



An  
Bord  
Pleanála

## Memorandum ACP-323024-25 – Request for Further Information

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**To:** Stephen Rhys Thomas, ADP  
**From:** Peadar McQuaid, PI  
**Re:** 323024-25  
**Date:** 18<sup>th</sup> December 2025

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### 1.0 Proposed Development

Galway County Council is seeking approval from An Coimisiun to undertake proposed works to raise the elevation levels of local tertiary road (L-52214) at Cuan Na Loinge, Ceantar na nOileán, Co Galway. The length of road to be raised is approximately 200 metres. The maximum increase of road elevation will be of 1.0 metre above the existing road level, with natural rock armour embankments and natural stone parapet walls on each sides together with associated drainage, water services, fencing and signage. The subject site is proximate to Kilkieran Bay and Islands Special Area of Conservation (SAC) (Site Code: 002111).

### 2.0 Observations/submissions

No submissions were received from members of the public. Three observations have been received from prescribed bodies namely, Inland Fisheries Ireland, Uisce Éireann and the Department of Housing, Local Government and Heritage (DAU). The DAU comments are detailed below.

## **2.1 DAU**

The Department has raised concerns in relation to the submitted NIS and the non-identification of Annex I habitat adjoining the proposed works. Furthermore, the Department has also queried the findings contained in the NIS with regards to possible habitat loss within the SAC. A cross-sectional detail drawing and diagram re-produced in the 'Preferred Scheme Option Report' indicates that a rock armour embankment is to be installed along the proposed elevated road which is significantly wider than the existing road which may result in the loss of Annex I habitat area (Coastal lagoons [1150], or Atlantic salt meadows (*Glauco-Puccinellietalia maritima*) [1330]).

The applicant was afforded an opportunity to respond to the Department's observation. Langan Consulting Engineers on behalf of the applicant have stated that the Coastal Lagoon habitat is identified in the submitted NIS and the replacement of the existing wall and boundary structures is like for like slightly off set from their original positions. The footprint of the boundary works element is approximately 150m<sup>2</sup>. The coastal lagoon within the SAC has an area of 122.8ha.

## **3.0 Information required**

Following a review of the application documentation including the Natura Impact Statement (NIS) and the observations received by the Commission, I consider that further information is required from the applicant in order to assist with the Commission's assessment of this application.

I am of the opinion that insufficient information has been provided regarding the potential overlap between the application site boundary, the SAC boundary and associated Annex I habitat.

I note that Table 9.2 of the submitted NIS screens in the following qualifying interest Annex I habitats of the Kilkieran Bay and Islands SAC (Site Code: 002111):

- Coastal lagoons [1150]. I note that this is a priority habitat. The overall conservation objective for this habitat is "*to maintain the favourable conservation condition of Coastal lagoons in Kilkieran Bay and Islands SAC,*

which is defined by the following list of attributes and targets" as listed in the site-specific conservation objectives document for this SAC<sup>1</sup>:

- Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) [1330]. The overall conservation objective for this habitat is "To restore the favourable conservation condition of Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) in Kilkieran Bay and Islands SAC, which is defined by the following list of attributes and targets" as listed in the site-specific conservation objectives document for this SAC.
- Mediterranean salt meadows (*Juncetalia maritimi*) [1410] The overall conservation objective for this habitat is "To restore the favourable conservation condition of Mediterranean salt meadows (*Juncetalia maritimi*) in Kilkieran Bay and Islands SAC, which is defined by the following list of attributes and targets" as listed in the site-specific conservation objectives document for this SAC.

Conflicting information is presented within the Environmental Constraints Report and the NIS regarding the location of the proposed works. Based on the submitted drawings it would appear that the proposed works would encroach into the Kilkieran Bay and Islands SAC. However, this needs to be clarified by the applicant.

Section 5.1 of the NIS discusses the habitats on the site including Salt Marsh (CM), Lagoons and Saline Lakes (CW1). Figure 5.2 of the NIS presents a habitat map with Fossit codes and description. I consider that the habitats described are not sufficiently detailed nor presented at the appropriate scale to confirm the precise overlap between the proposed works footprint and Annex I habitat of the SAC namely Coastal lagoons [1150], Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*) [1330] and Mediterranean salt meadows (*Juncetalia maritimi*) [1410].

I consider that a targeted habitat survey (going beyond Fossit level as presented in the NIS) is required to be undertaken. This survey would more accurately confirm the presence, location, area, condition and conservation assessment of Annex 1 habitat

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<sup>1</sup> <https://www.npws.ie/protected-sites/sac/002111>

within the site boundary and provide useful baseline information (in terms of best available scientific information) to support the Appropriate Assessment (AA).

Furthermore, I am not satisfied that there is sufficient information supplied by the Applicant on the precise area of habitat loss (if any) of these Annex I habitats and what (if any) impact the operational phase in particular the installation of new culverts would have on the hydrological conditions and lagoonal specialist species of the Loch Fhada upper pools.

Definitive findings and conclusions on, the effects on the environment, proper planning and sustainable development and likely significant effects on a European site, therefore, cannot be reached.

#### **4.0 Request for further information**

The Commission is not satisfied that it has received sufficient detailed information to show the precise impact of the proposed development on the Qualifying Interests of Kilkieran Bay and Islands Special Area of Conservation (SAC) namely Annex I habitat - Coastal lagoons [1150], Atlantic salt meadows (*Glauco-Puccinellietalia maritima*) [1330] and Mediterranean salt meadows (*Juncetalia maritimi*) [1410].

The Commission therefore requests the applicant to provide the following information to enable a full and comprehensive assessment to be completed and to reach definitive conclusions in respect of Appropriate Assessment.

**1. (a)** Clarification on the presence and location of any QI habitat within the site boundary, having regard to best practice survey guidance and published research on Annex I marine and benthic/lacustrine habitats.

**(b)** A targeted habitat survey is required to be undertaken within the site boundary, areas proximate to and in the wider vicinity of the proposed works to inform the response to item 1 (a) above.

The results of this habitat survey shall confirm the presence, location, extent, condition and conservation assessment of Annex I habitat/ non-Annex I habitats within and adjoining the site boundary. The habitat survey shall be clear in defining the extent of:

- i. The overlap between the application boundary, extent of the proposed works, the SAC boundary and Annex I habitat.
  - ii. Impact on Annex I habitat, as defined by its attributes and targets as detailed in the site-specific conservation objectives document for Kilkieran Bay and Islands SAC.
  - iii. Habitats providing a supporting function to the annex habitat.
  - iv. Habitats of biodiversity value beyond the Natura designation(s).
2. Detailed drawings (1:200 scale) showing the footprint of the proposed works, the SAC boundary and confirmed Annex I habitats/non-Annex I habitats within the application site boundary.
3. Detail the area(s) of temporary and/or permanent habitat loss (if any) within Annex I habitat area.
4. Justify, in terms of best available scientific information, why habitat loss (if any) will not result in adverse effects on site integrity of the SAC overall in view of the conservation objectives as defined by the specific attributes and targets.
5. The nature and location of the proposed culverts and concrete works. Statements such as "*The culverts should be designed with the hydrology of the site in mind*" should be clarified/refined/removed from the NIS. The applicant shall provide project specific information with regard to what (if any) impact the operational phase and the installation of new culverts would have on the hydrological conditions and lagoonal specialist species of the Loch Fhada upper pools.
6. Each supporting document including the NIS, EclA, EIA screening report and CEMP shall be amended to take account of the information requested above.

Please allow 3 months for response to this request.



Peadar McQuaid

Inspectorate



Stephen Rhys Thomas

ADP