



An
Coimisiún
Pleanála

Specialist Report:

Ecology

ABP-320946-24 – Specialist report

Direction from Commission:

R323606_TN

Development	Knockanima, Loughrea, County Galway
Type of Application	L.A. Dev. - AA Application
Topic	Direction from Commission: Appropriate Assessment
Ecologist	Paula Kearney BSc, CEcol, MCIEEM
Planning Inspector	Hugh O'Neill

Contents

Contents	2
1.0 Introduction	3
2.0 Implications for European Sites.....	4
3.0 Findings and conclusions	10

1.0 Introduction

1.1. Background

1.1.1. Case ABP-322097-25 relates to public realm enhancement works at Long Point, Loughrea, Co. Galway. A Direction from the Planning Commissioner dated 16/07/2025 requested a report from ecologists to consider, inter alia:

- a) Potential construction impacts for the proposed development on the Lough Rea SAC and SPA.
- b) Potential impacts of the proposed 'beach extension' on Lough Rea SAC and SPA (specifically addressing the importation of sand into the aquatic environment).
- c) Potential operational impacts on the Lough Rea SAC and SPA as a result of potentially increased visitor numbers.
- d) The comments received from the DAU in response to the further information submitted by the planning authority; and
- e) The adequacy of mitigation measures as set out by planning authority.

1.1.2. A Natura Impact Statement (NIS), including screening for Appropriate Assessment (AA) was prepared by MKO which was amended by further information received on the 16th day of July 2025.

1.1.3. The proposed development is located adjacent and partially within Lough Rea SAC [000304] and Lough Rea SPA [004134].

1.1.4. In my examination of the documents on file including the Planning Inspectors report and response to Further Information Request received on the 16th July 2025.

1.1.5. Therefore, my assessment, as directed by the Commission, is focused only on the five points (a-e) set out under Section 1.1.1, specifically impacts to Lough Rea SAC and SPA.

1.2. Scope of report

1.2.1. This report to the Commission includes a review of the Further Information Request Response documents including the updated Natura Impact

Statement, Updated Construction and Environmental Management Plan, Updated Ecological Impact Assessment taking account of documents on the case file, including the Screening for Appropriate Assessment (Stage1) and Appropriate Assessment (Stage 2).

1.2.2. In my capacity of Inspectorate Ecologist, with over 25 years professional experience, I have the relevant expertise to advise on and undertake Appropriate Assessment (AA) for the proposed works.

1.2.3. I have reviewed and examined the NIS including relevant appendices and figures. The documents have been reviewed with respect to the following current best practice guidance:

- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC
- EC (2021) Assessment of plans and projects in relation to Natura 2000 sites. Methodological guidance on Article 6(3) and 6(4) of the Habitats Directive 92/43/EC
- CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.3

2.0 Implications for European Sites

2.1. Natura Impact Statement Review

2.1.1. I have reviewed the Updated NIS and Updated CEMP with regards to potential construction impacts for the proposed development on Lough Rea SAC and SPA. Below, I will address each item individually, as submitted by the Commissioner.

a) Potential construction impacts for the proposed development on the Lough Rea SAC and SPA.

2.1.2. I am not satisfied that there has been adequate consideration of construction stage impacts on the Lough Rea SAC and SPA, particularly to the SAC Qualifying Interest (QI) habitat [3140] Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. during the construction and

installation of permanent structures within Lough Rea as indicated in the Proposed Site Layout Plan (Drawing No. P(01)03) and NIS Figure 3-2 and 3-4, including the following:

- Proposed Access Ramp
- Proposed Board Walk
- Proposed Crannog Viewing Platform
- Proposed Kayak Ramp

2.1.3. The assessment of potential effects and mitigation is set out in the NIS Section 6. It is stated in the NIS Section 6.1.1.1 that “*Lough Rea has a total surface area of approximately 301 ha, and the proposed works within the lake have a combined total area of approximately 0.024 ha, representing approximately 0.008% of the surface area of the lake. In addition, the proposed Crannóg viewing platform will be supported above the lake habitat, therefore, reducing this loss further*”.

2.1.4. Mitigation measures for the ‘in-lake’ works within Lough Rea are discussed in the NIS Section 6.1.2.1 and in the CEMP Section 2.4.10.

2.1.5. For each location it is proposed that the works will be carried out in the dry to avoid siltation of the Lough Rea and downstream watercourses. The works areas will be temporarily dammed (cofferdam) with sandbags and will completely surround the work area. A submersible pump will be used to pump water out of the works area, creating a dry working area, and will be pumped to a discharge point, a minimum of 30m from any waterbody and within the main construction site. It will pass through a silt bag before discharge to ground.

2.1.6. Other than for the construction of the Proposed Crannog Viewing Platform, no machinery will enter the works area(s).

2.1.7. Lough Rea 3140 Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. is characterised as having an extensive cyanobacterial crust zone, three or four charophyte zones and low total cover for vascular plant species.

- 2.1.8. The Conservation Objective (CO) Lough Rea SAC (NPWS, Version 1, July 2019) of Lough Rea SAC is to maintain the favourable conservation condition of Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. in Lough Rea SAC. Lough Rea SPA (NPWS, Version 1, October 2022) includes a CO to maintain or restore the favourable conservation condition of the wetland habitat at Lough Rea SPA as a resource for the regularly occurring migratory waterbirds that utilise it.
- 2.1.9. The COs are defined by the list of attributes and targets. Under the Lough Rea SAC, the 3140 habitat CO attribute for Habitat Area the target is “*Area stable or increasing subject to natural process*”. As stated in the NIS Section 6.1.1.1 areas proposed for the proposed access ramp, board walk, crannog viewing platform and kayak ramp are located within 0.024 ha of 3140 habitat.
- 2.1.10. It is argued in the NIS that “... whilst the entire lake habitat is mapped as *Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. within the SSCOs of the SAC, following the field surveys, it was noted that Chara spp. within the footprint of the Proposed Development were sparse and did not represent high quality areas of this QI. Furthermore, fringing habitat associated with this QI, such as reed beds, wet grassland, and marsh were absent from the Proposed Development site, further demonstrating that these habitats do not represent high quality examples of this QI.*”
- 2.1.11. However, the Development Applications Unit (DAU) submission dated 12 September 2025, disputes the statement the sparse charophyte cover “...does not represent high quality areas of this QI” and argue that this habitat could represent the typical vegetation of the species zone, however this can only be confirmed through a cyanobacterial crust survey which has not been conducted to date. Therefore, there is insufficient evidence provided in the NIS to determine the quality of the habitats within the footprint of the development site.
- 2.1.12. In addition, given the proximity and sensitivity of adjacent European Sites, the mitigation measures proposed for protection of water quality and silt

management are very general and not specific to the protection of the European sites.

- 2.1.13. I consider that assessment of potential impacts from the construction of the in-lake works have been underestimated given that Lough Rea is fed by springs and by a stream (Lough Rea SAC Site Code: 000304 Site Synopsis) and QI attributes include hydrological regime and water quality such as transparency and turbidity. There is no information in the documents provided whether there are groundwater springs or seepages at the proposed infrastructure locations. In addition, there is no hydrological assessment to inform the proposed mitigation measures to treat pumped water via a silt bag prior to discharging to ground and whether this method is appropriate to manage the volumes and sediment loading in the abstracted water.
- 2.1.14. A programme of works is not provided, other than that the timing for all in-lake works to be carried out during the period of July 1st to September 30th to minimise potential adverse impacts to fisheries, in line with Inland Fisheries Ireland (2016) Guidelines on Protection of Fisheries During Construction Works in and Adjacent to Waters.
- 2.1.15. It is unclear if all in-lake works will be carried out at the same time or the duration of works for each location. There is no assessment on the potential for temporary impacts to the hydrological regime of the lake and whether this could be exacerbated during potential drought conditions.
- 2.1.16. Details are not provided regarding the installation of sandbags to create a cofferdam at the multiple works' areas. Installing sandbags underwater is challenging to ensure correct configuration to avoid leaks and there is also potential to introduce foreign material into lake if the sandbags are damaged during installation, construction works and removal.
- 2.1.17. Pumping of the works areas will likely result in the intake of lake sediment. Unless appropriately managed, there is a risk of silt laden water being returned to the lake. Increases in turbidity can significantly affect the quantity and quality of light reaching vegetation and settlement of higher

loads of inorganic or organic material on lake vegetation communities may also have impacts on lake habitats and delicate species.

2.1.18. As the lake is groundwater fed, drying out the works areas will be exceptionally difficult, and information contained in the mitigation measures in the NIS or CEMP do not sufficiently address issues relating to continuous pumping and treatment of abstracted water to ensure satisfactory water quality of returning waters to the lake.

b) Potential impacts of the proposed 'beach extension' on Lough Rea SAC and SPA (specifically addressing the importation of sand into the aquatic environment).

2.1.19. On review of the Flood Risk Assessment prepared by Hydro Environmental Ltd (2024) surface wind waves can produce significant wave height in excess 0.5m. The concern is that due to surface wave action, imported beach material could be mobilised and deposited elsewhere on the lake shore submerging sensitive lake vegetation communities.

c) Potential operational impacts on the Lough Rea SAC and SPA as a result of potentially increased visitor numbers.

2.1.20. Lough Rea is an important breeding and wintering site for the two Special Conservation Interest (SCI) species of the SPA; coot and shoveler. Operational stage effects are discussed in the NIS Section 6.1.3.2 where it is acknowledged that the site is already a popular attraction and development intends on improving public amenities which may result in more human activity within the site. I agree with the findings of the NIS, that the Proposed Development site, does not provide significant supporting habitat for these species. These habitats are found on the sheltered western and south-eastern shores of the lake, at least 500m from the development site.

d) The comments received from the DAU in response to the further information submitted by the planning authority

2.1.21. Comments raised by the DAU relating to quality and condition of habitat 3140 are discussed under Section 2.1.11 of this report. I have concerns

regarding the proposed conditions to be applied should the Commission grant permission, specifically post consent surveys to determine the quality of the QI habitat and whether there are groundwater springs or seepages at the proposed infrastructure locations. As discussed earlier in this report, I consider that there are gaps in the scientific information submitted and in the efficacy of the mitigation measures proposed. It is not possible to condition measures that have not been assessed.

e) The adequacy of mitigation measures as set out by planning authority.

2.1.22. As discussed above the mitigation measures for the in-lake works are inadequate and do not address potential issues relating to groundwater and provide general and nonspecific mitigation measures related to prevention of water pollution. It is expected that the mitigation measures should be appropriate to the sensitivity of the receptor and include a detailed method statement for each in-lake works location, to include but not limited to the following elements:

- Turbidity can significantly affect the quantity and quality of light reaching rooted and attached vegetation and can, therefore, impact on lake habitats. Therefore, pre-construction monitoring during various weather conditions and surface wave action is required to set a baseline for water quality such as water transparency and turbidity. Secchi disk can be used for assessing water clarity, affected by suspended particles like sediment or algae.
- Best available options for temporary cofferdam arrangements that will facilitate minimal disturbance to the lakebed and risk of pollution during deployment and removal.
- Hydrological assessment is required to inform the most appropriate sediment control for the pumped water and land requirements to cater for infiltration. Depending on volumes, pumped water may need to be discharged through a series of sediment control structures before it can enter any surface water or the ground. This might include settlement

tanks/ temporary lagoons, silt fences/geotextile bags and dispersing treated water over natural vegetation to promote recharge and encourage percolation where sufficient area is available, not saturated, can provide infiltration and does not cause erosion.

- Turbidity monitoring will be carried out during in-lake works out to ensure that the water exiting the sediment control measures and entering the lake is not silted. The Ecological Clerk of Works will have the authority to stop works until the mitigation measures have been assessed and any issues resolved.

3.0 Findings and conclusions

- 3.1.1. The applicant determined that following the implementation of mitigation measures the construction and operation of the proposed development, individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.
- 3.1.2. Despite the relatively modest scale of the proposed development, I am not satisfied that there has been adequate consideration of the ecological baseline and the assessment of impacts is incomplete in not considering hydrological and water quality impacts to Lough Rea SAC and SPA during the proposed in-lake works.
- 3.1.3. Should the Commission be minded to grant consent, I would recommend that the in-lake works are excluded from the permission. The mitigation measures proposed are satisfactory for mitigating the effects of the proposed terrestrial elements of the development, including the following:
1. Repair works comprising:
 - a. Repair of the existing pier surfaces.
 2. Demolition of an existing changing shelter to facilitate passive surveillance and views of Lough Rea.
 3. Alteration to existing toilet and shower building to provide storage, plant, and a changing places toilet (accessible toilet, shower and changing facility) (93 sqm).

4. Provision of new changing, toilet and shower facilities in a single storey building (86 sqm) including sheltered outdoor shower changing area.
5. Provision of a lifeguard station building (16 sqm).
6. Provision of a totem sign extending to c. 4 metres in height.
7. Provision of a shared active travel route along the sites eastern boundary adjacent to the Lake Road (R351) and the provision of designated bicycle parking spaces.
8. Removal of 2 no. existing vehicular access points and alterations and junction upgrade works to the existing central access point, and provision of internal pedestrian crossings.
9. Reconfiguration of and upgrades to the existing car parking areas to provide increased parking provision and to accommodate age friendly and set down spaces and trading bays, and the provision of 1 no. new car parking area which includes EV charging and accessible parking spaces.
10. Provision of hard and soft site landscaping works, SuDS measures, pumping and water stations all connections, public lighting, and site services.
11. All ancillary services and associated site development works.

The following in-lake works are recommended to be excluded from the consent, as follows:

- Repair of the existing slipway to provide safe launching point for kayaks and stand-up paddle boards.
- Provision of a circular viewing deck to the south of the existing pier.
- Alteration to the lake edge (manmade and naturalised) including existing beach area and provision of a deck, steps and ramp to water's edge and beach area for access for all to the water.

Signed



Paula Kearney

Senior Ecologist (Inspectorate)

09/02/2026