REMEDIAL NATURA IMPACT STATEMENT REPORT

September 2026

Prepared for
Ann Conroy

Site Address
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REMEDIAL NATURA IMPACT STATEMENT

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Statement of Authority

This report was prepared by Larry Manning B.Sc. (Hons), an ecologist with more than 14 years of professional experience across ecological consultancy, fisheries science, field ecology and environmental assessment. His work includes Appropriate Assessment Screening, Natura Impact Statements, remedial Natura Impact Statements, Ecological Impact Assessment and EIAR biodiversity chapters, together with protected-species and habitat surveys. He has worked on terrestrial, freshwater and marine projects in Ireland and has prepared ecological assessments for infrastructure, renewable energy, housing, agricultural and conservation projects. The assessment presented here has been prepared using the information available for the substitute consent application, the field survey undertaken in October 2025 and the engineering/site suitability information supplied for the associated Section 37L application.

1.0 Introduction

OMC Group has been retained by Ann Conroy to prepare this updated Remedial Natura Impact Statement (rNIS) in support of an application for substitute consent for retention of an existing dwelling house, as constructed, at Derrynavglaun, Recess, Co. Galway. The dwelling has a stated floor area of 65.4 m². The substitute consent application concerns the dwelling and associated works already carried out. A separate application under Section 37L is intended to address further development comprising a new wastewater treatment system and polishing/infiltration arrangement. The Section 37L works are therefore treated as a separate project and are not relied upon as mitigation for the retrospective assessment of the dwelling that is the subject of this rNIS.

The previous substitute consent application was lodged in November 2025 and was subsequently deemed invalid by An Coimisiún Pleanála on 6 March 2026 because the public notices also sought permission for a new wastewater treatment unit and polishing filter bed. The Commission stated that those works constituted further development and could not form part of the substitute consent application. This revised rNIS has therefore been structured to maintain a clear distinction between: (i) development already carried out and now seeking substitute consent; (ii) present occupation and use of the completed dwelling; and (iii) the future Section 37L wastewater proposal, which is not assessed as part of the substitute consent project except where it is necessary to explain the planning context. Any Natura Impact Statement accompanying the Section 37L application is a separate prospective assessment of those future works and should not be treated as part of this remedial assessment.

The purpose of this rNIS is to provide the competent authority with sufficiently complete, precise and definitive scientific information to undertake Appropriate Assessment of the development as carried out. In accordance with Section 177G of the Planning and Development Act 2000, as amended, it addresses significant effects, if any, which have occurred, are occurring or can reasonably be expected to occur because the development was carried out. It also identifies any remedial or mitigation measures undertaken or proposed and, where applicable, the timeframe for their implementation.

1.1 Scope of the remedial assessment

This assessment is retrospective. It does not treat the construction phase as a future event. The dwelling and its immediate associated site works are understood to have been carried out approximately between 2019 and 2020. Exact start and completion dates are not available, and this approximate period is therefore used as the construction phase for the purposes of the retrospective assessment. The assessment considers the environmental baseline that is reasonably capable of being reconstructed from current site conditions, mapping, planning records, the applicant's documentation and the field survey completed on 23 October 2025. It then assesses the completed construction works, the current physical presence of the dwelling and the effects of its ongoing residential use. The assessment is precautionary where historic details are incomplete and does not infer the absence of effects merely because construction has already finished.

1.2 Information sources and surveys

No new ecological field survey has been undertaken for this update. The ecological field survey carried out by Larry Manning on 23 October 2025 remains the principal field evidence for the rNIS. The updated report also draws on the engineering Site Suitability Assessment, including site characterisation undertaken in March 2025, the revised planning report, the current substitute consent and Section 37L site layouts, the Commission's letter dated 6 March 2026, NPWS site information and conservation objectives, EPA mapping and guidance, and current An Coimisiún Pleanála guidance for substitute consent and Section 37L applications.

Field survey by Larry Manning on 23 October 2025.

OMC Site Suitability Assessment and Site Characterisation Form for the proposed future wastewater system, including trial hole and percolation testing undertaken in March 2025.

OMC Planning Report, September 2026, and revised substitute consent/Section 37L site layout drawings.

An Coimisiún Pleanála letter dated 6 March 2026 and Guidelines on Information to be submitted with Substitute Consent and Section 37L Applications.

NPWS protected-site data, site synopses and site-specific conservation objectives for The Twelve Bens/Garraun Complex SAC (002031) and Connemara Bog Complex SAC (002034).

EPA online environmental datasets, including water and groundwater information where relevant.

Department and European Commission guidance on Article 6(3) Appropriate Assessment.

The age of the ecological survey does not, in itself, prevent its use for a remedial assessment because the report is primarily concerned with the effects of development already carried out and with stable site characteristics. The 2025 survey has therefore been retained. Where the assessment concerns matters capable of changing over time, such as drainage, wastewater arrangements or the precise mapped relationship to a European site boundary, current documentary information has been used and any material uncertainty is expressly identified.

1.3 Limitations and precautionary approach

A remedial assessment necessarily relies on a combination of present-day evidence and reconstruction of past circumstances. The construction period is understood to have been approximately 2019–2020, but detailed construction records and exact dates are not available. The assessment therefore adopts a conservative approach by identifying plausible impact pathways associated with small-scale dwelling construction close to sensitive upland and peatland habitats, including sediment mobilisation, accidental release of fuels or wet concrete, local drainage alteration, dust, noise and temporary disturbance. The conclusion is based on whether such pathways could have affected the structure, function or conservation-objective attributes of a European site, rather than on a simple absence of recorded incidents.

2.0 Legislative and Policy Context

2.1 Habitats Directive and Appropriate Assessment

Article 6(3) of Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora requires that any plan or project not directly connected with or necessary to the management of a European site, but likely to have a significant effect on that site either individually or in combination with other plans or projects, be subject to Appropriate Assessment of its implications for the site in view of the site's conservation objectives. The competent authority may agree to the project only after having ascertained that it will not adversely affect the integrity of the site.

The assessment must be based on the best scientific knowledge in the field and must contain complete, precise and definitive findings and conclusions capable of removing reasonable scientific doubt as to the effects of the development on the European site concerned. The assessment must consider direct and indirect effects and the possibility of in-combination effects with other plans and projects.

2.2 Part XA and Section 177G

Part XA of the Planning and Development Act 2000, as amended, provides for substitute consent. Section 177G requires a remedial Natura Impact Statement to contain a statement of significant effects, if any, on the relevant European site which have occurred, are occurring or can reasonably be expected to occur because the development was carried out. It must also provide details of appropriate remedial or mitigation measures undertaken or proposed and the period within which proposed measures will be implemented. The present report is structured directly around those requirements.

2.3 Separate Section 37L application

The Commission's letter of 6 March 2026 identified the proposed new wastewater treatment unit and polishing filter bed as further development which cannot form part of the substitute consent application. The present rNIS therefore does not treat the future wastewater system as an element of the project seeking substitute consent and does not depend on that future project to reach its integrity conclusion. Any ecological effects of the proposed wastewater system must be assessed through the Section 37L process using the project description and evidence specific to that application.

3.0 Description of the Development

3.1 Site location and context

The site is located at Derrynavglaun, Recess, Co. Galway, in a rural upland setting reached by an existing private cul-de-sac lane. The surrounding landscape comprises farmed land, rough grassland, wet grassland/rush-dominated areas, peatland and rocky upland habitats, with scattered dwellings and agricultural buildings. The dwelling is positioned within an existing rural farm setting and is screened in part by established trees and vegetation.

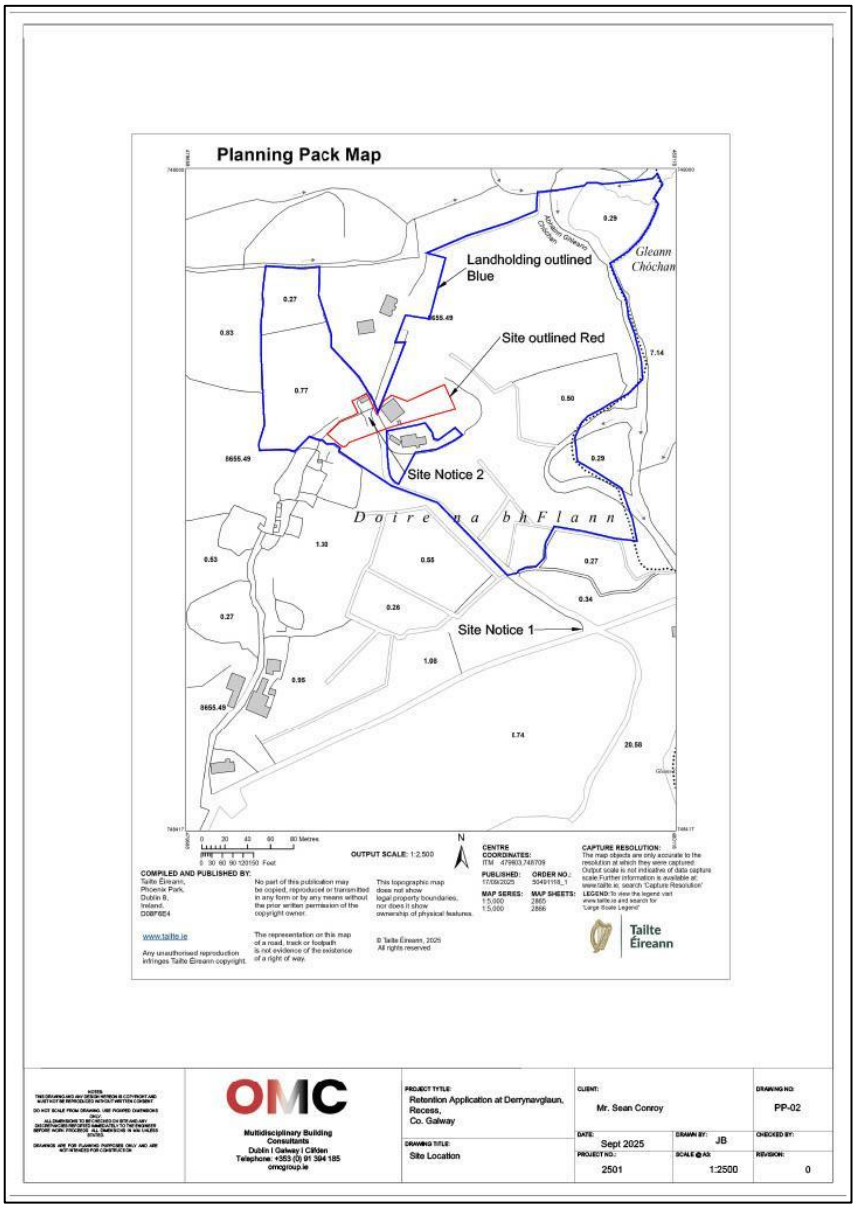


Figure 1. Site location plan supplied with the original rNIS.

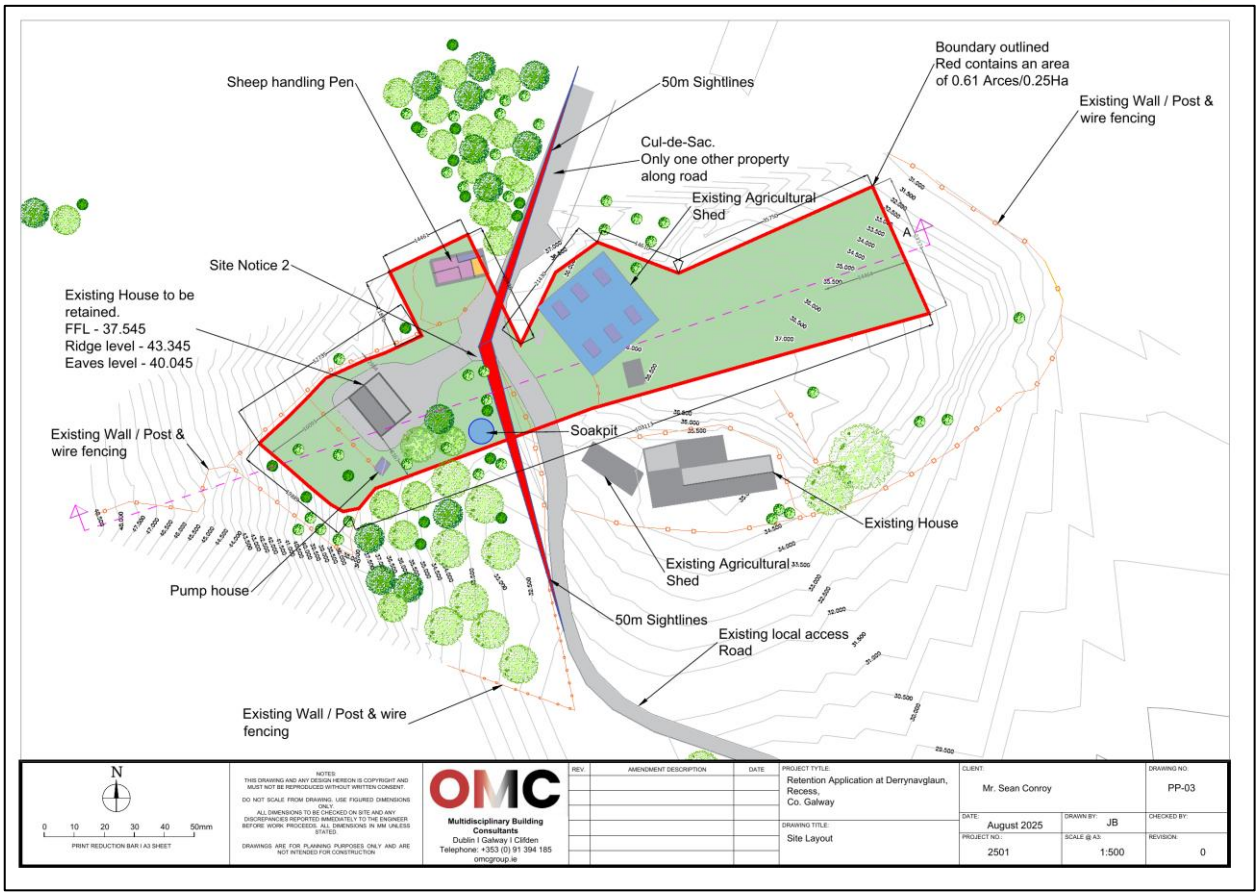


Figure 2. Substitute consent site layout. The future Section 37L wastewater infrastructure is not part of this substitute consent project.

3.2 Development seeking substitute consent

The development seeking substitute consent is the existing dwelling house as constructed, with a stated floor area of 65.4 m². The dwelling is a small two-bedroom, single-storey cottage with a mezzanine level and rooflights. Existing access is via the established private lane. Water is supplied from a spring located approximately 90 m west of the dwelling according to the Site Suitability Assessment. The current planning report states that the dwelling is presently served by a compost toilet.

The retrospective assessment includes the land disturbance reasonably associated with construction of the dwelling and its immediate curtilage, the completed building and the current residential occupation of that building. It does not include the separately proposed Tricel treatment system, tertiary polishing unit, dispersal arrangement or associated drainage works shown on the Section 37L drawing.

Current wastewater arrangements are not fully documented in the supplied material. The planning report confirms that toilet waste is managed by a compost toilet. Based on the information supplied for this update, domestic greywater is understood to be piped to the existing soakaway/soakpit shown on the substitute consent site layout. For the purposes of this rNIS, that arrangement is assessed precautionarily as an existing discharge of greywater to ground; no direct discharge to a watercourse has been identified. In the absence of as-built drainage records, the assessment therefore adopts the conservative assumption that the greywater pathway to soil and groundwater remains open through the existing soakaway/soakpit.

3.3 Site characterisation relevant to the assessment

The March 2025 Site Suitability Assessment records peaty podzolic/lithosolic soils and peat in the locality, metamorphic bedrock, an extreme groundwater vulnerability classification and the Recess groundwater body (IE_WE_G_0011), reported as being at Good status. The assessment records bedrock outcrop in the wider site area, no visible surface-water ponding on the assessment dates, the Glencoaghan River approximately 122 m south-east of the test location and drainage ditches in the vicinity, though none recorded within approximately 20–30 m of the test location. The assessment identifies drainage and groundwater as the principal potential receptors at risk. These characteristics reinforce the need for a conservative assessment of any pollutant or sediment pathway.

The trial hole encountered bedrock at approximately 0.76 m below ground level and no water was recorded in the trial hole at the time of inspection. The measured subsurface percolation value was 20.33 min/25 mm. These results relate to the future Section 37L wastewater proposal and are not used as mitigation for the development seeking substitute consent. They are nevertheless relevant to understanding local hydrogeological sensitivity and potential pathways.

4.0 European Sites and Zone of Influence

The zone of influence has been defined using a source–pathway–receptor approach rather than a fixed-radius rule. European sites were considered where a credible ecological, hydrological or hydrogeological pathway could connect the development to a qualifying interest or conservation-objective attribute. Particular attention has been given to The Twelve Bens/Garraun Complex SAC because of its proximity and to Connemara Bog Complex SAC because of potential downstream hydrological connectivity identified in the planning history.

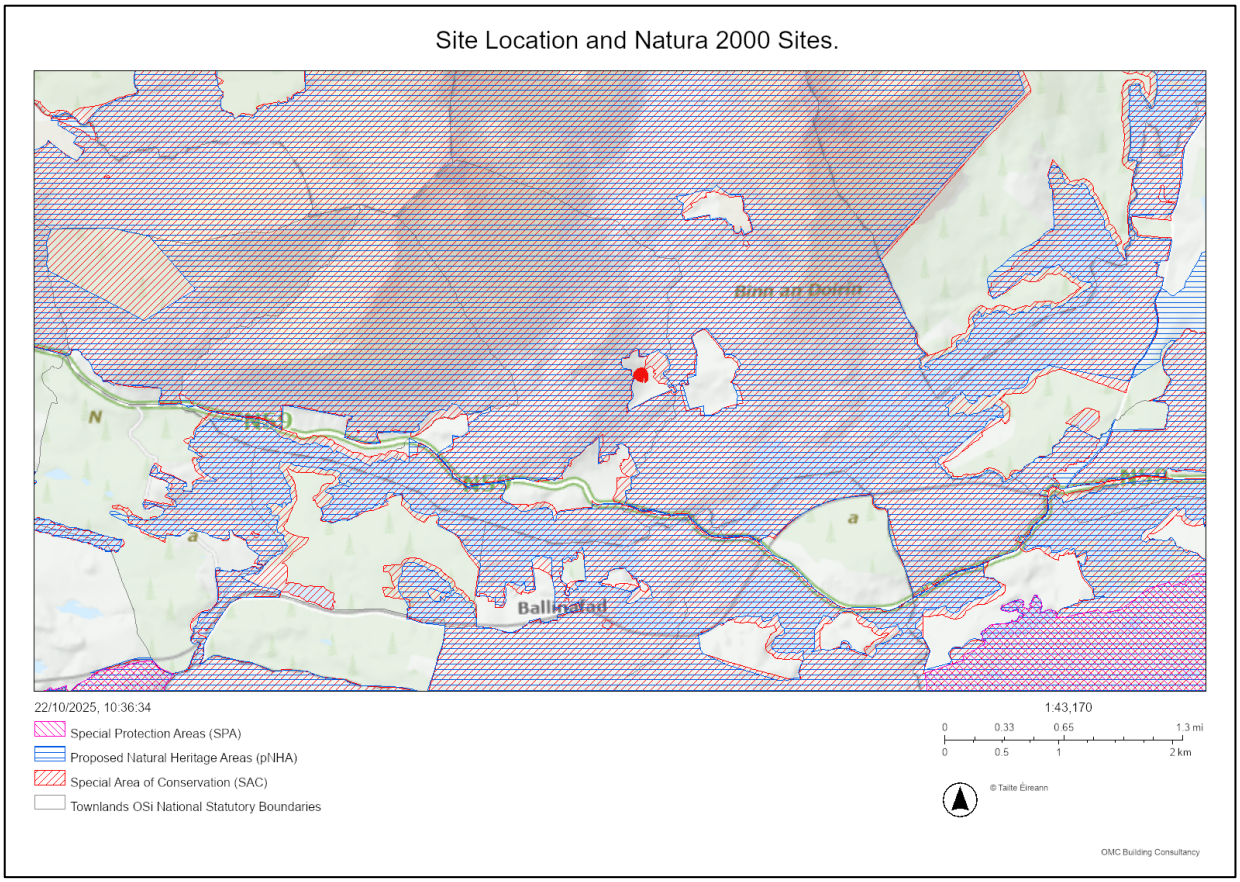


Figure 3. European sites in the wider area and the application site, as mapped in the original rNIS.

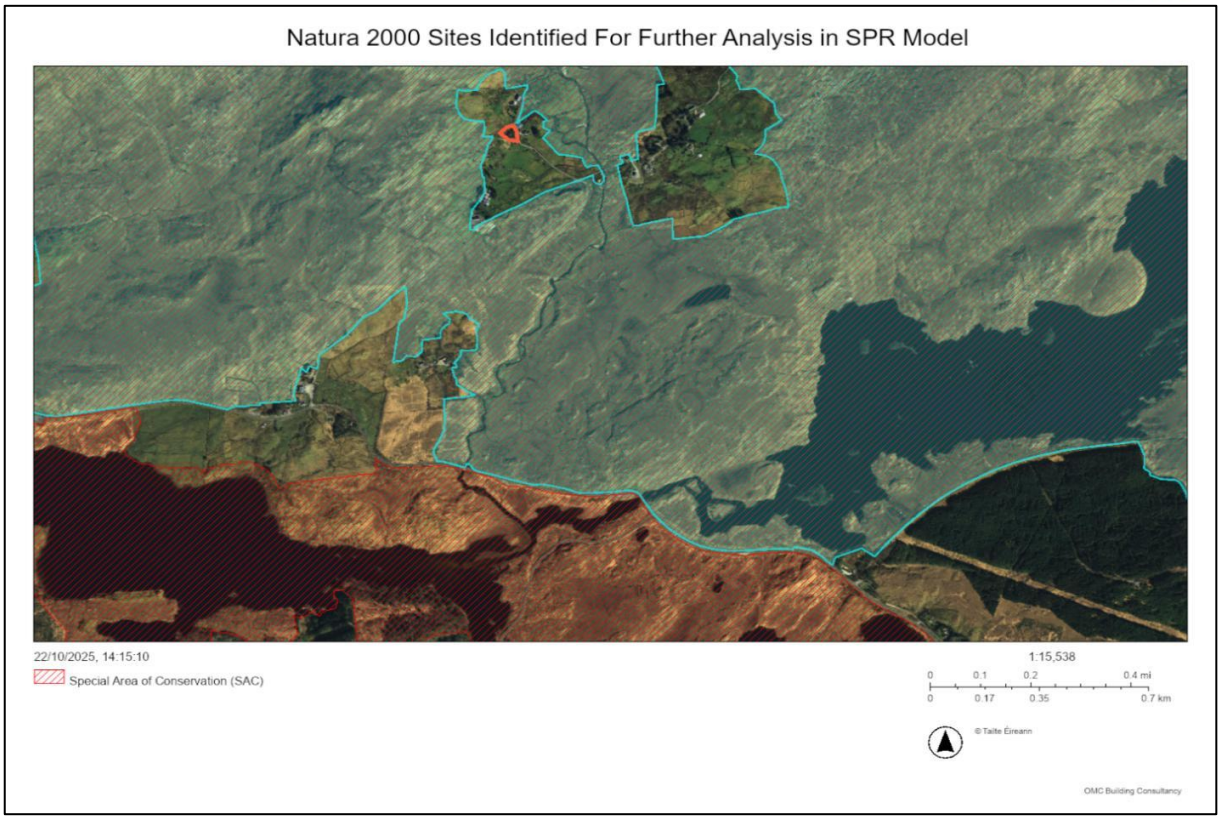


Figure 4. Source–pathway–receptor context.

European site	Site code	Relationship	Assessment rationale
The Twelve Bens/Garraun Complex SAC	002031	May lie partly within or immediately adjoining the SAC; original ecological material indicated approximately 10–25 m separation	Potential direct/local surface-water, shallow-groundwater, sediment and disturbance pathways. Detailed assessment undertaken on a precautionary boundary assumption.
Connemara Bog Complex SAC	002034	Approx. 3.65 km	Potential downstream hydrological linkage via local drainage/Glencoaghan catchment. Detailed assessment of water-dependent QIs required.
Connemara Bog Complex SPA	004181	Wider landscape	No direct habitat loss. No project-specific mechanism for significant disturbance or loss of function for SCI species identified from the small completed dwelling. Considered for ecological connectivity but not taken forward as a principal receptor.

The planning history records Galway County Council as describing the site as adjacent to and partially within The Twelve Bens/Garraun Complex SAC, while the original ecological material described the application site as outside the SAC and approximately 10–25 m from it. To avoid relying on an uncertain mapped separation, this updated rNIS adopts the more precautionary position that the application site may lie partly within or immediately adjoining the SAC. Direct habitat, hydrological and disturbance pathways are assessed on that basis, and the integrity conclusion does not depend on a precise metre separation from the mapped SAC boundary.

4.1 The Twelve Bens/Garraun Complex SAC (002031)

The Twelve Bens/Garraun Complex SAC is designated for a suite of oligotrophic lake, heath, blanket bog, scree, rocky slope and woodland habitats and for Freshwater Pearl Mussel, Atlantic Salmon, Otter and Slender Naiad. The site-specific conservation objectives require maintenance or restoration, as applicable, of habitat area, distribution, structure and functions, hydrological regime, water quality and the distribution and population attributes of the species for which the site is selected.

Code	Qualifying Interest	Relevant attributes potentially sensitive to project pathways
3110	Oligotrophic waters containing very few minerals of sandy plains	Water quality; hydrological regime; habitat area and distribution
3130	Oligotrophic to mesotrophic standing waters	Water quality; hydrology; habitat area and distribution
4060	Alpine and Boreal heaths	Habitat area; distribution; vegetation composition and structure
7130	Blanket bogs (* if active bog)	Habitat area; peat-forming function; hydrology; vegetation quality
7150	Depressions on peat substrates of the Rhynchosporion	Habitat area/distribution; hydrology; vegetation composition
8110	Siliceous scree	Habitat area/distribution; physical structure
8210	Calcareous rocky slopes with chasmophytic vegetation	Habitat area/distribution; physical structure
8220	Siliceous rocky slopes with chasmophytic vegetation	Habitat area/distribution; physical structure
91A0	Old sessile oak woods with Ilex and Blechnum	Woodland area, structure, composition and hydrology
1029	Freshwater Pearl Mussel (*Margaritifera margaritifera*)	Water quality, river substrate, host fish and population condition
1106	Atlantic Salmon (*Salmo salar*)	Water quality, spawning habitat, passage and population
1355	Otter (*Lutra lutra*)	Distribution, habitat, fish biomass and connectivity
1833	Slender Naiad (*Najas flexilis*)	Lake water quality, hydrology, habitat extent and population

4.2 Connemara Bog Complex SAC (002034)

Connemara Bog Complex SAC is designated for a broad range of coastal, aquatic, peatland, heath, fen, woodland and species interests. For this project the principal mechanism requiring examination is the possibility of water-quality or hydrological effects propagating through the catchment. The most relevant receptors are therefore the aquatic habitats and species and water-dependent peatland habitats. The greater separation distance means that effects would require a functioning pathway and sufficient magnitude to alter a conservation-objective attribute at the SAC.

Code	Qualifying Interest
1150	Coastal lagoons
1170	Reefs
3110	Oligotrophic waters
3130	Oligotrophic to mesotrophic standing waters
3160	Natural dystrophic lakes and ponds
3260	Water courses of plain to montane levels
4010	Northern Atlantic wet heaths
4030	European dry heaths
6410	Molinia meadows
7130	Blanket bogs (* if active bog)
7140	Transition mires and quaking bogs
7150	Rhynchosporion depressions
7230	Alkaline fens
91A0	Old sessile oak woods
1065	Marsh Fritillary (*Euphydryas aurinia*)
1106	Atlantic Salmon (*Salmo salar*)
1355	Otter (*Lutra lutra*)
1833	Slender Naiad (*Najas flexilis*)

5.0 Receiving Environment and Field Evidence

The 23 October 2025 ecological survey recorded the completed dwelling within an established rural farm setting. Habitats in and around the site comprised the built footprint and disturbed ground associated with the dwelling, rough/wet grassland and rush-dominated vegetation, scattered trees, stone and boundary features, and wider upland/peatland habitats. The survey did not record habitat corresponding to a qualifying Annex I habitat within the immediate footprint of the completed dwelling. No invasive non-native plant species of ecological concern were recorded within the surveyed development area.

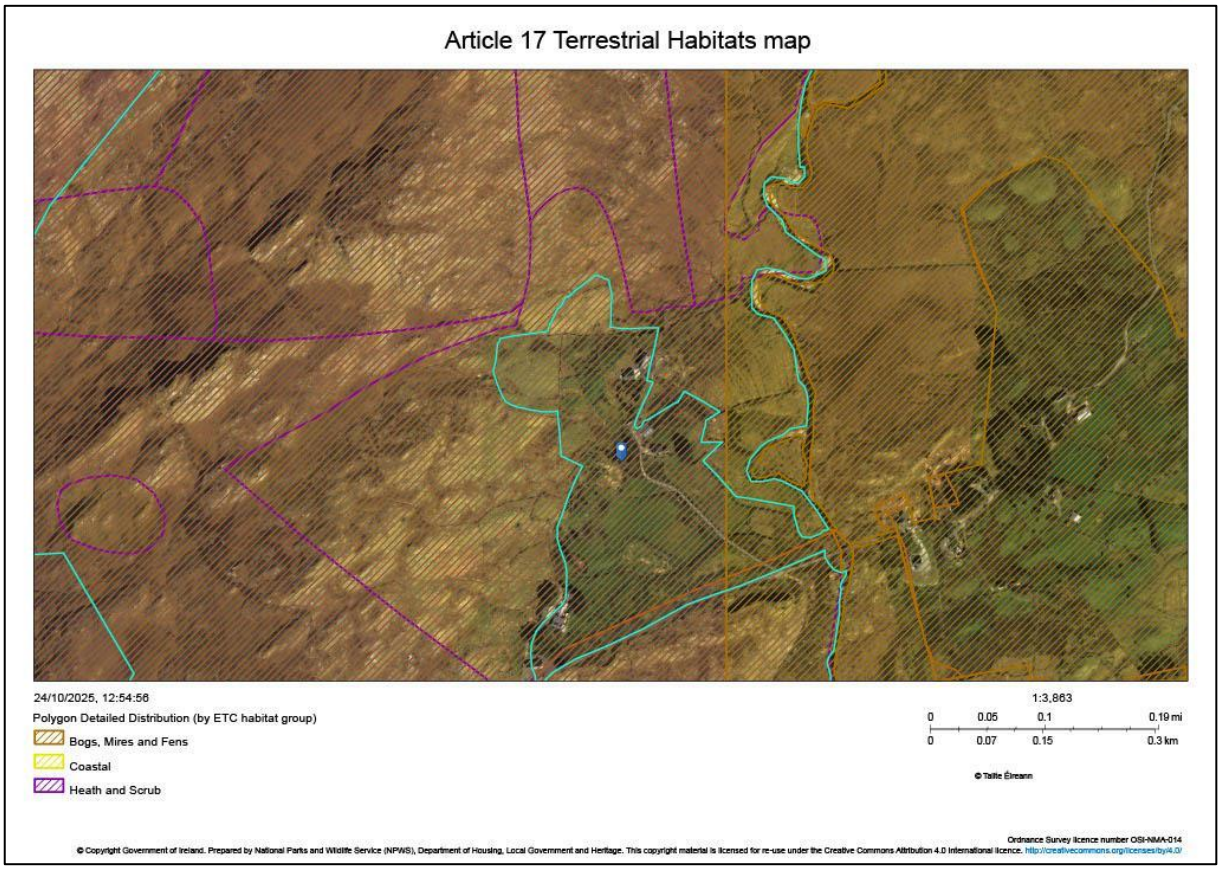


Figure 5. Article 17 terrestrial habitat context reproduced from the original rNIS.

No Annex I bird species were recorded using the development footprint during the ecological survey. No evidence of otter or other mammal use of the completed dwelling footprint was recorded. The survey did not identify features suggesting that the dwelling itself had displaced or fragmented a habitat necessary to maintain the conservation objectives of the SACs considered. These observations are used as supporting evidence only; the Appropriate Assessment conclusion does not depend on the absence of species during a single survey visit.

6.0 Retrospective Source–Pathway–Receptor Assessment

The assessment below distinguishes between effects that could have occurred during the approximate 2019–2020 construction period, effects that are occurring because the completed dwelling is present and occupied, and effects that can reasonably be expected to occur if the development continues. It focuses on pathways capable of affecting the conservation objectives of the European sites.

Source	Pathway	Receptor	Assessment
Land take / direct habitat loss	Construction footprint and curtilage	European-site habitat or habitat supporting QIs	Assessed on the precautionary basis that the application site may partly overlap or immediately adjoin the SAC. No Annex I qualifying habitat was identified within the dwelling footprint during the 2025 survey, and no loss of habitat necessary for a qualifying species was identified.
Sediment mobilisation	Excavation, exposed soil, vehicle movement during works	Nearby drainage, aquatic habitats/species	Plausible short-term construction pathway due to local slopes and drainage. Magnitude limited by small footprint and completed nature of works; no evidence of persistent sediment source or altered channel was identified.
Concrete / fuel / chemical release	Small-scale building works	Surface water / shallow groundwater	Accidental pathway was possible during construction. No evidence of a continuing source is present. Assessment considers whether any historic release could have caused persistent effect; none is evidenced in site condition or catchment information supplied.
Drainage / hydrological alteration	Groundworks, roof runoff and curtilage	Peatland, wetland and aquatic QIs	Potential local pathway. Completed dwelling is small and no major drainage diversion is described. No evidence of large-scale dewatering, peat cutting or channelisation associated with the dwelling has been identified.
Noise, lighting and human presence	Construction and residential occupation	Otter and mobile fauna	Localised and low magnitude in an existing farmed/residential setting. No mechanism identified for an adverse effect on SAC population or distribution targets.

Source	Pathway	Receptor	Assessment
Domestic wastewater / greywater	Current residential occupation	Groundwater / local drains / aquatic QIs	Material groundwater pathway assessed precautionarily. Compost toilet is documented; greywater is understood to discharge to the existing soakaway/soakpit. Precise as-built details remain unverified, so the pathway to soil and groundwater is treated as open.

7.0 Assessment of Effects: Construction Already Carried Out

7.1 Direct habitat loss and fragmentation

The principal risk of an adverse effect on site integrity would arise if construction caused direct loss, damage or fragmentation of qualifying habitat within The Twelve Bens/Garraun Complex SAC. The completed dwelling occupies a small footprint within a farmed and previously modified setting. The October 2025 survey did not identify qualifying Annex I habitat within the dwelling footprint. There is no evidence in the supplied material of peat extraction, drainage of blanket bog, excavation of lake or watercourse habitat, or removal of woodland qualifying habitat as part of the dwelling works. Because the SAC boundary relationship has been described differently in the planning history and earlier ecological material, this rNIS adopts the more conservative assumption that the application site may partly overlap or immediately adjoin the SAC. Even on that basis, the field evidence and project scale do not indicate loss of qualifying habitat, loss of habitat necessary for a qualifying species, or impairment of ecological connectivity at a scale relevant to site integrity.

7.2 Sediment and construction pollution

Small-scale dwelling construction can create short-lived risks from exposed soil, concrete, fuels and construction materials. The local setting is environmentally sensitive because surface drainage and groundwater provide potential pathways. The relevant works are understood to have taken place approximately during 2019–2020. The development footprint is limited, construction activity has ceased, and no continuing source of suspended sediment or construction chemicals is present. The supplied site information does not identify a constructed drain or direct discharge from the dwelling footprint to the SAC. The scale and duration of any plausible construction release would therefore have been limited and would have undergone attenuation before reaching downstream SAC receptors.

For aquatic QIs such as Atlantic Salmon, Freshwater Pearl Mussel and Slender Naiad, an adverse effect on integrity would require a change of sufficient magnitude, duration and spatial extent to affect water quality, habitat condition, recruitment or population attributes. No evidence has been identified that the dwelling construction caused such a change. The small scale of works, lack of a direct discharge and absence of a persistent pollutant source mean that a construction-related effect on these conservation-objective attributes can be excluded on the information available.

7.3 Hydrology and peatland function

Blanket bog, wet heath, Rhynchosporion depressions and aquatic habitats are sensitive to changes in water level and drainage. No extensive excavation, dewatering or drainage network associated with the dwelling has been identified. The completed house and immediate hard surfaces represent a small change in local runoff characteristics but are not of a scale capable of altering catchment hydrology or

the water regime of qualifying peatland habitat. No pathway has been identified by which the dwelling could have changed the hydrological regime of Connemara Bog Complex SAC several kilometres away.

7.4 Disturbance to species

Construction would have caused temporary local noise, movement and human activity. These effects were spatially confined to the dwelling site and temporary. The site lies in an existing farmed landscape containing dwellings, access lanes and routine agricultural activity. No mechanism is identified by which temporary dwelling construction could have caused a lasting reduction in otter distribution, fish biomass, salmon passage or any other species attribute used to define favourable conservation condition. No adverse effect on site integrity is therefore identified from disturbance.

8.0 Current and Ongoing Effects

8.1 Physical presence of the dwelling

The dwelling is complete and occupies a fixed, small footprint. There is no ongoing excavation, vegetation clearance or land take associated with the project. Roof and surface runoff are the principal continuing hydrological outputs. In the absence of a direct discharge to a sensitive habitat or watercourse, the completed structure is not expected to cause a measurable change in the area, distribution, structure or function of a qualifying habitat.

8.2 Residential use and wastewater

The planning report states that the dwelling is currently served by a compost toilet. Information supplied for this update indicates that domestic greywater from sinks, washing and bathing is understood to be piped to the existing soakaway/soakpit shown on the substitute consent site layout. No as-built drainage record has been supplied and the precise construction and discharge point have not been verified. For this assessment, the pathway from the soakaway through soil and groundwater is therefore treated as open on a precautionary basis. The future packaged wastewater treatment system and polishing/infiltration arrangement is the subject of the separate Section 37L application and is not relied upon in this rNIS.

This precautionary treatment avoids relying on uncertainty as evidence of no effect. The current source is limited to domestic greywater because toilet waste is managed separately by the compost toilet. No direct outfall to a watercourse is shown or described, and no evidence of effluent breakout, surface ponding, polluted runoff or water-quality deterioration attributable to the dwelling has been identified in the supplied information or during the October 2025 survey. The March 2025 site characterisation confirms that infiltrating water can pass through the local subsoil, while the shallow bedrock and extreme groundwater vulnerability reinforce the need to protect groundwater. Those site-characterisation results are used only to understand the potential pathway and are not relied upon as validation of the existing soakaway. On the information available, the existing domestic loading is not identified as having caused, currently causing, or being reasonably expected to cause an effect of a magnitude capable of adversely affecting the integrity of a European site. This conclusion does not amount to certification of the existing soakaway or wastewater arrangements. If contrary as-built evidence becomes available showing a direct surface-water discharge or a materially different drainage arrangement, the wastewater pathway would require reassessment.

8.3 Lighting, noise and human activity

Ongoing effects from a small rural dwelling comprise low-level domestic lighting, vehicle movements and human presence. These are limited in scale and occur within an existing farmed/residential landscape. No qualifying interest of either SAC is dependent on the dwelling footprint, and the level of activity is not capable of causing population-scale displacement or interruption of ecological connectivity. Domestic

lighting should remain focused on the dwelling and access area and should avoid unnecessary spill into adjacent semi-natural habitat as a general biodiversity measure.

9.0 Conservation-Objective Assessment

European-site receptor	Conservation-objective focus	Finding
Twelve Bens/Garraun SAC - oligotrophic lakes (3110/3130), Slender Naiad (1833)	Water quality, hydrology, habitat area and distribution	No direct land take from lake habitat. No direct discharge. Small construction footprint and no continuing sediment source. No adverse effect on conservation-objective attributes identified.
Twelve Bens/Garraun SAC - blanket bog/heath/Rhynchosporion (4060/7130/7150)	Habitat area, vegetation, peat-forming function and hydrology	No qualifying habitat was identified within the dwelling footprint during the field survey and no major drainage or dewatering works were identified. The assessment adopts the conservative assumption that the application site may partly overlap or immediately adjoin the SAC; even on that basis, no adverse effect on qualifying-habitat area or hydrological function is identified.
Twelve Bens/Garraun SAC - scree/rocky slopes/woodland (8110/8210/8220/91A0)	Habitat area, distribution and structure	No overlap or pathway from small dwelling to these habitat features has been identified.
Twelve Bens/Garraun SAC - Freshwater Pearl Mussel / Salmon / Otter (1029/1106/1355)	Water quality, river habitat, prey biomass, distribution and connectivity	No direct works in watercourses. Any construction runoff pathway would have been indirect and limited. No ongoing pollutant source established. No adverse effect on population or habitat attributes identified.
Connemara Bog Complex SAC - aquatic and water-dependent QIs	Water quality and hydrological regime	Potential pathway is downstream and attenuated over kilometres. Small project scale, lack of direct discharge and absence of persistent construction source exclude an effect capable of undermining conservation objectives.
Connemara Bog Complex SAC - terrestrial/coastal QIs	Habitat area, structure and distribution	No ecological pathway from the dwelling to these QIs has been identified.

10.0 In-Combination Effects

The in-combination assessment considers other plans and projects that could act on the same European-site receptors through the same pathways. The existing rNIS identified several recent or current planning applications in the wider Recess and Glencoaghan area, including one-off dwellings, domestic extensions/garages, agricultural development and electricity infrastructure. These developments are generally small in scale and, where consented, are subject to their own planning and environmental controls.

The principal cumulative pathway relevant to this project is water quality. The development seeking substitute consent does not involve a continuing construction discharge and does not create a major drainage or abstraction pressure. On the information available, there is no evidence of a concentration of projects that, together with the completed dwelling, would cause a measurable deterioration of water quality or hydrological regime at either SAC. The Galway County Development Plan 2022–2028 also contains policies requiring protection of European sites and water resources and requires project-level Appropriate Assessment where relevant. These controls reduce the likelihood of unassessed additive effects but are not relied upon as project mitigation.

The separate Section 37L wastewater proposal must be considered on its own merits and, where required, in combination with this existing dwelling and other projects. It is not treated here as a mitigation measure for the substitute consent development.

11.0 Remedial and Mitigation Measures

Section 177G requires details of remedial or mitigation measures undertaken or proposed where such measures are necessary to remedy or mitigate significant effects. No significant adverse effect on a European site has been identified from the dwelling construction on the evidence available. Accordingly, no habitat restoration, compensatory measure or remedial works within a European site are identified as necessary for the development seeking substitute consent.

The following measures are retained as precautionary operational safeguards. They do not alter the project description and are not substitutes for the separate Section 37L assessment:

- No domestic wastewater or greywater shall be discharged directly to any surface-water feature, drainage ditch or wetland habitat. The existing greywater arrangement assessed in this rNIS should not be altered or intensified beyond the current domestic loading unless separately authorised and environmentally assessed where required.
- Any existing surface-water drainage associated with the dwelling shall be maintained so that it does not cause erosion, concentrated runoff or sediment transport toward semi-natural habitat or watercourses.
- Any domestic fuel or chemical storage, if present, shall be secure and located so that accidental release cannot enter drainage features.
- External lighting shall be limited to that necessary for safe domestic use and directed toward the dwelling/access area, avoiding unnecessary spill into adjacent semi-natural habitat.
- Pending determination and implementation of any separately consented Section 37L wastewater works, the current compost-toilet and greywater-to-ground arrangement shall remain within the factual and loading assumptions assessed in this rNIS. Any material change requiring development consent must be addressed through the appropriate planning and environmental assessment process.

11.1 Implementation period

The operational safeguards above apply immediately and for the lifetime of the development. No delayed remedial programme is required because no significant historic effect requiring restoration has been identified. The proposed future wastewater treatment system has its own implementation programme under the separate Section 37L application and is outside the scope of this rNIS.

12.0 Residual Effects and Site Integrity

Following consideration of the development as carried out, the completed physical works, the present use of the dwelling, the sensitive attributes of the European sites, the potential hydrological and ecological

pathways and the possibility of in-combination effects, no mechanism has been identified by which the development would cause a lasting or ongoing change to a conservation-objective attribute of either The Twelve Bens/Garraun Complex SAC or Connemara Bog Complex SAC.

The project is not of a scale capable of altering catchment hydrology, reducing the area or distribution of qualifying habitat, fragmenting habitat required by a qualifying species or causing population-level disturbance. Potential construction-phase sediment or pollution pathways were temporary and indirect and no evidence of a persistent source remains. The integrity of a European site is understood in terms of the coherence of its ecological structure and function across its whole area that enables it to sustain the habitats, habitat complexes and/or populations for which it is designated. The completed dwelling has not been shown to undermine that structure or function.

13.0 Conclusion

This updated Remedial Natura Impact Statement has been prepared for the substitute consent application for the existing 65.4 m² dwelling at Derrynavglaun, Recess, Co. Galway. It has been revised to reflect the Commission's March 2026 validation decision and to separate the development already carried out from the future Section 37L wastewater proposal. The assessment retains the ecological survey completed on 23 October 2025 and supplements it with the revised planning, engineering and site information supplied in 2026.

On the basis of the scientific information available, including the precautionary boundary and wastewater assumptions expressly described in this report, the development seeking substitute consent has not been identified as having caused, currently causing, or being reasonably expected to cause an adverse effect on the integrity of The Twelve Bens/Garraun Complex SAC (002031), Connemara Bog Complex SAC (002034), or any other European site, either alone or in combination with other plans or projects. No significant effect requiring ecological remediation within a European site has been identified. The assessment of ongoing wastewater pathways is based on the conservative understanding that toilet waste is managed by a compost toilet and domestic greywater is discharged to ground through the existing soakaway/soakpit, with no direct surface-water discharge identified.

The conclusion does not rely on the proposed future wastewater treatment system or other Section 37L works. Those works constitute a separate project and must be assessed through the Section 37L process, including by a separate Natura Impact Statement where Appropriate Assessment is required. Where precise historic or as-built information is unavailable, this rNIS has adopted conservative assumptions rather than treating uncertainty as evidence of no effect. The integrity conclusion is therefore not dependent on resolving the exact metre separation from the SAC boundary or on certifying the detailed construction of the existing soakaway.

14.0 References

An Coimisiún Pleanála (2026). Guidelines on Information to be submitted with Substitute Consent and Section 37L Applications.

An Coimisiún Pleanála (2026). Letter to OMC, Case ACP-323890-25, dated 6 March 2026.

Department of Environment, Heritage and Local Government (2010). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities.

European Commission (2018). Managing Natura 2000 Sites: The provisions of Article 6 of the Habitats Directive 92/43/EEC.

European Commission (2021). Assessment of plans and projects in relation to Natura 2000 sites - Methodological guidance on Article 6(3) and (4) of the Habitats Directive 92/43/EEC.

NPWS (2017). Conservation Objectives: The Twelve Bens/Garraun Complex SAC 002031. Version 1.

NPWS (2015). Conservation Objectives: Connemara Bog Complex SAC 002034. Version 1.

NPWS. Protected Sites datasets, site synopses and conservation-objective supporting documents for SAC 002031 and SAC 002034.

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

OMC Group (2025/2026). Site Suitability Assessment, Planning Report, substitute consent drawings and Section 37L drawings for Ann Conroy, Derrynavglaun, Recess, Co. Galway.

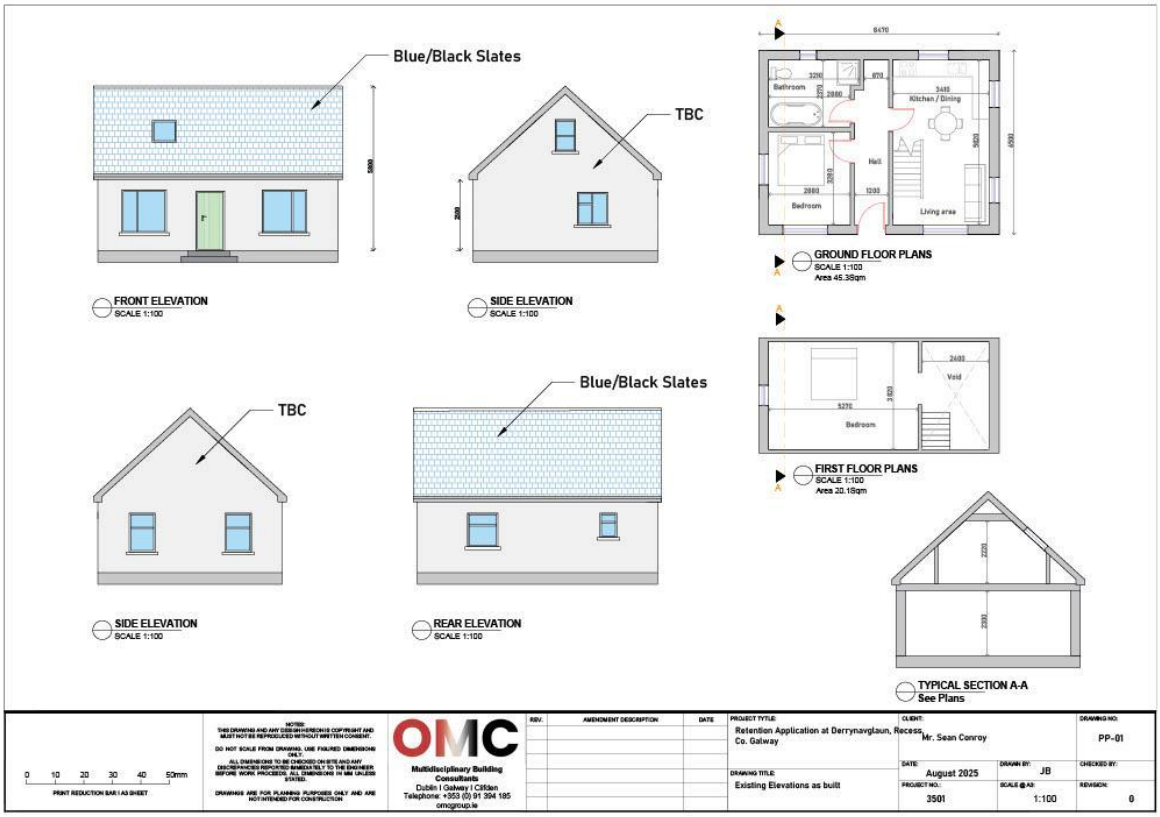
Planning and Development Act 2000, as amended, Part XA and Section 177G.

Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

Directive 2009/147/EC on the conservation of wild birds.

Appendix A - Key Supplied Project Information

The following figure reproduces the dwelling plans/elevations available in the existing rNIS. The drawings should be read together with the current substitute consent drawing set submitted with the application.



Appendix Figure A1. Existing dwelling plans and elevations.

Appendix B - Assessment Assumptions and Information Limitations

The following assumptions and information limitations have been incorporated directly into the assessment. They are stated transparently so that the conclusions can be read in the context of the available evidence. The assessment adopts the more precautionary position where precise historic or as-built information is unavailable.

Construction chronology: the dwelling and immediate associated site works are understood to have been carried out approximately between 2019 and 2020. Exact start and completion dates are not available. This approximate period is used consistently for the retrospective construction-phase assessment.

Current wastewater/greywater management: the compost toilet is documented in the planning report. In the absence of an as-built drainage record, domestic greywater is conservatively assumed to discharge to ground through the existing soakaway/soakpit shown on the substitute consent layout. No direct surface-water discharge has been identified in the supplied material, and the soil/groundwater pathway is treated as open for the assessment.

European-site boundary: the planning history and earlier ecological material describe the relationship to The Twelve Bens/Garraun Complex SAC differently. For this final rNIS, the assessment adopts the more conservative position that the application site may lie partly within or immediately adjoining the SAC. The conclusions therefore do not depend on the precise mapped separation from the SAC boundary.

Appendix C - European Site Context and Sensitivity

C1 The Twelve Bens/Garraun Complex SAC

The Twelve Bens/Garraun Complex SAC is an extensive upland and lowland site in north-west Connemara. It includes the Twelve Bens mountain range, upland blanket bog and heath, oligotrophic lakes, rocky slopes and scree, river systems and areas of old sessile oak woodland. The Ballynahinch/Owenmore river system forms part of the wider ecological setting. The site is selected for a combination of water-dependent habitats, peatland habitats and Annex II species including Freshwater Pearl Mussel, Atlantic Salmon, Otter and Slender Naiad. The ecological sensitivities most relevant to the present project are therefore water quality, natural hydrology, maintenance of peatland structure and function, and protection of aquatic habitat connectivity.

The conservation objectives for the site require favourable conservation condition to be maintained or restored through site-specific attributes and targets. For lake habitats, these include stable habitat area, appropriate natural hydrological regimes and water quality conditions capable of supporting characteristic vegetation. For blanket bog and associated wet habitats, the objectives depend on maintenance of peat-forming processes, appropriate drainage and water levels, and characteristic vegetation. For aquatic species, the objectives are linked to water quality, habitat condition, connectivity and population distribution. The remedial assessment has therefore focused on whether the completed dwelling could have caused a change to any of these attributes rather than simply considering distance from the SAC boundary.

C2 Connemara Bog Complex SAC

Connemara Bog Complex SAC covers a large part of the south Connemara lowlands and supports a highly diverse mosaic of Atlantic blanket bog, wet and dry heath, lakes, rivers, transition mires, fens, Molinia meadows, woodland and coastal habitats. The site also supports Marsh Fritillary, Atlantic Salmon, Otter and Slender Naiad. The site is of particular conservation importance because of the extent and relative continuity of lowland blanket bog and the combination of aquatic and peatland habitats within the same landscape.

For the present project, the most plausible connection to Connemara Bog Complex SAC is hydrological rather than direct. Potential effects would therefore have to be transmitted through surface-water or groundwater pathways and would have to be sufficiently large and persistent to change a conservation-objective attribute. The project does not overlap the SAC and no direct removal of its habitat can occur. The small scale of the dwelling and the absence of a direct discharge or major drainage intervention substantially constrain the magnitude of any pathway to this more distant site.

C3 Sensitivity of aquatic qualifying interests

Atlantic Salmon, Freshwater Pearl Mussel and Slender Naiad are sensitive to deterioration in water quality and changes in aquatic habitat. Salmon require access to suitable spawning and nursery habitat and are sensitive to siltation and pollution. Freshwater Pearl Mussel is particularly sensitive to fine sediment, nutrient enrichment and changes affecting juvenile habitat and host fish. Slender Naiad requires suitable lake habitat, water quality and hydrological conditions. These sensitivities justify the conservative consideration of sediment, construction pollutants and domestic wastewater pathways in this rNIS even though the dwelling is small.

No works occurred within a watercourse as part of the development seeking substitute consent. The construction phase is complete and there is no continuing source of construction sediment. Any effect on these aquatic qualifying interests would therefore have required a pollutant or sediment release of sufficient magnitude to travel through the local catchment and alter habitat conditions within a European site. No such persistent effect or mechanism has been identified in the supplied evidence.

C4 Sensitivity of peatland and wet-heath habitats

Blanket bog, wet heath and Rhynchosporion vegetation depend on maintenance of appropriate hydrological conditions and are vulnerable to drainage, peat excavation, nutrient enrichment, trampling and erosion. A local development can affect these habitats where it causes direct land take, intercepts drainage, concentrates runoff or creates a persistent source of nutrients or sediment. The assessment therefore considers both the dwelling footprint and any plausible change to local drainage. No extensive drainage, peat extraction or dewatering associated with the dwelling has been identified. On the precautionary assumption that the application site may partly overlap or immediately adjoin the SAC, the completed development is still not considered capable of altering the hydrological function of qualifying peatland habitat at a scale relevant to site integrity.

Appendix D - Section 177G Compliance Matrix

Requirement	What is required	How addressed in this rNIS
Section 177G(1)(a)	Statement of significant effects, if any, which have occurred, are occurring or can reasonably be expected to occur because the development was carried out.	Sections 6–10 and 12 assess historic construction effects, current effects and reasonably foreseeable continuation effects by source–pathway–receptor and conservation-objective attributes.
Section 177G(1)(b)(i)	Details of appropriate remedial or mitigation measures undertaken or proposed to remedy or mitigate significant effects.	Section 11 records that no significant adverse effect requiring ecological remediation has been identified and sets out precautionary operational safeguards.
Section 177G(1)(b)(ii)	Period within which proposed remedial or mitigation measures shall be carried out.	Section 11.1 states that operational safeguards apply immediately and for the lifetime of the development. No delayed ecological remediation programme is required.
Project definition / validation	Substitute consent must relate only to development already carried out; further development is addressed separately.	Sections 1, 2.3 and 3.2 expressly exclude the future wastewater treatment system and polishing/infiltration works from the substitute consent project.

Requirement	What is required	How addressed in this rNIS
Article 6(3) integrity test	Competent authority must be able to determine that the project will not adversely affect site integrity in view of conservation objectives.	Sections 9, 12 and 13 provide the conservation-objective assessment and integrity conclusion. Boundary and wastewater uncertainties are addressed through explicit precautionary assumptions rather than left as unresolved pre-issue matters.
In-combination assessment	Assessment must consider effects together with other plans or projects.	Section 10 considers the principal cumulative pathway, relevant local development types and the separate Section 37L project.
Best scientific knowledge / uncertainty	Assessment must be sufficiently complete, precise and definitive and must address reasonable scientific doubt.	Sections 1.2–1.3 explain the retained 2025 field survey, documentary updates, limitations and precautionary approach. Appendix B records the conservative assumptions used where exact historic or as-built information is unavailable.

Appendix E - Planning and Application Context

The planning history demonstrates that the need for substitute consent arose because previous retention applications could not proceed without the environmental assessment required for a development in this sensitive location. The history is relevant to understanding the project and the reason a remedial Appropriate Assessment is now being undertaken. It does not change the ecological test applied in this rNIS.

Reference	Application / process	Relevance
22/61281	Retention of existing agricultural shed	Invalidated following site inspection and concern that the structure had characteristics of habitable use.
23/60490	Retention of existing dwelling house	Invalidated because the site notice did not accurately correspond with the application.
23/60678	Retention of existing dwelling house	Invalidated because the planning authority considered the development one for which prior environmental assessment requirements arose.
23/61395	Retention of existing dwelling house	Invalidated; planning authority referred to the proximity/possible overlap with The Twelve Bens/Garraun Complex SAC and potential downstream connection to Connemara Bog Complex SAC.
ACP pre-application 321050-24	Substitute consent pre-application consultation	Concluded 24 February 2025.

Reference	Application / process	Relevance
ACP-323890-25	Substitute consent application lodged November 2025	Deemed invalid 6 March 2026 because the notices also included a new wastewater system, which the Commission considered further development.
Current application	Substitute consent for dwelling as constructed	Revised to exclude future wastewater infrastructure; separate Section 37L application to address that further development.

The updated report has been drafted so that the project assessed in the rNIS matches the substitute consent description and avoids reliance on the proposed Section 37L works. This project-definition discipline is important because the Appropriate Assessment must assess the same development that is before the competent authority for decision.