as a result of the proposed development and other proposed projects.

In light of this, I consider that it is reasonable to conclude that the impact, in material assets and waste terms, of Phase 1 and Phase 2 of the visitors centre, which includes the village car park, the subject of this application are not likely to result in any significant environmental impact.

Having regard to the examination of environmental information provided in respect of material assets and waste, in particular in Chapter 7 of the EIAR it is considered that there is no potential for significant environmental effects.

8.6.5 Land and Soils

Issues Raised

The DHLG&H and submissions from observers have raised concern whether the dry toilets are an appropriate solution from an environmental perspective. Soil erosion, soil compaction and soil stability may occur by weather, water flow or the movement of heavy machinery. The removal of soil from proposed Village Car Park and reconfiguration of the harbour car park is also raised as a concern. Sedimentation and accidental spills and contamination / pollution are also causes of concern.

Examination of the EIAR

Context

Chapter 8 considers Land and Soils. The project has incorporated elements of best practice into the construction and operational design of the project. Assessments are based on this being implemented. The current proposal is to develop the project in two phases. Phase 1 construction will be completed and in operation before the commencement of Phase 2.

- The proposed Phase 1 construction includes the upgrade works at Inis Cealtra Island and the new Village Car Park at Mountshannon, north of Aistear Park.
- The proposed Phase 2 construction includes the reconfiguration of the Harbour Car Park and the new Visitor Centre at Mountshannon, south of Aistear Park.

It is set out that site survey/investigations were carried out for the Old rectory and Visitor Centre Site in February and March 2022. No excavations were carried out on Inis Cealtra.

<u>Inis Cealtra Island</u>

The topography of the island slopes upward from the jetty location, at approximately +30.00m OD, to a relatively flat plateau with a high point of +40.00m OD.

The Island development will require a permanent land take of 23 sq.m for the Weather Shelter Pod, 16sq.m for the WC Pod and 23sq.m for the Staff Pod.

Notwithstanding the footprint of the proposed pods and walkway, there will be an additional temporary land take of pasture land during the construction phase for the temporary construction compound. This area will be reinstated once the construction works have been completed.

Overall, the effect of land take during the construction phase is assessed as negative, not-significant, localised, likely, temporary, direct effect.

Installation of 4 number 800mm (max diameter) steel piles will be required to retain the new floating jetty, which will be accessed via a ramp requiring 4 number 203mm H piles to support the concrete (2mx2m) anchor base that retains the ramp anchor points. Similarly, 2 254mm x 254mm H piles will be required to retain the Canoe Launch section. These piles will be vibrated into the bed by an excavator on the pontoon raft.

The effect is assessed as a negative, slight, localised, likely, long-term, direct effect.

Village Car Park

The highest point in the car park is at approximately +50.00m OD.

The new public car park measuring 8,594 sq.m will require a permanent land take. The layout has been developed to minimise the extent of hard paving required on site.

Overall, the effect is assessed as negative, moderate, localised, likely, permanent, direct effect.

Approximately 3,200m3 of topsoil will be excavated to depths agreed upon and in conjunction with the site specifications and design drawings issued.

Bulk excavation of a volume of 4,200m3 approximately will then occur to the required sub-formation levels using excavators and dumpers.

The effect is assessed as a negative, moderate, localised, likely, permanent, direct effect.

Harbour Car Park Reconfiguration

The harbour car park level is at approximately +32.00m OD.

Visitor Centre

The existing Rectory site slopes up relatively steeply from south to north, rising from approximately +32.00m OD at its southern boundary to +40.00m OD at the rectory building itself.

Approximately 1,600m3 of topsoil will be excavated, segregated and transported to an agreed deposition area. This material would then be removed from the site with a minor amount kept on site in a temporary storage area for later use in landscaping.

Bulk excavation of approximately 6,200m3 under the proposed building and front courtyard and 1000m3 for the realigned access track and other external areas will then occur to the required sub formation levels using excavators and dumpers.

The effect is assessed as a negative, moderate, localised, likely, permanent, direct effect.

In terms of the underlying geology, Inis Cealtra and the Mountshannon area is underlain by Lower Carboniferous Limestone (Ballysteen Formation). The formation consists of irregularly bedded and nodular bedded argillaceous bioclastic limestones (wackestones and packstones), interbedded with fossiliferous calcareous shales.

Potential Effects

During the operational phase of the proposed development, there is still a risk that contamination from on-site oils, fuels from vehicles and brown water, can affect the land and soils environment. Any effect from a hydrocarbon spill to soil may also indirectly effect the hydrological/hydrogeological environment. Due to the increased number of visitors the land and soils on Inis Cealtra Island may also experience soil compaction due to the increased number of visitors walking on the soils. Sedimentation can also affect safety on the site from build-up, flooding from drain blockages, and maintenance issues from soil erosion. Soil loss due to erosion can result if areas are left exposed.

Mitigation

Section 8.9 sets out Mitigation Measures. The design of the paths is in line with the principles of minimal intervention to archaeological and natural heritage, which also results in minimum intervention with the land and soils. The paths are all proposed as mown paths to existing ground level with several path options proposed to spread

the footfall reducing soil compaction and erosion. These may be phased in different seasons as the intensity of use is observed.

The design of the three new staff and public welfare facility 'pods' were designed to be lightweight, freestanding, timber pavilions, raised on timber legs so that their contact with the ground will be minimal, reducing the impact to land and soils.

The incorporated design mitigation of the pods and pathways for the island thereby reducing potential effects associated with impact to land and soils.

The Village Car Park is designed with SuDS features to attenuate and treat surface water reducing the associated impact on soils.

A site-specific Construction & Environmental Management Plan (CEMP) will be developed and implemented during the construction phase.

During construction of the jetty, the CEMP will be implemented, including the management of concrete management plan to ensure minimisation of the likelihood of an accidental spill of concrete. Concrete batching will take place off site and wash down and wash out of concrete trucks will take place off site. Weather conditions and typical seasonal weather variations will be taken account of when planning concrete pours. The refuelling of the excavator will use a drip tray and a spill kit will be made available in the event of a spill on the pontoon.

There is no significant impact foreseen from the operational phase of the Inis Cealtra visitor experience or the new car park. On Inis Cealtra Island where the footfall is expected to be the heaviest, 1m on either side of the path is proposed to be mown in addition to the 2m width in the main season to allow visitors to spread over a wider width of the path limiting compaction of soils. A 6-week mowing regime is proposed in the summer for the additional strips. The pods have been designed to be dismantled and removed if required, with little trace left on the landscape.

The new car park is designed with SuDS features to attenuate and treat surface water reducing the associated impact on soils to negligible.

There is no significant impact foreseen from the operational phase of the Harbour car park reconfiguration and visitor centre. There will be no alteration to the existing footprint for the car park. The proposed drainage network will incorporate sumps within manholes for silt removal and a bypass petrol interceptor prior to discharge

preventing soil contamination. The proposed development includes a detailed Visitor Management Plan (VMP).

Therein, it is noted that mitigation measures will be employed at the site and include, but are not limited to, measures to prevent soil and groundwater contamination, including appropriate handling of fuels. Pollution control and other preventative measures have been incorporated into the project design to minimise adverse effects on soil quality. Mitigation by design has been the principal means which will reduce suspended sediment run-off arising from construction activities. Preventative measures also include fuel, concrete, and waste management, which are incorporated into the project CEMP. No significant residual impacts are recorded.

Evaluation and Assessment: Direct and Indirect Effects

I have examined, analysed and evaluated the information provided in Chapter 7 and all the associated documents and submissions on file in respect of Land and Soils. I am satisfied that the information submitted in the EIAR adequately demonstrates an understanding of the potential impacts.

Having regard to the nature of the proposed visitors centre experience, it is inevitable there will be an impact on land and soils, during construction and operation phases. I concur that the nature and size of the site, relative to its location, would mean that effects on land and soils is not significant. Impacts upon Water and Hydrology, Cultural Heritage: Built Heritage and Cultural Heritage: Archaeological Heritage are of relevance to land and soil and are independently assessed in Chapter 9, Chapter 13 and Chapter 14, respectively, of this report and I do not intend to replicate such assessments here.

I accept that there is potential for contamination of land and soil from spillages or leakages from machinery or stored substances. However, pollution control measures which have been put in place, as set out the EIAR have served to reduce the risk of soil and bedrock contamination, and I concur the works will not result in significant residual effects to soils and geology (see also detailed discussion in relation to groundwater below).

A Screening for Appropriate Assessment (Stage 1) and Natura Impact Statement (Stage 2) were completed for the proposed development and determined that there will be no adverse impacts on any qualifying species of protected Natura 2000 sites.

Additionally, mitigation measures will be implemented as part of the EIAR and the CEMP to ensure that there will be no significant adverse effects on the land and soils pertaining to the development site

Conclusion: Direct and Indirect

Having regard to the above, I would agree with the conclusion reached in Chapter 8 of the EIAR that the proposed visitors centre experience will not give rise to direct nor indirect adverse impacts, and that significant adverse impacts on land and soil can be ruled out.

8.6.6. Water & Hydrology

Issues Raised

Third party observations have raised issues of run-off during the construction phase, unpredictable weather conditions and climate change impacts, proposed visitor numbers to the Island and that provision of W.C facilities on Inis Cealtra are problematic.

Examination of the EIAR

Context

Chapter 9 considers water, which assesses potential impacts on surface water, ground water, flood attenuation, stockpiles and storage areas, disposal of soil and increased boat activity moving from the Island to the Mainland, which can reasonably be expected to occur because of the Development.

Local Hydrology

All elements of the proposed development (the visitors centre, car park, Harbour, Lough Derg and the Island) are located within Hydrometric Area No. 25C, also known as the Lower Shannon catchment.

The Lough Derg TN lake water body (IE_SH_25_191a) is located 0.1km south of the proposed visitors centre, 0.2km south of the proposed car park and adjacent to the Mountshannon Harbour car park. Inis Cealtra is located within this lake water body. There are no surface water bodies located within the proposed development footprint of the proposed visitors centre and car park. There is no surface water i.e. streams on Inis Cealtra but there is a spring associated with the holy well which is fed by groundwater from a locally important aquifer in the limestone bedrock. Our Lady's

Holy Well is situated a short distance south of Saint Mary's Church on the east shore of the Island (Holy Island).

Surface Water and Groundwater

The EIAR sets out that the potential sources of impact are to groundwater and surface water. During construction, pollution from mobilised suspended solids (release of sediment and silt from vibration driving of metal piles and excavation of lake bed) are generally the main concern, but accidental spillage of fuels, lubricants, hydraulic fluids and cement from construction plant may lead to incidents, especially where there are inadequate pollution mitigation measures. Activities within or close to the watercourse channels can lead to increased turbidity through re-suspension of bed sediments and release of new sediments from earthworks.

Inis Cealtra

- Demolition: One building (GFA 16 sq.m.) will be demolished and the materials removed by boat to the mainland for disposal by a licensed contractor. It is not proposed there will be any earthworks on the island therefore there will be no stockpiling of materials that could potentially cause run-off to Lough Derg.
- Pods: Three new staff and public welfare facility 'pods' are proposed on the island to meet the minimum needs of staff and visitors by providing a weather shelter, WCs and a rest room for island staff. The proposed pods will be timber framed structures sitting on metal piles. The structure will be infilled with timber and clad with timber on their roof and walls.
- Site enabling works: Contractor welfare facilities, storage areas, bunding, run-off controls and provision of temporary power, light and water services will be required to facilitate the development. The enabling works and development will also result in increased levels of boat traffic. It is proposed that works on the island will only be completed in periods of dry weather, making run-off unlikely. The welfare facilities will include portaloos and contents will be removed and disposed of to a licensed facility. There will be no foul water generated during construction. Construction boat traffic would be in the region of 8 round boat trips daily. The proposed Phase 1 construction would not increase expected 2027 levels of boat activity on Lough Derg.

The EIAR sets out that given the relatively small scale of the works, the nature and limited scale of the materials being used for construction and duration of the works, the overall effect will be negative, short-term, localised and not significant.

- Mooring Point: The installation will include a new L-shaped floating access jetty and walkway at the north-west of the island, consisting of a floating breakwater jetty and a stone and concrete causeway which will be connected by a steel access ramp. To facilitate the new floating jetty, the lake bed (2m3) will need to be excavated on the south end of the main breakwater jetty. Steel piles will be required to retain the jetty. This will require 4 number 203mm H piles to support the concrete (2m x2m) anchor base that retains the ramp anchor points. These piles will be vibrated into the bed by an excavator on the pontoon raft along the stone causeway on the Southern side and the piles will be hidden inside the stone filled gabions to the Island. Similarly, 2 254mm x 254mm H piles will be required to retain the Canoe Launch section in the sheltered side of the land Structure. They will be vibrated also into place by the excavator on the Pontoon raft. The excavator will place a gabion mattress of washed stone inside the trench sheet wall. Pre-mixed concrete will be poured into the shuttered area to form the anchor point for the ramp to the floating jetty. 4 piles will be core drilled into the lake bed as brackets for the floating jetty. These works will take approximately 7-8 weeks. Impacts on hydrology from this stage of the project could include:
    - Discharge of construction materials, e.g. uncured concrete to surface or ground waters;
    - Release of sediment and silt from vibration driving of metal piles and excavation of lake bed;
    - Accidental fuel spill from excavator.

The EIAR sets out that given the nature of the works, the location and materials to be used, the potential for impact on water has the potential to be slight, negative, localised and short-term without mitigation.

Village Car Park

The new car park will involve site clearance works, construction of a temporary site construction compound and construction of a new public car park. The site drainage will consist of the installation of suitable protection (e.g., silt curtain) around the site boundaries to control and treat any run-off during the works. There is no direct hydrological connection between the proposed car park and Lough Derg, however the proximity of the proposed works provides a remote possibility for an indirect hydrological connection via surface water run-off/drainage. Clearance works including topsoil and bulk excavation may be kept in a temporary storage area with some soil held for future landscaping.

The remainder of the material will be brought to a suitably licenced facility. Stone and asphalt will be imported to form a new hardcore area and grasscrete blocks will be used for the overflow car park.

Drainage works including manholes and gullies will be connected to the existing combined drain which runs along the site entrance. Bunded containment will be provided for storage of lubricants, oils and site generators. A temporary construction compound to include concrete washout, waste materials and welfare facilities will be provided with surface water management being constructed early in the project and a wastewater management system with disposal by a suitably licensed contractor for the duration of the project.

The EIAR sets out that given the nature of the works, the location and materials to be used and the lack of hydrological connectivity the potential for impact on water will not be significant, negative, localised and short-term without mitigation.

Harbour Car Park Reconfiguration

Phase 2 works include the reconfiguration of the Harbour car park and the development of a visitor centre at the Old Rectory site.

The car park will be reconfigured to provide 49 total car parking spaces and public realm enhancements. There will be no alteration to the existing drainage regime. The proximity of the car park to Lough Derg provides the possibility of an indirect hydrological connection. A temporary site construction compound for the visitor centre development and car park reconfiguration will be required which will provide a

bunded containment area for the storage of lubricants, oils and site generators. The car park will be resurfaced and new paving and finishes provided throughout.

The EIAR stes out that given the scale of the works, the location and materials to be used, the potential for impact on water will not be significant, negative, localised and short-term without mitigation.

Visitor Centre

A part-one-storey, part-two-storey Visitor Centre with a gross floor area (GFA) of 1,594 sq.m is proposed to be constructed in the southern part of the Old Rectory site, fronting Harbour Road. Works include, demolition of a section of stone wall, topsoil stripping of approx. 1600m^3 of material, and concrete pours.

The river waterbody Kilrateera_Upper_010 (IE_SH_25K720870) is located approximately 0.5km to the east of the site proposed for the visitors centre and car park. The river waterbody Shannon (Lower)_040 (IE_SH_25A050100) is located approximately 0.4km and 0.5km to the west of the proposed visitors centre and car park respectively.

Site drainage will consist of a silt curtain around the site boundaries to control and treat and run-off during the works. A foul drainage connection will be made within the public road to the south of the site. An existing watermain connection exists on the site, and this will be availed of during the construction phase and/or a temporary connection may be made to Uisce Éireann's water mains if needed. A bunded containment area will be provided within the compound for the storage of lubricants, oils and site generators etc. If necessary, the compounds will be fenced and secured with locked gates.

A construction methodology is provided in the Construction Environmental Management Plan. An environmental manager will be appointed to ensure that the CEMP is developed, implemented and maintained. A number of surface water plans including a Surface Water Management and Run-off Control Management Plan, a Fuels and Oils Management Plan and a Concrete Management Plan will form part of the CEMP.

The EIAR submits that given the scale of the works, the location and materials to be used, the potential for impact on water will not be significant, negative, localised and short-term without mitigation.

Water Framework Directive - Protected Areas

The WFD requires a register of protected areas. The Lough Derg is a protected area in terms of the WFD protected areas for drinking water (Article 7 abstraction for drinking water) and falls within the Shannon International River Basin District (IRBD). It is also designated for the Lough Derg (Shannon) SPA (004058). I highlight Chapter 10 assessment of Biodiversity and the Appropriate Assessment Screening and NIS which were prepared for the proposed development.

The use of SuDS features will mitigate any potential impacts relating to changes in runoff rates and volumes whilst also maintaining quality of water the vicinity of Lough Derg. There will, therefore, be an imperceptible impact from development in the operational phase. The NIS determined that there will be no adverse effects on any qualifying interests of protected Natura 2000 sites hydrologically linked and downstream of the proposed site. Therefore, there will be no significant adverse effects on the hydrological or hydrogeological regime pertaining to the development site.

Bathing Waters

There is a designated bathing area east of the main harbour at Mountshannon that has up to 1503 visitors during peak times. The quality of the bathing water is identified as excellent in the most recent sampled dated July 2024.

Flood Risk

The initial stage of a site-specific flood risk assessment includes an assessment of the available flood risk data to identify flood risk indicators in the study area.

The study area is subject to three potential flood risk mechanisms;

- Fluvial flooding caused by overtopping of Rivers and Streams;
- Pluvial flooding caused when the intensity of rainfall events is such that the ground cannot absorb rainfall run-off effectively or urban drainage systems cannot carry the run off generated; and
- Groundwater–flooding caused by a rise in the level of the water table.

Fluvial: There are no river water bodies located within the footprint of the proposed development. A review of the indicative fluvial mapping data indicates that there is no risk of fluvial flooding at the proposed development.

Pluvial: Intense rainfall events have the potential to cause localised flooding. The storm water drainage for both phases is designed where possible in accordance with the following:

- Pipes are designed to reach self-cleansing velocity in the one in 2-year event
- Sewers not surcharging in the 2-year event
- Sewers not flooding in the 100-year event with 20% Climate Change
- Class 1 Bypass Petrol Interceptors
- Sub-surface attenuation systems designed for storage of a 1 in 100-year storm plus 20% Climate Change factor
- The sites/elements are designed to attenuate the greenfield runoff rate for the 1-year, 30-year and 100-year return periods respectively. This is in compliance with Appendix E of the Greater Dublin Strategic Drainage Strategy. The aim of this is to mimic the existing hydrological regime existing on the site so to minimize the impact of the development. An emergency overflow will be provided also in the event of blockage occurring at the hydrobrake.

The stormwater generated on Inis Cealtra will be managed at its source by dispersing the runoff through the natural vegetation of Inis Cealtra and the use of permeable materials to maximise the use of SUDS measures where reasonably practicable. There are no plans to implement an underground sewer system.

There will be no alteration to the harbour car park reconfiguration hydraulic regime.

The visitor centre has an existing storm water system attenuating the discharge from the Old Rectory.

The proposed system will attenuate flows from the impermeable surfaces within the visitor centre development. The proposed drainage system will incorporate

sumps within manholes for silt removal and bypass petrol interceptors prior to discharge. The outfall will be to Lough Derg.

The new village car park will incorporate both hard and soft engineering solutions for storm water management. The site is split into multiple sub-catchments. The overflow car park will use Grasscrete paving allowing for infiltration of rainfall to ground. The hardstand car parking will capture rainfall via gullies and filter drains. The stormwater will tie into a combined public sewer which runs adjacent to the site entrance.

Groundwater: The GSI Groundwater Flooding Data View and OPW flood maps show the closest area at risk of groundwater flooding as being over 10km to the east in County Tipperary. Therefore, the risk due to groundwater flooding is deemed to be low.

Flood Risk Assessments

Flood Risk Assessment reports have been prepared as part of the planning application. An FRA was prepared on behalf of Clare County Council for the proposed development on the island of Inis Cealtra and Mountshannon, Co. Clare. The report concluded that elements of the project are within Flood Zone A & B as defined in the Flood Risk Management Guidelines. The proposed uses are justified based on existing zoning, existing use and the SFRA conducted for the County Development Plan.

An additional FRA was prepared for the jetty development to be located at Inis Cealtra. The development is classed as ‘water compatible’ development and therefore allowed in any flood zone.

Groundwater Vulnerability

Groundwater vulnerability is a term used to represent the intrinsic geological and hydrogeological characteristics that determine the ease with which groundwater may be contaminated generally by human activities. Mapping provided by the GSI indicates that the majority of the site is underlain by an aquifer of low vulnerability for the proposed visitors centre, car park and harbour. Inis Cealtra is underlain by an aquifer of medium vulnerability.

During the operational phase it is not proposed to establish a direct water supply connection to the existing Uisce Éireann network to serve Inis Cealtra due to its inherent constraints being an Island. A dry toilet system will be implemented on Inis Cealtra to address the logistical challenges of removing solids and liquids. There is no water requirement for the village car park or harbour car park reconfiguration. There is also no foul sewer requirement for either of the car parks. The visitor centre will be serviced for potable water by a 100mm pipe via a T-junction to the existing 150mm diameter water main located on Harbour Road. It is proposed that the foul water generated within the Visitor Centre will be treated by the existing on-site treatment unit prior to discharge by an existing connection to the foul sewer in Harbour Road.

A worst-case scenario would arise if the water quality and best practice measures are not implemented during the construction phase of the development. This may result in the generation of uncontrolled release of suspended solids or hazardous materials such as oils or concrete from the site which would result in an unacceptable impact on local receptors and the receiving environment. A Summary of Mitigation and Monitoring is set out in section 9.14 of the EIAR. As stated earlier pollution control and other preventative measures have been incorporated into the project design to minimise adverse effects on water quality. Mitigation by design has been the principal means which will reduce suspended sediment run-off arising from construction activities. Preventative measures also include fuel, concrete, and waste management, which are incorporated into the project CEMP.

The implementation of the proposed mitigation measures will;

- Prevent a deterioration in status of bodies of surface and groundwater;
- Not jeopardise the attainment of good surface water chemical status;
- Not permanently exclude or compromise the achievement of the objectives of the WFD in other bodies of water within the same river basin district; and
- Is consistent with other Community Environmental legislation.

Evaluation and Assessment: Direct and Indirect Effects

I have examined, analysed and evaluated the information provided in Chapter 9 and all the associated documents and submissions on file in respect of Hydrology. I am satisfied that the information submitted in the EIAR adequately demonstrates an understanding of the potential impacts and provides suitably comprehensive range of mitigation and monitoring measures in Section 9.14 to reduce any potential impacts.

Due to the design of the project, and the mitigation and monitoring measures described which will be adopted, it is not likely that there will drawdown of groundwater, or that there will be a discharge of priority substances or priority hazardous substances from the proposed development. The proposed development alone or in combination with other developments is not likely to cause a deterioration

in the quality of any body of surface water or groundwater, is not likely to alter the chemical status of any waters, is not likely to have a significant effect on any European site and is not likely to compromise the ability of any waters to meet the objectives of the Water Framework Directive and transposing legislation.

Conclusion: Direct and Indirect Effects

I am satisfied that sufficient information has been provided to inform the consideration of effects in respect of water resources and hydrology. Having regard to the considerations above, I would agree with the conclusions reached in Chapter 9 of the EIAR that the proposed development would not give rise to significant direct nor indirect adverse impacts on surface water or groundwater.

8.6.7 Biodiversity

Issues Raised

Concerns are raised with respect to excessive disturbance and scale of proposed new jetty and over development of the area. Impact of dredging on aquatic habitats and water quality. It is contended that Lough Derg's ecosystem, already under stress, supports diverse wildlife in the Inis Cealtra-Knockaphort area, including sensitive species like kingfishers, herons, curlews, and White-Tailed Eagles. Offshore dredging to accommodate larger boats risks disturbing aquatic

habitats and water quality. Concern is raised to the environmental impact study's thoroughness in addressing unique ecological dynamics. Increased boat traffic, requiring a deepened navigation channel, threatens the fragile ecosystem, particularly nesting birds in the rushes. Increased boat traffic from the jetty and ferry operations threatens the natural beauty and ecological balance of Lough Derg.

Examination of the EIAR

Context

Chapter 10 considers Biodiversity. Site surveys were carried out in June 2021. I consider that the data collected during the 2021 and 2022 surveys remains relevant to the proposed development.

The EIAR is accompanied by Appendix 10-1 Bird Survey, Appendix 10-2 Aquatic Survey, Appendix 10-3 Bat Survey and Appendix 10-4 Habitat Survey.
In conjunction with the habitat surveys, botanical surveys were completed on the 10th of June 2021 within the study area. Bird surveys were conducted on a regular basis over a 3 year period comprising March 2021 to March 2024 with a total of 26 survey visits completed within the study area. The Biodiversity Chapter of the EIAR assesses sites designated for nature conservation, habitats and species, determining ecologically significant effects on key ecological receptors and should be read in conjunction with 'Template 2: Standard AA Screening Determination and template test for likely significant effects' and 'Template 3: Standard AA template and AA determination', which form part of the overall assessment of the proposed project. It is noted that the NIS is solely concerned with ascertaining whether a project will adversely affect the integrity of a Natura 2000 site with respect to the function and structure of the Conservation Objectives for the site's Qualifying Interest (QI) species and habitats. Consequently, mitigation measures listed within the NIS are concerned only with ameliorating the impact of any potentially significant effects to the Conservation Objectives for two sites located within the zone of potential impact – Lough Derg (Shannon) SPA, and Lower River Shannon SAC.

The Proposed Development site is largely encompassed within the Lough Derg (Shannon) SPA. The site synopsis notes that Lough Derg (Shannon) SPA is of

high ornithological importance as it supports nationally important breeding populations of cormorant and common tern. In winter, it has nationally important populations of tufted duck and goldeneye, as well as a range of other species including whooper swan (Cygnus cygnus). The presence of whooper swan, Greenland white-fronted goose (Anser albifrons), Greylags goose (Anser answer), Hen harrier and common tern is of particular note as these are listed on Annex I of the E.U. Birds Directive.

The E.U. Birds Directive pays particular attention to wetlands and, as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for wetland & waterbirds. Parts of Lough Derg (Shannon) SPA are a Wildfowl Sanctuary. Hen Harrier are also known to roost in the reedbeds on the margins of the site during the winter.

The EIAR sets out that Lough Derg pNHA (site code 000011) is the only site of National importance in the ZOI of the proposed development. Cloonamirran Wood (site code 001686) lies ca. 1.25 km east of the proposed development but this site, selected for woodland habitat, is outside the ZOI.

Lough Derg (River Shannon) is an Important Bird Area (IBA code IE130), as is the Slieve Aughty Mountains. Sites designated for nature conservation in the Mountshannon region are illustrated in Table 10-5 of the EIAR. Sites designated for nature conservation within the ZOI of the Proposed Development are listed in Table 10-7 of the EIAR, along with their qualifying features and distance from the Proposed Development. The designated sites are assessed in detail in the AA assessment carried out for the proposed project and I do not intend to repeat this assessment here.

Current Conditions

The study comprises three sites, two of which are in the village of Mountshannon on the shores of Lough Derg, and Inis Cealtra, or Holy Island, which is approximately 1.75km to the southwest of the village. Both are in the tourism area know as the ‘Hidden Heartlands’, which indicates that the area is somewhat underexplored in terms of tourism. Lough Derg is part of the Shannon river system, and is designated as an Special Protection Area (SPA) for its ecological importance.

Mountshannon has the status of ‘Large Village’, the core of which is designated as an Architectural Conservation Area. The existing environment on Mountshannon includes grassland, treeline, hedgerow, stonewall some spoil sand bare ground and mixed broadleaved/conifer woodland.

Inis Cealtra is a drumlin- - or dome shaped island close to the Lough Derg shoreline. It is one of the most famous monastic sites from the ecclesiastical period in Ireland. The uninhabited island is located at the mouth of Scarriff Bay on Lough Derg c. 2km from Mountshannon. The island is cherished for its spiritual ambience, tranquility, beauty, ecclesiastical heritage, natural heritage, folklore and cultural traditions as well as its historical links to Brian Boru and the Vikings. Holy Island attractions include a round tower, monastic cell, ruins of six churches, high crosses, holly well and unique graveyard. The island is accessible via boat or paddle. The burial site is still in use for the local community, and tourists are attracted to the history and walking trails on the island. It has been included since 2010 on the UNESCO1 World Heritage Tentative List. The island is part of an area of international biodiversity importance as it is situated within a Special Protection Area (SPA), as designated under the European Bird Directive.

The village is home to Ireland’s White-tailed eagles and a popular destination for Shannon cruisers. It is an attractive scenic village close to the marina and provides visitors with a view of Lough Derg and its islands. The Eagles nest near Mountshannon attracting bird watchers from all over Ireland. It is noted, however, that the White-tailed Eagle is not a Qualifying Interest (QI) species of the Lough Derg (Shannon) SPA. It is also noted that the new visitor centre will include a range of uses and facilities providing for interpretation, exhibition and education, flexible café/event space and a research centre for the white-tailed sea eagle project.

The EIAR acknowledges that the Inis Cealtra-Knockaphort area supports a diverse range of wildlife including ‘kingfishers, herons, curlews, and White-Tailed Eagles’, and it is for this reason that an extensive program of ornithological surveys was undertaken on Inis Cealtra and on the mainland at Mountshannon Harbour and Knockaphort Pier from March 2021 to March 2024. Counts were also carried out from within agricultural fields overlooking the northern and southern shores of Scariff Bay.

Section 10.6.3.9.4 of Chapter 6, Biodiversity, sets out the results of the ornithological surveys which formed the baseline data to ensure thorough and detailed impact assessments could be made with regards local bird populations and the proposed development's design, construction and operation.

The new jetty will be installed at the same location as the existing jetty on the north-eastern side of Inis Cealtra. It is noted that there will be no dredging required to accommodate larger boats nor is offshore dredging for construction of the proposed Inis Cealtra jetty anticipated. Instead, there will be some limited excavation of the lakebed required involving the removal of approximately 2 m^3 of material on the southern end of the proposed breakwater jetty. Once removed, the excavated material will be placed into a skip on a pontoon raft, removed from site and disposed of correctly.

As stated above, section 10.6 of Chapter 10, Biodiversity, and in Section 3 of the NIS, a comprehensive suite of ecological surveys was completed over a period of three years from March 2021 to March 2024. As part of those surveys, the area between Inis Cealtra and Knockaphort Pier was surveyed for a range of ecological receptors, including otter, birds, and white-clawed crayfish. The EIAR acknowledges that the proposed jetty extension will result in a small loss of common habitats, such as Limestone-marl lakes and Reed and large sedge swamp. These habitats do not provide important feeding or resting areas for waterbirds, and surveys show no significant populations of these species at the site.

Therefore, the loss of habitat is expected to have only minor, short-term effects on waterbirds. During construction, some disturbance to birds in the surrounding area may occur due to noise and human activity, but these effects are likely to be temporary and minor. Overall, the project has been designed to balance development with protecting the wildlife and peaceful character of Lough Derg.

Habitats and Flora

No rare or protected flora species were recorded during the habitat and botanical surveys completed in 2021 by DE (2016).

Bats

The EIAR at section 10.6.3.8 sets out Bat records and Table 10-11 sets out Bat Conservation Ireland bat records for the 2 km grid squares covering the mainland (R78) and Inis Cealtra (R68) components of the proposed development. Daubenton's bat, Natterer's bat, Leisler's bat, Soprano pipistrelle and Brown long-eared bat were recorded.

As can be seen from this data, the area encompassed within the 2 km grid squares listed is of best value for Natterer's bat (Myotis nattereri), common pipistrelle (Pipistrellus pipistrellus), soprano pipistrelle (Pipistrellus pygmaeus) and brown long-eared bat (Plecotus auritus), all having ratings over 50 across both the 2 km grid squares. Ratings for Daubenton's bat (Myotis daubentonii), Leisler's bat (Nyctalus leisleri) and lesser horseshoe bat (Rhinolophus hipposideros) are all below 50. The proposed development site has a low rating for lesser horseshoe bat and there are no records of this species in the 10km grid squares covering the proposed development site. The proposed development is located within the range of the species but outside the distribution of the species (NPWS, 2019).

The EIAR notes that the car park site, the old rectory site, visitors centre site and Inis Cealtra are all suitable for bats. Mature trees and scrub is considered to provide good foraging habitat for bats. The Old Rectory is a bat roost. It is concluded that while some bats roost in the Rectory, it is not a maternity roost. It is likely that bats utilise the car park site for foraging during the active season. Some of the lost habitat with larger trees have ivy cover which could be used as roosts for bats between foraging bouts during the summer season. These habitat types are common and widespread in the greater area. No roost sites were recorded.

The trees at the Old Rectory site have limited potential to harbour bats in terms of crevices or holes that would provide cover. Some of the larger trees had some ivy cover, so these trees could be used as night roosts for bats between foraging bouts during the summer season. It is likely that bats utilise the site and adjacent lake for foraging during their active season.

On Inis Cealtra a shed at the west pier consists of a low flat roof, which is heavily shaded by woodland growing over and around it. This shed, which is proposed to be demolished, is assessed as a structure of low bat roost potential. No evidence

indicating the presence of roosting bats was identified during an inspection survey of a shed at the west pier on 16th June 2023. Woodland and scrub that occurs in places around the perimeter of the island is considered to provide good foraging habitat for bats. Similarly, pockets of scrub away from the lake are deemed to provide good foraging for bats. Mature trees with ivy cover, especially some of the larger ash trees on the island could be used by roosting bats. Daubenton's bat and Leisler's bat forage over Lough Derg as it is an important source of insect life. Other bat species likely forage along the shores of the lake. Eleven mature trees surrounding the island were identified as having potential to support bats.

Potential Effects

The demolition phase includes the proposed demolition of the concrete shelter on Inis Cealtra and the demolition of structures on the mainland. This phase has the potential to cause habitat alteration to the surrounding habitats. The construction phase includes a range of elements which have the potential to cause habitat loss and/or habitat alteration and disturbance. The habitat loss anticipated for the mainland carpark includes the loss of Improved agricultural grassland, Hedgerow, Treeline and Stonewalls and other stone works. The habitat loss at the visitors centre includes Amenity grassland, Scattered trees and parkland and Mixed broadleaved/conifer woodland. While there will be no reduction in area of 'Buildings and artificial surfaces and Spoil and bare ground. At the Harbour there will be no reduction in area of 'Buildings and artificial surfaces within the site however some elements of this habitat (comprising parts of the building and existing hard standing areas) will be removed so there will be a degree of loss. The proposed development on Inis Cealtra will require the direct loss of the following locally important habitat which overlaps with the SPA: Improved Agricultural Grassland and Dry Meadows and Grassy Verge Grassland for the pods and footpaths, Wet Grassland (GS4), Marsh and Scrub will require a habitat loss of for footpaths. Lastly the Oak-ash-hazel woodland habitat will also encounter potential habitat alteration whereby the proposed pods will be placed and no reduction in area of the Stonewall and other stonework is anticipated.

The fauna likely affected by the construction phase include hedgehog, badger, pygmy shrew, Irish hare, Irish stoat, otter, pine marten, red deer, fallow deer, red squirrel, bats, birds, terrestrial macroinvertebrates and reptiles. These faunae are

affected by both habitat loss/alteration and disturbance/displacement by noise/ human activity.

During the operational phase of the Proposed Development, significant effects on habitats are not anticipated. There will be a substantial increase in human activity at the site as a result of the Proposed Development and the enhanced visitor facilities.

In relation to Bats.

Inis Cealtra

During the construction phase, there will be an increase in the level of lighting on-site; however, use of lighting will be temporary as it will mainly be associated with works during standard construction hours and is expected to be localised within the Site, corresponding to the area of works active at any one time. Development of the Site during the construction phase will result in the loss/modification/fragmentation or alteration of foraging/commuting habitats (either physically or indirectly e.g., through lighting). The Site does not contain any high-value foraging/commuting habitats for bats, but the proposal will result in the loss/modification of Scrub (WS1) and (0.0046 Ha) Oak-ash-hazel woodland (WN2) which have some value to foraging bats.

Visitors Centre

There will be an increased human presence on-site throughout the construction phase, scheduled to take place in phases over a period of 18 months. This is expected to be at its greatest level during the initial phase, in which time the main construction activity, associated with the visitors centre, will take place, after which noise emissions will reduce for subsequent phases. The use of machinery and general construction activity will still result in an increase in fugitive noise emissions considerably over and above current baseline conditions for a sustained period.

During the construction phase, there will be an increase in the level of lighting on-site; however, use of lighting will be temporary as it will mainly be associated with works during standard construction hours and is expected to be localised within the Site, corresponding to the area of works active at any one time. Development of the Site during the construction phase will result in the

loss/modification/fragmentation or alteration of foraging/commuting habitats (either physically or indirectly e.g., through lighting). The Site does not contain any high-value foraging/commuting habitats for bats, but the proposal will result in the loss/modification of approximately 0.1044 Ha of Mixed broadleaved/conifer woodland and 0.0356 Ha of Scattered trees and parkland which have some value to foraging bats.

Car Park

There will be an increased human presence on-site throughout the construction phase, scheduled to take place in phases over a period of 12 months. This is expected to be at its greatest level during the initial phase, in which time the main construction activity, associated with carpark, will take place, after which noise emissions will reduce for subsequent phases.

During the construction phase, there will be an increase in the level of lighting on-site; however, use of lighting will be temporary as it will mainly be associated with works during standard construction hours and is expected to be localised within the Site, corresponding to the area of works active at any one time. Development of the Site during the construction phase will result in the loss/modification/fragmentation or alteration of foraging/commuting habitats (either physically or indirectly e.g., through lighting). The Site does not contain any high-value foraging/commuting habitats for bats, but the proposal will result in the loss/modification of approximately 0.0396 Ha of hedgerow which have some value to foraging bats.

Effects on all bat species associated with construction-related disturbance / displacement as a result of increased noise and lighting are assessed as Short-term, Likely, Slight to Moderate, Negative effects. Effects on all bat species associated with loss of foraging/commuting habitat during construction are assessed as Permanent, Likely, Slight, Negative effects (see Table 10-23 of the EIAR).

Enhancement

Section 4.7.6 of the EIAR sets out the proposed biodiversity enhancement measures for the site. The enhancement measures include: bird boxes, bat boxes, Pollinator-friendly management of the site, biodiversity signage and the eradication of mink from Inis Cealtra.

Section 10.13.1 of the EIAR sets out the proposed enhancement measures for the proposed development site.

Bird Box Scheme

To further enhance the Site for birds, a bird box scheme comprising artificial nest boxes will be installed to provide additional nesting habitat for birds. Different bird box designs are available to accommodate a wide variety of species such as swift, swallow, starling, blue tit (Cyanistes caeruleus), great tit (Parus major) and robin (Erithacus rubecula). It is proposed that a minimum of 10 No. bird boxes are installed within the Site on structures and trees, as appropriate. Installation of the nest box scheme, including the final number and location of boxes to be installed, is to be undertaken under the direction of the appointed ECoW.

Bat Box Scheme

To enhance the Site for bats, bat boxes will be erected on suitable trees within the Site. The scheme will comprise a mix of bat-box designs to attract a variety of bat species such as common pipistrelle, soprano pipistrelle, Leisler's bat and brown long-eared bat, all of which were recorded within the Site during baseline surveys. A minimum of 20 no. bat boxes are to be installed. Design and installation of the bat box scheme will be overseen by the appointed ecologist and will follow BCIreland guidance.

Pollinator-friendly Management of the Site

Pollinator-friendly management of green spaces and other managed areas will be implemented at the Site during the operational phase of the Proposed Development. This should have regard to 'All-Ireland Pollinator Plan' guidance.

Biodiversity Signage

Informative biodiversity signage will be erected in suitable locations throughout the Site where the public can easily access them, such as within amenity/landscaped areas or at various points around the mainland and island.

Eradication of mink from Inis Cealtra

Surveys and monitoring programs help guide eradication efforts by providing critical information on mink distribution and behaviour. Using camera traps, track surveys, and other methods to assess their presence and distribution. The National Parks and

Wildlife Service (NPWS) and local conservation groups use live trapping to manage mink populations in various regions. This method is effective for targeted removal and helps monitor mink numbers.

Mitigation

Section 10.10 of the Biodiversity Chapter specifically addresses the full range of mitigation impacts that may arise during the demolition, construction, and operational phases of the project. These measures have been developed to ensure the protection of ecological integrity throughout all phases of the project. Section 10.10 of Chapter 6, Biodiversity, also sets out a comprehensive suite of mitigation measures aimed at reducing potential impacts on all ecological receptors, including habitats and species. For habitats, key mitigation measures include avoiding sensitive areas where possible, minimising habitat loss through careful site planning, reinstating or enhancing habitats post-construction, and implementing protective buffer zones around ecologically valuable areas. These actions are intended to prevent degradation, support recovery, and maintain ecological function.

Otter

A pre-construction survey for otter should be undertaken no more than 10-12 months in advance of construction, as per best-practice guidance set out in NRA (2008) in relation to construction works and otter. The survey should be supplemented by an additional survey immediately prior to site works commencing if more than four weeks have elapsed since the initial pre-construction survey.

In the event of an otter breeding/resting place being discovered within or in proximity of the Site, all construction activity and site works will be undertaken in accordance with NRA (2008). Implementation of best-practice guidelines for otter will be overseen by the appointed ECoW.

Badger

A pre-construction survey for badger should be undertaken prior to the commencement of any works as per best-practice guidance set out in NRA (2006b) in relation to construction works and badger. The purpose of the pre-construction survey is to identify any changes within the site. The survey should be undertaken no more than 10-12 months in advance of construction. The survey should be

supplemented by an additional survey immediately prior to site works commencing if more than four weeks have elapsed since the initial pre-construction survey.

In the event of a badger breeding/resting place being discovered within or in proximity of the site, all construction activity and site works will be undertaken in accordance with NRA (2006b).

Implementation of best-practice guidelines for badger will be overseen by the appointed ECoW.

Bats.

Pre-construction surveys of any structures/trees to be modified and/or removed and considered to have any potential to accommodate roosting bats are to be carried out at the site in advance of construction commencing.

In the event that bat roosts are identified within the Site, best-practice mitigation will be recommended by the appointed ecologist in consultation with the Planning Authority/NPWS.

Specific measures to avoid unnecessary external artificial lighting and minimise the incidence of light spill from the Proposed Development onto adjacent areas once operational have been incorporated into the proposed Lighting Plan to reduce potential impacts.

Protection of Water Quality

For the SuDS strategy to work as designed it is important that the entire drainage system is well maintained. It will be the responsibility of the site management team to ensure the drainage system is maintained. The recommended programme of maintenance for the proposed storm water network and foul water network will be adhered to. There is to be no disposal of waste on the Island.

Residual Effects

Residual effects, with the above mitigation measures in place, were deemed to be not significant, imperceptible, imperceptible to slight or slight on all habitats, mammals (excl bats), Bats (‘imperceptible to slight’ – ‘disturbance / displacement’ and ‘slight’ – ‘habitat loss / fragmentation’) Birds – ‘loss of foraging / resting habitat’ is also mostly ‘slight’, see Table 10-36 summary of demolition phase effects post mitigation. Table 110.11.3 sets out summary of operational Phase effects post

Mitigation. Residual effects are considered not significant, localized imperceptible and slight for habitats, mammals (excl bats), bats, birds, reptiles and amphibians, water quality and management of wastewater.

It is concluded within the EIAR that provided that the Proposed Development is constructed and operated in accordance with the design, best practice and mitigation measures stipulated, significant residual effects on biodiversity are not anticipated on any Important Ecological Feature (IEF) at any scale.

Evaluation and Assessment: Direct and Indirect Effects

I have examined, analysed and evaluated the information provided in Chapter 10 and all the associated documents and submissions on file in respect of Biodiversity. I am satisfied that the information submitted in the EIAR adequately demonstrates an understanding of the potential impacts and provides suitably comprehensive range of mitigation and monitoring measures in Section 10.10 to reduce any potential impacts.

The application of mitigation and protection measures throughout the construction and operational phases will ensure that no significant residual impacts will arise from the project, either alone or in combination with other plans or projects.

Due to the design of the project, the mitigation and monitoring measures and enhancement measures described which will be adopted, it is not likely that the project would have a significant or negative impact on any habitat alteration / disturbance, mammals, bats, birds, reptiles and amphibians freshwater macro-invertebrates and freshwater aquatic or cause a deterioration in the quality of any body of surface water or groundwater, is not likely to significantly impact upon any Important Ecological Feature (IEF) at any scale.

Conclusion: Direct and Indirect Effects

Having regard to the examination of environmental information provided in respect of biodiversity, I am satisfied that sufficient information has been provided to inform the consideration of effects in respect of Biodiversity. Having regard to the considerations above, I would agree with the conclusions reached in Chapter 10 of the EIAR that the proposed development would not give rise to significant direct nor

indirect environmental adverse impacts on biodiversity or any important Ecological Feature (IEF) at any scale.

The implementation of the proposed enhancement measures has the potential to result in significant positive effects on biodiversity over the longer term, relative to the current condition of the site.

8.6.8 Noise and Vibration

Issues Raised

Concern is raised generally of the impact upon Mountshannon from hundreds of people transversing it. It is argued that there seems to be an over scaling of ambition that takes no account of the amenity that is enjoyed by the local community. The proposed 33-meter extension to the existing pier, forming a 52-meter L-shaped floating jetty, is considered too extensive, intrusive, and disruptive to the quiet, wildlife-rich, and spiritual nature of Lough Derg. It is contended increased boat traffic, requiring a deepened navigation channel, threatens the fragile ecosystem, particularly nesting birds in the rushes. Concern that the works will likely have a significant effect on the Mountshannon Arts festival, including road closures, increased traffic, noise, dust, and temporary parking adjustments.

Examination of the EIAR

Chapter 11 considers 'Noise and Vibration'. The chapter carries out an assessment on the potential noise and vibration impact for the construction phase, operational phase and demolition phase and proposes mitigation measures to minimise any adverse effects. The chapter evaluates the potential noise and vibration effects on sensitive receptors from the proposed development at Inis Cealtra Island and Mountshannon Village.

The island located within the Lough Derg (Shannon) SPA is designated for the below qualifying interests:

- Cormorant (Phalacrocorax carbo) [A017]
- Tufted Duck (Aythya fuligula) [A061]
- Goldeneye (Bucephala clangula) [A067]
- Common Tern (Sterna hirundo) [A193]

- Wetland and Waterbirds [A999]

Potential effects

The highest potential noise impact will arise from demolition works and construction works. The primary sources of outward noise in the operational context will be from traffic movements to site using the existing road network and also from building service plant noise within the Visitor Centre.

A baseline environmental noise survey was conducted in the vicinity of the mainland proposed development to quantify the existing noise environment at the nearest NSLs that may be affected by the proposed development. The noise measurement locations (NML) were chosen to represent the nearest noise sensitive receptors (NSLs) to the proposed development boundary. Given the scale of works, there were no predicted significant impacts to ecological receptors however, these have also been assessed throughout the chapter.

Baseline noise surveys conducted at NMLs revealed that existing noise levels are influenced mainly by road traffic, natural sounds of Lough Derg, boat activity and Harbour activities as well human activity in the area. Traffic Noise was the main contribution of noise at NML1 in Mountshannon Village. Traffic noise was present at all other monitoring locations but to a lesser extent.

Noise Impacts from small-scale demolition activities, such as removing a concrete shelter on Inis Cealtra and removal of walls at the Village Car Park and in front of the proposed Visitor Centre will be minimal and temporary. No significant noise effects are predicted as a result of demolition works associated with the proposed development. The use of hand tools and small-scale equipment during demolition minimises vibration impacts. There will be no significant vibration impacts anticipated during the demolition phase. Construction activities, including site clearance, piling works at Inis Cealtra Island, and building works, may temporarily increase noise levels. The highest potential noise levels at Inis Cealtra Island are expected from piling operations required for the floating jetty and welfare facility pods on Inis Cealtra. It is acknowledged in the EIAR that the piling aspect of construction works on Inis Cealtra would generate high levels of noise and vibration at source. However, it is important to note that Inis Cealtra Island is beside a lough (Lough Derg) which

does not support particular aquatic mammals, whose sense of hearing is relied upon for navigation and hunting. Piling is to take place outside of bird breeding season to minimise effects. There is existing anthropogenic noise in the vicinity of Inis Cealtra with boat activity and therefore a temporary introduction of piling noise is not expected to cause significant effects. Piling activities at Inis Cealtra Island may generate noise and vibration, but these are not expected to affect NSLs due to distance from works.

The construction of the Mountshannon Village car park and Visitor Centre will require the removal of a small number of selected trees and vegetation. Noise from tree-felling equipment, such as chainsaws and harvesters, may reach slight to moderate levels at nearby residential receptors, particularly those closest to the Mountshannon Village car park. However, these activities will be temporary and mitigated with hoarding and best practices. Increased construction traffic on local roads is not expected to significantly raise noise levels due to the relatively small increase in vehicle numbers. Boat traffic associated with construction on Inis Cealtra is also unlikely to significantly impact the acoustic environment of Lough Derg. Construction-related vibrations at Mountshannon Village Car Park, Visitor Centre and Harbour such as those from excavators, are deemed not to be significant at nearby NSLs in the EIAR.

Chapter 10 Biodiversity has assessed the impact of noise on ecological receptors and assessed the effect of construction noise from the Mountshannon Village Car Park area to be not significant to slight.

Mitigation

No significant effects are predicted at NSLs or ecological receptors from demolition phase works, however best practice measures as outlined for construction noise mitigation, will be applied during demolition works.

During the construction phase, best practices, such as regular maintenance of machinery and limiting working hours will mitigate the effects of noise. Piling works on Inis Cealtra Island will be carried out, outside of breeding and nesting seasons to minimise ecological impacts.

Temporary hoarding and careful sequencing of work will reduce noise impacts on nearby residents and ecological receptors. Felling activities will be scheduled to avoid sensitive breeding or nesting periods for birds, typically from April to July.

As many mature trees as possible shall be retained to maintain natural noise buffers. Vibration from construction and demolition activities will be limited to values outlined in Section 11.5.3.2 of Chapter 11 to prevent significant effects.

Evaluation and Assessment: Direct and Indirect Effects

I have examined, analysed and evaluated the information provided in Chapter 11 and all the associated documents and submissions on file in respect of Noise and Vibration. I have inspected the site and the surrounding area. I am satisfied that noise from increased road traffic will not be significant based on traffic increases on existing levels. I am also satisfied that the information submitted in the EIAR adequately demonstrates an understanding of the potential impacts generated by the development and provides a suitable range of mitigation and monitoring measures. Noise monitoring will be conducted during construction to ensure compliance with noise limits. No operational phase monitoring is required.

In relation to the conclusions of the EIAR, I concur with same, and I am satisfied that the information submitted in the EIAR has adequately set out the potential impacts of the development on noise and vibration. With the implementation of mitigation measures, the proposed development will not result in significant noise or vibration impacts during any phase of the project. Temporary effects during construction and demolition will be carefully managed to protect residents and wildlife, while operational noise levels will remain imperceptible to nearby receptors. The overall impact of the project on the noise and vibration environment is expected to be minimal and manageable. Therefore, I am satisfied that no significant effects on the noise and vibration environment will result from the development.

8.6.9 Air Quality and Climate

Issues Raised

Concern is raised that proposed visitor numbers to the island are unsustainable, especially given future climate change impacts. The traditional tourism season (spring, summer, autumn) cannot continue unaltered due to unpredictable weather

conditions. The Department of Transport notes the climate action plan and advises regard be had to CAP.

Examination of the EIAR

Context and potential effects

Chapter 12 of the EIAR considers the impacts of the development on air quality in the vicinity of the site. The chapter evaluates the potential air quality and climate impacts on sensitive receptors from the proposed development at Inis Cealtra and Mountshannon throughout the different phases of the project. The assessment examines impacts during demolition, construction and operational phases of the project and proposes mitigation measures to minimise any adverse effects.

Mountshannon is a seasonally busy village and is a popular destination for Shannon cruisers. Attractions include a tour of Holy Island, fly fishing, angling, walking trails and bird watching. The proposed development is located within and adjacent to Lough Derg (Shannon) SPA 004058 and is 11.7km north of Lower River Shannon SAC 002165.

The potential for a significant impact to air quality may arise from emissions of fugitive dust during construction. Cognisance is had to paragraph 12.4.2.2 Air Quality of the EIAR, it discusses and assesses potential for a significant impact to air quality from emissions of fugitive dust during construction. It is noted that Transport Infrastructure Ireland (TII) have issued updated guidance, December 2022, ‘Air Quality Assessment of Proposed National Roads – Standard ‘. This has been consulted to determine the potential impacts from the proposed construction activities, in respect to dust, traffic and ecology. For routes that pass within 2km of a designated area of conservation (either Irish or European designation) the TII requires consultation with an Ecologist (2011). However, the TII guidance states that in practice the potential for impact to an ecological site is highest within 200m of the proposed scheme and when significant changes in AADT (>5%) occur.

Table 12-22 and 12-23 of the EIAR shows the risk of the various stages of the development in relation to dust soiling, human health and ecological receptors. Overall, in the absence of mitigation, dust effects from the proposed development

construction phase works are predicted to be negative, not significant temporary to short-term and direct on dust sensitive receptors.

Paragraph 12.4.2.3 Climate sets out a detailed assessment of the project with respect to national climate policy.

I note that the EIAR refers to CAP2024 and that this has been updated with CAP2025. The Climate Action Plan 2025 (CAP25) is the third annual statutory update to Ireland's Climate Action Plan 2015 under the Climate Action and Low Carbon Development (Amendment) Act 2021. CAP25 builds on previous Climate Action Plans by refining and updating the measures required to deliver carbon budgets and sectorial emission ceilings. It provides a roadmap for taking action to reduce greenhouse gas emissions by 51% by 2030 and achieve climate neutrality by no later than 2050. The CAP has six vital high impact sectors where the biggest savings can be made: renewable energy, energy efficiency of buildings, transport, sustainable farming, sustainable business and change of land-use.
Albeit the CAP has been updated since the application was submitted I consider that the information contained in the EIAR and supplementary documentation remain valid and are acceptable to carry out an adequate assessment of air quality and climate impact, regard being had to CAP2025.

As well as ecological receptors, there are a number of other sensitive receptors, including residential and commercial within close proximity to the proposed village car park (Phase 1) and the Visitor Centre and Harbour Car Park reconfiguration (Phase 2).

Air quality during Phase 1 operation could be impacted by:

- Road traffic from increased visitor numbers; There is potential for impact on human health from a deterioration in air quality associated with emissions from vehicles.
- Boat traffic from increased visitor numbers.

There will be no increase in total boat traffic generated by Mountshannon Harbour and on Lough Derg with the proposed Phase 1 development in operation. Road traffic was assessed against TII criteria for potential for impact on air quality. None of the TII criteria were met therefore the requirement for a detailed assessment was scoped out. Additionally, Ireland's commitment to halve transport related carbon

emissions by 2030 compared to 2018 and the shift in transport to fleet electrification would indicate that the relative air quality impacts of increased road traffic would be less significant by the peak Phase 1 operating period of 2032.

Air quality during Phase 2 operation could be impacted by:

- Road traffic from increased visitor numbers;
- Boat traffic from increased visitor numbers;
- Emissions from increased power consumption.

Phase 2 boat traffic will increase by six additional boat trips during operation. Road traffic was assessed against TII criteria for potential for impact on air quality from Phase 2. None of the TII criteria were met therefore the requirement for a detailed assessment was scoped out. Additionally, Ireland's commitment to halve transport related carbon emissions by 2030 compared to 2018 and the shift in transport to fleet electrification would indicate that the relative air quality impacts of increased road traffic would be less significant by the peak Phase 2 operating period of 2046. The increase in power demand from operation of the visitor centre will be supplied by electricity. The commitment to 80% renewables by 2030 and net zero by 2050 would indicate that the electricity supply will be sourced from renewables and the increased demand would therefore not have a significant impact on air quality or climate.

The potential for impact from climate change on the project would be considered by way of increased flood risk to elements of the project. A flood risk assessment was carried out and a justification test was conducted for the proposed development. Most of the infrastructure, the jetty and harbour public realm are water compatible developments. The visitor centre, while shown outside Flood Zones A and B, has a ground level proposed higher than the flood level.

Having considered the implementation of good construction practice and design for the proposed development and other development in the surrounding area, no cumulative effects are anticipated.

Mitigation

All phases of construction including demolition shall be undertaken in accordance with the measures outlined in the CEMP. These measures will include:

- Maintaining clean road surfaces;

- Dust suppression during dry or windy conditions;
- Use of wheel wash facility where appropriate;
- Speed restrictions on site;
- Covering or dust suppression of stockpiles if required;
- Ensure regular maintenance of plant and equipment;
- Adherence to the Traffic Management Plan.

Table 12.29 and Table 12.30 of the EIAR provides a Summary of Demolition & Construction Phase Effects Post Mitigation and Summary of Operational Phase Effects Post Mitigation. Both indicate that overall likely significant residual effects of the proposed development following the application of mitigation measures is 'Imperceptible'.

Evaluation and Assessment: Direct and Indirect Effects

I have examined, analysed and evaluated the information provided in Chapter 12, and all the associated documents and submissions on file in respect of Air Quality and Climate. I am satisfied that the information submitted in the EIAR adequately demonstrates an understanding of the potential impacts generated by the development and provides a suitable range of mitigation and monitoring measures, which will minimise adverse effects on air quality and climate.

8.6.10 Cultural Heritage – Built Heritage & Cultural Heritage – Archaeological Heritage

Issues Raised

The Department of Housing, Local Government and Heritage (DHLGH) has submitted a detailed submission raising concerns with respect to errors and erroneous statements contained within the EIAR. Concern is raised of screw piling, (quantity and dimensions) to form paths and to construct pods. It is contended that no details have been included on the methodology to be employed in installing the proposed aggregate surfaces or details of its maintenance, and no appropriate archaeological assessment has been presented. Concern is raised of impacts of construction of the proposed 2no. raised boardwalks on archaeological heritage. 11

Archaeological Conditions are recommended with Conditions C3, C5 and C6 as set out in OPR Practice Note PN03: Planning Conditions (October 2022), with appropriate site-specific additions/adaptations based on the particular characteristics of the development and informed by the findings of the EIAR.

A number of submissions highlight that Inis Cealtra is renowned as an internationally important complex of medieval ecclesiastical archaeological sites and monuments. The DHLGH submit that its attendant underwater cultural heritage adds considerably to its overall significance and the underwater archaeological diver and geophysical surveys conducted to inform the design and mitigation strategy for the proposed project have added a considerable body of new knowledge of the site's submerged cultural heritage.

The DHLGH sets out 6 detailed recommendations and mitigation measures in relation to underwater and terrestrial archaeology. The DHLGH requests that compliance with this condition shall require a formal statement in writing from the Department to An Bord Pleanala that all mitigation measures have been implemented and approved.

Examination of the EIAR

Context

Chapter 13 and Chapter 14 of the EIAR considers the potential effects of the development on Cultural Heritage: Built Heritage & Cultural heritage- Archaeological Heritage. Both should be read in conjunction with Appendix 13.1 (List of Recorded Monuments on Inis Cealtra from Historic Environment Viewer, archaeology.ie) and the following appendices:

Appendix 14.1 Geophysical survey Preliminary Report 21R0095

Appendix 14.2. Inis Cealtra Co Clare Lidar and Geophysical Report

Appendix 14.3 Inis Cealtra Co Clare Underwater Archaeological Impact Assessment

Appendix 14.4 Inis Cealtra Archaeo-geophysical Survey

Appendix 14.5 Underwater Archaeological Impact Assessment

Appendix 14.6 Old Rectory Mountshannon, Archaeological Impact Assessment

Appendix 14.7 Excavation of Archaeological Test pits at Inis Cealtra

Paragraph 13.4.8 of the EIAR details site surveys / investigations.

It is set out that no further survey or investigation of the Built Heritage of Inis Cealtra has been undertaken as part of the assessment. Additional surveys of archaeological relevance were commissioned by Clare County Council. The geophysics survey (Appendix 14.1) is a preliminary survey. A Lidar Survey (Appendix 14.2) was undertaken using a Drone flying over the island, and the data was interpreted by Dr Stephen Davis of UCD Archaeology Department. A series of underwater surveys (Appendix 14.3, 14.4. and 14. 5) were undertaken. Further non-invasive surveys, including underwater geophysics, identified the presence of probable log-boats, and other more modern detritus, particularly around the present jetty on the north- west side of the island. Test pits for engineering purposes were monitored at the Old Rectory site in Mountshannon (Appendix 14.6). No material of archaeological significance was uncovered. Test pits under Ministerial Consent were excavated in September 2024 in the proposed locations of Welfare and Staff pods on the north-eastern part of the island, close to the jetty. No finds or features of archaeological significance were recovered. Hence it is submitted that the location of the pods was selected as it is removed from the monastic built elements, and the lack of archaeological features in this area.

The assessment in Chapter 13 includes a detailed baseline study of the various components of the Built Heritage of Inis Cealtra, an early medieval monastic island foundation. The main components of the Built Heritage are described. They include five churches with surviving Romanesque to 17th century architectural features, a probable tomb-shrine, and substantial remains of a round tower. The Built Heritage also includes a large assemblage of early medieval and medieval carved stone. The assessment also includes the more recent built elements which are the jetty, of probably 19th century, and the fisherman's hut, built in the 1960s.

On the mainland, the assessment refers to the late historic field boundary, relict from the layout of Mountshannon as a milling town. The new Visitor Centre is within the curtilage of the Old rectory, a protected structure. There is an ACA within the village core, and it includes the south portion of the car park site.

Both Chapters 13 and 14 note that the main site of archaeological and cultural significance is, however, Inis Cealtra. There are many buildings of high cultural significance on the island site. The island has an important group of ecclesiastic monuments located on the eastern shore. This comprises the following churches or ecclesiastic buildings: St Caimin's, St Michael's, St Brigid's, St Mary's, Tempeall na bhFear nGonta, a shrine (known as the Confessional) and substantial remains of a round tower. A stone monument known as the Bargaining Stone, a Penetential Station, lies near the Lady Well. There are numerous bullaun stones, mounds of stones and earth associated with pilgrim patterns, earthworks and a children's burial ground or 'cillin'. There are 189 individual sites or stone features identified on the island and entered on the Record of Monuments and Places. The individual monuments are listed in Appendix 13.1 of the EIAR. Chapter 14 sets out archaeological features of the Island, paragraph 14.6.6 Burials, 14.6.7 Early medieval enclosure on Inis Cealtra, 14.6.9 Main features uncovered in the excavations, 14.6.8 Layout of the Monastery, 14.6.9.5.1 The Confessional, 14.6.9.5.2 The Round Tower, 14.6.9.5.3 Domestic Structures, 14.6.9.5.4 The earth walled church, 14.6.10 Mountshannon Old Rectory and New Surface Carpark,

Currently, the Minister for Housing, Local Government and Heritage is responsible for the protection of the archaeological remains on Inis Cealtra. The local authority Clare County Council owns the lands on the island which are not in ownership of the State. Clare County Council also has responsibility for municipal burial grounds located on the island. The Office of Public Works (OPW) is responsible for the management of the national monuments on Inis Cealtra. The National Monuments Service (NMS) is responsible for the conservation and recording of the site. National Parks & Wildlife Service (NPWS) has a role in management and environmental conservation on Inis Cealtra, given the area's SAC and SPA designations. Waterways Ireland has responsibility for the management, development and promotion of Lough Derg and the Shannon Navigation, including Mountshannon Harbour and the jetty on Inis Cealtra. There will be no change to the role of the statutory bodies responsible for the national monuments and conservation measures on Inis Cealtra, nor the role of Waterways Ireland.

A detailed description of the Monuments including St Camin's Church (RMP:CLO29-009011), The Confessional, St. Bridget's Church, Tempall na bhFear nGonta, St.

Mary's Church, The Lady Well, St. Michaels Church, Round Tower, Carved Stone, Possible Terrace, House – 18th/19th century, Potential station 'Bargaining Stone', Post Medieval Pilgrimage, Bullaun Stones, Paths, Landing Stages and Fisherman's Hut are set out in paragraph's 13.6.4 – 13.6.20 of the EIAR.

Note: The initial proposal was to demolish the Fisherman's Hut on the north-east of the Island. Subsequent to submissions, in particular, a submission from the Mountshannon Angling Club, the applicant proposes to amend the proposal in their response submission. It is now proposed to retain the Fisherman's Hut rather than demolition, together with a reduction in the size of the proposed staff pod and shelter pod (and resultant reduction to the length of the raised boardwalk).

The applicant respectfully requests that *'An Bord Pleanála facilitate this modest revision to the proposal in its decision on the application, whether by way of a request for further information or a condition of consent in the event permission is granted'.*

It is my opinion that the alteration proposed is 'de minimis' and can be dealt with by way of condition and compliance. This matter will be dealt with in the planning assessment of the overall report.

Potential effects

The potential effects on Cultural Heritage: Built Heritage should be read in conjunction with the subsequent chapter Cultural heritage: Archaeological Heritage.

None of the works to the island are to take place in the zone of the monastic buildings, with impact only on the stone jetty at the north-west side of the island and the 1960s concrete built Fisherman's Hut.
In terms of potential effects, the EIAR sets out that the monuments, churches and ecclesiastic buildings will not be directly affected by the proposed development, the pier and welfare pods being sited on the north- west side of the island. It is submitted that this location was selected being down slope, and out of view of the main group of monuments, in an area which has limited potential for archaeological remains.

As already stated above test pits under Ministerial Consent were excavated in September 2024 in the proposed location of the Welfare and Staff pods on the north-eastern part of the island, close to the jetty. No finds or features of archaeological significance were recovered.

Construction of 3no. new staff and public welfare facility “pods” on the island, construction of new floating access jetty and raised boardwalk / walkway and construction of new pedestrian paths on the island will require drilling, ‘mini-pile foundations’ and screw piling. The process of the construction of the new jetty, pods, and paths on the Island is set out in detail in paragraph 14.8.2 of the EIAR

The applicant’s response to issues raised by the DHLGH acknowledges that Chapter 2 of the EIAR (Section 2.5.7.1 ‘Waste’) incorrectly states that ‘No excavation works are proposed to take place on Inis Cealtra Island in connection with the new paths and construction of the welfare pods.’ It states:

‘*The EIAR incorrectly states no excavation works are proposed on the island in connection with the new paths and construction of the welfare pods, however, screw piling for the pods is proposed. It is acknowledged that this does constitute excavation, albeit very limited in scale. Screw-piling is a replacement piling technique whereby steel piles are rotated into the ground with minimal vibration and noise. It is a fast and easy installation with minimal site disturbance and environmental impact. This is due to the fact that there is no requirement for pile caps or beams and there is no excavation or spoil generated. Section 3.6.8.2 of the CEMP refers to the use of screw piles for the pod foundations. Mitigation for the piles has been outlined in Chapter 14, in that each pile location is to be excavated in advance by a licensed archaeologist to subsoil prior to completion of the pile’*.

I consider that the applicant’s response to the issues raised is sufficient to overcome the error / deficiency in the EIAR. It is clear from the information submitted that drilling, mini-pile foundations, screw piling constitute ‘works’. However, it is my opinion that the impact would be slight and not significant upon Cultural Heritage: built heritage or Cultural Heritage: archaeological heritage, given the mitigation proposed and minimal impact / intervention. I consider that the proposed siting, design and construction technique represents a sustainable approach to the development that is aligned with the overarching aim of minimal intervention.
No other significant effects are considered to be likely.

Mitigation

Archaeological monitoring under Ministerial Consent from National Monuments is to be undertaken as part of the works, at all stages, that the archaeologist and National

Monuments consider to be appropriate. The EIAR submits that all the measures are standard archaeological mitigation measures with positive outcome.

I note that albeit the Fisherman's Hut is now proposed to be retained. The EIAR sets out that 'Some archaeological mitigation is considered necessary in demolition of the fisherman's hut on the island. Removal of the concrete plinth on which the hut is constructed should be monitored by the archaeologist'.

I note the response to DHLGH in section 2.1.1, any ground intrusion arising from construction of the pods and boardwalk would be subject to archaeological monitoring, ensuring that the change will not adversely impact subsurface archaeology.

Mitigation measures include monitoring construction of the new sections of the jetty. Prior to locating the exact position of the test bores and subsequent piles for the jetty, these sections of the lakebed should be subject to an underwater excavation. It is not anticipated that any artefacts or structures of archaeological significance will be located, but it is advisable that this take place in advance of piling.

Similarly, it is stated in the EIAR that the areas of lake bed which have to be excavated or dredged as part of the breakwater construction should be subject to underwater excavation/ screening as part of the construction programme. I note however that the response to submissions clearly states that there will be no dredging required to accommodate larger boats nor is offshore dredging for construction of the proposed Inis Cealtra jetty anticipated. Instead, there will be some limited excavation of the lakebed required involving the removal of approximately 2 m3 of material on the southern end of the proposed breakwater jetty. Once removed, the excavated material will be placed into a skip on a pontoon raft, removed from site and disposed of correctly.

The comments from the Underwater Archaeology Section of National Monuments, and the specific conditions which the UA Section recommend applied to this development, namely Recommendations 1-6, are noted, and shall be discussed further in the planning assessment of this report. I note the applicant's response that the recommendations should be implemented in full. Also, that the project archaeologist on behalf of the applicant also wishes to acknowledge the contribution

of the UA Section to this project, including their technical expertise and wealth of knowledge.

Archaeological monitoring of scrub removal, is proposed, in advance of the screw piling for the pods, with the location of each pile screened as part of the construction.

Recording of the old field property line in the site of the car park at Mountshannon is proposed in advance of its partial removal. It is recommended that removal of topsoil for the construction of the car park should be monitored by a suitably qualified archaeologist.

It is stated that no mitigation is deemed necessary in the Operational Phase for either Cultural heritage - Built Heritage or Cultural Heritage: Archaeological Heritage with the implementation of the Visitors Management Plan.

I note measures to cap visitor numbers (100 max. per hour and 400 max. per day) as an operational phase mitigation measure. There are also operational stage measures such as monitoring the condition of walking paths by island staff/tour guides as part of the Landscape and Conservation Management Plan. I consider that there will be no residual impacts upon cultural heritage present within the site or the vicinity, with implementation of the visitor management strategies and conservation measures and mitigation set out in the VMP.

Evaluation and Assessment: Direct and Indirect Effects

I have examined, analysed and evaluated the information provided in Chapter 13 & Chapter 14 and all the associated documents and submissions on file in respect of Cultural Heritage: Built heritage & Cultural Heritage: Archaeological Heritage. I am satisfied that the information submitted in the EIAR adequately demonstrates an understanding of the potential impacts on same.

In relation to the conclusions of the EIAR, I would generally concur with the conclusions of same. The most direct impact to the cultural heritage lies in the construction of the new jetty at the north-west side of the island. I agree that the impact will be low, as the construction of the stone and concrete jetty here in the 19th century or earlier will have resulted in the removal of any earlier material if such was present. I note the applicants agreement to carry out the recommendations and specific conditions of the Underwater Archaeology Section of National Monuments.

Increased visitor numbers will result in the presence of staff on the island, to inform and guide the visitors, to maintain the landscape and in part improve it with additional planting of native species and removal of the encroaching scrub. I believe that the impact to the Built Heritage from increased visitor numbers will be positive.

Proposals for the maintenance and improvement of the landscape are outlined in the Landscape and Conservation Management Plan. Establishment of improved visitor facilities, both in Mountshannon and on Inis Cealtra, will bring increased awareness of this important island monastic site, which ranks in significance with sites such as Clonmacnoise and Glendalough. Renewed focus on Inis Cealtra will result in an increase of research and study of this important resource.

Overall, I am of the opinion that it is reasonable to conclude that the project would not result in any significant impacts on and that no significant adverse impact arises in relation to archaeological and cultural heritage. I am satisfied that the pods are to be located in an area of very low archaeological significance, with only either naturally deposited sands or hillwash present, and other soils with modern material throughout present. The foundations for the pods are a series of screw piles, which

will have minimal impact on underlying deposits. I am satisfied that subject to implementation of the recommended mitigation measures during the construction phase to protect archaeology and with implementation of the visitor management strategies and conservation measures and mitigation set out in the VMP, impact of the project will not result in a significant impact upon cultural heritage.

8.6.11 Interactions of the Foregoing

Chapter 15 addresses significant interactions of impacts between each of the separate disciplines. Table 15.1 provides, via a matrix table, the main interactions between the various aspects of the environment with potential for impacts before the implementation of mitigation measures. The major interactions between the environmental topics have been covered, where applicable, under the relevant chapters within the EIAR. During the construction phase, all environmental factors interact with population and human health. During the construction phase, the following aspects have potential to interact with **Material Assets - Waste:**

- Population & Human Health.
- Traffic & Transport.
- Land & Soils.
- Climate.

During the operational phase, the following aspects have potential to interact with **Material Assets - Waste:**

- Population & Human Health.
- Material Assets: Traffic & Transport.
- Climate.

During the construction phase, the following aspects have potential to interact with **Land and Soils:**

- Air Quality
- Material Assets: Transport, Built Services and Waste
- Water & Hydrology
- Biodiversity.

During the operational phase, the following aspects have potential to interact with **Land and Soils:**

- Water & Hydrology

During the demolition and construction phase, the following aspects have potential to interact with **water & hydrology:**

- Land & Soils
- Biodiversity.
- Air Quality

During the operational phase, the following aspects have potential to interact with **water & hydrology**:

- Material Assets Built Services.
- Biodiversity.

- Climate.

  During the construction and operational phase, the following aspects have potential to interact with **Biodiversity:**

  - Land & Soils
  - Water and Hydrology
  - Air Quality

During the construction and operational phase phase, the following aspects have potential to interact with **noise and vibration**:

- Traffic and Transport
- Population and Human Health

During the construction phase, the following aspects have the potential to interact with **built heritage:**

- Cultural Heritage: Archaeology.
- Landscape & Visual.

During the operational phase, the following aspects have the potential to interact with **built heritage**:

- Landscape and Visual.
- Population and Human Health.

During the construction phase, the following aspects have the potential to interact with **archaeological heritage:**

- Land and Soils.
- Cultural Heritage: Built Heritage.

The main area of concern relates to the effects of the works which may impact on population and human health, surface water and hydrology, the interaction with land and soils, ecology and biodiversity, archaeological heritage and built heritage and on the landscape. As the development is unlikely to have a significant effect on the environmental factors assessed above, with mitigation where relevant, there are no

other significant effects on the environment that are likely to arise from the development due to the interaction between those factors.

I am satisfied that no significant effects are envisaged from interactions between the proposed construction and operation of the visitors centre and any associated activities and any of the environmental factors or as a result of cumulative impacts.

8.6.12 Mitigation Measures

The EIAR sets out likely significant environmental impacts and where necessary proposes measures to mitigate or ameliorate such impacts. Chapter 16 of the EIAR summarises the proposed mitigation measures set out in Chapters 4 to 14. All the mitigation measures proposed within the individual specialists' assessments will be incorporated into the Construction and Environmental Management Plan (CEMP) prior to works commencing on-site.

Tables 16-1 – 16-3 sets out, in detail, a 'Summary of Incorporated Design Phase Mitigation', 'Summary of Demolition and Construction Phase Mitigation' and 'Summary of Operational Phase Mitigation'. Mitigation is referred to throughout this report in each individual chapter and I note the section above relating to description of the features, if any, of the proposed development and the measures, if any, envisaged to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment of the development.

Tables 16-1 - 16-3 of the EIAR indicate monitoring measures which will be included in the Construction Environmental Management Plan (CEMP), Waste Management Plan (WMP), Surface Water Management Plan (SWMP), Construction Traffic Management Plan (CTMP), Construction Dust Management Plan (CDMP), Archaeological Heritage Monitoring, Built Heritage monitoring and a Visitors Management Plan (VMP), incl. frequency of monitoring, reporting period and responsibility.

Mitigation measures comprise standard good practices and site-specific measures and are capable of offsetting significant adverse effects identified in the EIAR. They are extensive and I note in particular the use of a suitably qualified archaeologist at demolition and construction phase. Other mitigation measures proposed during the delivery stage of the development, revolve primarily around the implementation of appropriate site management procedures during the construction works – such as the

control of lighting, storage of materials, placement of site offices and compounds, control of vehicular access, and effective dust and dirt control measures, etc. Such mitigation will be set out in the Construction Management Plan prepared for the scheme.

The Construction Management Plan is to be prepared by the appointed contractor and agreed with the Local Authority prior to the commencement of any construction works. It will deal with all issues related to the construction, delivery and management of the scheme during the construction stage and will ultimately include details on the following:

- o Daily and weekly working hours.
- o Agreed haul routes for incoming materials.
- o Licensed hauliers to be used.
- o Disposal sites.
- o Travel arrangements for construction personnel.
- o Appropriate on-site parking arrangements for construction personnel to prevent overspill parking on the local road network.
- o Temporary construction entrances to be provided.
- o Wheel wash facilities if required.
- o Road cleaning and sweeping measures to be put in place if required.
- o Temporary construction signage to be put in place and maintained.

- The proposed Construction Traffic Management Plan (CTMP) and Construction and Environmental Management Plan (CEMP), which form part of the proposal, outline the commitments and mitigation measures to be implemented during the construction phase of the proposed development.
- Traffic and transport monitoring is not required, as the predicted traffic volumes and effects are identified in Chapter 5 Material Assets: Traffic & Transport of the EIAR.
- Install any bunding and/or run-off controls where required such as installation of suitable protection (e.g., silt curtain) around the site boundaries to control and treat any run-off during the works
- Weather conditions and typical seasonal weather variations will be taken account of when planning stripping of topsoil and excavations.

- All oils, fuels, paints and other chemicals will be stored in a secure bunded hardstand area. Refuelling and servicing of construction machinery will take place in a designated hardstand area which is also remote from any surface water inlets (where not possible to carry out such activities off site).
- Concrete batching will take place off site and wash down and wash out of concrete trucks will take place in the secure compound.
- The construction compound will include adequate staff welfare facilities including foul drainage and potable water supply. Foul drainage discharge from the construction compound will be tankered off site to a licensed facility until a connection to the public foul drainage network has been established.
- Management of Alien Invasive Plant Species (IAPS): To reduce the risk of the introduction or spread of IAPS within the area, management and control measures will be implemented on-site during the demolition phase in accordance with best practice guidance.
- Protection of Habitats: Measures will be implemented throughout the demolition phase to prevent disturbance of sensitive sites such as Lough Derg (Shannon) SPA and immediately adjacent ecologically sensitive woodland habitats.
- Protection of Habitats: The area of proposed works will be kept to the minimum necessary to minimise disturbance to habitats and flora. Vegetation removal within the Site will be minimised and restricted to those areas of vegetation which have been identified for removal. During site reinstatement, any bare areas of ground at the Site will be planted.
- Protection of Bats/Lighting Plan
    - Potential impacts to bats and other fauna have been taken into consideration at design stage with regard to the operational phase Lighting Plan which is proposed for the development.
    - Specific measures to avoid unnecessary external artificial lighting and minimise the incidence of light spill from the Proposed Development onto adjacent areas once operational have been incorporated into the proposed Lighting Plan to reduce potential impacts.
    - Chapter 10 Biodiversity of the EIAR sets out guidelines, taken from the Bat Conservation Trust 2023 ‘Guidance Note 08/23’, which have been incorporated into the proposed Lighting Plan for the development.

- A Visitor Management Plan (VMP) has been prepared and submitted under separate cover. It sets out the envisaged structure and responsibilities for the management of the proposed development during operation.
    - Visitor capacity will be limited, and visitor access will be on a booked basis only, with pre booking online and a timed visitor entry system to stagger visitor arrivals. The VMP will control visitor traffic generation volumes and times and is part of the proposal.
    - Total operational staff numbers for Phase 1 will be up nine staff, including up to two additional staff with the permitted Old Rectory development. Total operational staff numbers for Phase 2 will be up 20 staff, including up to 13 additional staff with the permitted Old Rectory development.

      Total operational staff numbers will be significantly less than the 75 employees threshold identified by the Clare County Development Plan 2023-2029 for a Mobility Management Plan.
    - Clare County Council, via Clare Tourism DAC, will manage and operate the Inis Cealtra Visitor Experience, inclusive of the Visitor Centre, new car park facilities off Main Street, and the welfare facilities on Inis Cealtra. Boat tour operators will be licenced, awarded by tender by Clare County Council on a 3-year basis. The café in the Visitor Centre will be operated by lease.
    - The measures in the VMP include establishment of the Inis Cealtra Management Group, to have oversight both in terms of the strategic management of the island and the operational management of the island. This group, led by Clare County Council, will include the Office of Public Works (OPW), National monuments Service (NMS), Waterways Ireland (WWI) and Department of Housing, Local Government and Heritage.
    - The Inis Cealtra Community Forum will be established to represent the local community in the management of the island and visitor experience, including local access provision.
    - The VMP details a comprehensive suite of measures that will be implemented during operation, to ensure effective site management and visitor access management. Local access protocols will be adopted as follows:

- Members of the local community and members of Lough Derg Anglers will be able to land for free with a permit-style approach. A register of those with a local connection and members of the Anglers will be retained by Clare County Council.
- A discounted permit system will be available to established local tourism businesses for island access, managed by Clare County Council.
- Access will remain to St Mary's and St Caiman's burial grounds and pre-existing plots for burial purposes. Access for visitors will be restricted during burials.

- To ensure the ongoing safety of visitors and employees on the island, a risk assessment and safety plan will be developed annually for Inis Cealtra.
- Where and when heavy footfall expected, potential mitigation measures to be used include the widening of mown paths, the addition of crushed aggregate mixed with topsoil, and the rotation of paths used.
- A contractor will be appointed to manage the maintenance of the foul system and waste removal from the island.

I am satisfied that no significant direct and indirect effects on the environment are likely, subject to the proposed mitigation measures, to avoid, prevent or reduce such effects for the proposed demolition, construction and operation of the visitor's centre, being adhered to.

8.7 Reasoned Conclusion

Having regard to the examination of environmental information contained above, to the EIAR provided by the applicant and the submissions received, the contents of which I have noted, I consider that the main significant direct and indirect effects of the proposed development on the environment are, and will be mitigated as follows:

- **Archaeology and Cultural Heritage:** The construction phase on Inis Cealtra i.e. the construction of the new jetty, the insertion of three pods and series of new mown grass pedestrian paths, has taken account of the archaeological and heritage significance of the site. The jetty will be located in an area which is currently the main landing site. The pods will have minimal ground fastening, on a small number of screw piles. The pods will be constructed off-site and assembled on the Island. Mown paths will be clearly laid out and any wear and

tear monitored as outlined in the Landscape and Conservation Management Plan. Removal of topsoil for the car park at Mountshannon will be monitored by a suitably qualified archaeologist. Archaeological monitoring and/or advance excavation shall be carried out, by suitably qualified archaeologists, as part of the demolition and construction phase. With the implementation of mitigation measures outlined in Chapter 16 of the EIAR the potential for negative effects on unrecorded sites and artefacts during excavations, will be significantly reduced.

- **Biodiversity:** The construction phase of the development at this location will result in local level impacts to hedgehog, badger, pygmy shrew, Irish hare, Irish stoat, otter, pine marten, red deer, fallow deer, red squirrel, bats, birds, terrestrial macro invertebrates and reptiles. Mitigation measures proposed include the use of the construction and environmental management plan (CEMP), the appointment of a project ecologist/ecological clerk of works (ECOW), protection of water quality, management of construction waste, storage of materials, bio-security, management of alien invasive plant species, the protection of habitats and fauna, birds, bats, otter and badgers. During the operational phase of the Proposed Development, significant effects on habitats are not anticipated.
- **Landscape and Visual Effects:** The introduction of welfare pods, W.C, boardwalk and jetty on Inis Cealtra, the insertion of the car park off the main street in Mountshannon and the development of the visitors centre in the village will change the existing landscape. The magnitude of change for Inis Cealtra is considered high to medium. This leads to a landscape effect that is classified from profound to high, and positive. The magnitude of change for the proposed car park is slight to moderate and positive. The magnitude of change for the proposed visitors centre is deemed high / moderate and positive. Overall, the activation of public spaces and careful management of visitors within the framework of the three integrated sites will lead to a high to moderate and positive landscape effect.
- **Traffic:** Negative impacts are not anticipated to arise during the construction or operational phases of the development. The proposed Phase 1 & 2 peak construction would not significantly increase peak hour traffic volumes at

existing and proposed junctions, to materially affect the predicted not significant traffic queuing and delays; and the junctions would continue to operate well within practical capacity during the proposed construction and operational phases. The proposed development includes a detailed Visitor Management Plan (VMP). Visitor capacity will be limited, and visitor access will be on a booked basis only, with pre booking online and a timed visitor entry system to stagger visitor arrivals. The VMP will control visitor traffic generation volumes and times and is part of the proposal. Traffic impacts will be short-term and temporary and will be adequately mitigated during construction by the implementation of measures set out in the EIAR, including the final CEMP, Construction Traffic Management Plan.

- **Climate:** During the construction and operation of both phases of the proposed development, a number of activities will take place, some of which have the potential to affect the local air quality at the site or in its vicinity. Pollution control and other preventative measures have been incorporated into the project design to minimise adverse effects on air quality during construction. There are no significant residual impacts predicted as a result of the construction or operational phases of the proposed scheme in particular with consideration of the stricter air quality limits to be imposed, advancements in technology for transport emissions and higher percentage of electric vehicles in the fleet. There are no significant effects on air quality and climate foreseen as a result of the proposed development operational phase.
- **Population and Human Health:** Potential significant positive impacts on the socio-economic profile of the area due to the delivery of a high-quality tourism development.

The EIAR has considered that the main significant direct and indirect effects of the proposed development on the environment would be primarily mitigated by environmental management measures, as appropriate. Notwithstanding the foregoing, the Inis Cealtra Visitors Experience promotes Inis Cealtra as a tourism destination and supports the sustainable expansion of tourist facilities on the island of Inis Cealtra and at Mountshannon Village, in line with policy, it is considered that these effects are not sufficient to warrant refusing permission for the development and are acceptable.

8.7 Water Framework Directive (WFD)

The EIAR addresses the WFD under the following headings:

- Water Framework Directive - Protected Areas
- Bathing Waters
- Flood Risk
- Flood Risk Assessment

It is considered that preventative measures mitigation incorporated into the CEMP will:

- Prevent a deterioration in status of bodies of surface and groundwater;
- Not jeopardise the attainment of good surface water chemical status;
- Not permanently exclude or compromise the achievement of the objectives of the WFD in other bodies of water within the same river basin district; and
- Is consistent with other Community Environmental legislation.

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.

9.0 The likely significant effects on a European site

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

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

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.

9.2 The Natura Impact Statement (NIS)

The application was accompanied by an NIS which described the proposed development, the project site and the surrounding area. The NIS contained a Stage 1 Screening Assessment which concluded that a Stage 2 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.

The NIS was informed by the following studies, surveys and consultations:

A desktop study was carried out to collate information available on the proposed development site's natural environment. This comprised a review of relevant publications, data and datasets from the following sources:

- Ordnance Survey Ireland (OSI) aerial photography, 1:50,000 mapping, GeoHive and online satellite imagery sources;
- National Parks and Wildlife Service (NPWS);
- National Biodiversity Data Centre (NBDC) (online map-viewer);
- Central Statistics Office (CSO);

- BirdWatch Ireland and I-WeBS data;
- Geological Survey Ireland (GSI) area maps (including Teagasc soil maps);
- Environmental Protection Agency (EPA) waterbody and water quality data;
- Water Action Plan 2024: A River Basin Management Plan for Ireland.
- Inland Fisheries Ireland (IFI) online fish sampling reports and fish data;
- Review of requested records from NPWS Rare and Protected Species database;
- Clare County Development Plan (2023 – 2029)
- Consultations with Uisce Eireann
- Consultation with National Monuments Service (NMS)
- Consultation with Waterways Ireland (WWI)
- Consultation with Office of Public Works (OPW)
- Consultation with the National Parks and Wildlife Service (NPWS).
- Consultation with BirdWatch Ireland.

The NIS concluded that, subject to the implementation of best practice and the recommended mitigation measures, the proposed construction and operation of the Inis Cealtra Visitor Experience on Inis Cealtra in Lough Derg and at Mountshannon Village on the County Clare mainland would not adversely affect (either directly or indirectly) the integrity of either Lough Derg (Shannon) SPA or Lower River Shannon SAC, either alone or in combination with other plans or projects, in light of the specific conservation objectives of each site.

9.3 A Screening Determination (See Appendix 1 of this Report)

In accordance with Section 177U(4) of the Planning and Development Act 2000 (as amended) and on the basis of objective information, I conclude that the proposed development is likely to have a significant effect on the protected waterbird species and wetland habitat, aquatic and terrestrial habitats and species of the following

SACs/SPAs sites ‘alone’ in respect of effects associated with construction and disturbance;

- Lough Derg (Shannon) SPA [004058]
- Lower River Shannon SAC (002165)

The applicants AA Screening included 5 no. European Sites in total. I do not consider that any other European sites fall within the zone of influence of the project based on a combination of factors including the nature and scale of the project, the distance from the site to European sites, and any potential pathways which may exist from the development site to a European site, aided in part by the applicant’s Appropriate Assessment Screening Report and NIS for the proposed development, the conservation objectives of Natura 2000 sites, the lack of suitable habitat for qualifying interests, as well as by the information on file and I have also visited the site. Thus, having regard to the qualifying interests for which the sites were designated and in the absence of connections to and distance between the application site, it is therefore reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on the following 3 no. European Sites in view of the site(s) conservation objectives;

- Slieve Aughty Mountains SPA (004168),
- Lough Derg, North-east Shore SAC (002241) and
- River Shannon and River Fergus Estuaries SPA (004077)

I conclude that a Stage 2 Appropriate Assessment is not therefore required for the 3 no. sites outlined above.

To conclude, I consider that Appropriate Assessment (Stage 2) [under Section 177V of the Planning and Development Act 2000] is required on the basis of the effects of the project ‘alone’ for the following sites, for which the potential for significant effects could not be excluded:

- Lough Derg (Shannon) SPA [004058]
- Lower River Shannon SAC (002165)

This conclusion is based on:

- Objective information presented in the Applicants Screening Report and NIS,
- Standard pollution controls that would be employed regardless of proximity to a European site and effectiveness of same,
- Distance from European Sites,
- The absence of meaningful pathway to any European Site,
- Impacts predicted would not affect the conservation objectives.

No measures intended to avoid or reduce harmful effects on European sites were taken into account in reaching this conclusion.

9.4 Appropriate Assessment Conclusion - Stage 2 (Appendix 1 of this Report)

The proposed development has been considered under the assessment requirements of Section 177U and 177AE of the Planning and Development Act 2000 and having regard to:

- The scientific information on file in respect of the Lough Derg (Shannon) SPA [004058] and Lower River Shannon SAC (002165)
- The available information as presented in the submitted documents regarding habitats, species, ground and surface water pathways between the application site and the European sites and other information available, (incl. the desktop studies and field surveys), NPWS website and aerial imagery,
- The nature and scale of the proposed development and works and the nature of potential likely significant effects,
- The separation distances and the lack of connections between the proposed development site and the European sites examined in this assessment,
- The nature of the qualifying interests, special conservation interests and conservation objectives of the European sites,

- The potential impacts and mitigation measures proposed for all phases of the proposed development.

This conclusion is based on a complete assessment of all aspects of the proposed project. I consider that it is reasonable to conclude on the basis of the information on the file, which I consider adequate in order to carry out a Stage 2 Appropriate Assessment, that the proposed development, individually or in combination with other plans and projects would not adversely affect the integrity of the European sites including Lough Derg (Shannon) SPA [004058] or Lower River Shannon SAC (002165) or any other European site, in view of the site's Conservation Objectives.

9.5 Appropriate Assessment Conclusions

I am satisfied that the proposed development individually or in combination with other plans or projects would not adversely affect the integrity of any European sites in light of their conservation objectives (subject to the implementation of mitigation measures outlined in Appendix 1 of this Report and the applicants EIAR and NIS).

10.0 Recommendation

I recommend that the Visitors Centre Development is approved. On the basis of the above assessment, I recommend that the Board 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 EIAR and NIS.

Reasons and Considerations

In coming to its decision, the Board is consistent with:

- Climate Action and Low Carbon Development Act 2015 (as amended) as amended by Climate Action and Low Carbon Development (Amendment) Act 2021
- Climate Action Plan 2024 (CAP 2024) and Climate Action Plan 2025 (CAP 2025),

In coming to its decision, the Board had regard to;

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

(b) the European Union (Birds and Natural Habitats) Regulations 2011-2015,

(c) National Planning Framework 2018-2040 (NPF),

(d) The National Development Plan 2021-2030 (NDP),

(e) National Biodiversity Action Plan 2023-2030 (NBAP)

(f) Regional Spatial Economic Strategy for the Southern Region 2020-32 (RSES),

(g) the policies and objectives of the Clare County Development Plan, 2023-2029,

(h) the nature and extent of the proposed works as set out in the application for approval,

(i) the information submitted with the planning application including the Environmental Impact Assessment Report (EIAR), Appropriate Assessment Screening and NIS,

(j) the conservation objectives, qualifying interests and special conservation interests for the Lough Derg (Shannon) SPA (site code 004058) and Lower River Shannon SAC (site code 002165)

(k) 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 a European Site,

(l) The submissions and observations received in relation to the proposed development,

(m) The report of the Inspector.

Environmental Impact Assessment

The Board completed an environmental impact assessment of the proposed development taking account of:

a) the nature, scale and extent of the proposed development,

b) the Environmental Impact Assessment Reports (EIAR's) and associated documentation submitted in support of the application,

c) the Screening for Appropriate Assessment and NIS and associated documentation submitted in support of the application,

d) the submissions received from the Observers and Prescribed Bodies, and

e) the Inspector's report.

The Board considered that the environmental impact assessment report, supported by the documentation submitted by the applicant, adequately considers alternatives to the proposed development, and identifies and describes adequately the direct, indirect, residual and cumulative effects of the proposed development on the environment.

The Board agreed with the examination, set out in the Inspector's report, of the information contained in the environmental impact assessment report and associated documentation submitted by the applicant and submissions made in the course of the application.

The Board considered, and agreed with the Inspectors reasoned conclusions, that the main direct and indirect effects of the proposed development on the environment are and would be mitigated as follows:

- **Archaeology and Cultural Heritage:** The construction phase on Inis Cealtra i.e. the construction of the new jetty, the insertion of three pods and series of new mown grass pedestrian paths, has taken account of the archaeological and heritage significance of the site. The jetty will be located in an area which is currently the main landing site. The pods will have minimal ground fastening, on a small number of screw piles. The pods will be constructed off-site and assembled on the Island. Mown paths will be clearly laid out and any wear and tear monitored as outlined in the Landscape and Conservation Management Plan. Removal of topsoil for the car park at Mountshannon will be monitored by a suitably qualified archaeologist. Archaeological monitoring and/or advance excavation shall be carried out, by suitably qualified archaeologists, as part of the demolition and construction phase. With the implementation of mitigation measures outlined in Chapter 16 of the EIAR the potential for negative effects

on unrecorded sites and artefacts during excavations, will be significantly reduced.

- **Biodiversity:** The construction phase of the development at this location will result in local level impacts to hedgehog, badger, pygmy shrew, Irish hare, Irish stoat, otter, pine marten, red deer, fallow deer, red squirrel, bats, birds, terrestrial macro invertebrates and reptiles. Mitigation measures proposed include the use of the construction and environmental management plan (CEMP), the appointment of a project ecologist/ecological clerk of works (ECOW), protection of water quality, management of construction waste, storage of materials, bio-security, management of alien invasive plant species, the protection of habitats and fauna, birds, bats, otter and badgers. During the operational phase of the Proposed Development, significant effects on habitats are not anticipated.
- **Landscape and Visual Effects:** The introduction of welfare pods, W.C, boardwalk and jetty on Inis Cealtra, the insertion of the car park off the main street in Mountshannon and the development of the visitors centre in the village will change the existing landscape. The magnitude of change for Inis Cealtra is considered high to medium. This leads to a landscape effect that is classified from profound to high, and positive. The magnitude of change for the proposed car park is slight to moderate and positive. The magnitude of change for the proposed visitors centre is deemed high / moderate and positive. Overall, the activation of public spaces and careful management of visitors within the framework of the three integrated sites will lead to a high to moderate and positive landscape effect.
- **Traffic:** Negative impacts are not anticipated to arise during the construction or operational phases of the development. The proposed Phase 1 & 2 peak construction would not significantly increase peak hour traffic volumes at existing and proposed junctions, to materially affect the predicted not significant traffic queuing and delays; and the junctions would continue to operate well within practical capacity during the proposed construction and operational phases. The proposed development includes a detailed Visitor Management Plan (VMP). Visitor capacity will be limited, and visitor access will be on a booked basis only, with pre booking online and a timed visitor entry system to

stagger visitor arrivals. The VMP will control visitor traffic generation volumes and times and is part of the proposal. Traffic impacts will be short-term and temporary and will be adequately mitigated during construction by the implementation of measures set out in the EIAR, including the final CEMP, Construction Traffic Management Plan.

- **Climate:** During the construction and operation of both phases of the proposed development, a number of activities will take place, some of which have the potential to affect the local air quality at the site or in its vicinity. Pollution control and other preventative measures have been incorporated into the project design to minimise adverse effects on air quality during construction. There are no significant residual impacts predicted as a result of the construction or operational phases of the proposed scheme in particular with consideration of the stricter air quality limits to be imposed, advancements in technology for transport emissions and higher percentage of electric vehicles to be used. There are no significant effects on air quality and climate foreseen as a result of the proposed development operational phase.
- **Population and Human Health:** Potential significant positive impacts on the socio-economic profile of the area due to the delivery of a high-quality tourism development.

The EIAR has considered that the main significant direct and indirect effects of the proposed development on the environment would be primarily mitigated by environmental management measures, as appropriate. Notwithstanding the foregoing, the Inis Cealtra Visitors Experience promotes Inis Cealtra as a tourism destination and supports the sustainable expansion of tourist facilities on the island of Inis Cealtra and at Mountshannon Village, in line with policy, it is considered that these effects are not sufficient to warrant refusing permission for the development and are acceptable.

Appropriate Assessment

The Board agreed with and adopted the screening assessment and conclusion carried out in the Inspector's report that the Lough Derg (Shannon) SPA (004058)

and Lower River Shannon SAC (002165), are the only European Sites in respect of which the proposed development has the potential to have a significant effect.

The Board considered the Natura Impact Statement and associated documentation submitted with the application for approval, the mitigation measures contained therein, the submissions and observations on file, and the Inspector's assessment. The Board completed an appropriate assessment of the implications of the proposed development for the affected European Sites, namely the Lough Derg (Shannon) SPA (004058) and Lower River Shannon SAC (002165), in view of the site's conservation objectives. The Board considered that the information before it was adequate to allow the carrying out of an appropriate assessment. In completing the appropriate assessment, the Board 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 Board 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 Board 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.

11.0 Recommended Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application submitted on 12th December 2024 and as modified by the plans and documentation submitted with the response to observations received on the 23rd May 25 except as may otherwise be required in order to comply with the following conditions. Where 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 proposed development shall be carried out as follows:
   (i) The Fisherman's Hut on Inis Celatra shall be retained insitu.
   (ii) A reduction in the size of the proposed staff pod and shelter pod and resultant reduction to the length of the raised boardwalk, as per documentation submitted by the applicant on the 23.05.25, in response to submissions.
   (iii) A 1.8m high local natural stone boundary wall, enhanced with natural tree and hedge screening on both sides, shall be constructed to the north, east and west of the proposed village car park.

Upon completion of works, a compliance report of the works, specified above, shall be prepared by the local authority and placed on file and retained as part of the public record.

Reason: In the interest of visual and residential amenity.

3. The mitigation measures and monitoring commitments identified in the Environmental Impact Assessment Report, and other plans and particulars submitted with the application shall be carried out in full except as may otherwise be required in order to comply with other conditions. Prior to the commencement of development, a schedule of mitigation measures and monitoring commitments identified in the Environmental Impact Assessment Report, and details of a time schedule for implementation of the 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 clarity and protection of the environment during the construction and operational phases of the proposed development.

4. The mitigation and monitoring measures identified in the Natura Impact Statement 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, the protection of European Sites and in the interest of public health.

5. The mitigation measures and monitoring commitments identified in the Visitors Management Plan, and other plans and particulars submitted with the application shall be carried out in full except as may otherwise be required in order to comply with other conditions.

Reason: In the interest of clarity and protection of the environment during the operational phase of the proposed development.

6. The developer shall appoint a Community Liaison Officer for all stages of the development who shall be the first point of contact for residents and be responsible for monitoring and reporting of complaints, maintaining a complaints register, addressing complaints and for discharging information in relation to the development to residents.

Reason: In the interest of amenity and orderly development.

7. 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.

8. 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 Environmental Impact Assessment and demonstration of proposals to adhere to best practice and protocols. The CEMP shall include:

(a) Location of the site and materials compound(s) including area(s) identified for the storage of construction refuse;

(b) Location of areas for construction site offices and staff facilities;

(c) Details of site security fencing and hoardings;

(d) Details of on-site car parking facilities for site workers during the course of construction;

(e) Measures to obviate queuing of construction traffic on the adjoining road network;

(f) Measures to prevent the spillage or deposit of clay, rubble or other debris on the public road network;

(g) Alternative arrangements to be put in place for pedestrians and vehicles in the case of the closure of any public road or footpath during the course of site development works;

(h) Details of a local community feedback mechanism, where feedback including complaints are received and acted upon by a designated Community Liaison Officer;

(i) Details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels;

(j) Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained. Such bunds shall be roofed to exclude rainwater;

(j) Off-site disposal of construction/demolition waste and details of how it is proposed to manage excavated soil;

(k) Means to ensure that surface water run-off is controlled such that no silt or other pollutants enter local surface water sewers or drains;

(l) Works to be carried out in accordance with Inland Fisheries Ireland 'Guidelines on protection of fisheries during construction works in and adjacent to waters';

(m) A record of daily checks that the works are being undertaken in accordance with the Construction Management Plan shall be available for inspection by the planning authority, with monitoring on a daily basis of all watercourses / waterbodies in or adjacent to works areas;

Reason: In the interest of amenities, public health and safety and environmental protection.

9. 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 Lough Derg 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. a pre-construction bat survey shall be carried out by a suitably qualified ecologist during the active bat season, and,

any destruction of bat roosting sites or relocation of bat species shall be carried out by a suitably qualified ecologist under a Derogation Licence granted by the Minster of Housing, Local Government and Heritage.

e. Any areas damaged by machinery or equipment shall be fully re-instated.
f. Prevention measures shall be put in place to prevent the introduction or spread of invasive species.

Reason: In the interests of biodiversity and nature conservation.

10. 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.

11. The developer shall engage a suitably qualified (licensed eligible) archaeologist to monitor (licensed under the National Monuments Acts) all site clearance works, screw piling / topsoil stripping, groundworks, dredging, tree removal, and/or the implementation of agreed preservation in-situ measures associated with the development. Prior to the commencement of such works the archaeologist shall consult with and forward to the Local Authority archaeologist or the NMS as appropriate a method statement for written agreement. The use of appropriate tools and/or machinery to ensure the preservation and recording of any surviving archaeological remains shall be necessary. 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 local authority, in consultation with the National Monuments Service, regarding appropriate mitigation [e.g. preservation in-situ or by record/excavation].

The developer shall facilitate the archaeologist in recording any remains identified. Any further archaeological mitigation requirements specified by the local authority, following consultation with the National Monuments Service, shall be complied with by the developer. Following the completion of all archaeological work on site and any necessary post-excavation specialist analysis, the local 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 either in situ or by record of places, caves, sites, features or other objects of archaeological interest.

12. All mitigation measures in relation to archaeology and cultural heritage as set out in the following surveys and report:

(i) Appendix 13.1 List of Recorded Monuments on Inis Cealtra from Historic Environment Viewer, archaeology.ie

(ii) Appendix 14.1 Geophysical survey Preliminary Report 21R0095

(iii) Appendix 14.2. Inis Cealtra Co Clare Lidar and Geophysical Report

(iv) Appendix 14.3 Inis Cealtra Co Clare Underwater Archaeological Impact Assessment

(v) Appendix 14.4 Inis Cealtra Archaeo-geophysical Survey

(vi) Appendix 14.5 Underwater Archaeological Impact Assessment

(vii) Appendix 14.6 Old Rectory Mountshannon, Archaeological Impact Assessment

(viii) Appendix 14.7 Excavation of Archaeological Test pits at Inis Cealtra

(ix) Chapter 13 Cultural Heritage: Built Heritage

(x) Chapter 14 Cultural Heritage: Archaeology

included in application documents, shall be implemented in full, except as may otherwise be required in order to comply with specify conditions relating to archaeological heritage/the conditions of this permission. The planning authority and the National Monuments Service shall be furnished with a final archaeological report describing the results of any archaeological investigative work/ excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation either in situ or by record of places, caves, sites, features or other objects of archaeological interest.

13. Site development and building works shall be carried out between the hours of 07.00 to 19.00 Mondays to Fridays inclusive, between 08.00 to 14.00 on Saturdays and not at all on Sundays and public holidays.

Reason: To safeguard the amenity of property in the vicinity.

14. Drainage arrangements including the attenuation and disposal of surface water, shall comply with the requirements of the local authority for such works and services.

Reason: In the interest of public health and surface water management.

15. The developer shall comply with the requirements of Uisce Éireann with regard to diversion of infrastructure within the site and connections to the public network.

Reason: In the interest of public health and surface water management.

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.

Fiona Fair
Senior Planning Inspector /
Planning Inspector

21.07.2025

APPENDIX 1

Template 2: Standard AA Screening Determination Template
Test for likely significant effects

Screening for Appropriate Assessment

Test for likely significant effects

Step 1: Description of the project and local site characteristics

The application is being made by Clare County Council pursuant to Section 175 (3) and Section 177AE of the Planning and Development Act, 2000 (as amended). Accordingly, an Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development. Refer to Inspectors report R321474-24 for further detail. I have considered the application to undertake a proposed upgrade and enhanced visitor facilities at Inis Cealtra (Holy Island) and Mountshannon Village, in light of the requirements of S177AE of the Planning and Development Act 2000 as amended.

The proposed development provides for an upgrade and enhanced visitor facilities on lands measuring approximately 20.3 hectares located at Inis Cealtra (Holy Island) an island on the western side of Lough Derg, approximately 1.7 kilometres southwest of Mountshannon Harbour. And at two locations in Mountshannon Village, in the Townland of Mountshannon. The two sites in Mountshannon Village include:

- Lands within the curtilage of the 'Old Rectory' (a Protected Structure, RPS No. 464) and extending south to encompass a section of Harbour Road (L-4034) and Mountshannon Harbour car park, and
- Lands to the north of Aistear Park on the north side of Main Street (R352).

Inis Cealtra is located entirely within the **Lough Derg (Shannon) SPA (004058).** The southern corner of Visitor Centre site is located 0.03 km northwest of the SPA. New Mountshannon Village public car park is located 0.15 km northeast of SPA.

The new Mountshannon Village public car park is located 0.3 km southwest of the **Slieve Aughty Mountains SPA (004168)** and Inis Cealtra is 1.7 km south of the SPA. The visitor centre site is 10.2 km southwest of **Lough Derg, North-east Shore SAC (002241)** and Inis Cealtra is 12.4 km southwest of the SAC. Inis Cealtra is located 11.7 km north of **Lower River Shannon SAC (002165)** and Mountshannon Harbour is located 13.3 km north of SAC. Inis Cealtra is located 30.5 km northeast of the **River Shannon and River Fergus Estuaries SPA (004077)** and Mountshannon Harbour is located 32.8 km northeast of the SPA. CCC Ecologists report noted no impact in relation to AA subject to mitigation measures being implemented as explained in Section 2 of this report.	
Brief description of project	Located in the southwest corner of Lough Derg in County Clare, Inis Cealtra (Holy Island) is an important historical and cultural site that, along with two principal areas on the mainland at Mountshannon village, is the proposed location for development of the Inis Cealtra Visitor Experience. Works on the island will include installation of three welfare 'pods', new pedestrian paths, and a new floating access jetty at the northwest of the island to provide a safer mooring point for vessels and become the principal arrival point for visitors to the island. On the mainland at Mountshannon Village, a part-one-storey, part-two-storey Visitor Centre is proposed to be constructed within the southern part of the Old Rectory site, fronting Harbour Road and facing Mountshannon

	Harbour and Lough Derg. Within the Visitor Centre, there will be a café and a series of spaces for interpretation, exhibition and education associated with the Inis Cealtra Visitor Experience. The proposed development also includes a reconfiguration of the existing Mountshannon Harbour car park to increase the number of parking spaces and provide additional amenities such as a seating area. Also, at a site on the north side of Main Street in Mountshannon Village, a new public car park will be installed with capacity for cars, coaches, and bicycles along with accessible car parking spaces, electric vehicle (EV) charging points and an overflow car parking area.
Brief description of development site characteristics and potential impact mechanisms	Potential effects to: ▪ Water quality; ▪ Habitat loss/alteration; ▪ Habitat or species fragmentation; and ▪ Disturbance and/or displacement of species. **Construction Phase – Mainland:** ▪ Clearing and/or removing any required trees, scrub and surface vegetation (topsoil/sub-soil/shrubs/etc.). Removal of existing masonry wall sections and/or other landscape features. ▪ Topsoil stripping, bulk excavations and earth works, and heavy engineering required to construct the Visitor Centre building, its exterior and the new Mountshannon Village car park. ▪ Surface milling of existing Mountshannon Harbour car park and resurfacing works.

	▪ General construction activity. ▪ Machinery: The on-site presence and sustained use of heavy and light plant machinery, albeit at variable rates and numbers, during daylight hours for the duration of the works. ▪ Use of fuels/oils/lubricants, concrete and other such substances considered harmful to the aquatic environment. ▪ Human presence: Sustained increase in human activity, albeit at variable rates and numbers, during daylight hours for the duration of the works. ▪ Increased noise and air emissions associated with construction activity. ▪ Temporary storage of excavated spoil/material. **Construction Phase – Inis Cealtra** ▪ Borehole drilling at the proposed new jetty location as part of site investigation works. ▪ Piling and excavations for installation of new jetty and mooring point. ▪ Cut back of vegetation/scrub and mowing of paths on the island. ▪ The presence and sustained use of light machinery on the island and pontoon raft, albeit at variable rates, during daylight hours for duration of works. ▪ Use of fuels/oils/lubricants, concrete and other such substances considered harmful to the aquatic environment. ▪ Human presence: Sustained increase in human activity, albeit at variable rates and numbers, during daylight hours for the duration of the works. ▪ Increased noise and air emissions associated with construction activity. ▪ Temporary storage of excavated spoil/material.

	▪ Generation of waste/spoil/construction run-off. **Operational Phase - Mainland** ▪ Increased artificial lighting/noise/traffic. ▪ Increased human presence, particularly during summer months and holiday time. ▪ Maintenance of site infrastructure and landscaped gardens around Visitor Centre. ▪ Permanent surface water management systems. ▪ Generation of waste streams and effluents from Visitor Centre and café. **Operational Phase – Inis Cealtra** ▪ Increased noise and human presence on the island. ▪ Maintenance of island pods and correct disposal of WC pod waste. ▪ Maintenance of pathways and island infrastructure. ▪ Permanent surface water management systems. **Mainland Construction Phase:** ▪ There is no spatial overlap of any of the proposed development's mainland sites with any European site, and therefore, there will be no direct loss/alteration/land-take within any European site. ▪ There will be loss and direct alteration of habitat (mainly agricultural/amenity grassland and artificial surfaces) within construction footprint. ▪ Potential for species disturbance/displacement impacts due to construction activities including fugitive noise emissions from machinery, human activity.

	▪ The mainland development sites are indirectly hydrologically connected to two European sites – Lough Derg (Shannon) SPA [004058] and Lower River Shannon SAC [002165] – by virtue of their proximity to Lough Derg. ▪ Potential for water quality impacts via erosion and run-off of silt, and/or ingress of fuels/oils, cementitious material, or other substances via overland flow and/or proposed drainage network to local watercourses and Lough Derg. ▪ Potential for groundwater contamination through spillage of oils, fuels and chemicals. ▪ Potential for indirect alteration of habitats that are outside of but are hydrologically linked to the development site. ▪ Potential for indirect species disturbance/displacement due to in-situ or ex-situ habitat loss/alteration impacts, increased noise/human presence, impairment of water quality and/or impacts on prey availability. ▪ Potential for spread of invasive alien plant and animal species. **Inis Cealtra - Construction Phase** ▪ Inis Cealtra is located entirely within Lough Derg (Shannon) SPA, therefore, there will be some direct loss/alteration of SPA's habitat. There will be minimal land-take (non-qualifying habitats) from within the construction footprint of the SPA. ▪ Potential for species disturbance/displacement due to construction activities including fugitive noise emissions from machinery, boats, human activity. ▪ There is a direct hydrological link between Inis Cealtra and Lough Derg (Shannon) SPA, and an indirect hydrological link between Inis Cealtra and the Lower River Shannon SAC [002165] via Lough Derg and the River Shannon.

	▪ Potential water quality impacts via erosion and silt run-off, ingress of fuels/oils and/or cementitious material or other substances via overland flow to Lough Derg. ▪ Potential for direct water quality impacts to Lough Derg and the SPA during installation/construction of the new jetty and mooring point. ▪ Potential species disturbance impacts due to construction activities including fugitive noise emissions from machinery, boats, human activity. ▪ Potential for groundwater contamination through spillage of oils, fuels and chemicals. ▪ Potential for species disturbance/displacement due to in-situ or ex-situ habitat loss/alteration impacts, increased noise/human presence, impairment of water quality and/or impacts on prey availability. ▪ Potential for spread of invasive alien plant and animal species. **Operational Phase** ▪ Potential for species disturbance/displacement (direct and indirect habitat loss) due to operation/maintenance of the entire Inis Cealtra Visitor Experience including the proposed Visitor Centre and Inis Cealtra itself. ▪ Potential for species displacement whereby a species is deterred from using normal routes to access breeding, foraging or roosting habitats. ▪ Potential for direct and indirect water quality impacts through the erosion and run-off of silt, and/or ingress of fuels/oils via overland flow and/or the drainage network to local watercourses and Lough Derg.

	▪ Potential for groundwater contamination through spillage of oils, fuels and chemicals. ▪ Potential for indirect alteration of habitats outside of but hydrologically linked to the development site. ▪ Potential for indirect species disturbance/displacement due to impairment of water quality and/or impacts on prey availability. ▪ Potential for direct species disturbance/displacement at Inis Cealtra due to habitat loss/alteration impacts, increased noise/human presence, impairment of water quality and/or impacts on prey availability. ▪ Potential for spread of invasive alien plant and animal species. The most likely sources of water quality impacts are those arising directly from operation of boat tours and those arising indirectly during island tours and the maintenance of the dry toilet system within the WC Pod. Water quality is a key environmental factor underpinning the conservation condition of the complex of aquatic and wetland habitats and species that support the qualifying features for which the Lough Derg (Shannon) SPA and the Lower River Shannon SAC are classified. A direct hydrological link connecting the SPA with the proposed new floating access jetty, canoe launch and access walkway will be created during the construction and operational phases of the proposed works on Inis Cealtra. This also creates a direct, albeit tenuous, hydrological link to the Lower River Shannon SAC located approximately 14 river kilometres downstream via the River Shannon.
Screening report	Yes
Natura Impact Statement	Yes

Relevant submissions	**Submissions/observations** Submission were received from: • DHLGH, • An Taisce, • Department of Transport, • TII A detailed summary of all the observation is set out in pg 15 -23 planning assessment report R321474-24. DHLGH concerns centre on issues of archaeological impact and concerns of screw piling (quantity and dimensions) to form paths and to construct pods. It highlights concerns of use and design of WC pods, it considers that the archaeological information in the EIAR is deficient. No specific AA issues raised. An Taisce raise concern of disturbance of ecological receptors and note importance of retaining the integrity and amenity of the lakeshore. No specific AA issues raised. The Department of Transport highlights the Climate Action Plan. No specific AA issues raised. TII has no specific observations. Environmental Concerns from Observers include: • The lake, the wildlife, and the natural beauty of this place are irreplaceable. • Concern of negative impact upon ecosystems, ecology, local habitats and wildlife. • Changes to the shoreline, increased boat traffic, and possible dredging could all have serious consequences for the delicate balance of the ecosystem. • Interference with the lake bed, disturbance of wildlife species and the particular location choice of the access pier may have a detrimental effect on the ecological balance of the surroundings. A smaller passenger ferry and minimal work

	on the existing pier would cause less disturbance and give a more authentic experience. • It's not just about protecting what we have for now–it's about making sure that future generations will still be able to experience the unspoiled beauty of Mountshannon and Holy Island. • Need for a conservation management plan. • Mountshannon sewerage plant is near capacity. • Concern what water level of service the village will receive in lieu of demand placed on water capacity, which is deemed by Uisce Eireann as insufficient, as of Dec 2024. • There is a need to further review the adequacy of the environmental assessments submitted. Inaccuracies and errors in the NIS and EIAR. • This island is an SAC (special area of conservation) and is in close proximity to a nesting area of the White -Tailed Sea Eagle. These birds have been reintroduced in the last number of years after a 100yr lapse. • Concern of introduction of solar panels for power. The reflection off these panels has been proven to have a negative environmental impact particularly on reclusive birds such as White-Tailed Sea Eagle. • Concern of sanitary facilities on the island with the projected numbers, how is this going to be managed and not cause pollution.

Step 2. Identification of relevant European sites using the Source-pathway-receptor model

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
Lough Derg (Shannon) SPA (004058).	**Lough Derg (Shannon) SPA | National Parks & Wildlife Service – Aug 2024**	0Km - Inis Cealtra is located entirely within the SPA	- Designated for two wintering waterfowl species, two	Yes

	Cormorant (Phalacrocorax carbo) [A017] Tufted Duck (Aythya fuligula) [A061] Goldeneye (Bucephala clangula) [A067] Common Tern (Sterna hirundo) [A193] Wetland and Waterbirds [A999]	The southern corner of Visitor Centre site is located 0.03 km northwest of the SPA. New Mountshannon Village public car park is located 0.15 km northeast of SPA.	breeding waterfowl species and wetland habitats. - Spatial overlap with proposed development on Inis Cealtra. - Direct hydrological link with Lough Derg via the proposed new jetty works at Inis Cealtra. - Indirect hydrological connection of the SPA with all mainland elements of proposed development by virtue of their proximity to Lough Derg and the gentle lakeward-leaning proclivity of the mainland sites. - Potential for significant effects to the SPA.	

			- Further assessment is required.	
Slieve Aughty Mountains SPA (004168)	Slieve Aughty Mountains SPA | National Parks & Wildlife Service - December 2022 Hen Harrier (Circus cyaneus) [A082] Merlin (Falco columbarius) [A098]	The new Mountshannon Village public car park is located 0.3 km southwest of the SPA. Inis Cealtra is located 1.7 km south of the SPA.	- Designated for merlin and hen harrier. - Neither species observed during MWP bird surveys. - No spatial overlap with the proposal site. - Habitat at proposed development site not considered optimal for either QI species. - No plausible impact pathway linking the proposed development site to the SPA located upstream/upgradient of the proposed development.	No
River Shannon and River Fergus Estuaries SPA (004077)	River Shannon and River Fergus Estuaries SPA | National Parks & Wildlife Service – September 2012	Inis Cealtra is located 30.5 km northeast of the SPA.	- Designated for waterbird species and wetland habitats.	No

	Cormorant (Phalacrocorax carbo) [A017] Whooper Swan (Cygnus cygnus) [A038] Light-bellied Brent Goose (Branta bernicla hrota) [A046] Shelduck (Tadorna tadorna) [A048] Wigeon (Anas penelope) [A050] Teal (Anas crecca) [A052] Pintail (Anas acuta) [A054] Shoveler (Anas clypeata) [A056] Scaup (Aythya marila) [A062] Ringed Plover (Charadrius hiaticula) [A137] Golden Plover (Pluvialis apricaria) [A140] Grey Plover (Pluvialis squatarola) [A141] Lapwing (Vanellus vanellus) [A142] Knot (Calidris canutus) [A143] Dunlin (Calidris alpina) [A149] Black-tailed Godwit (Limosa limosa) [A156] Bar-tailed Godwit (Limosa lapponica) [A157]	Mountshannon Harbour is located 32.8 km northeast of the SPA.	- No spatial overlap with the proposal site. - Proposal site located nearly 45 rkm upstream of SPA. Outside project ZOI and core foraging ranges of species (SNH, 2016). - Proposal site is in separate WFD catchment to SPA - no plausible impact pathway linking the two.	

	Curlew (Numenius arquata) [A160] Redshank (Tringa totanus) [A162] Greenshank (Tringa nebularia) [A164] Black-headed Gull (Chroicocephalus ridibundus) [A179] Wetland and Waterbirds [A999]			
Lough Derg, North-east Shore SAC (002241)	**Lough Derg, North-east Shore SAC | National Parks & Wildlife Service – April 2019** Juniperus communis formations on heaths or calcareous grasslands [5130] Calcareous fens with Cladium mariscus and species of the Caricion davallianae [7210] Alkaline fens [7230] Limestone pavements [8240] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0]	The visitor centre site is 10.2 km southwest of the SAC. Inis Cealtra is 12.4 km southwest of the SAC.	Designated for six terrestrial habitats. - No spatial overlap with the proposal site. - SAC located upstream/upgradient of the proposed development so no plausible impact pathway linking the two.	No

	Taxus baccata woods of the British Isles [91J0]			
Lower River Shannon SAC (002165)	https://www.npws.ie/protected-sites/sac/002165 - August 2012 Sandbanks which are slightly covered by sea water all the time [1110] Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Coastal lagoons [1150] Large shallow inlets and bays [1160] Reefs [1170] Perennial vegetation of stony banks [1220] Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330]	Inis Cealtra is located 11.7 km north of the SAC. Mountshannon Harbour is located 13.3 km north of SAC.	- Designated for wide variety of aquatic and terrestrial habitats and species. - No spatial overlap: however, Lough Derg drains into the SAC via the River Shannon. - Direct hydrological connection between the proposal site and the SAC, located approximately 14 km downstream from Inis Cealtra. - Habitats within the proposal site suitable for some QI's.	Yes

	Mediterranean salt meadows (Juncetalia maritimi) [1410] Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260] Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0] Margaritifera margaritifera (Freshwater Pearl Mussel) [1029] Petromyzon marinus (Sea Lamprey) [1095] Lampetra planeri (Brook Lamprey) [1096] Lampetra fluviatilis (River Lamprey) [1099] Salmo salar (Salmon) [1106] Tursiops truncatus (Common Bottlenose Dolphin) [1349] Lutra lutra (Otter) [1355]		- Potential for significant effects to the SAC. -Further assessment is required.	

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

AA Screening matrix

Site name **Qualifying interests**	**Possibility of significant effects (alone) in view of the conservation objectives of the site***	
	Impacts	**Effects**
Lough Derg (Shannon) SPA (004058).	Construction • **Noise and disturbance to birds** – Disturbance arising from the presence of personnel, plant and machinery, noise generated by demolition, piling and construction works, may disturb birds using habitats surrounding the Site. Any lighting used during the construction phase could also cause disturbance of SCI birds when foraging or roosting. • **Contaminated Surface water runoff** – Direct hydrological link. Impact of contaminated water into Lough Derg / estuarine habitats during construction. • **Noise/Vibration disturbance to Marine Life** – Due to the new jetty works.	Construction of the Proposed Development in close proximity to wetland and estuarine habitats has the potential to impact bird SCI. There is potential for the loss/alteration of the 'Wetlands' [A999] habitat for which the Lough Derg (Shannon) SPA is designated during the construction and operational phases of the proposed development via a reduction in water quality which in turn can then adversely affect the SCI species of the SPA.
Yes	**Likelihood of significant effects from proposed development (alone): Y/N**	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects?	

Yes	**Possibility of significant effects (alone) in view of the conservation objectives of the site***	
	Impacts	**Effects**
Lower River Shannon SAC (002165) - Located 1.7 km south of Inis Cealtra. -14 rkm downstream from Inis Cealtra. -13.3 km south of Mountshannon Harbour. -15.2 rkm downstream of Mountshannon Harbour	**• Contaminated Surface water runoff** – - Direct hydrological connection between the proposed site and the SAC, located approximately 14 rkm downstream from Inis Cealtra Impact to estuarine habitats of contaminated water into Lough Derg, which drains into the SAC via the River Shannon, during construction.	- Habitats within the proposed site suitable for some QI's. - It is possible that any water quality effects within the SPA may also affect the QI habitats for which the SAC is designated - Potential for significant effects to the SAC.
Yes	**Likelihood of significant effects from proposed development (alone): Y/N**	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects?	
Yes	**Possibility of significant effects (alone) in view of the conservation objectives of the site***	
Step 4 Conclude if the proposed development could result in likely significant effects on a European site		
It is not possible to exclude the possibility that the proposed development alone would result in significant effects on **Lough Derg (Shannon) SPA (004058) and Lower River Shannon SAC (002165)** from effects associated with: • Construction and operation habitat loss and alteration impacts, • Construction and operation water quality impacts and • Construction and operation noise disturbance/displacement impacts.		

Construction of the Proposed Development in close proximity to marine, wetland and estuarine habitats has the potential to impact bird SCI. Potential for direct water quality impacts to Lough Derg and the SPA during installation/construction of the new jetty and mooring point. Noise and visual disturbance, arising from the presence of personnel, plant and machinery, noise generated by demolition and construction works, including piling, may disturb birds using habitats surrounding the Site. Any lighting used during the construction phase could also cause disturbance of SCI birds when foraging or roosting. Disturbance could cause birds to avoid areas otherwise suitable for foraging or roosting, causing their distribution within the SPA to shift and potentially leading to reduced abundance of birds within the SPA

An appropriate assessment is required on the basis of the possible effects of the project 'alone'. Further assessment in-combination with other plans and projects is not required at screening stage.

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 it is not possible to exclude that the proposed development alone would give rise to significant effects on **Lough Derg (Shannon) SPA (004058) and Lower River Shannon SAC (002165)** European Site(s) in view of the sites conservation objectives. It is therefore determined that Appropriate Assessment (stage 2) [under Section 177V of the Planning and Development Act 2000] is required on the basis of the effects of the project 'alone'. Appropriate Assessment is required.

This determination is based on:

- Objective information presented in the Screening Report,
- Standard pollution controls that would be employed regardless of proximity to a European site and effectiveness of same,
- Potential for direct hydrological connection / direct water quality impacts between the proposed site and the SAC located approximately 14 rkm downstream from Inis Cealtra, during installation/construction of the new jetty and mooring point.
- Distance from European Sites.

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 it is possible to determine that the proposed development alone will not give rise to significant effects on **Slieve Aughty Mountains SPA (004168), Lough Derg, North-east Shore SAC (002241)** and the **River Shannon and River Fergus Estuaries SPA (004077)** European Site(s) in view of the sites conservation objectives.

- Objective information presented in the Screening Report
- Nature and scale of the project.
- Standard pollution controls that would be employed regardless of proximity to a European site and effectiveness of same.
- Distance from European Sites.
- The absence of meaningful pathway to any European site.
- Impacts predicted would not affect the conservation objectives.

No measures intended to avoid or reduce harmful effects on European sites were taken into account in reaching this conclusion.

Template 3: Standard AA Template and AA Determination

Appropriate Assessment

The requirements of Article 6(3) as related to appropriate assessment of a project under part XAB, sections S177AE of the Planning and Development Act 2000 (as amended) are considered fully in this section.

I conclude that the proposed development is likely to have a significant effect on the Lough Derg (Shannon) SPA (004058) and Lower River Shannon SAC (002165) 'alone' in respect of habitat loss and alteration impacts, water quality impacts and noise disturbance/displacement impacts arising from the presence of personnel, plant and machinery, noise generated by demolition and construction works, including piling. There is potential for direct water quality impacts to Lough Derg and the SPA during installation/construction of the new jetty and mooring point. In addition, there is potential for water quality impacts to conservation objectives of the Lower River Shannon SAC, given direct downstream hydrological connection.

I do not consider that any other European sites fall within the zone of influence of the project based on a combination of factors including the nature and scale of the project, the distance from the site to European sites, and any potential pathways which may exist from the development site to a European site, aided in part by the applicant's Appropriate Assessment Screening Report and NIS for the proposed development, the conservation objectives of Natura 2000 sites, no plausible impact pathway, the lack of suitable habitat for qualifying interests, as well as by the information on file and I have also visited the site.

The main elements of the proposed development are divided into mainland and Island as follows:

<u>Mainland</u>

• Visitor Centre and Public Realm Upgrades

• New Mountshannon Village Car Park at Main Street

• Reconfiguration of Existing Mountshannon Harbour Car Park

<u>Inis Cealtra Island (Holy Island)</u>

• Three New Welfare Pods

• New Floating Access Jetty, Canoe Launch Jetty and Access Walkway

• Series of Pedestrian Walkways

The Applicants AA Screening included five European Sites in total. European sites located in proximity to the subject site include:

- Lough Derg (Shannon) SPA (004058)
    - Inis Cealtra is located entirely within the SPA.
    - Southern corner of Visitor Centre site is located 0.03 km northwest of SPA.
    - New Mountshannon Village public car park is located 0.15 km northeast of SPA.
- Slieve Aughty Mountains SPA (004168)
    - New Mountshannon Village public car park located 0.3 km southwest of SPA.
    - Inis Cealtra is 1.7 km south of SPA.
- Lough Derg, North-east Shore SAC (002241)
    - Visitor Centre site is 10.2 km southwest of SAC
    - Inis Cealtra is 12.4 km southwest of SAC
- Lower River Shannon SAC (002165)
    - Inis Cealtra is located 11.7 km north of SAC.
    - Mountshannon Harbour is located 13.3 km north of SAC.
- River Shannon and River Fergus Estuaries SPA (004077)
    - Inis Cealtra is located 30.5 km northeast of SPA.
    - Mountshannon Harbour is located 32.8 km northeast of SPA.

As set out in AA Screening (see Template 2 attached as appendix) two of the sites, Lough Derg (Shannon) SPA (004058) and Lower River Shannon SAC (002165) were screened in for Stage 2 assessment. The reason for inclusion of the of Lough Derg (Shannon) SPA relates to proximity and a direct hydrological link with Lough Derg, via the proposed new jetty works at Inis Cealtra, the impact of construction phase noise and vibration disturbance on the QI's (Qualifying Interests) which include Cormorant, Tufted Duck, Goldeneye, Common Tern, Wetland and Waterbirds also the indirect hydrological connection of the SPA with all mainland elements of the proposed development by virtue of their proximity to Lough Derg and the gentle lakeward-leaning proclivity of the mainland sites. With respect to Lower River Shannon SAC albeit there is no spatial overlap, Lough Derg drains into the SAC via the River Shannon, therefore maintaining a direct hydrological connection between the proposal site and the SAC, located approximately 14 km downstream from Inis Cealtra. Habitats within

the proposed site are suitable for some of the SAC's QI's and there is potential for significant effects 'alone' to the SAC which QI's include, inter alia, sandbanks, estuaries, mudflats and sandflats, coastal lagoons, shallow inlets and bays, fresh water pearl mussel, sea lamprey, Atlantic salmon, common bottlenose dolphin and otter.

In agreement with the applicants AA Screening, I am of the opinion that the three sites screened out, namely, Slieve Aughty Mountains SPA (004168), Lough Derg, North-east Shore SAC (002241) and the River Shannon and River Fergus Estuaries SPA (004077) are of sufficient distance upstream/upgradient of the proposed development site with no direct link hydrologically or otherwise. That there will be no significant impact from construction noise or vibration, water quality impacts or habitat loss and alterations impacts. That there would be no adverse effect on the QI's and hence they can be screened out at Stage 1.

It is therefore reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on the following European Sites in view of the site(s) conservation objectives;

- Slieve Aughty Mountains SPA (004168),
- Lough Derg, North-east Shore SAC (002241)
- The River Shannon and River Fergus Estuaries SPA (004077)

I consider that Appropriate Assessment (stage 2) under Section 177V of the Planning and Development Act 2000 is required on the basis of the effects of the project 'alone' for the following sites, for which the potential for significant effects could not be excluded:

- Lough Derg (Shannon) SPA (004058).
- Lower River Shannon SAC (002165)

This conclusion is based on:

- Objective information presented in the Applicants Screening Report and NIS,
- Standard pollution controls that would be employed regardless of proximity to a European site and effectiveness of same,
- Distance from European Sites,
- The absence of meaningful pathway to any European Site,
- Impacts predicted would not affect the conservation objectives.

No measures intended to avoid or reduce harmful effects on European sites were taken into account in reaching this conclusion.

(Stage 2) Appropriate Assessment

Taking account of the preceding screening determination, the following is an appropriate assessment of the implications of the proposed development of construction and operation of the Inis Cealtra Visitor Experience on Inis Cealtra in Lough Derg and at Mountshannon Village on the County Clare mainland in view of the relevant conservation objectives of Lough Derg (Shannon) SPA (004058) and Lower River Shannon SAC (002165) based on scientific information provided by the applicant and considering expert opinion set out in observations on nature conservation.

The information relied upon includes the following:

- Natura Impact Statement prepared by prepared by Úna Williams (MSc. BSc.), Ecologist and Environmental Scientist, and Orla van der Noll (MSc. BSc.), Ecologist, both of Malachy Walsh and Partners (MWP) Engineering and Environmental Consultants in County Kerry.
- EIAR
- Architectural Design Statement.
- Accessibility Audit
- Arboriculture
- Photomontages
- Visitors Management Plan
- Flood Risk Assessment
- Ordnance Survey Ireland (OSI) aerial photography, 1:50,000 mapping, GeoHive and online satellite imagery sources;
- National Parks and Wildlife Service (NPWS);
- National Biodiversity Data Centre (NBDC) (online map-viewer);
- Central Statistics Office (CSO);
- BirdWatch Ireland and I-WeBS data;
- Geological Survey Ireland (GSI) area maps (including Teagasc soil maps);
- Environmental Protection Agency (EPA) waterbody and water quality data;
- Water Action Plan 2024: A River Basin Management Plan for Ireland.
- Inland Fisheries Ireland (IFI) online fish sampling reports and fish data;
- Review of requested records from NPWS Rare and Protected Species database;
- Clare County Development Plan (2023 – 2029)
- Consultations with Uisce Eireann
- Consultation with National Monuments Service (NMS)
- Consultation with Waterways Ireland (WWI)
- Consultation with Office of Public Works (OPW)
- Consultation with the National Parks and Wildlife Service (NPWS).
- Consultation with BirdWatch Ireland.

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.

Submissions/observations

Submission were received from:

- DHLGH,
- An Taisce,
- Department of Transport,
- TII

A detailed summary of all the observation is set out in page 15 -23 of the planning assessment report R321474-24.

DHLGH concerns centre on issues of archaeological impact and concerns of screw piling (quantity and dimensions) to form paths and to construct pods. It highlights concerns of use and design of WC pods, it considers that the archaeological information in the EIAR is deficient. No specific AA issues raised.

An Taisce raise concern of disturbance of ecological receptors and note importance of retaining the integrity and amenity of the lakeshore. No specific AA issues raised.

The Department of Transport highlights the Climate Action Plan. No specific AA issues raised.

TII has no specific observations.

Environmental Concerns from Observers include:

- The lake, the wildlife, and the natural beauty of this place are irreplaceable.
- Concern of negative impact upon ecosystems, ecology, local habitats and wildlife.
- Changes to the shoreline, increased boat traffic, and possible dredging could all have serious consequences for the delicate balance of the ecosystem.
- Interference with the lake bed, disturbance of wildlife species and the particular location choice of the access pier may have a detrimental effect on the ecological balance of the surroundings. A smaller passenger ferry and minimal work on the existing pier would cause less disturbance and give a more authentic experience.
- It's not just about protecting what we have for now, it's about making sure that future generations will still be able to experience the unspoiled beauty of Mountshannon and Holy Island.
- Need for a conservation management plan.
- Mountshannon sewerage plant is near capacity.
- Concern what water level of service the village will receive in lieu of demand placed on water capacity, which is deemed by Uisce Eireann as insufficient, as of Dec 2024.

- There is a need to further review the adequacy of the environmental assessments submitted. Inaccuracies and errors in the NIS and EIAR.
- This island is an SAC (special area of conservation) and is in close proximity to a nesting area of the White -Tailed Sea Eagle. These birds have been reintroduced in the last number of years after a 100yr lapse.
- Concern of introduction of solar panels for power. The reflection off these panels has been proven to have a negative environmental impact particularly on reclusive birds such as White-Tailed Sea Eagle.
- Concern of sanitary facilities on the island with the projected numbers, how is this going to be managed and not cause pollution.

NAME OF SAC/ SPA (SITE CODE): Lough Derg (Shannon) SPA (004058)

The Lough Derg (Shannon) SPA, is located approximately 0.03 kilometres southeast of the proposed Visitor Centre site.

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

(i) Water quality degradation (construction and operation)
(ii) Disturbance of mobile species
(iii) Habitat loss and alteration impacts (construction and operation)
(iv) Habitat or species fragmentation

See Tables 23 - 27 NIS

Qualifying Interest features likely to be affected	**Conservation Objectives**	**Potential adverse effects**	**Mitigation measures (summary)**
			[Best practice pollution control measures Application of industry standard controls, CEMP, Supervision by ECOW.]
Cormorant [A017] (NPWS, 2024).	Restore to favourable	Yes. Potential degradation of water quality and	• Water quality protection will be applied as a precaution. • Habitats within the footprint of the proposed development are not considered optimal for breeding cormorant colonies

	conservation condition **Attributes & Targets:** **Breeding population size –** Long term SPA population trend is stable or increasing. **Productivity rate –** Sufficient to maintain a stable or increasing population. **Distribution: extent of available nesting options within the SPA –** Sufficient availability of suitable nesting sites throughout the SPA to maintain a stable or increasing population. **Forage spatial distribution, extent, abundance and availability –** Sufficient number of locations, area of suitable habitat and available forage biomass to support the population target.	disturbance are possible which could potentially affect the breeding population trend and range. Potential for loss/alteration of wetland habitat via a reduction in water quality.	and cormorant are not currently known to occupy breeding colonies within at least three kilometres of Inis Cealtra. • The proposed development is not expected to cause a significant decline in the breeding population of cormorant, but water quality impacts and/or disturbance of the species are possible which could potentially affect the breeding population and range. While no significant effects to this measure are expected, mitigation regarding water quality protection will be applied as a precaution. • Mitigation Measures are proposed in Chapter 8.0 of the applicants NIS. These will be discussed in detail further in this assessment.	

	Disturbance at the breeding site – Disturbance occurs at levels that do not significantly impact on birds at the breeding site. **Disturbance at areas ecologically connected to the colony –** Disturbance occurs at levels that do not significantly impact on breeding population. **Barriers to connectivity –** No significant increase.			
Tufted Duck [A061] (NPWS, 2024).	Maintain conservation condition of this species. **Attributes & Targets:** **Winter population trend –** Long term winter population trend is stable or increasing. **Winter spatial distribution –** Sufficient number of locations,	Yes. Water quality impacts and/or disturbance of this species is possible which could potentially affect the population trend. Potential for loss/alteration of wetland habitat via	• During MWP ornithological surveys, tufted duck were seen roosting in relatively large numbers throughout most of the winter counts (see QI species survey results summary in Section 3.11.5, of the NIS), particularly in the reed beds around Knockaphort Pier and shorelines at Mountshannon Bay. Impacts on water quality could reduce the quality/availability of tufted duck roosting resources, therefore, mitigation regarding water quality protection will be applied. • Mitigation Measures are proposed in Chapter 8.0 of the applicants NIS. These will be discussed in detail further in this assessment.	

	area, and availability (in terms of timing and intensity of use) of suitable habitat to support the population target. **Disturbance at wintering site –** The intensity, frequency, timing and duration of disturbance occurs at levels that do not significantly impact the achievement of targets for population trend and spatial distribution. **Barriers to connectivity and site use –** The number, location, shape and area of barriers do not significantly impact the wintering population's access to the SPA or other ecologically important sites outside the SPA. **Forage spatial distribution, extent and abundance –**	a reduction in water quality.		

	Sufficient number of locations, area of suitable habitat and available forage biomass to support the population target. **Roost spatial distribution and extent –** Sufficient number of locations, area and availability of suitable roosting habitat to support the population target. **Supporting habitat: area and quality –** Sufficient area of utilisable habitat available in ecologically important sites outside the SPA.			
Goldeneye [A067] (NPWS, 2024).	Maintain the Favourable conservation condition **Attributes & Targets:** **Winter population trend –** Long term winter population trend is stable or increasing.	Yes. Potential degradation of water quality and disturbance are possible which could potentially affect the breeding population trend and range.	• During the MWP ornithological surveys, goldeneye were recorded only very rarely during winter counts and were not present at all during the winter 2023/24 counts (see QI species survey results summary in Section 3.11.5, of the NIS). The project is not expected to cause a significant decline in the wintering spatial distribution of goldeneye, but water quality impacts and/or disturbance of this species is possible which could potentially affect the amount available suitable habitat, therefore, mitigation regarding	

	Winter spatial distribution – Sufficient number of locations, area, and availability (in terms of timing and intensity of use) of suitable habitat to support the population target. **Disturbance at wintering site –** Disturbance occurs at levels that do not significantly impact the achievement of targets for population trend and spatial distribution. **Barriers to connectivity and site use –** Barriers do not significantly impact the wintering population's access to the SPA or other ecologically important sites outside the SPA. **Forage spatial distribution, extent and abundance –** Sufficient number of	Potential for loss/alteration of wetland habitat via a reduction in water quality.	water quality protection will be applied. • Mitigation Measures are proposed in Chapter 8.0 of the applicants NIS. These will be discussed in detail further in this assessment.	

	locations, area of suitable habitat and available forage biomass to support the population target. **Roost spatial distribution and extent –** Sufficient number of locations, area and availability of suitable roosting habitat to support the population target.			
Common Tern [A193] (NPWS, 2024)	Restore to favourable conservation condition **Attributes & Targets:** **Breeding population size –** Long term SPA population trend is stable or increasing. **Productivity rate –** Sufficient to maintain a stable or increasing population. **Distribution: extent of available nesting options within the SPA –** Sufficient availability	Yes. Potential degradation of water quality and disturbance are possible which could potentially affect the breeding population trend. Potential for loss/alteration of wetland habitat via a reduction in water quality.	• During MWP ornithological surveys, common tern was recorded only very rarely during summer counts and were not present at all at Mountshannon Harbour. No evidence for the presence of breeding tern colonies at the proposed development site was recorded (see QI species survey results summary in Section 3.11.5, above). The proposed development is not expected to cause a significant decline in the breeding population size ofcommon tern, but water quality impacts and/or disturbance of this species is possible which could potentially affect the breeding population trend, therefore, mitigation regarding water quality protection will be applied. • Mitigation Measures are proposed in Chapter 8.0 of the applicants NIS. These will be discussed in detail further in this assessment.	

	of suitable nesting sites throughout the SPA to maintain a stable or increasing population. **Forage spatial distribution, extent, abundance and availability –** Sufficient number of locations, area of suitable habitat and available forage biomass to support the population target. **Disturbance at the breeding site –** Disturbance occurs at levels that do not significantly impact on birds at the breeding site. **Disturbance at areas ecologically connected to the colony –** Disturbance occurs at levels that do not significantly impact on breeding population. **Barriers to connectivity –** No significant increase.			

Wetlands [A999] (NPWS, 2024).	Maintain the Favourable conservation condition **Attributes & Targets:** **Wetland habitat area –** No significant loss to wetland habitat within the SPA, other than that occurring from natural patterns of variation. **Wetland habitat quality and functioning –** No significant impact on the quality or functioning of the wetland habitat within the SPA, other than that occurring from natural patterns of variation.	Yes. There will be some direct loss/alteration (approx. 0.007 ha) of wetlands. Potential degradation of water quality and habitat loss and loss of habitat quality and/or functioning.	• Mitigation Measures are proposed in Chapter 8.0 of the applicants NIS. These will be discussed in detail further in this assessment.	
NAME OF SAC/ SPA (SITE CODE): Lower River Shannon SAC (002165) **The Lower River Shannon SAC is located approximately 15.2 river kilometres downstream of Mountshannon Harbour.** **Summary of Key issues that could give rise to adverse effects (from screening stage): [examples]** **(i) Water quality degradation (construction and operation)** **(ii) Disturbance of mobile species** **(iii) Habitat loss and alteration impacts (construction and operation)** **(iv) Habitat or species fragmentation** **See Tables 28 - 32 NIS**				

Qualifying Interest features likely to be affected	**Conservation Objectives**	**Potential adverse effects**	**Mitigation measures (summary)**	
	Maintain / restore favourable conservation condition		[Best practice pollution control measures Application of industry standard controls, CEMP, Supervision by ECOW.]	
Sandbanks which are slightly covered by seawater all the time [1110] Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140]	To maintain the favourable conservation condition.	**No** Given the intervening distances between the proposed development site and each of these three marine/coastal habitats, it is considered that no element of the proposed project has the potential for significant effects on these designated habitats.	N/A	
Coastal lagoons [1150]	To restore favourable conservation condition.	**No** As this habitat type is confined to coastline above the high tide mark and is therefore	N/A	

		outside the zone of influence of any potential impact arising from the proposed development's construction/operation, there will not be a significant impact to 'Coastal lagoons'.		
Large shallow inlets and bays [1160] Reefs [1170]	To maintain the favourable conservation condition.	**No** Given the extent of the intervening distances between the proposal site and both these habitats, in conjunction with very high exchange rates of water within the Shannon and Fergus estuaries, it is considered that the proposed development does not have potential for significant effects on these habitats. Thus, the project will not affect the conservation	N/A	

		objectives for 'Large shallow inlets and bays' or 'Reefs'.		
Perennial vegetation of stony banks [1220] Vegetated sea cliffs of the Atlantic and Baltic coasts [1230]	To maintain the favourable conservation condition.	**No** Given the characteristics of the proposed development and the distances intervening, both these habitats are deemed to be outside the zone of influence of any potential impact arising from the proposed development's construction/operation and there is no potential for significant impacts to these habitats.	N/A	

Salicornia and other annuals colonising mud and sand [1310]	To maintain the favourable conservation condition.	**No** Given the characteristics of the project including the nature, extent and scale of the proposed works, and the distance intervening, it is not considered that the proposed development has any potential to significantly impact on this habitat-type. Thus, the project will not affect the conservation objectives for 'Salicornia and other annuals colonising mud and sand'.	N/A	
Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] Mediterranean salt meadows (Juncetalia maritimi) [1410]	To restore the favourable conservation condition	**No** Given the characteristics of the proposed development including the nature, extent and scale of the proposed works, and the distance intervening, both these habitats are deemed to be outside the zone of	N/A	

		influence of any potential impact arising from the proposed development's construction/operation and it is not considered that the proposal has any potential to significantly impact upon these habitat-types. Thus, the project will not affect the conservation objectives of either 'Atlantic salt meadows' or 'Mediterranean salt meadows'.		
Watercourses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260] (NPWS, 2012b)	Maintain favourable conservation condition. **Attributes & Targets:** **Habitat distribution** No decline, subject to natural processes. **Hydrological regime: river flow** Maintain appropriate hydrological regimes	**Yes.** Potential release of pollutants into watercourses, which affect the quality of the water, and may in turn effect habitat area and distribution.	• Construction and operation activities of the proposed development could potentially result in release of pollutants into watercourses and affect the quality of the water, which may in turn effect habitat area and distribution. • Mitigation Measures are proposed in Chapter 8.0 of the applicants NIS. These will be discussed in detail further in this assessment.	

	Hydrological regime: tidal influence Maintain natural tidal regime **Hydrological regime: freshwater seepages** Maintain appropriate freshwater seepage regimes.			
Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae) [91E0]	Maintain favourable conservation condition.	**No** As there is no hydrological connection between the proposed development site and mapped areas of these habitats within the SAC, and since the habitat types are confined to restricted terrestrial locations above the high tide mark, they are outside the ZOI of any potential impact arising from the proposed development. Therefore, no significant impacts to the conservation	N/A	

		objectives for either 'Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae)' or for 'Alluvial forests with Alnus glutinosa and Fraxinus excelsior' are anticipated		
Freshwater Pearl Mussel Margaritifera margaritifera [1029] (NPWS, 2012b)	Restore favourable conservation condition.	**No** Conservation objectives for this species within the SAC apply to the freshwater pearl mussel population in the Cloon River, Co. Clare. This population is confined to the main channel and distributed from Croany Bridge to upstream of Clonderalaw Bridge (NPWS, 2012a) The Cloon River enters the main Shannon Estuary at a point more than 62 km southwest of the proposed development site. Given the	N/A	

		characteristics and location of the project, and species' ecology, it is not considered that the proposal has any potential to significantly impact on freshwater pearl mussel. Thus, the project will not affect the conservation objectives for 'Freshwater Pearl Mussel'		
Sea lamprey [1095] (NPWS, 2012b)	Restore favourable conservation condition **Attributes & Targets:** **Population structure of juveniles** At least three age/size groups present. **Juvenile density in fine sediment** Juvenile density at least 1/m²	**Yes.** Potential for construction activities to release pollutants into Lough Derg and affect water quality of silt beds within the lake and further downstream within the SAC.	• Mitigation measures have been prescribed with regards to the protection of water quality, wetland habitat, waterbird species and water-dependant species during both the construction and operational phases. • Mitigation Measures are proposed in Chapter 8.0 of the applicants NIS. These will be discussed in detail further in this assessment.	

	Extent and distribution of spawning habitat No decline in extent and distribution of spawning beds. **Availability of juvenile habitat.** More than 50% of sample sites positive.			
River lamprey [1099]] (NPWS, 2012b)	Maintain favourable conservation condition. **Attributes & Targets:** **Distribution** Access to all water courses down to first order streams **Population structure of juveniles** At least three age/size groups of river/brook lamprey present **Extent and distribution of spawning habitat.**	**Yes.** Potential adverse water quality effects which may arise because of the proposed development could impact on juvenile lamprey habitat condition and availability in watercourses downstream of the site within the SAC.	• Mitigation measures have been prescribed with regards to the protection of water quality, wetland habitat, waterbird species and water-dependant species during both the construction and operational phases. • Mitigation Measures are proposed in Chapter 8.0 of the applicants NIS. These will be discussed in detail further in this assessment.	

	No decline in extent and distribution of spawning beds. **Availability of juvenile habitat.** More than 50% of sample sites positive			
Brook Lamprey (Lampetra planeri) [1096]	Maintain favourable conservation condition. **Attributes & Targets:** **Distribution** Access to all water courses down to first order streams **Population structure of juveniles** At least three age/size groups of river/brook lamprey present **Extent and distribution of spawning habitat.** No decline in extent and distribution of spawning beds.	**Yes.** Potential adverse water quality effects. The SAC's northern boundary is located at Killaloe Bridge approximately 14 river km downstream from Inis Cealtra creating a hydrological connection to the SAC via the River Shannon. Through this hydrological link there is potential for water quality impacts to occur, particularly during the construction phase of the proposed development.	• Mitigation measures have been prescribed with regards to the protection of water quality, wetland habitat, waterbird species and water-dependant species during both the construction and operational phases. • Mitigation Measures are proposed in Chapter 8.0 of the applicants NIS. These will be discussed in detail further in this assessment.	

	Availability of juvenile habitat. More than 50% of sample sites positive			
Common Bottlenose Dolphin (Tursiops truncatus) [1349]	Maintain favourable conservation condition.	**No** Given the nature, extent, scale and location of the proposed development, the dilution potential of the River Shannon and estuary, and the distribution of bottlenose dolphin habitat and records within the estuary, it is not considered that the proposal has the potential to significantly impact on this species.	N/A	
Atlantic Salmon [1106] (NPWS, 2012b)	Restore favourable conservation condition **Attributes & Targets:** **Distribution** 100% of river channels down to second order accessible from estuary **Adult spawning fish**	**Yes.** The proposed development has the potential to result in indirect water quality impacts that may affect Salmon attributes and migration.	• As above, also, to avoid the times of migration of salmon smolts, works should be carried out in the period July to September, inclusive. The proposed construction works, and the timing of instream works will be agreed with Inland Fisheries Ireland (IFI) prior to the commencement of works. • Mitigation Measures are proposed in Chapter 8.0 of the applicants NIS. These will be discussed in detail further in this assessment.	

	Conservation Limit (CL) for each system consistently exceeded **Salmon fry abundance** Maintain or exceed 0+ fry mean catchment-wide abundance threshold value. Currently set at 17 salmon fry/5 min sampling. **Number and distribution of redds** No decline in number and distribution of spawning redds due to anthropogenic causes **Water quality** At least Q4 at all sites sampled by EPA			
Otter [1355] (NPWS, 2012b)	Restore favourable conservation condition **Attributes & Targets:** **Distribution** No significant decline	**Yes.** Potential to result in water quality impacts that may affect otter prey biomass and indirectly affect otter distribution. Potential to	• Habitat disturbance to fauna will be limited by controlling the movement of vehicles and personnel. Construction vehicles, plant and personnel will not encroach onto habitats beyond the proposed development footprint. • A suitably qualified ecologist will conduct otter surveys prior	

	Extent of terrestrial habitat No significant decline. Area mapped and calculated as 596.8ha above high water mark (HWM); 958.9ha along river banks/ around ponds. **Extent of marine habitat** No significant decline. Area mapped and calculated as 4,461.6ha **Extent of freshwater (river) habitat** No significant decline. Length mapped and calculated as 500.1km **Extent of freshwater (lake/lagoon) habitat.** No significant decline. Area mapped and calculated as 125.6ha **Couching sites and holts**	adversely impact water quality that may affect availability of suitable couching sites and holts.	to commencement of any construction works on Inis Cealtra to ensure that any newly established holts do not occur within the works area otter or within 150 metres of the works area. • Mitigation measures set out in Section 8.3.5, of the NIS, regarding protection of water quality should be followed to protect otter from any significant effects that a reduction in water quality could incur. The timing of the works (July to September) stated in Section 8.3.4, of the NIS, is vital and will reduce negative impacts on salmonids, lamprey and other otter prey. The works will not involve blocking any part of the lake completely and there are no large pipes or deep excavations proposed for any part of the development that might risk otter entrapment. • Mitigation Measures are proposed in Chapter 8.0 of the applicants NIS. These will be discussed in detail further in this assessment.	

	No significant decline **Fish biomass available.** No significant decline **Barriers to connectivity** No significant increase.			

The above table is based on the documentation and information provided on the file and I am satisfied that the submitted NIS has identified the relevant attributes and targets of the Qualifying Interests. In particular, I note those relating to the SCI bird species and QI wetland habitat for which the Lough Derg (Shannon) SPA is designated, and to the QI species and habitat for which the Lower Shannon SAC is designated.

During the construction phase of the proposed development, there is potential for negative water quality impacts on downstream waterbodies due mainly to earthworks and the release of sediment. There is potential for the project to contribute to a cumulative impact on water quality in local watercourses, within and downstream of the site, by way of sediments and other pollutants potentially entering the watercourses. These water quality effects, could exacerbate potential impacts associated with the proposed development within the Lower Shannon Catchment (25C) and undermine the conservation objectives for the qualifying features of the Lough Derg (Shannon) SPA and the Lower River Shannon SAC as discussed in Section 7.0 and Tables 23 - 32 of the NIS.

- Seabirds, as identified above, can often use many different areas of the SPA to engage in various maintenance behaviours (e.g bathing, preening) and, while it is unlikely the proposed development will present a significant barrier to connectivity given its limited scale and scope, reduced water quality could adversely impact food availability and food procurement by species leading to an impact on productivity rates. The specific QI Species, Attributes and Targets for the Conservation Objectives of both for the Lough Derg (Shannon) SPA and the Lower River Shannon SAC are presented in the Table above.
- I note fugitive noise from machinery and/or human activity during the construction phase will largely be restricted to the immediate vicinity of the proposed development site, and while there is some

potential for disturbance to bird forage locations, they will be temporary due to the nature of the works and unlikely to significantly affect the availability and quality of foraging habitat within the SPA.

- Disturbance contributes to increased energetic expenditure by SCI species which can result in increased likelihood of winter mortality or reduced fitness (if energy expenditure is greater than energy gain) and can negatively impact population trends. Anthropogenic recreational activities on the lake such as boating, angling, kayaking can potentially disturb goldeneye and affect the species' population trend and spatial distribution. However, the frequency of these activities at Inis Cealtra and Mountshannon Village will peak in summer months and are, therefore, unlikely to significantly disturb goldeneye at their wintering sites. During MWP ornithological surveys, goldeneye were recorded only very rarely during winter counts and were not present at all during winter 2023/24 counts.
- There will be some direct loss/alteration (approx. 0.007 ha) of wetlands because of the proposed works at Inis Cealtra which is located within the footprint of the SPA. The area of loss which will arise because of the proposed development is not considered to be significant in the context of the overall size of the SPA and extent of comparable habitat.
- Construction and operation activities of the proposed development could potentially result in release of pollutants into watercourses and affect the quality of the water, which may in turn effect habitat area and distribution.
- There will be some direct loss/alteration (approx. 0.007 ha) of wetlands because of the proposed works at Inis Cealtra which is located within the footprint of the SPA. The area of loss which will arise because of the proposed development is not considered to be significant in the context of the overall size of the SPA and extent of comparable habitat.
- Accidental fuel/oil spills or uncontrolled emissions of cementitious material/wastewater or other harmful substances also pose a risk to water quality and habitat condition in the absence of appropriate controls.
- Species of lamprey tend to spawn in sandy or gravelly sediment (Kurz & Costello, 1999). Potential adverse water quality effects which may arise because of the proposed development could impact on spawning habitat potentially located downstream of the site and could result in a decline in spawning habitat extent within the SAC.
- The proposed development has the potential to result in indirect water quality impacts that may affect adult spawning fish, salmon fry or out-migrating smolts, and number of redds. A reduction in water quality may also indirectly affect the Conservation Limit (CL) during the early life stages (spawning and movement of alevins upwards through gravels) of this species should sediment and associated nutrients result in the loss/alteration of gravel habitats.
- The waters around Inis Cealtra and Mountshannon Harbour are considered optimal otter foraging habitat and it is very likely that some of the SAC otter population use these waters as foraging grounds. The proposed development has potential to result in water quality impacts that may affect otter prey biomass and indirectly affect otter distribution. While MWP field surveys identified spraints on the eastern side of Inis Cealtra, no holts or breeding habitat were identified and no decline in the number of couching sites and holts for otter are anticipated. However, the proposed development has potential to adversely impact water quality that may affect availability of suitable couching sites and holts. Therefore, there is potential for negative effects to this attribute and mitigation regarding water quality protection will be applied.

Mitigation regarding water quality protection will be applied, as follows, as a precaution:

Construction Phase:

- A Construction and Environmental Management Plan (CEMP)
- A suitably qualified and experienced project ecologist/Ecological Clerk of Works (ECoW) will be employed during the construction phase of the project to ensure all environmental impact prevention controls relevant to construction activities occurring at the time are in place.
- Routine environmental inspections
- Temporary Site Compounds and Parking
- Management of Fuel/Oil
- Management of Concrete.
- Appropriate siltation measures will be put in place prior to excavations. Silt-retaining measures (silt fence/silt curtain or other suitable materials) employed to reduce the risk of silt run-off will be used.
- The storage of materials, containers, stockpiles and waste, however temporary, will follow best practice at all times and be stored at designated areas only within the demarcated extent of the works footprint.
- Once piling and excavation works begin, visual inspections of the silt-curtained-area should be regularly undertaken while turbidity and pH levels of the water both inside and outside the silt curtain should be frequently taken using handheld monitors. Should any discolouration of the lake water outside the silt curtain be observed, works will be stopped immediately so the issue can be identified and rectified before works continue.
- All necessary excavations and construction will be supervised by a suitably qualified and experienced engineer.
- The storage of materials, containers, stockpiles and waste, however temporary, will follow best practice at all times and be stored at designated areas only within the demarcated extent of the works footprint.
- To avoid or minimise impacts to the water quality of Lough Derg during piling and excavation of the lakebed, management measures involving the use of a silt curtain to trap and contain any sediment released are recommended and should be overseen by an experienced ECoW to ensure their effective implementation. Site biosecurity measures to reduce the risk of introduction or spread of invasive species are highly recommended and, therefore, the silt curtain should be disinfected before being brought to site as detailed in Section 8.3.8 of the NIS
- Management of Construction waste as per section 8.3.6 of NIS
- Construction Noise and Disturbance measures as per section 8.3.7 of NIS
- To avoid the times of migration of salmon smolts, works should be carried out in the period July to September, inclusive. The proposed construction works, and the timing of instream works will be agreed with Inland Fisheries Ireland (IFI) prior to the commencement of works.
- Mitigation measures set out in Section 8.3.5, of the NIS, regarding protection of water quality should be followed to protect otter from any significant effects that a reduction in water quality could incur. The timing of the works (July to September) stated in Section 8.3.4, of the NIS, is vital and will reduce negative impacts on salmonids, lamprey and other otter prey. The works will not involve blocking any part of the lake completely and there are no large pipes or deep excavations proposed for any part of the development that might risk otter entrapment; therefore, connectivity will not be significantly affected.
- All tree felling will be undertaken in accordance with a tree felling licence, using good working practices as outlined by the Department of Agriculture, Food and the Marine (DAFM) ‘Standards

for Felling and Reforestation' (DAFM, 2019). These standards deal with sensitive areas, buffer zone guidelines for aquatic zones, ground preparation and drainage, chemicals, fuel and machine oils. Tree felling will also comply with all measures prescribed in the CEMP and in accordance with the proposed surface water management for the project. All conditions associated with a proposed felling licence will be complied with. Where possible, tree felling and vegetation clearance will only take place before or after the bird breeding season (1st April to August 31st, inclusive). Construction work will commence before the breeding season begins (1st April) to ensure that incubating birds or birds with young are not displaced by the disturbance work commencing during the breeding season.

- Weather forecasts should be checked daily, which will assist in planning the work and anticipating high water levels, therefore, ensuring works are carried out in a safer manner.
- Best Practice and mitigation measures to avoid the spread of invasive alien species (IAS) are incorporated into the CEMP.
- To minimise environmental risk, no concrete pours will take place during severe weather events such as during flooding or heavy rainfall (10 mm/hr).

Operational Phase

- The proposed drainage network will incorporate sumps within manholes for silt removal and a bypass petrol interceptor prior to discharge. During operation of the Visitor Centre, foul water generated will be treated by the existing on-site treatment unit prior to discharge by an existing connection to the foul sewer at Harbour Road.
- Given the location of the proposed Visitor Centre, the design philosophy is to provide sufficient lighting to guide people along either the driveway or the pathway to the property entrance while also ensuring safe access and egress from the building. The proposed light fittings will all only provide downward light output to ensure that there is no adverse light pollution on the surrounding environs. All lanterns specified will be designed to operate at 3000 K (Kelvin) to minimise any unfavourable effects on the local wildlife and natural environment.
- LED Lanterns mounted on six-metre-columns will operate in the new Mountshannon public car park. Each lantern will be controlled via an individual photocell, with the overall lighting scheme controlled via an astronomical time clock to enable lights to be switched off when the car park is not in use. To minimise or negate any adverse light pollution within the surrounding environs, the proposed light fittings will only provide downward light output and will operate at 3000 K to minimise or negate any adverse light pollution and/or unfavourable ecological effects within the surrounding environs.
- The network of pedestrian pathways on Inis Cealtra will follow existing paths where possible and existing ground levels and contours for minimum visual impact and to avoid any subterranean archaeological features.
- Mitigation measures set out in section 8.4.3 of the NIS are proposed to prevent path erosion and strengthen soil structure.
- 2 no. dry WCs for emergency use only. No water supply or foul drainage required. In a dry toilet system, the HDPE tank is usually installed underground, however, in this case, due to the archaeological sensitivity of the island, the tank will be placed at ground level and new ground mounded up to more than 850 millimetres around the tank to conceal it. The ventilation chimney and WC enclosure will be constructed on top of the concealed tank while the wormery and

oxygenation box will be placed on the ground behind the WC. A separate timber-framed and clad structure will be constructed around this.

- A dry toilet system will be implemented to overcome the logistical challenges of removing solids and liquids. Deposited waste will be separated into liquid and solid form. This waste will then be stored in a holding container as part of the dry toilet set-up. A contractor will be appointed to manage the maintenance of the foul system and waste removal from the island. The designated maintenance contractor will ensure that the waste is delivered to the appropriate Uisce Éireann treatment facility, where it will be processed in accordance with Uisce Éireann standards. Uisce Éireann has advised that the effluent collected will likely be taken by an authorised and licenced tankard wastewater haulier to Bunlicky Wastewater Treatment Plant (WWTP) in Limerick City.

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

The likelihood of adverse effects to a European site from the proposed development has been determined based on the following indicators:

- Water quality;
- Habitat loss or alteration;
- Disturbance/displacement of species; and
- Habitat or species fragmentation.

Examples:

(i) Water quality degradation

The main pathway by which adverse ecological impacts could potentially occur and affect the integrity of both relevant European sites – Lough Derg (Shannon) SPA, and Lower River Shannon SAC – is by hydrological means, either directly or indirectly into Lough Derg.

The risk to water quality arises from the potential for ingress of sediment or accidental fuel/oil spillages discharging directly into the SPA or indirectly into the SPA via existing drainage systems and/or surface flow runoff. Any pollutants entering the lake have the potential, albeit remote, to then be transferred downstream via the River Shannon to the freshwater regions of the Lower River Shannon SAC located approximately 14 river kilometres downstream from Inis Cealtra and 15.2 river kilometres downstream from Mountshannon Harbour. These risks are particularly acute during excavation and construction activities. Consequently, mitigation measures, as described above, will be implemented to ensure that pollutants and sediment are not transferred to receiving waterbodies

via surface water and run-off on the site. Furthermore, the drainage system proposed for the operational phase of the development has been designed to cause minimal disturbance to the current hydrological regime by maintaining diffuse flows.

As discussed in Section 7.4.1, of the NIS, water quality is a crucial environmental factor underpinning the conservation condition of the complex of wetland habitats and aquatic species and birds that the Lough Derg (Shannon) SPA and the Lower River Shannon SAC are selected for. Increased sediment levels, nutrient-enrichment, and other aquatic pollution, which could arise in the absence of effective water quality protection measures, would impact on the freshwater ecology of Lough Derg and downstream watercourses.

Mitigation measures and conditions

The risk of occurrence, however, can be adequately prevented through the implementation of standard best management practices and controls. Therefore, certain mitigation measures are recommended with regards to protection of water quality. Section 8, of the NIS and mitigation measures set out above, which outline a programme of mitigation measures designed to ameliorate potential adverse water quality impacts from the proposed development and the indirect habitat impacts that could significantly affect the Conservation Objectives of the Lough Derg (Shannon) SPA and/or Lower River Shannon SAC.

(ii) Habitat loss or alteration;

There will be direct loss/alteration of habitat from within Lough Derg (Shannon) SPA during both the construction and operational phases of the proposed Inis Cealtra elements of the development. On the island, there will be some limited cut back of approximately 0.058 hectares of scrubby vegetation to facilitate installation of the welfare pods. To accommodate the island's pedestrian pathway network, approximately 0.32 hectares of habitat (0.3 ha wet grassland; 0.007 ha marsh; 0.004 ha woodland) will be cut back or altered. Wet grassland, woodland and scrub are generally not considered to be of significant foraging/nesting/roosting value to any of the four SCI species that the SPA is designated for, namely cormorant, tufted duck, goldeneye, and common tern, because as

mentioned in Section 7.4.2.1, of the NIS, these species mainly forage and roost in open water, while breeding colonies of common tern use open areas of islands or beaches and, although inland cormorant breeding colonies do use trees beside water, there are no colonies of breeding cormorant currently found on Inis Cealtra (NPWS, 2024). Marsh may be of some value for roosting waterbirds but as the area to be altered is only approximately 0.007 hectares, the potential for significant impacts to the QI species of the SPA is considered low. 'Marsh (GM1)' also corresponds to the QI habitat 'Wetlands [A999]' for which the SPA is designated, and while the loss of this designated habitat will be permanent, it will be localised and is of such a limited scale and scope as to be considered insignificant.

During installation of the new floating access jetty, canoe launch jetty, and access walkway (refer to Section 4.3.7.4, of the NIS), there will be a loss of approximately 0.001 hectares of 'Reed and large sedge swamp (FS1)' from the northern side of the island. This corresponds to the QI habitat 'Wetlands [A999]' for which the SPA is designated, and while the loss of this designated habitat will be permanent, it will be localised and is of such a limited scale and scope as to be considered not significant.

Additionally, since there is a tenuous hydrological connection of approximately 14 river kilometres linking Inis Cealtra with the downstream Lower River Shannon SAC via the River Shannon, it is also possible that any water quality effects within the SPA may also affect the QI habitat 'Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260]' for which the SAC is designated. This creates potential for significant indirect alteration/loss of the aquatic habitat within the SAC in the absence of mitigation.

There is potential for the loss/alteration of the 'Wetlands' [A999] habitat for which the Lough Derg (Shannon) SPA is designated during the construction and operational phases of the proposed development via a reduction in water quality which in turn can then adversely affect the SCI species of the SPA as listed in Table 20, of the NIS and set out above. Similarly, the proposed development may potentially result in indirect alteration of the habitat 'Water courses of plain to montane levels with the Ranunculion fluitantis and Callitricho-Batrachion vegetation [3260]' and alteration/loss of

otter foraging/resting habitat within the Lower River Shannon SAC via a reduction in water quality. The risk of occurrence, however, can be adequately prevented through the implementation of standard best management practices and controls.

Mitigation measures and conditions

Mitigation measures are recommended with regards to protection of water quality. Section 8, of the NIS, outlines a programme of mitigation measures designed to ameliorate potential adverse water quality impacts from the proposed development and the indirect habitat impacts that might ensue, are also set out in detail above.

(iii) Disturbance/displacement of species;

The waters of Lough Derg around Inis Cealtra are optimal foraging grounds for otter whose diet is dominated by fish, particularly salmonids, eels and sticklebacks. Brown trout and three-spined stickleback were both recorded in waters at the northern shores of the island during the MWP aquatic surveys described in Sections 2.7.3 and 3.10.3, of the NIS, and an otter spraint was recorded on the eastern side of the island during mammal surveys (Section 3.9.1, of the NIS). Otter is a QI for the Lower Shannon SAC located approximately 14 river kilometres downstream of the proposed works at Inis Cealtra and, therefore, the otter that use the island may be part of the SAC's otter population. As described in Sections 7.4.1.1.2 and 7.4.1.2.4, of the NIS, without a programme of mitigation there is potential for a reduction in water quality at Inis Cealtra during the construction and operational phases of the development. This can significantly alter the suitability of the site for otters and their requirements and affect the conservation objectives for the otter population of the SAC.

There is potential for indirect disturbance/displacement effects of the four SCI bird species both on Inis Cealtra and at the proposed mainland development locations due to a reduction in water quality. As discussed in Section 7.4.1, of the NIS, without mitigative actions, the construction and operational phases of the proposed works have the potential to cause significant direct and/or indirect water quality impacts within the SPA due to surface water run-off or through the accidental release of

pollutants such as fuels, oils, silt, chemicals or other hydrocarbons. Siltation of the substrate and potential eutrophication could lead to increased biomass of filamentous algae which would reduce the availability of suitable habitat and increase the potential for significant displacement effects of the SCI bird species for which the SPA is designated.

There is also potential for disturbance/displacement effects due to fugitive noise emissions generated during the construction phase of the proposed mainland elements of the development. During the construction phase, groundworks to prepare the Visitor Centre site and new car park at Main Street, and the surface milling of the existing Mountshannon Harbour car park are expected to comprise the main activities with potential to generate noise emissions. However, such activities will be temporary and restricted to the mainland within the urban fabric of Mountshannon village and are, therefore, not expected to be significantly over and above existing ambient noise levels. Similarly, despite a predicted increase in visitor numbers and traffic to the village during the summer months, the operational phase of the proposed development's mainland elements is not expected to generate greatly increased noise emissions over existing levels.

Once operational, an increase in boats travelling between Inis Cealtra and Mountshannon Harbour passing the wetland habitats located along the edge of the lake could potentially disturb/displace the SCI bird species for which the SPA is designated. However, as detailed in Section 4.4.5, of the NIS, boat tours will only be carried out from March to September, inclusive, and are, therefore, not expected to cause significant disturbance/displacement effects to the wintering populations of tufted duck and goldeneye for which the SPA is designated.

The other two SCI species of the SPA – common tern and cormorant – are designated for their breeding populations. However, there is no suitable habitat for breeding tern located along the boat route and, furthermore, breeding tern colonies within the SPA have been almost exclusively located at Goat Island, approximately 16 river kilometres upstream of Mountshannon Harbour (NPWS, 2024). Breeding colonies of cormorant within the SPA are usually located on one of the many vegetated/tree-covered small islands. As shown in Figure 16 of the NIS, the route for the Inis Cealtra boat tours is an existing navigation channel, and, therefore, while the tours will pass some small

islands that have potential to support breeding cormorant colonies, the disturbance from the boats is not anticipated to be significantly over and above existing levels.

On Inis Cealtra, installation of the new floating access jetty, canoe launch and access walkway will provide the most potential to disturb/displace SCI bird species due to fugitive noise emissions from activities such as piling and use of machinery and plant such as the WWI workboat, drilling rig, and excavator. The disturbance effects will be temporary, however, and restricted to the existing jetty location. Installation of the welfare pods and pedestrian pathway network will also have the potential to disturb/displace SCI bird species due to fugitive noise emissions from small machinery such as the lawnmower, jackhammer, and mini-digger.

Lough Derg and other areas of fringing wetland habitat of the lake comprise suitable foraging/roosting habitat for many different wintering waterbird species, therefore, where works are potentially undertaken during the winter period, migratory waterbird species have the potential to be subjected to some degree of direct/indirect disturbance/displacement during the construction or operational phases of the development through either noise, human activity or potential water quality impacts. In relation to fugitive noise emissions and increased human activity associated with either phase of the development, as Mountshannon Harbour comprises an existing operational jetty/marina and Inis Cealtra has a small but functional slipway/jetty, it is expected that wintering waterbird species potentially foraging/roosting within the vicinity will have acquired some level of habituation to anthropogenic activity. Disturbance/displacement impacts arising from this aspect of the works on migratory waterbird species are expected to be temporary in nature.

Mitigation measures and conditions

The implementation of a programme of mitigation measures as recommended in Section 8, of the NIS, that are designed to ameliorate potential impacts from the proposed development and the disturbance/displacement impacts that may ensue.

(iV) Habitat or species fragmentation.

The construction and operation of the mainland elements of the proposed development do not overlap with either of the relevant European sites – Lough Derg (Shannon) SPA and Lower River Shannon SAC – and will not result in any direct habitat loss/alteration within either. Therefore, significant habitat or species fragmentation impacts are not envisaged for these European sites as a result of the mainland elements of the proposed development.

With regards to the removal of minor areas of non-qualifying habitat within Lough Derg (Shannon) SPA, comprising largely habitats such as agricultural grassland, amenity grassland and scrub, as well as minor pockets of woodland and wet grassland, these do not comprise habitats of ecological value for the SPA's SCI bird species. Removal of minor areas of these habitats is not expected to result in significant species or habitat fragmentation impacts within the SPA, nor is it expected to result in significant ex-situ species fragmentation impacts for QIs of the Lower River Shannon SAC listed in Table 21, of the NIS.

It has been determined in Section 7.4.2.2, of the NIS, that approximately 0.001 hectares of reedbeds will be removed/altered from the north of the island to facilitate piling works required for installation of the new floating access jetty and canoe launch jetty. The loss of this habitat is limited and is not expected to result in significant habitat or species fragmentation impacts within the SPA or the SAC.

It has been determined that general construction and operational activities of the proposed development have the potential to result in the introduction and/or spread of invasive alien plant and animal species within the SPA and/or the SAC and/or indirect impacts on qualifying habitats and species. While this aspect of the project is not considered to have the potential for significant habitat or species fragmentation impacts within the SPA and/or the SAC, both general and site-specific mitigation measures designed to prevent either the introduction and/or spread of invasive alien plant and animal species are recommended.

A series of two-metre-wide mown grass pedestrian pathways is proposed for Inis Cealtra to allow visitors to explore the island and its archaeological features. The proposed pathways will be restricted to areas of improved grassland apart from small sections crossing wet grassland and

fringing marsh habitat to the southeast of the island. Overall, approximately 0.308 hectares of 'Wet grassland (GS4)' and 0.0066 hectares of 'Marsh (GM1)' will be cut back/altered to enable installation of the pedestrian pathway network on the island which may potentially result in wetland habitat fragmentation. However, any habitat fragmentation will be minor and is unlikely to have significant effects on the designated 'Wetlands (A999)' of the SPA nor the SCI bird species for which the SPA is designated.

Mitigation measures and conditions

Mitigation measures in relation to protection of the prevention of introduction/spread of invasive alien plant and animal species, and mitigation pertaining to the protection of wetland habitats are outlined in Section 8, of the NIS. Residual impacts are assessed in Section 9, of the NIS

In-combination effects

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.

It is considered that as there are no relevant plans and projects which have the potential to act in combination with the subject project, that there are no residual impacts that could impact in combination, it can therefore, be concluded that no in-combination issues arise.

I conclude that the proposed development would have had no likely significant effect in combination with other plans and projects on the qualifying features of any European site(s). No further assessment is required for the project.

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 the Lough Derg (Shannon) SPA and the Lower River Shannon SAC, European sites.

Based on the information provided, I am satisfied that adverse effects arising from aspects of the proposed development can be excluded for the European sites considered in the appropriate Assessment. No direct impacts are predicted. Indirect impacts (noise and disturbance) would be temporary in nature and mitigation measures are described to prevent ingress of silt laden surface

water. To avoid or minimise impacts to the water quality of Lough Derg during piling and excavation of the lakebed, management measures involving the use of a silt curtain to trap and contain any sediment released are recommended and shall be overseen by an experienced ECoW to ensure their effective implementation. Site biosecurity measures to reduce the risk of introduction or spread of invasive species are proposed. Monitoring measures are also proposed to ensure compliance and effective management of measures. I am satisfied that the mitigation measures proposed to prevent adverse effects have been assessed as effective and can be implemented. There are no proposals within plans that could act in-combination with the Proposed Development.

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 Lough Derg (Shannon) SPA and the Lower River Shannon SAC. Adverse effects on sites 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 Lough Derg (Shannon) SPA and the Lower River Shannon SAC 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 all associated material submitted and taking into account observations of the Department of Housing, Local Government and Heritage, I consider that adverse effects on site integrity of the Lough Derg (Shannon) SPA and the Lower River Shannon SAC 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.
- The proposed development individually or in combination with other plans or projects would not adversely affect the integrity of any European sites in light of their conservation objectives (subject to the implementation of mitigation measures outlined above).
- The proposed development will not affect the attainment of conservation objectives for Lough Derg (Shannon) SPA and the Lower River Shannon SAC or prevent or delay the restoration of favourable conservation condition for Lough Derg (Shannon) SPA and the Lower River Shannon SAC.
- Application of planning conditions to:
    - Ensure effectiveness of mitigation measures proposed and adoption of an updated Construction Environmental Management Plan (CEMP).
    - The mitigation measures and environmental commitments contained in the submitted Natura Impact Statement (NIS) shall be implemented in full as part of the development.
    - No ground clearance shall be undertaken and no vegetation shall be cleared from the 1st day of March to 31st day of August, unless otherwise agreed with the planning authority.