



An
Coimisiún
Pleanála

Inspector's Addendum Report

ABP-322613A-25

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| Development | Alterations and extension to house to include demolition of garage and construction of new garage together with all associated site works. |
| Location | Murrisknabol, Murrisk, Westport, Co Mayo. |
| Planning Authority | Mayo County Council. |
| Planning Authority Reg. Ref. | 2560046. |
| Applicant(s) | Bríd McGing. |
| Type of Application | Permission. |
| Planning Authority Decision | Grant Permission. |
| Type of Appeal | Third Party. |
| Appellant(s) | Raoul Downey and Frances Delaney. |
| Observer(s) | None. |
| Date of Site Inspection | 21 st August 2025. |
| Inspector | C. Daly. |

1.0 Introduction

- 1.1. This report is an addendum to the Inspector's Report in respect of file no. ABP-322613-25 (dated 29th August 2025) and should be read in addition to the previous assessment contained therein.
- 1.2. On the 19th September 2025, the Commission decided to defer consideration of this case and to issue a notice under Section 132 of the 2000 Act as amended. This was because it considered that additional details of the proposed wastewater treatment system including suitable scaled drawings showing all elements of the system and that a Natura Impact Statement including an assessment of any impacts from the proposed wastewater treatment system and any potential flood risk was required. This was requested by letter to the applicant on 24th September 2025. A response to this with an updated site layout plan with site specific waste water treatment system dimensions and specifications together with a section drawing and a Natura Impact Statement were received by the Commission on 21st October 2025.
- 1.3. This response was cross-circulated under Section 131 to all parties on 23rd October 2025. Responses to this were received from Raoul Downey and Frances Delaney. No other responses were received from the parties within the required timeframe.
- 1.4. On the 27th November 2025 the Commission requested the applicant to publish a newspaper notice and erect a site notice in accordance with its format informing that a Natura Impact Statement had been received and inviting submissions. A response confirming this had been done was required by 17th December 2025. On this date the applicant's planning consultant emailed the Commission stating that they would require more time as they only received the registered letter on 17th December 2025 and asking for more time to re-advertise.
- 1.5. On the 18th December 2025 the Commission requested the applicant to publish a newspaper notice and erect a site notice in accordance with its format informing that a Natura Impact Statement had been received and inviting submissions. Confirmation of this was requested by 16th January 2026.
- 1.6. On the 6th January 2026 the applicant's planning consultant advised the Commission that the requested notices had been erected and published with proofs attached.

1.7. On the 11th February 2026 the Administration Section in the Commission for this case advised the Inspectorate that the revised notices were published/erected on 30th December 2025, that the last date to make submissions/observations was 2nd February 2026 and that no submissions/observations were received. It noted the request of the Commission for an addendum report by way of direction of 9th September 2025 and it forwarded the file for the preparation of this report.

2.0 **Response to the Commission's Request**

2.1. The response to the Section 132 request of the Commission can be summarised as follows:

- The response included a Natura Impact Statement prepared by Siobhán Sheil, ecologist and environmental consultant at Sitecheck and an updated site layout plan with site specific wastewater treatment system including dimensions and specifications of the system proposed along with a section drawing through the system.
- The NIS concludes that the proposed development in close proximity to the Clew Bay SAC will not have any negative impacts on the European site and that a positive impact on the protected site will result from the upgrading of the existing non-compliant septic tank and soakaway to a fully EPA compliant domestic wastewater treatment system.

2.2. The response of the third parties, Raoul Downey and Frances Delaney, to the Section 131 request of the Commission can be summarised as follows:

- Guidance and case law on AA provides that the assessment should be on the basis of best scientific evidence and methods with surveys, research and analysis required.
- The NIS author prepared an inadequate and inaccurate screening report in 2023 which was used for reg. ref. 24/60437 and the subject application. There was a failure to recognise the impacts of the wastewater treatment system in this report.

- There is no evidence that the precautionary principle has been applied in the AA Screening or the NIS.
- The reports fail to identify the location of the high water mark (HWM). In Section 4.4 of the NIS it is said to be 20m from the site whereas it adjoins the site and this is the SAC boundary.
- The Shore Road is incorrectly identified as sitting above the HWM when it is part of the foreshore which is completely covered at high tide and therefore distances have been overstated particularly in relation to the separation distances from the wastewater treatment system.
- The HWM at the base of the driveway has not been recognised.
- The NIS omits the type of marine species found at Murrisk and this suggests that the assessment has not been approached in the required scientific and objective manner.
- The NIS mis-states the grounds of appeal.
- The photomontages mis-represent the scale of the development.
- The statements in relation to the design of the proposal indicate a lack of objectivity in the NIS.
- The submitted Site Layout Plan is not a scale drawing as it states “*use figured dimensions only do not scale off this drawing*” and a scale drawing is required for separation distances. It fails to show all elements of the system and the precise location of either the secondary treatment or tertiary stone filter bed.
- The NIS author has not taken any measurements to satisfy herself that the separation distances comply with the EPA Code of Practice where a 50m separation distance from the lake or foreshore applies.
- The 15.11m separation distance shown on the plan is likely grossly overstated given the proximity of the foreshore.
- The slope at the front of the development has not been factored into the drawings but a minimum 4m separation distance is required and a minimum

10m is required from the dwelling for a treatment area which also requires a minimum area of 5m X 10m.

- Minimum separation distances for the WWTS have not been demonstrated for the location in front of the dwelling.
- A minimum separation distance of 5m applies from the soakaway but the location has not been shown.
- The statement that the upgrading of the non-existent septic tank and soakaway is a positive impact cannot be sustained as it would have to be undertaken anyway.
- It is not possible to locate the WWTS appropriately given the scale of the proposal.
- The proposal will have a negative impact as it will compromise the protection that would otherwise be achieved if the wastewater treatment upgrade also involved its relocation to a more appropriate part of the site.

3.0 Policy Context

3.1. Mayo County Development Plan 2022 – 2028 (the CDP)

Volume 1

NEO 26 To consider applications for development, within Mayo's Coastal Areas and Lakeshores and within areas along scenic routes with designated scenic views, that can demonstrate a long-standing social link to the area concerned, whilst ensuring that it:

- *Does not impinge in any significant way on the character, integrity and distinctiveness of the area.*
- *Cannot be considered at an alternative location.*
- *Meets high standards in siting and design.*
- *Contributes to and enhances local landscape character.*

- *Satisfies all other criteria, with regard to, inter alia, servicing, public safety and environmental considerations.*

Volume 2

Section 2.10 Effluent Treatment Systems

In un-serviced rural areas where a proposed dwelling cannot connect to the public wastewater treatment plant, a site suitability assessment will be required. The assessment must be carried out in accordance with the EPA Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses and take into account the cumulative effects of existing and proposed developments in the area. The assessment shall be carried out and certified by a suitably qualified person (i.e. the holder of an EPA FETAC certificate or equivalent) with professional indemnity insurance.

In coastal/lakeside areas, any effluent disposal system or percolation area for single dwellings shall be located at least 100m from the High-Water of the sea/lake and 100m from any lands liable to flooding along the sea / lake.

Section 8.4 Effluent Treatment Systems

The suitability of a site for the treatment of wastewater shall be determined, in accordance with the criteria set down in the EPA Wastewater Treatment Manuals i.e. the EPA Wastewater Treatment Manuals-Treatment Systems for Single Houses (2009) and the EPA Wastewater Treatment Manuals- Treatment Systems for Small Communities, Business, Leisure Centres and Hotels (including any updated or superseding document or any revision or replacement of these manuals or any guidelines issued by the EPA concerning the content of these manuals).

3.2. EPA Code of Practice 2021: “Domestic Waste Water Treatment Systems (Population Equivalent ≤ 10)” (the EPA Code)

This code of practice is relevant in relation to the assessment of the proposed wastewater treatment system.

Section 2.2 therein includes the following, *“if retrofitting existing systems that do not comply with this CoP, where the site is unsuitable, the proposed upgrade must*

provide improved treatment and reduced environmental impact as in many cases site improvement works will not be sufficient to enable the site to be used for a system incorporating discharge to ground”.

4.0 **Assessment**

4.1. Having examined the application details and all other documentation on file, in particular the response of the Applicant to the Commission’s Section 132 notice and the response to the Section 131 notice to the parties, the reports of the local authority, and having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the substantive issues for this addendum report to be as follows:

- Wastewater Treatment.
- Appropriate Assessment

4.2. **Wastewater Treatment**

- 4.2.1. My first report noted the site location within Flood Zone C where no significant flood risk is identified per the OPW Flood Maps. It is located immediately adjacent to an area in Flood Zones A and B, which includes the adjacent Shore Road to the south. My first report also, having regard to the proposal being for extensions to an existing dwelling where there is an existing septic tank rather than a new dwelling proposal and noting Section 2.2 of the EPA Code of Practice, on the basis of a significantly improvement WWTS, considered that it would significantly improve the wastewater treatment system on the site and would be acceptable in relation to impact on public health.
- 4.2.2. The Commission requested that the applicant provide additional details including suitable scaled drawings showing all elements of the WWTS and the separation distances to waterbodies. Having reviewed the submitted documentation including the information in the submitted NIS and the submitted A4 Site Layout Plan drawing which is stated to be to scale 1:250 @A1, I note it shows a separation distance of 15.11m to the foreshore. I note the appellants response that the 4m separation

distance from the slope would be met given the flat area where the WWTS is proposed and that there is sufficient space for the c.53sqm percolation area.

- 4.2.3. I note it is stated in the NIS that the percolation area would be 52.5sqm (7.5m X 7m) for the secondary wastewater treatment system. However, I note this has not been shown on the updated Proposed Site Layout Plan drawing where the Commission requested details of the WWTS and I draw this to the attention of the Commission. I also note an inconsistency in that the Site Layout Plan submitted following the Commission's request shows the secondary treatment unit in a different position on the site by comparison with the site layout drawing shown within the Site Suitability Report.
- 4.2.4. I note that the updated Site Layout Plan specifically refers back to the Site Suitability Report such that I note a material inconsistency between the drawings in this regard. Noting this inconsistency, together with the failure to clearly outline the area for the percolation area on the new site layout plan as requested, I am not satisfied that the applicant's proposed wastewater treatment system plan has been demonstrated to be feasible per the most recent site layout and the details for same that have been outlined in their most recent submission.
- 4.2.5. Therefore, I consider that the inconsistency shown in the latest site layout plan in relation to the location of the secondary treatment unit together with the failure to show the location of the percolation area for same, is such that I cannot rely on the most recent information submitted to conclude that there would be a significant improvement by comparison with the existing septic tank system on the site per Section 2.2 of the EPA Code. This, in my opinion, would be contrary to the EPA Code and there is potential for the discharge of polluted water to the ground and onwards to the waters of the SAC.
- 4.2.6. See Appendix 1 below for my assessment of the detail included in relation to this matter in the NIS and as it relates to impacts on the Clew Bay SAC where the precautionary principle applies and any possibility of significant effects on the qualifying interests must be ruled out.

4.3. **Appropriate Assessment**

- 4.3.1. See Appendix 1 below for Appropriate Assessment. My first report noted that it was not possible to exclude that the proposed development alone will give rise to significant effects on Clew Bay Complex Special Area of Conservation (SAC) (site code 001482) in view of the site conservation objectives and that Appropriate Assessment was required. This was based mainly on the potential for disturbance or other impacts on the qualifying interests and the potential for polluted run-off to the SAC and the need for mitigation and the absence of detailed dated surveys in relation to the qualifying interest species of the SAC.
- 4.3.2. I note the Commission in its request to the applicant requested an NIS including an assessment of any impacts from the proposed wastewater treatment system and any potential flood risk from coastal flooding.
- 4.3.3. In screening the need for Appropriate Assessment (see Appendix 2 of my first report), it was determined that the proposed development could result in significant effects on Clew Bay SAC in view of the conservation objectives of the site and that Appropriate Assessment under the provisions of S177U was required.
- 4.3.4. Following an examination, analysis and evaluation of the NIS and all associated material submitted, I consider that adverse effects on the site integrity of the Clew Bay SAC cannot be excluded in view of the conservation objectives of the site and that reasonable scientific doubt remains as to the absence of such effects. My conclusion is based on the following:
- The absence of any evidence of recent dated surveys of the mobile species in accordance with best practice that are qualifying interests of the SAC in the vicinity of the site, particularly otter, to support the findings that otter would stay away from the site.
 - The potential for disturbance to otter during the construction stage with no mitigation measures (such as construction site hoarding) proposed.
 - Based on the updated Site Layout Plan, the failure of the proposed wastewater treatment system to meet the EPA Code of Practice 2021: 'Domestic Waste Water Treatment Systems (Population Equivalent ≤ 10)',

based on the precautionary principle, to remove all doubt as to the avoidance of negative impacts on the water quality of the SAC.

- 4.3.5. Having regard to the submitted NIS, and based on the above AA determination, there is an absence of reliable information on which Appropriate Assessment of the proposed development can be made in accordance with the requirements of Article 6 of the Habitats Directive. It is not possible to exclude that the proposed development alone will give rise to significant effects on Clew Bay Complex Special Area of Conservation (SAC) (site code 001482) in view of the site conservation objectives. Accordingly, the Commission is precluded from granting permission in these circumstances. The proposed development would, therefore, not be in accordance with the proper planning and sustainable development of the area.

4.4. Other Issues

- 4.4.1. In relation to the issues raised by the appellant in the response to the NIS, I have assessed the NIS in detail in Appendix 1, I note the qualifications of the Environmental Scientist outlined in section 1.4 thereof. I have noted a failure to assess the applicable mobile species that are qualifying interests of the Clew Bay SAC on the basis of best scientific evidence given the absence of surveys. I have noted the issues raised by the appellant in relation to the high water mark location and the stated absence of a scale on the submitted Site Layout Plan. I note issues in relation to visual impact and the scale of development have been previously assessed in my first report and I do not consider them applicable to Appropriate Assessment in this case.
- 4.4.2. I have also assessed the issues raised by the appellants in relation to wastewater treatment above and in Appendix 1.

5.0 Recommendation

- 5.1. Referring to my previous report and the above assessment, I recommended that permission be refused.

6.0 Reasons and Considerations

1. Having regard to the policies and objectives of the Mayo County Development Plan 2022-2028, to the nature and scale of the proposed development and its relationship with the surrounding area and with Clew Bay Complex Special Area of Conservation (SAC), the submitted Natura Impact Statement and noting the absence therein of dated mobile species surveys of the SAC in line with best practice and that absent detail therein as to how disturbance impacts on some of the qualifying interest species can be credibly avoided in the absence of outlined mitigation measures at construction and operation stages, it cannot be ruled out that there would be a significant negative impact on the qualifying interests of the SAC. Based on the updated site layout plan and the absence of detail in relation to the feasibility of the percolation area, it cannot be ruled out that the proposed wastewater treatment system would not have a significant negative impact on the SAC due to the potential discharge of polluted wastewater to the ground and onwards to the SAC waters. Therefore, the Appropriate Assessment of the proposed development cannot exclude that the proposed development alone will give rise to significant effects on Clew Bay Complex Special Area of Conservation (SAC) (site code 001482) in view of the site conservation objectives. Accordingly, the Commission is precluded from granting permission in these circumstances. The proposed development would, therefore, not be in accordance with the proper planning and sustainable development of the area.

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 me, directly or indirectly, following my professional assessment and recommendation set out in my report in an improper or inappropriate way.

Ciarán Daly

Planning Inspector

6th May 2026.

Appendix 1 Appropriate Assessment Determination

Appropriate Assessment

The requirements of Article 6(3) as related to appropriate assessment of a project under part XAB, sections 177V of the Planning and Development Act 2000 (as amended) are considered fully in this section.

Taking account of the screening determination in my first report, the following is an appropriate assessment of the implications of the proposed development of alterations and extension to house to include demolition of garage and construction of new garage, in view of the relevant conservation objectives of Clew Bay Complex SAC (site code 001482) based on scientific information provided by the applicant.

The information relied upon includes the following:

- Natura Impact Statement prepared by Siobhán Sheil, Sitecheck Environmental Consultant, dated 18th October 2025.
- National Parks and Wildlife Service data.

I am not satisfied that the information provided is adequate to allow for Appropriate Assessment. I am not satisfied that all aspects of the project which could result in significant effects are considered and assessed in the NIS (see further below) and mitigation measures designed to avoid or reduce any adverse effects on site integrity are included and assessed for effectiveness.

Submissions/observations

See Section 2.2 of the above report. Issues raised include the reliability of the NIS.

NAME OF SAC/ SPA (SITE CODE): Clew Bay Complex SAC (001482)

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

- (i) Water quality degradation.
- (ii) Disturbance of mobile species.
- (iii) Wastewater treatment system.
- (iv) Coastal flood risk.

| Qualifying Interest features likely to be affected | Conservation Objectives | Potential adverse effects | Mitigation measures (summary) |
|---|---|---|--|
| <p>Mudflats and sandflats not covered by seawater at low tide [1140]</p> <p>Coastal lagoons [1150]</p> <p>Large shallow inlets and bays [1160]</p> <p>Annual vegetation of drift lines [1210]</p> <p>Perennial vegetation of stony banks [1220]</p> <p>Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330]</p> <p>Embryonic shifting dunes [2110]</p> <p>Shifting dunes along the shoreline with Ammophila arenaria (white dunes) [2120]</p> <p>Machairs (* in Ireland) [21A0]</p> | <p>Maintain / restore favourable conservation condition</p> | <p>Untreated/polluted wastewater and water based emissions from the site during construction and operation.</p> <p>Construction activity, mainly noise and movements on the site, could disturb otter (Absence of dated surveys as to the locations of the otter).</p> <p>Coastal flooding interacting with untreated wastewater.</p> | <p>NIS SECTION 5</p> <p>The NIS notes that no site specific mitigation measures are required.</p> <p>All environmental protection works are stated to be part of existing construction standards, methodologies and codes of practice.</p> <p>It states that the Shore Road will not be used for deliveries.</p> <p>It notes a positive impact will result from the upgrading of the existing non-compliant septic tank and soakaway to a fully EPA compliant domestic wastewater treatment system.</p> <p>It notes the location outside of any flood risk zone.</p> |

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|---|--|--|--|--|
| <p>Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0]</p> <p>Geyer's whorl snail (<i>Vertigo geyeri</i>) [1013]</p> <p>Lutra lutra (Otter) [1355]</p> <p>Phoca vitulina (Harbour Seal) [1365]</p> | | | | |
| | | | | |

The above table is based on the documentation and information provided on the file and while I note that the submitted NIS has identified the relevant attributes and targets of the Qualifying Interests, it has not included any recent surveys, including in relation to otter in the vicinity of the subject site.

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

(i) Water quality degradation

In relation to the construction phase, the NIS relates that this involves works inside the boundaries of the site and that transport of materials will be via road and not via the Shore Road. It notes that all construction methods will be to current construction standards.

I note that effects in relation to increased sedimentation and pollution could be dealt with by standard construction measures and these are not referred to in the NIS as mitigation measures.

In relation to the operational stage, please see section on wastewater treatment below.

Mitigation measures and conditions

None proposed.

(ii) Disturbance of mobile species

I note no reference in the NIS in relation to construction related disturbance impacts from, for example, noise and movement on the site.

In relation to the high water mark, Section 4.4 of the NIS states that the site is 20m from this location when it is in fact adjacent to the HWM and to the SAC. I note that the areas mapped by the NPWS require a 10m terrestrial buffer along the shoreline. While noting Common (Harbour) Seal are found in Clew Bay and that they are not associated with this part of the SAC, it notes the otter are associated with it including up to the boundary. However, it does not consider that they would approach the site as they would not use such “*a busy location for nesting, commuting, or fishing*” being shy creatures. I note no recent surveys have been undertaken to scientifically support this assertion and I note no mitigation measures are proposed to screen construction activity from the SAC.

The NIS also notes that “*couching sites or holts have not been identified within the site. The project will not reduce the number of couching sites or holts. The project will not significantly affect this conservation measure*”.

Noting the above, I do not consider the NIS findings in relation to the potential disturbance of otter to be sufficient to avoid such a risk and to avoid negative impacts on the otter population of the SAC.

Mitigation measures and conditions

None proposed.

(iii) Wastewater treatment system

In relation to the proposed wastewater treatment system (WWTS), the NIS notes that “*the proposed upgrade of the existing domestic septic tank to a fully EPA compliant wastewater treatment system can be taken as a positive impact*”. However, as noted in my first report, the system would not be compliant in relation to separation distance from the coastal inlet. Noting this, that a new dwelling is not proposed and Section 2.2. of the EPA Code which provides for upgrades to existing system, I considered this would be an improvement on the current septic tank system.

Having reviewed the update Site Layout Plan details, I would draw the Commission’s attention to note that the drawing is noted to be not to scale, that the area to the south of the location is reasonably flat such that the 4m separation distance from the slope would be met and that while not shown, the soakaway location could be dealt with by condition. The Commission may wish to consider its opinion on this matter.

Noting the precautionary principle in relation to Appropriate Assessment, I consider that a residual risk to water quality and the qualifying interests of the SAC cannot be ruled out given the updated site layout plan and inconsistencies with the original proposed layout and the failure to demonstrate on the updated site layout plan that the percolation area is feasible on the site.

Mitigation measures and conditions

None proposed.

(iv) Coastal flood risk.

Section 4.6 of the NIS relates to flood risk and it notes the site is not located within any flood risk zone but is adjacent to an area where there is a 0.5% AEP coastal flood risk (1 in 200 year event – Flood Zone B moderate risk). Given that the house and proposed WWTS are elevated above the high water mark, it notes that the upgraded wastewater treatment system and house are not at risk of flooding.

The NIS notes that *“Tom McDonnell Regional MCC Coordinator for Climate Action assessed the proposed development site as part of the planning process. His conclusion was that the site is in Zone C. The site has access impacted by coastal flooding at high tides. This is temporary in nature and can be managed”*. This appears to be a reference to Shore Road which is not the normal means of access to the site. It notes that *“the Shore Road will be impacted but the wall at the boundary of the property prevents the tide from entering the house curtilage”*.

The NIS also notes the high end future scenario maps (for 2100 which show an increase of 500mm in sea levels and glacial isostatic adjustment) and that there could be some flooding near the site entrance, most likely from where the Shore Road meets the L5879. It notes that this would be where the elevation is at 3.381mOD and as it would be tidal, that it would be manageable and that this location does not affect the extensions or the location of the WWTS. It notes the proposed development has an average elevation of 6.5mOD with an elevation of 7.044mOD at the location of the WWTS and notes an insignificant flood risk to the WWTS.

Having reviewed the OPW floor risk maps and noting the elevated site levels and southern site wall as well as the location of the WWTS, I consider the findings of the NIS to be credible in this regard.

Mitigation measures and conditions

None proposed.

In-combination effects

Plans and projects that could act in combination with the proposed development are detailed and assessed.

Findings and conclusions

The applicant determined that without the implementation of mitigation measures the construction and operation of the proposed development alone, or in combination with other plans and projects, will not adversely affect the integrity of this European site.

Based on the information provided, I am not satisfied that adverse effects arising from aspects of the proposed development can be excluded for the European sites considered in the appropriate Assessment.

Reasonable scientific doubt

I am not satisfied that no reasonable scientific doubt remains as to the absence of adverse effects.

Site Integrity

Adverse effects on site integrity cannot be excluded and 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 Clew Bay SAC in view of the conservation objectives of the site and that Appropriate Assessment under the provisions of S177U was required.

Following an examination, analysis and evaluation of the NIS, all associated material submitted, I consider that adverse effects on site integrity of the Clew Bay SAC cannot be excluded in view of the conservation objectives of the site and that reasonable scientific doubt remains as to the absence of such effects.

My conclusion is based on the following:

- The absence of any recent surveys of the mobile species that are qualifying interests of the SAC in the vicinity of the site, particularly otter, to support the findings that otter would stay away from the site.
- The potential for disturbance to otter during the construction stage with no mitigation measures proposed.
- Based on the updated Site Layout Plan, the failure of the proposed wastewater treatment system to meet the minimum separation distance required from the foreshore by the EPA Code of Practice 2021: 'Domestic Waste Water Treatment Systems (Population Equivalent ≤ 10)', based on the precautionary principle, to remove all doubt as to the avoidance of negative impacts on the water quality of the SAC.