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Natura Impact Statement Report for Proposed Development at Doorus Demesne, Co. Galway.

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Document Control	
Project Title:	Natura Impact Statement Report for a Proposed Development at Doorus Demesne, Co. Galway
Project Reference No:	26-074
Project Description:	Natura Impact Statement Report for a Proposed Development at Doorus Demesne, Co. Galway
Status:	FINAL
Client Details:	Joe Gormley
Issued By:	Coyle Environmental Ltd., 1st & 2nd Floor Kilmurry House, Castlerea, Co. Roscommon

Document Production & Approval			
	Name	**Date**	**Position**
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Revision History		
Rev	**Status**	**Date**
0	Draft	17/06/2026
1	Final	01/07/2026

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1. Introduction

1.1. Requirement for an Appropriate Assessment

All plans and projects are required to be screened for potential impacts upon Special Areas of Conservation (SACs) or Special Protection Areas (SPAs) under Article 6 of the EU Habitat's Directive (Council Directive 92/43/EEC). The aim of this screening process is to establish whether a full Appropriate Assessment of the plan or project is necessary.

Consideration of likely significant effects should be based on the Source – Pathway – Receptor (S-P-R) risk assessment principle. If there is no ecological pathway or functional link between the proposed development and the European site, there is no potential for impact, and the project can be screened out. Ecological pathways can be physical, for example, water or air in the case of airborne pollutants (e.g. ammonia from intensive agricultural installations). Functional pathways occur, for example, where the application site is used as foraging for a Qualifying Interest of a SAC or SPA.

1.2. The Aim of the Report

This Natura Impact Statement (NIS) has been prepared in accordance with the current guidance on the Appropriate Assessment (AA) process, produced by the European Commission (EC, 2001; 2018) which was used to produce the guidance documents Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (DEHLG, 2009) and Office of the Planning Regulator; Appropriate Assessment Screening for Development Management (2021).

In April 2026 Coyle Environmental Ltd was appointed on behalf of Joe Gormley to provide the necessary information to allow the competent authority (in this case Galway County Council) to conduct an Article 6 (3) Appropriate Assessment for a proposed development in Doorus Demesne. This information is being submitted as a Natura Impact Statement (NIS).

The purpose of this NIS is to provide the information required to determine if the project along or in-combination with other plans and projects could undermine the conservation objectives of the European sites and give rise to likely significant effects in the absence of mitigation measures.

2. Regulatory Context

2.1. Relevant Legislation

The EU Habitats Directive (92/43/EEC) provides legal protection for habitats and species of European importance. It sets up the Natura 2000 network, a European network of important ecological sites comprising of Special Areas of Conservation (SACs) designated under Member States under this directive and Special Protection Areas (SPAs) classified under the Birds Directive (Directive2009/147/EC).

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The Birds Directive seeks to conserve all wild birds, protecting birds, their eggs, nests and habitats. The Directive (Directive2009/147/EC) requires that Member States take measures to classify the most suitable areas as Special Protection Areas (SPAs) for the conversation of bird species listed in Annex 1 of the Directive. SPAs are selected for threatened and migratory bird species (listed in Annex I of the Birds Directive). SPA areas are of international importance for these migratory birds.

The EU Habitats Directive (92/43/EEC) also requires that protection is given to sites (Special Areas of Conservation) which are made up of, or support, particular habitats and species listed in annexes to this Directive.

To protect this network, Articles 6(3) and 6(4) of this Directive also call for the undertaking of an Appropriate Assessment on any plan or project, not directly connected or necessary for the management of which is likely to have a significant effect on any European designated sites in view of the conservation objectives.

Articles 6(3) and 6(4) of the Habitats Directive sets out the decision-making tests for plans or projects affecting Natura 2000 sites. Article 6(3) establishes the requirement for Appropriate Assessment:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.”

Article 6(4) deals with the steps that should be taken when it is determined, as a result of appropriate assessment, that a plan/project will adversely affect a European site. Issues dealing with alternative solutions, imperative reasons of overriding public interest and compensatory measures need to be addressed in this case.

Article 6(4) states:

“If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, the Member States shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

Where the site concerned hosts a priority natural habitat type and/or a priority species, the only considerations which may be raised are those relating to human health or public safety, to

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beneficial consequences of primary importance for the environment or, further to an opinion from the Commission to other imperative reasons of overriding public interest."

The Water Framework Directive (WFD) (2000/60/EC) aims to ensure that Member States achieve water quality at least *Good Status* in rivers, lakes, groundwater, estuaries and coastal waters by 2027 and that status does not deteriorate in any waters. The WFD was transposed into Irish law by the European Communities (Water Policy) Regulations 2003 (S.I. 722 of 2003). Water quality must be protected and highly impacts species diversity as such it is an important factor to consider in Appropriate Assessment.

3. Methodology

3.1. Appropriate Assessment Screening and NIS

This AA Screening and NIS has been prepared with reference to the following:

- 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 Significantly Affecting Natura 2000 sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC.
- European Commission (2006). Nature and Biodiversity Cases: Ruling of the European Court of Justice.
- European Commission (2007). Clarification of the Concepts of: Alternative Solution, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence, Opinion of the Commission.
- Department of Environment, Heritage and Local Government (2009). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities.
- Office of the Planning Regulator (2021). Appropriate Assessment Screening for Development Management.
- NPWS (2025). The Status of EU Protected Habitats and Species in Ireland.
- CIEEM (2018) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.2. Chartered Institute of Ecology and Environmental Management, Winchester.

In complying with the obligations set out in Articles 6(3) and following the guidelines described above, this screening statement has been structured as a stage-by-stage approach as follows:

- Description of the proposed project.
- Identification of the Natura 2000 sites close to the proposed development.

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- Identification and description of any individual and cumulative impacts on the Natura 2000 sites likely to result from the project.
- Assessment of the significance of the impacts identified above on the site integrity.
- Exclusion of sites where it can be objectively concluded that there will be no significant effects.

3.2. Statement of Competency

This AA Screening and NIS report was carried out by Catherine Howarth. Catherine Howarth has a BSc (Honours) in Conservation Biology and Ecology from the University of Exeter and a Certificate in Ecological Consultancy. Catherine Howarth has over 17 years' experience in habitat monitoring and surveying. Catherine Howarth is a Consultant Ecologist at Coyle Environmental and is an Associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

3.3. Field Based Studies

A Preliminary Ecological Assessment of the site was commissioned by Vervine Enterprises shortly after acquiring the 50 acres in order to better understand the ecological value of the site. Ecologist Jen Fisher conducted surveys in November and December 2020. The report has been made available to inform the desk study ahead of further surveys carried out in 2026.

The site at Doorus Demesne, Co. Galway was visited by Catherine Howarth of Coyle Environmental Ltd on the 16th of April 2026 to conduct a Site Walkover Survey when field notes and photographs were taken. Habitats within the application site were classified in accordance with Level 3 of *A Guide to Habitats in Ireland* (Fossitt, 2000). These habitats are denoted in the text along with their habitat code, e.g., the habitat code for improved agricultural grassland is GA1. A species list and photos of the site are included as appendices.

3.4. Desk Studies & Consultation

A desk study was carried out to collate information on European sites in the vicinity of the proposed development. The following data sources were accessed to complete a thorough examination of potential impacts prior to the completion of this statement:

- National Parks and Wildlife Service - Aerial photographs and maps of designated sites, information on habitats and species within these sites and information on protected plant or animal species, conservation objectives, site synopses and standard data forms for relevant designated sites.
- Environmental Protection Agency (EPA)- Information pertaining to water quality, geology and licensed facilities within the area;
- Myplan.ie – Mapped based information;
- National Biodiversity Data Centre (NBDC) – Information pertaining to protected plant and animal species within the study area;
- Google Street View – High quality aerials and street images;

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- John O'Reilly – Information regarding the proposed development including site plans and specifications and information on the site.
- Galway County Council – Information on planning history in the area for the assessment of cumulative impacts.

3.5. Assessment Methodology

The development was assessed to identify any potential ecological impacts and it's 'Zone of Influence' (ZOI). The ZOI of a proposed development is the geographical area over which it could affect the receiving environment in a manner that could have significant effects on the Qualifying Interests of a European site.

For significant effects to arise there must be a potential impact from a Source, i.e., a development, to a Receptor, i.e., a European site via an Ecological pathway e.g. a water course. If there is no ecological pathway or functional link between the proposed development and the European site, there is no potential for impact, and the project can be screened out.

Based on the potential impacts and their ZOI, the Natura 2000 sites potentially at risk from direct, indirect or in-combination impacts were identified. The assessment considered all potential impact sources and pathways connecting the proposed development to Natura 2000 sites, in view of the conservation objectives supporting the favourable conservation condition of the site's Qualifying Interests (QIs) or Special Conservation Interests (SCIs).

The conservation objectives relating to each Natura 2000 site and its QIs/SCIs are cited generally for SACs as "to maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or Annex II species for which the SAC has been selected", and for SPAs "to maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA".

The conservation status of a habitat is defined in Article 1 of the Directive. The conservation status of a natural habitat will be taken as favourable when:

- Its natural range and area it covers within that range is stable or increasing.
- The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future.
- The conservation status of its typical species is favourable.

The favourable conservation status of a species is achieved when:

- The population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats.
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future.
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

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Natura 2000 sites within 15km of the proposed works and those greater than 15km away with a direct pathway and biodiversity connections to the works location, must be considered when performing the Appropriate assessment Screening for this project, in accordance with Appropriate Assessment guidance (OPR 2021), CIEEM Guidance 2018 and complying with the requirements of Article 6(3) and Article 6(4) of the EU Habitats Directive. This 15km zone is a starting point when identifying the ZOI, which may vary from project to project due to the nature of the project, environmental receptors and the potential for in-combination effects.

When considering potential impacts such as direct disturbance, the potential ZOI may be much less than 15km. Likewise for hydrological impacts, the ZOI can be greater than 15km. If a hydrological pathway exists between works and a Natura 2000 site, the conservation objectives of protected sites beyond 15km should be considered. Where site-specific conservation objectives (SSCOs) have been prepared for a European site, these include a series of specific attributes and targets against which effects on conservation condition, or integrity, can be measured. Where potential significant effects are identified, then these SSCOs should be considered in detail.

The potential impacts of the works on these protected sites have been assessed using the Source-Pathway-Receptor model. If a pollution pathway exists between source (development site) and receptor (protected area Qualifying Interests and Special Conservation Interests), there is a potential environmental risk. A hydrological pathway allows for potential pollutants and contaminants to travel to downstream receptors using water as a transport medium. In this case the proposed development is the potential source, the proximity provides a potential pathway and the Qualifying Interests (QIs), and Special Conservation Interests (SCIs) of downstream Natura 2000 are the receptors of concern.

4. Appropriate Assessment Screening

4.1. Development Description

Joe Gormley is applying to Galway county council for full planning permission to renovate and alter existing house, remove existing outbuildings, construct a new addition, a yoga room, a proprietary wastewater treatment system & all associated site works & services at Doorus Demesne, Kinvara, Co. Galway. An extract from the Site Layout is shown in Figure 1.

Wastewater and surface water

The proposed development includes a new WWTS and percolation area. The SCA Report which accompanies this application recommends a secondary treatment system with a packaged polishing filter. The invert of the polishing filter to be constructed at 700mm above existing ground-level to allow for at least 1200mm soil between invert and bedrock in accordance with EPA COP 2021 for Tertiary Systems. The proposed new WWTS is a Tricel Novo Package Plant and Tricel Tero, designed to treat 900litres of wastewater per day. The Tricel Novo WWTS are in conformance

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with EN12566-3 and SR66. This WWTS will be installed, operated and maintained in accordance with EPA 2021 guidelines.

Surface water will be directed to 3 no. soak pits shown on the site layout in Figure 1.

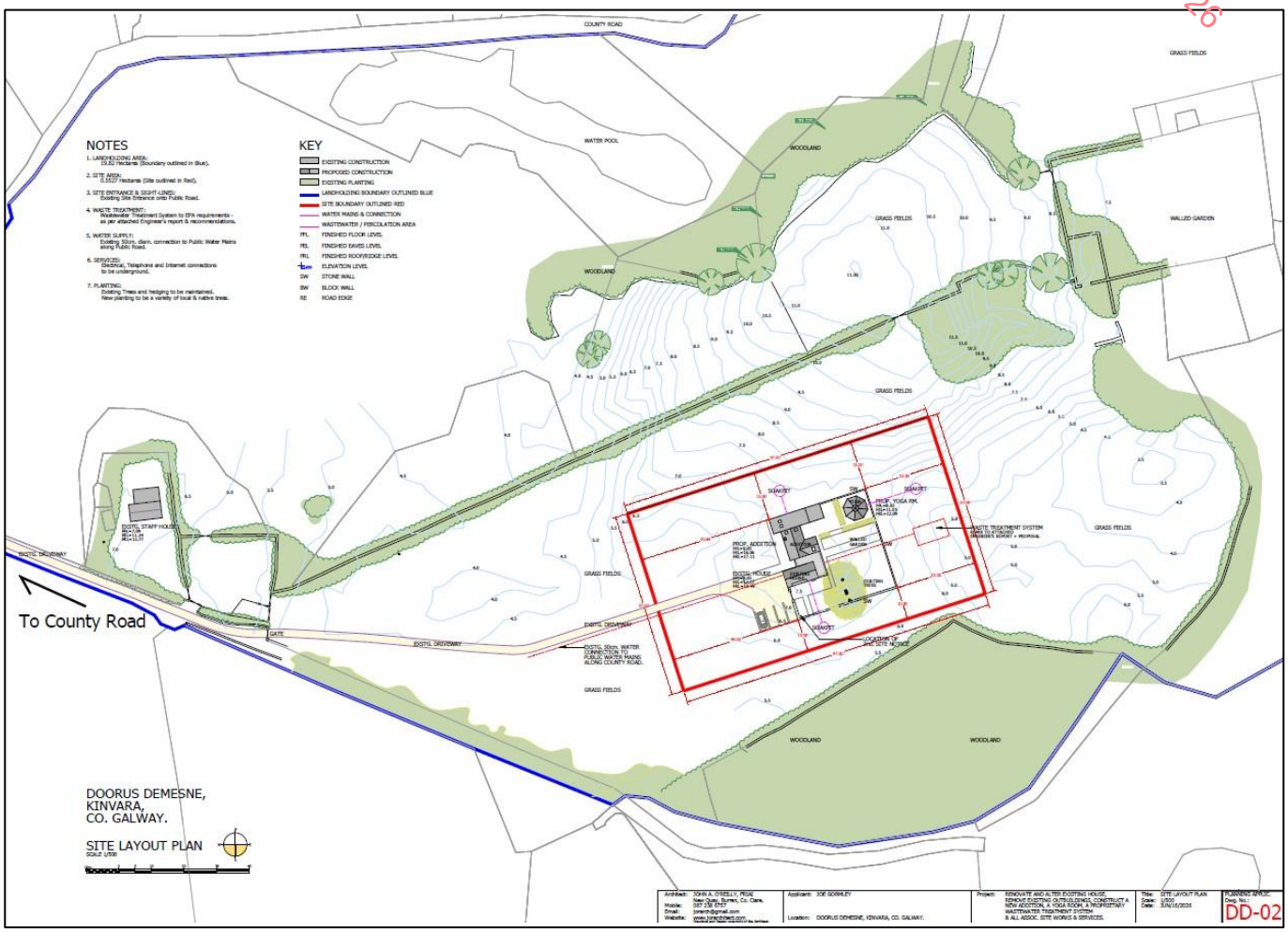


Figure 1 – Extract from Site layout (John O'Reilly)

4.2. Site Location and Surrounding Environment

The site is approximately 0.55 hectares, part of lands 19.82ha in Doorus Demesne, Kinvara, Co. Galway. The site is located 2.7km northwest of Kinvara Village on local roads off the L8585.

Site is located within the townland of Doorus Demesne, which is surrounded by Agricultural Pasture, with Kinvara Bay to the north and east. The land use classification within the site, as defined by the 2018 CORINE landcover dataset, is classified as 'Heterogeneous Agricultural Areas' while the bedrock of the site is Hawkhill Member – peloidal limestone with chert and Limestone till (Carboniferous) subsoil or Karstified limestone bedrock as surface.

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Site location maps are shown in Figures 2 and 3, an aerial photograph of the site and its surrounding landscape is shown in Figure 4.



Figure 2 – Site Location Map with Site Pinned (NPWS)

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Figure 3 – Aerial Photograph of site and surrounding landscape

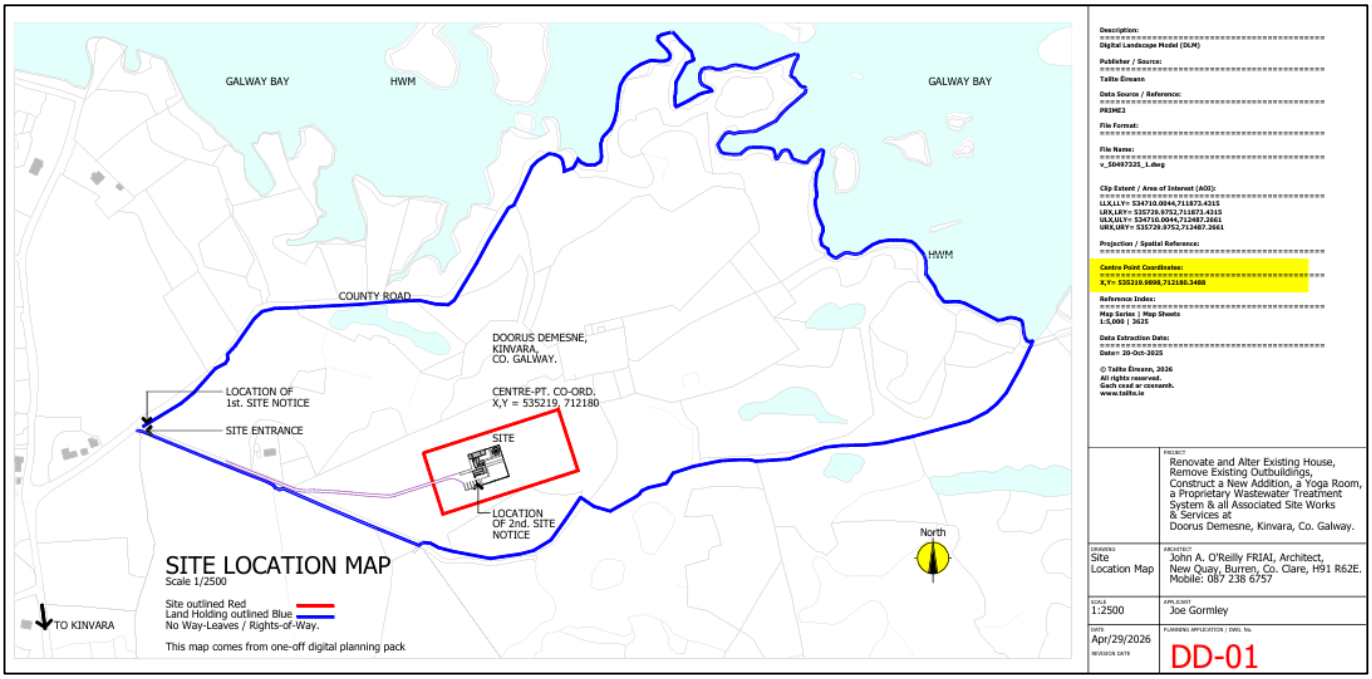


Figure 4 – Site Location Map with Site Outlined in Red

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4.3. Habitats within the Site

The development site is adjacent to areas that has been designated for nature conservation purposes. The habitats within the site are described in greater detail below.

The main habitats on the site are Improved Agricultural Grassland (GA1), Dry Calcareous Neutral Grassland (GS1), Buildings & Artificial Surfaces (BL3) and Stone Walls (BL1).

The surrounding land includes the following habitats: Improved Agricultural Grassland (GA1), Dry Calcareous Neutral Grassland (GS1), Stone Walls and Other Stonework (BL1), Hedgerows (WL1), Woodland Mosaic (WN1/WD1/WS2/WS1), Scrub (WS1), Ponds (FL8), Mud Shores (LS4), Upper Salt Marsh (CM2), Lagoon (CW1) and Sheltered Rocky Shores (LR3). The northern edge of the site is adjacent to Galway Bay, and a number of coastal habitats were present both within and adjacent to the site.

All habitats within the proposed development site were mapped and are shown on the accompanying habitat map in Figure 5.

4.3.1. Notable ecological features

4.3.1.1. Bats

The area has a high bat suitability index on the National Biodiversity Data Centre records, and a Potential Roost Assessment and Emergence Survey was carried out on 12th May 2026. The Bat Survey Report accompanies this NIS. No bat roosts were found within the proposed development site. Several bat species including Pipistrelles, myotis and Leisler's bats were recorded foraging along the hedgerows and treelines to the north and south of the site. A sensitive lighting scheme is recommended for the benefit of all nocturnal species.

4.3.1.2. Non-volant mammals

Signs of fox and badger were observed during the ecological site walkover on 16th April 2026 towards the eastern side of the landholding, however no signs were found within or adjacent to the proposed development site.

4.3.1.3. Birds

The stone outbuildings have nesting swallows and Great Tits, any demolition works must be done outside of the bird nesting season, which runs from 1st March to 31st August.

4.3.1.4. Flora

The surrounding fields are calcareous grassland. While there native wildflowers present the grassland on site lacks the indicator species required for Annex I grassland habitat. The land is currently grazed by horses and there are currently no plans for works in this area.

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4.3.1.5. Annex I habitats

Galway Bay Complex SAC is on part of and surrounds the land owned by Mr Gormley to the north, east and south. Galway Bay Complex SAC has several Annex I habitats including Mudflats and sandflats not covered by seawater at low tide [1140], Coastal lagoons [1150], *Salicornia* and other annuals colonising mud and sand [1310], Atlantic salt meadows (Glauco-Puccinellietalia maritimae) [1330] and Mediterranean salt meadows (Juncetalia maritimi) [1410] which are present within close proximity to the proposed development site.

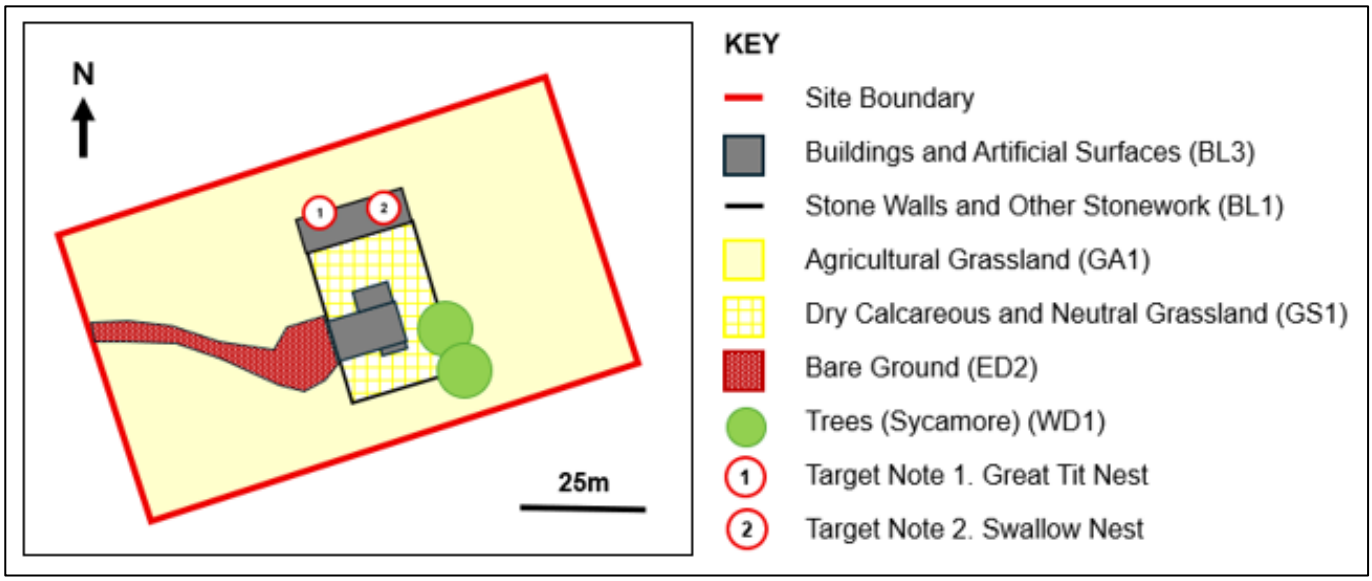


Figure 5 – Habitat Map with Fossitt codes and description.

4.4. Water Features and Quality

The application site is located within the Galway Bay South East Catchment (29), and the Kilchreest_SC_010 Sub-Catchment (29_8). The site is within the Kinvara-Gort (IE_WE_G_0002) Groundwater Body, and the status of this groundwater body is good. The closest waterbody is Kinvara Bay, part of Galway Bay, the shore form the north and eastern of the site. The site is located on a Regionally Important Aquifer - Karstified (conduit).

4.5. Natura 2000 Sites Identified

In accordance with the Appropriate Assessment guidance (OPR 2021) and Inland Fisheries Ireland Guidance Notes for AA Screenings in the vicinity of watercourses (IFI 2018), a list of Natura 2000 sites within 15km of the proposed development have been identified and described according to their site synopses, qualifying interests and conservation objectives. In addition, any other sites further than this, but potentially within its zone of interest were also considered. The ZOI may be determined by an assessment of the connectivity or pathway between the application site (source)

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and the designated areas (receptors) by virtue of hydrological connectivity, atmospheric emissions, flight paths, ecological corridors etc.

The proposed works are within 15km of twenty SACs and four SPAs that have been designated under the EU Habitats Directive and the EU Birds Directive. Maps and aerial photographs showing the locations of Natura 2000 sites relative to the application site are shown in Figure 6. These designated areas, their closest points to the development and QIs are outlined in Table 1. A full description of these sites can be read on the website of the National Parks and Wildlife Service (npws.ie).

Each of these 24 Natura 2000 sites will be evaluated following the Source-Pathway-Receptor model and screened in or out accordingly. In this case the proposed development is the potential source, the most likely significant pathway is hydrological, in this instance due to the proximity of the site to Kinvara Bay and the Qualifying Interests (QIs) and Special Conservation Interests (SCIs) of downstream Natura 2000 are the receptors of concern. Figure 7 shows the location of Natura 2000 sites in the ZOI of the application site.

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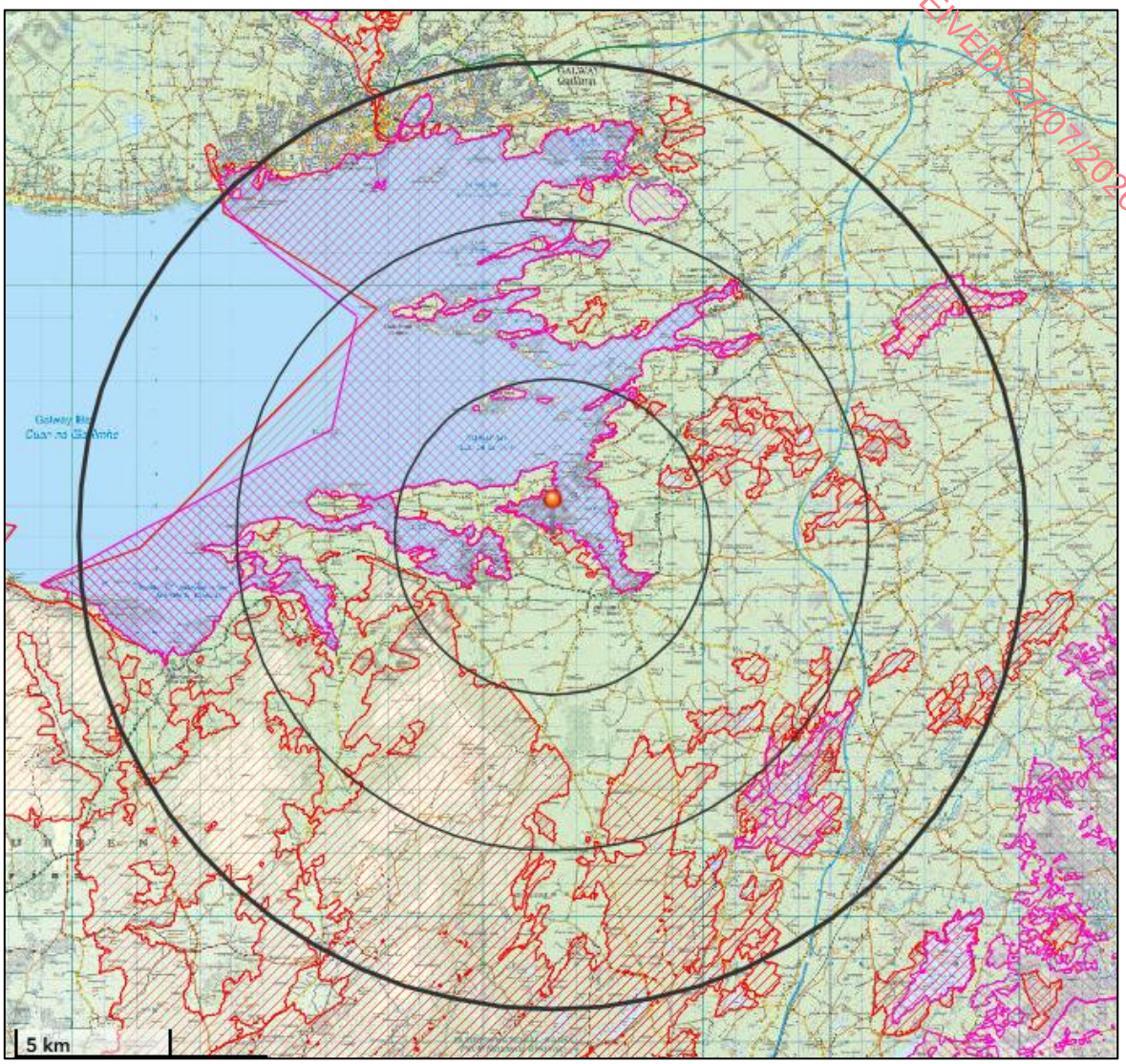


Figure 6 – The Application Site in relation to the Natura 2000 Sites within 5, 10 & 15km (Red/Pink). (NPWS Maps)

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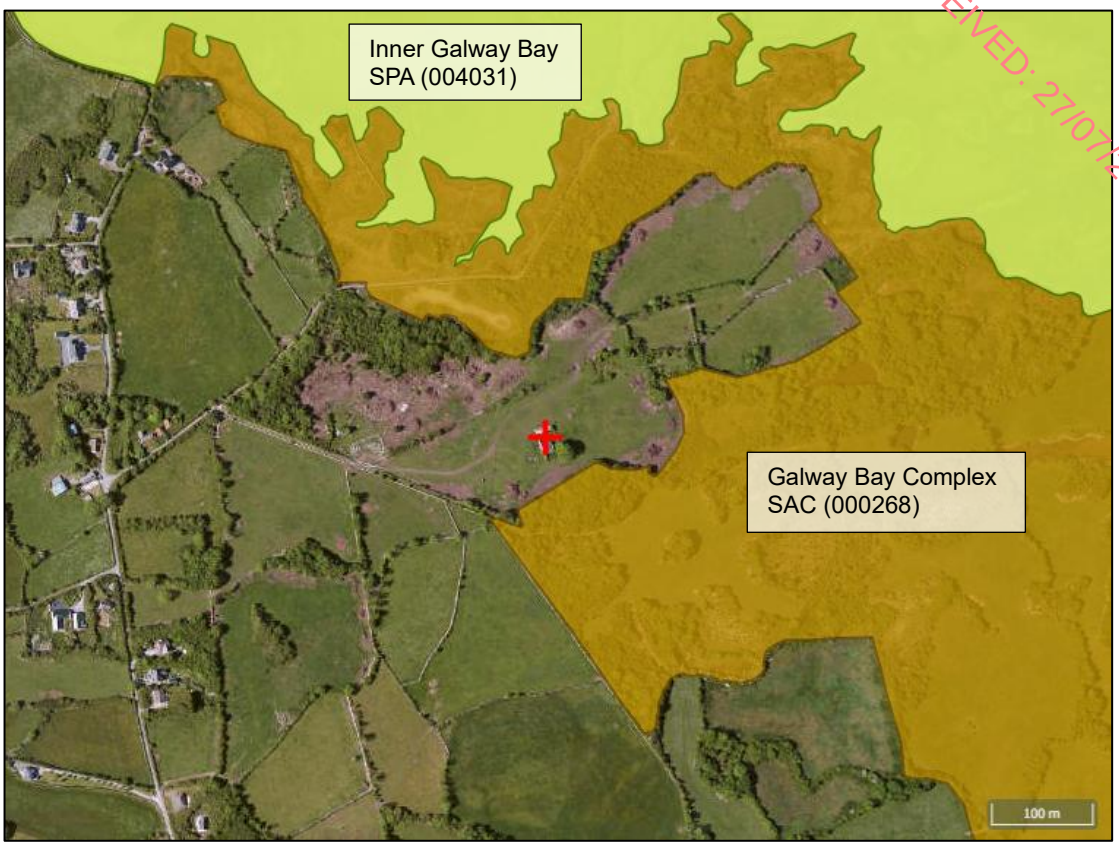


Figure 7 – The Application Site (Red) in relation to SACs and SPAs (Orange/Yellow). (EPA Maps)

Table 1 – Natura 2000 sites within 15km of the site.

Site Name & Code	Distance	Qualifying Interests	Screened In / Out
Galway Bay Complex SAC 000268	0.01km	**Habitats** 1140 Mudflats and sandflats not covered by seawater at low tide 1150 Coastal lagoons* 1160 Large shallow inlets and bays 1170 Reefs 1220 Perennial vegetation of stony banks 1230 Vegetated sea cliffs of the Atlantic and Baltic coasts 1310 Salicornia and other annuals colonising mud and sand 1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae) 1410 Mediterranean salt meadows (Juncetalia maritimi) 3180 Turloughs* 5130 *Juniperus communis* formations on heaths or calcareous grasslands	**Screened In** – Due to the proximity of the proposed development site to the SAC, there is a direct ecological link and the potential for a hydrological link from the application site to the SAC and the potential for significant effects upon this SAC and its QIs arising from constructional and operational impacts cannot be ruled out and further assessment is required.

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Site Name & Code	Distance	Qualifying Interests	Screened In / Out
		6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) 7210 Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae** 7230 Alkaline fens 8240 Limestone pavements* **Species** 1355 Otter *(Lutra lutra)* 1365 Harbour Seal *(Phoca vitulina)*	
Lough Fingall Complex SAC 000606	3.76km	**Habitats** 3180 Turloughs* 4060 Alpine and Boreal heaths 5130 *Juniperus communis* formations on heaths or calcareous grasslands 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) 7210 Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae** 8240 Limestone pavements* **Species** 1303 Lesser Horseshoe Bat *(Rhinolophus hipposideros)*	**Screened Out** - There is no hydrological or ecological connectivity between the application site and these SACs, and significant effects upon these SACs will not arise. The site is greater than 2km from the nearest recorded Lesser Horseshoe Bat roost.
East Burren Complex SAC 001926	3.87km	**Habitats** 3140 Hard oligo-mesotrophic waters with benthic vegetation of *Chara spp*. 3180 Turloughs* 3260 Water courses of plain to montane levels with the *Ranunculion fluitantis* and Callitricho-Batrachion vegetation 4060 Alpine and Boreal heaths 5130 *Juniperus communis* formations on heaths or calcareous grasslands 6130 Calaminarian grasslands of the *Violetalia calaminariae* 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) 6510 Lowland hay meadows (*Alopecurus*	

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Site Name & Code	Distance	Qualifying Interests	Screened In / Out
		pratensis, Sanguisorba officinalis) 7210 Calcareous fens with *Cladium mariscus* and species of the *Caricion davallianae** 7220 Petrifying springs with tufa formation (Cratoneurion)* 7230 Alkaline fens 8240 Limestone pavements* 8310 Caves not open to the public 91E0 Alluvial forests with *Alnus glutinosa* and *Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)** **Species** 1065 Marsh Fritillary *(Euphydryas aurinia)* 1303 Lesser Horseshoe Bat *(Rhinolophus hipposideros)* 1355 Otter (*Lutra lutra*)	
Cahermore Turlough SAC 002294	7.00km	**Habitats** 3180 Turloughs*	**Screened Out** - There is no significant hydrological or ecological connectivity between the application site and these SACs, and significant effects upon the SACs listed will not arise.
Caherglassaun Turlough SAC 000238	7.07km	**Habitats** 3180 Turloughs* 3270 Rivers with muddy banks with *Chenopodion rubri p.p.* and *Bidention p.p.* vegetation **Species** 1303 Lesser Horseshoe Bat *(Rhinolophus hipposideros)*	
Kiltiernan Turlough SAC 001285	7.76km	**Habitats** 3180 Turloughs*	
Ardrahan Grassland SAC 002244	7.97km	**Habitats** 4060 Alpine and Boreal heaths 5130 *Juniperus communis* formations on heaths or calcareous grasslands 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) 8240 Limestone pavements*	

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Site Name & Code	Distance	Qualifying Interests	Screened In / Out
Moneen Mountain SAC 000054	8.00km	**Habitats** 3180 Turloughs* 4060 Alpine and Boreal heaths 5130 *Juniperus communis* formations on heaths or calcareous grasslands 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) 7220 Petrifying springs with tufa formation (Cratoneurion)* 8240 Limestone pavements* **Species** 1065 Marsh Fritillary *(Euphydryas aurinia)* 1303 Lesser Horseshoe Bat *(Rhinolophus hipposideros)*	
Coole-Garryland Complex SAC 000252	9.14km	**Habitats** 3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation 3180 Turloughs* 3270 Rivers with muddy banks with *Chenopodion rubri p.p.* and *Bidention p.p.* vegetation 5130 *Juniperus communis* formations on heaths or calcareous grasslands 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) 8240 Limestone pavements* 91J0 *Taxus baccata* woods of the British Isles* **Species** 1303 Lesser Horseshoe Bat *(Rhinolophus hipposideros)*	
Castletaylor Complex SAC 000242	10.07km	**Habitats** 3180 Turloughs* 4060 Alpine and Boreal heaths 5130 *Juniperus communis* formations on heaths or calcareous grasslands 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid	

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Site Name & Code	Distance	Qualifying Interests	Screened In / Out
		sites) 8240 Limestone pavements*	
Ballinduff Turlough SAC 002295	11.02km	**Habitats** 3180 Turloughs*	
Kiltartan Cave (Coole) SAC 000286	11.69km	**Habitats** 8310 Caves not open to the public **Species** 1303 Lesser Horseshoe Bat *(Rhinolophus hipposideros)*	
Rahasane Turlough SAC 000322	12.06km	**Habitats** 3180 Turloughs*	
Carrowbaun, Newhall and Ballylee Turloughs SAC 002293	12.96km	**Habitats** 3180 Turloughs*	
Ballyvaughan Turlough SAC 000996	13.59km	**Habitats** 3180 Turloughs*	
Black Head-Poulsallagh Complex SAC 000020	13.64km	**Habitats** 1170 Reefs 1220 Perennial vegetation of stony banks 2130 Fixed coastal dunes with herbaceous vegetation (grey dunes)* 3260 Water courses of plain to montane levels with the *Ranunculion fluitantis* and Callitricho-Batrachion vegetation 4060 Alpine and Boreal heaths 5130 *Juniperus communis* formations on heaths or calcareous grasslands 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) 6510 Lowland hay meadows (*Alopecurus pratensis, Sanguisorba officinalis*) 7220 Petrifying springs with tufa formation (Cratoneurion)* 8240 Limestone pavements*	

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Site Name & Code	Distance	Qualifying Interests	Screened In / Out
		8330 Submerged or partially submerged sea caves **Species** 1395 Petalwort *(Petalophyllum ralfsii)*	
Lough Corrib SAC 000297	14.03km	**Habitats** 3110 Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae)* 3130 Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or Isoeto-Nanojuncetea 3140 Hard oligo-mesotrophic waters with benthic vegetation of *Chara spp.* 3260 Water courses of plain to montane levels with the *Ranunculion fluitantis* and Callitricho-Batrachion vegetation 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) 6410 *Molinia* meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*) 7110 Active raised bogs* 7120 Degraded raised bogs still capable of natural regeneration 7150 Depressions on peat substrates of the Rhynchosporion 7210 Calcareous fens with *Cladium mariscus and* species of the *Caricion davallianae** 7220 Petrifying springs with tufa formation (Cratoneurion)* 7230 Alkaline fens 8240 Limestone pavements* 91A0 Old sessile oak woods with *Ilex* and *Blechnum* in the British Isles 91D0 Bog woodland* **Species** 1029 Freshwater Pearl Mussel *(Margaritifera margaritifera)* 1092 White-clawed Crayfish *(Austropotamobius pallipes)* 1095 Sea Lamprey *(Petromyzon marinus)* 1096 Brook Lamprey *(Lampetra planeri)* 1106 Salmon *(Salmo salar)* 1303 Lesser Horseshoe Bat *(Rhinolophus*	

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Site Name & Code	Distance	Qualifying Interests	Screened In / Out
		hipposideros) 1355 Otter *(Lutra lutra)* 1833 Slender Naiad *(Najas flexilis)* 6216 Slender Green Feather-moss *(Hamatocaulis vernicosus)*	
Lough Coy SAC 000297	14.11km	**Habitats** 3180 Turloughs*	
Termon Lough SAC 001321	14.22km	**Habitats** 3180 Turloughs*	
Peterswell Turlough SAC 000318	14.80km	**Habitats** 3180 Turloughs* 3270 Rivers with muddy banks with *Chenopodion rubri p.p.* and *Bidention p.p.* vegetation	
Inner Galway Bay SPA 004031	0.01km	**Birds** A002 Black-throated Diver *(Gavia arctica)* A003 Great Northern Diver *(Gavia immer)* A017 Cormorant *(Phalacrocorax carbo)* A028 Grey Heron *(Ardea cinerea)* A046 Light-bellied Brent Goose *(Branta bernicla hrota)* A050 Wigeon *(Anas penelope)* A052 Teal *(Anas crecca)* A069 Red-breasted Merganser *(Mergus serrator)* A137 Ringed Plover *(Charadrius hiaticula)* A140 Golden Plover *(Pluvialis apricaria)* A142 Lapwing *(Vanellus vanellus)* A149 Dunlin *(Calidris alpina)* A157 Bar-tailed Godwit *(Limosa lapponica)* A160 Curlew *(Numenius arquata)* A162 Redshank *(Tringa totanus)* A169 Turnstone *(Arenaria interpres)* A179 Black-headed Gull *(Chroicocephalus ridibundus)* A182 Common Gull *(Larus canus)* A191 Sandwich Tern *(Sterna sandvicensis)* A193 Common Tern *(Sterna hirundo)* **Habitats** Wetlands	**Screened In** - Due to the proximity of the proposed development site to the SPA, there is a direct ecological link and the potential for a hydrological link to the SPA. There is potential for significant effects upon this SPA and its QIs arising from constructional and operational impacts cannot be ruled out and further assessment is required.

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Site Name & Code	Distance	Qualifying Interests	Screened In / Out
Coole-Garryland SPA 004107	9.41km	**Birds** A038 Whooper Swan *(Cygnus cygnus)*	**Screened Out** - There is no hydrological or ecological connectivity between the application site and these SPAs, and significant effects upon the SPAs listed will not arise.
Cregganna Marsh SPA 004142	10.32km	**Birds** A395 Greenland White-fronted Goose (*Anser albifrons flavirostris*)	
Rahasane Turlough SPA 004089	12.06km	**Birds** A038 Whooper Swan *(Cygnus cygnus)* A050 Wigeon *(Anas penelope)* A140 Golden Plover *(Pluvialis apricaria)* A156 Black-tailed Godwit *(Limosa limosa)* A395 Greenland White-fronted Goose *(Anser albifrons flavirostris)* **Habitats** Wetlands	

4.6. Identification of Potential Effects

The proposed development at Doorus Demesne has a direct ecological and potential hydrological link to Galway Bay Complex SAC (000268) and Inner Galway Bay SPA (004031). In this regard the potential impacts regarding negative impacts, affecting these designated sites, given its proximity will be addressed in detail in Section 5.

There are no expected impacts from the proposed works on the other designated sites listed in Table 1 as there are no direct hydrological connection or the distance is deemed far enough away that any disturbance emanating from the proposed works would be both temporary and on a negligible scale so as not to have an impact. Accordingly, these sites will not be discussed regarding potential impact.

The development is not directly connected with or necessary for the management of the designated site. In the absence of any mitigation, impacts upon these designated sites arising from the operation of this proposed development cannot be ruled out. Therefore, using the precautionary principal, in a worst-case scenario and in the absence of mitigation, an accidental pollution event of a sufficient magnitude during construction or operation, either alone or in-combination with other pollution sources, could potentially affect the surface water quality to an extent that undermines the conservation objectives of certain qualifying interests of Galway Bay Complex SAC and Inner Galway Bay SPA. Local disturbance may have a negative impact on protected habitats and species in the area. A reduction in water quality locally has the potential to affect the aquatic habitats and natural conditions that are required to maintain or achieve the specific attributes and

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targets of the qualifying interests associated with Galway Bay Complex SAC and Inner Galway Bay SPA and the conservation objectives that have been set for these QIs.

Therefore, following an evaluation of the relevant information including the characteristics of the proposed development and the likelihood of significant effects on the sites and with regards to the tenets of the precautionary principal, it is considered in the opinion of this author that, on the basis of objective information, it is not possible to exclude that the proposed development, either individually or in combination with other plans or projects, will have a likely significant effect on the above European sites.

Only those features of the development that have the potential to affect the integrity and conservation objectives of the identified Natura sites and protected species have been considered. Several factors were examined at this stage and dismissed or carried forward for Appropriate Assessment as relevant. The following areas were examined in relation to potential impacts and subsequent effects from the proposed development on the Natura 2000 sites identified:

- Deterioration of water quality in designated areas resulting from pollution from surface water run-off during site preparation and construction.
- Destruction of supporting habitat adjacent to protected area during site preparation and construction
- Disturbance to protected species during site preparation and construction
- Deterioration of habitat in designated areas during the operation of the site.
- Cumulative impacts with other proposed/existing developments.

4.7. Screening Conclusions

This section considers the list of sites identified in Section 4.5. It can be considered that all sites, except for Galway Bay Complex SAC and Inner Galway Bay SPA can be excluded from the remainder of the Appropriate Assessment process. This is based on their distance from the proposed development and the fact that it is outside of the Zone of Influence of these sites and that no impacts are likely to arise. The remaining concerns will therefore focus upon the protected habitats and species of the Galway Bay Complex SAC and Inner Galway Bay SPA.

The proposed development is not directly connected with or necessary to the nature conservation management of the designated site. Therefore, following the precautionary principal in consideration of likely significant effects on Galway Bay Complex SAC and Inner Galway Bay SPA in relation to the proposed development at Doorus Demesne, this project must proceed to the next stage of Appropriate Assessment, the Natura Impact Assessment.

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5. Stage II – Natura Impact Statement

5.1. Introduction

The main objective of this stage (Stage 2, Natura Impact Statement) in the Appropriate Assessment process is to determine whether the development of the proposed planning application at Doorus Demesne (either alone or in combination with other plans, programmes and projects) will result in significant adverse effects to the integrity of the Natura 2000 sites identified with respect to these site's structures, species, functions and/or conservation objectives. This stage also outlines the mitigation measures that should be taken to avoid any negative impacts of this application, should it receive consent.

5.2. Site Specific Conservation Objectives

For the sites that have been screened in the Site-Specific Conservation Objectives (SSCOs) were reviewed considering the proposed development and the potential impacts that might occur. These SSCOs aim to define the favourable conservation condition for the habitats or species at that site. They outline certain attributes such as distribution, population structure, water quality for different species and habitats with targets, which define favourable condition for a habitat or species at a particular site. The maintenance of habitats and species within the Natura 2000 sites at favourable conservation condition will contribute to the overall maintenance of favourable conservation status of those habitats and species at national level. Where available, these SSCOs can be downloaded on the NPWS website. Any potential threats to the attributes and targets as defined in these SSCOs were assessed and where necessary, mitigated for.

For each Qualifying Interest of the SAC, the specific conservation objective is either to *maintain or restore* the favourable conservation condition of that interest, by defining a list of attributes and targets which are indicative of the conservation status of that interest. For habitats, the main attributes include habitat area; habitat and community distribution; vegetation structure/composition and physical structure. The main target is to ensure that the habitats are stable or increasing in area and that the other attributes are maintained or restored.

For the Annex II species of the SPA, the main attributes are population trend and distribution, whilst the targets aim to ensure that the long-term population trends of the species are stable or increasing and that there is no significant decrease in the numbers or range of areas used by the species, other than that occurring from natural patterns of variation.

5.3. Natura 2000 Sites Identified

A summary of the site screened in is presented below. Full details of these sites are available on the website of the National Parks and Wildlife Service.

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5.3.1. Galway Bay Complex SAC (000268)

'Situated on the west coast of Ireland, this site comprises the inner, shallow part of a large bay which is partially sheltered by the Aran Islands. The Burren karstic limestone fringes the southern sides and extends into the sublittoral. West of Galway city the bedrock geology is granite. There are numerous shallow and intertidal inlets on the eastern and southern sides, notably Muckinish, Aughinish and Kinvarra Bays. A number of small islands composed of glacial deposits are located along the eastern side. These include Eddy Island, Deer Island and Tawin Island. A diverse range of marine, coastal and terrestrial habitats, including several listed on Annex I of the E.U. Habitats Directive, occur within the site, making the area of high scientific importance.

Galway Bay South holds a very high number of littoral communities (12). They range from rocky terraces to sandy beaches with rock or sand dunes behind. The intertidal sediments of Galway Bay support good examples of communities that are moderately exposed to wave action. A well-defined talitrid amphipod zone in the upper shore gives way to an intertidal, mid shore zone with sparse epifauna or infauna.

Saltmarshes are frequent within this extensive coastal site, with both E.U. Habitats Directive types, 'Atlantic Salt Meadow' and 'Mediterranean Salt Meadow' well represented. Most of the saltmarshes are classified as the bay type, with the substrate being mud or mud/sand. There is one lagoon type and one estuary type. Lagoon saltmarshes are the rarest type found in Ireland. The best examples of saltmarsh are located in inner Galway bay, east of a line running between Galway city and Kinvarra. In this area the coastline is highly indented, thus providing the sheltered conditions necessary for extensive saltmarsh development.

Inner Galway Bay provides extensive good quality habitat for Common Seal (maximum count of 317 in the all-Ireland survey of 2003). This species is listed on Annex II of the E.U. Habitats Directive. The seals use a range of haul-out sites distributed through the bay - these include inner Oranmore Bay, Rabbit Island, St. Brendan's Island, Tawin Island, Kinvarra Bay, Aughinish Bay and Ballyvaughan. The site provides optimum habitat for Otter, also an Annex II-listed species.

Galway Bay is a very important ornithological site. The shallow waters provide excellent habitat for Great Northern Divers, Black-throated Divers, Scaup, Long-tailed Duck and Red-breasted Merganser. All of these populations are of national importance. The intertidal areas and shoreline provides feeding and roosting habitat for wintering waterfowl, with Brent Goose (517) having a population of international importance and a further 11 species having populations of national importance.

Fishing and aquaculture are the main commercial activities within the site. A concern is that sewage effluent and detritus of the aquaculture industry could be deleterious to benthic communities. Reef and sediment communities are vulnerable to disturbance or compaction from tractors accessing oyster trestles. The *Paracentrotus lividus* populations have been shown to be vulnerable to over-fishing. Extraction of maerl in Galway Bay is a threat. Owing to the proximity of Galway city, shoreline and terrestrial habitats are under pressure from urban expansion and recreational

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activities. Eutrophication is probably affecting some of the lagoons and is a continued threat. Drainage is a general threat to the turlough and fen habitats. Bird populations may be disturbed by aquaculture activities.

This large coastal site is of immense conservation importance, with many habitats listed on Annex I of the E.U. Habitats Directive, four of which have priority status(lagoon, Cladium fen, turlough and orchid-rich calcareous grassland). The examples of shallow bays, reefs, lagoons and saltmarshes found within this site are amongst the best in the country. The site supports an important Common Seal colony and a breeding Otter population (Annex II species), and six regular Annex I E.U. Birds Directive species. The site also has four Red Data Book plant species, plus a host of rare or scarce marine and lagoonal animal and plant species.'

In 2013, the NPWS published Site Specific Conservation Objectives (SSCOs) for the Galway Bay Complex SAC. These SSCOs can be downloaded on the NPWS website. Any potential threats to the attributes and targets as defined in these SSCOs were assessed and where necessary, mitigated for.

5.3.2 Inner Galway Bay SPA (004031)

'Inner Galway Bay SPA is a very large, marine-dominated site situated on the west coast of Ireland. The inner bay is protected from exposure to Atlantic swells by the Aran Islands and Black Head. Subsidiary bays and inlets (e.g. Poulnaclough, Aughinish and Kinvarra Bays) add texture to the patterns of water movement and sediment deposition, which lends variety to the marine habitats and communities. The terraced Carboniferous (Viséan) limestone platform of the Burren sweeps down to the shore and into the sublittoral. The long shoreline is noted for its diversity, and comprises complex mixtures of bedrock shore, shingle beach, sandy beach and fringing salt marshes. Intertidal sand and mud flats occur around much of the shoreline, with the largest areas being found on the sheltered eastern coast between Oranmore Bay and Kinvarra Bay. A number of small islands and rocky islets in the Bay are included within the site.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Black-throated Diver, Great Northern Diver, Cormorant, Grey Heron, Light-bellied Brent Goose, Wigeon, Teal, Red breasted Merganser, Ringed Plover, Golden Plover, Lapwing, Dunlin, Bar-tailed Godwit, Curlew, Redshank, Turnstone, Black-headed Gull, Common Gull, Sandwich Tern and Common Tern. The E.U. Birds Directive pays particular attention to wetlands and, as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds.

Inner Galway Bay supports an excellent diversity of wintering wetland birds, with divers, grebes, cormorants, dabbling duck, sea duck and waders all well represented. There are internationally important wintering populations of Great Northern Diver and Light-Bellied Brent Goose and nationally important wintering populations of an additional sixteen species.

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Inner Galway Bay SPA is of high ornithological importance with two wintering species having populations of international importance and a further sixteen wintering species having populations of national importance. The breeding colonies of Sandwich Tern, Common Tern and Cormorant are also of national importance. Also of note is that six of the regularly occurring species are listed on Annex I of the E.U. Birds Directive, i.e. Black-throated Diver, Great Northern Diver, Golden Plover, Bar tailed Godwit, Sandwich Tern and Common Tern. Inner Galway Bay is a Ramsar Convention site, and part of the Inner Galway Bay SPA is a Wildfowl Sanctuary.'

In 2013, the NPWS published Site Specific Conservation Objectives (SSCOs) for the Inner Galway Bay SPA. These SSCOs can be downloaded on the NPWS website. Any potential threats to the attributes and targets as defined in these SSCOs were assessed and where necessary, mitigated for.

5.4. Qualifying Interests of the Galway Bay Complex SAC – Screened Out

Galway Bay Complex SAC is a complex and varied site. Certain qualifying interests of these sites will not be potentially impacted upon from this proposed development, either due to the distance involved or because they are features that are outside of the Zone of Influence of the site. These features and the reason for their screening out are listed in Table 2. In considering these QI features, the SSCOs of the site were referred to, along with the most recent Article 17 Reports on the status of protected habitats and species in Ireland (NPWS, 2025).

Table 2 – The Qualifying Interests of the Galway Bay Complex SAC (Screened Out)

Designated Feature & Code	Rationale for Screening Out
1160 Large shallow inlets and bays 1220 Perennial vegetation of stony banks 1230 Vegetated sea cliffs of the Atlantic and Baltic coasts 3180 Turloughs* 5130 *Juniperus communis* formations on heaths or calcareous grasslands 7210 Calcareous fens with *Cladium mariscus* and species of the Caricion davallianae* 7230 Alkaline fens 8240 Limestone pavements*	This habitat is not present within or adjacent to the proposed application site according to the mapped habitats within the NPWS maps and supporting documents. There will be no loss or fragmentation of this habitat within the SAC, and significant effects upon it can be ruled out.

5.5. Qualifying Interests of the Galway Bay Complex SAC – Screened In

Table 3 describes the qualifying interests of the Galway Bay Complex SAC that have the potential to be impacted upon from the proposed development, i.e., these QIs have been screened in, and potential effects have been considered in terms of the SSCOs that have been set.

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Table 3 – The Qualifying Interests of the Galway Bay Complex SAC (Screened In)

Designated Feature & Code	Rationale for Screening In
1140 Mudflats and sandflats not covered by seawater at low tide 1150 Coastal lagoons* 1170 Reefs 1310 *Salicornia* and other annuals colonising mud and sand 1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae) 1410 Mediterranean salt meadows (Juncetalia maritimi) 6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites)	These habitats have the potential for ecological and hydrological connectivity to the site, as such the SSCOs of this habitat will be considered in detail and mitigation measures outlined to protect this habitat.
1355 Otter *(Lutra lutra)* 1365 Harbour Seal *(Phoca vitulina)*	This species habitat may occur adjacent to the development site, these species may be negatively impacted by disturbance or a decrease in water quality of its habitats downstream of the development. As such the SSCOs of this species will be considered in detail and mitigation measures outlined to protect this species habitat.

5.5.1. SSCOS of the Galway Bay Complex SAC QI (Screened In)

Site specific conservation objectives for this site were prepared in 2013 (NPWS, 2013). These SSCOs can be downloaded on the NPWS website: (https://www.npws.ie/sites/default/files/protected-sites/conservation_objectives/CO000268.pdf). These SSCOs are outlined in Table 4.

Table 4 – The SSCOs of the Galway Bay Complex SAC QI (Screened In)

Habitat Name [Code]	Attributes	Conservation Objective & Potential for Impacts
1140 Mudflats and sandflats not covered by seawater at low tide	Habitat area Community distribution	To maintain the favourable conservation condition of this habitat in the SAC. There will be no loss of habitat or change in the intertidal community types as a result of the proposed development.
1150 Coastal lagoons*	Habitat area Habitat distribution Salinity regime Hydrological regime Barrier: connectivity between lagoon and sea Water quality: Chlorophyll a	To restore the favourable conservation condition of this habitat in the SAC. There will be no loss of habitat or change in the salinity, the hydrological regime or connection between lagoons and the sea as a result of the proposed development. However, a decrease in water quality due to the proposed development

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Habitat Name [Code]	Attributes	Conservation Objective & Potential for Impacts
	Water quality: Molybdate Reactive Phosphorous (MRP) Water quality: Dissolved Inorganic Nitrogen (DIN) Depth of macrophyte colonisation Typical plant species Typical animal species Negative indicator species	has the potential to effect the nutrient levels and so the typical plant and animal species associated with this habitat. Measures for the protection of water quality are provided in section 6.
1170 Reefs	Distribution Habitat area Community extent Community structure: *Mytilus* density Community structure	To maintain the favourable conservation condition of this habitat in the SAC. There will be no loss of habitat or change in community extent or structure as a result of the proposed development.
1310 *Salicornia* and other annuals colonising mud and sand	Habitat area Habitat distribution Physical structure: sediment supply Physical structure: creeks and pans	To maintain the favourable conservation condition of this habitat in the SAC. There will be no loss of habitat or change in physical structure, vegetation structure or vegetation composition as a result of the proposed development.
1330 Atlantic Salt Meadows (Glauco-Puccinellietalia maritimae) 1410 Mediterranean salt meadows (Juncetalia maritimi)	Physical structure: flooding regime Vegetation structure: zonation Vegetation structure: vegetation height Vegetation structure: vegetation cover Vegetation composition: typical species and sub-communities Vegetation structure: negative indicator species *spartina anglica*	To restore the favourable conservation condition of these habitats in the SAC. There will be no loss of habitat or change in physical structure, vegetation structure or vegetation composition as a result of the proposed development. Due to the small scale of the development, the topography of raised ground and >100m separation distance between the proposed development site boundary and the habitat is not likely that there is the potential for any negative effects to occur.
6210 Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (*important orchid sites)	Habitat area Habitat distribution Vegetation composition: broadleaf herb: grass ratio Vegetation composition: typical species Vegetation composition: negative indicator species Vegetation structure: sward height Vegetation structure: woody species and bracken (*Pteridium aquilinum*)	To maintain the favourable conservation condition of this habitat in the SAC. The extent of this habitat in the SAC is currently unknown. Areas are likely to be small and often in mosaic with other habitats such as limestone pavement and scrub (Dwyer et al., 2007; internal NPWS files). There is no known Annex I grassland habitat on or adjacent to the site, however, to support the existing grassland habitats within and around the SAC, measures to prevent the introduction of any invasive plant species due to imported building materials and heavy machinery required on site are addressed in Section 6.

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Habitat Name [Code]	Attributes	Conservation Objective & Potential for Impacts
	Physical structure: bare ground	
1355 Otter *(Lutra lutra)*	Distribution Extent of terrestrial habitat Extent of freshwater (river) habitat Extent of freshwater (lake/lagoon) habitat Couching sites and holts Fish biomass available Barriers to connectivity	To restore the favourable conservation condition of this species in the SAC. Due to the small scale of the development, on an existing dwelling and its immediate surrounds there will be no decrease in marine or terrestrial habitat or barriers to connectivity. Otters need couching sites and holts throughout their territory where they are secure from disturbance (Kruuk, 2006; Kruuk and Moorhouse, 1991). The surrounding habitat to the north, east and west of the proposed development site is suitable for Otter and measures to prevent disturbance are listed in section 6.
1365 Harbour Seal (*Phoca vitulina*)	Access to suitable habitat Breeding behaviour Moulting behaviour Resting behaviour Disturbance	To maintain the favourable conservation condition of this species in the SAC. Harbour seal are recorded utilising the marine habitat to the east of the proposed development site, Due to the small scale of the development, the topography of raised ground and >500m separation distance between the proposed development site boundary and this species habitat it is not likely that there is the potential for any negative effects to occur.

5.6. Qualifying Interests of the Inner Galway Bay SPA – Screened In

Table 5 describes the qualifying interests of the Inner Galway Bay SPA that have the potential to be impacted upon from the proposed development, i.e., these QIs have been screened in, and potential effects have been considered in terms of the SSCOs that have been set. In considering these QI features, the SSCOs of the site were referred to, along with the most recent Article 17 Reports on the status of protected habitats and species in Ireland (NPWS, 2025).

Table 5 – The Qualifying Interests of the Inner Galway Bay SPA (Screened In)

Designated Feature/ Species & Code	Conservation Objectives & Rationale for Screening In
A999 Wetland	SSCO: To maintain the favourable conservation condition of the wetland habitat at Inner Galway Bay SPA as a resource for the regularly occurring migratory waterbirds that utilise it. Attribute & Target Habitat Area: The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 13,267ha, other than that occurring from natural patterns of variation.

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Designated Feature/ Species & Code	Conservation Objectives & Rationale for Screening In
	This habitat is present in close proximity to the proposed application site. There will be no loss or fragmentation of this habitat within the SPA, however a deterioration in water quality could negatively impact this habitat and the species reliant on it. Measures for the protection of water quality are listed in section 6.
A017 Cormorant (*Phalacrocorax carbo)* A191 Sandwich Tern (*Sterna sandvicensis*) A193 Common Tern (*Sterna hirundo*)	SSCO: To maintain the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA. Attribute & Target Breeding population abundance: No significant decline Productivity rate: No significant decline Distribution: breeding colonies: No significant decline Prey biomass available: No significant decline Barriers to connectivity: No significant increase Disturbance at breeding site: Human activities should occur at levels that do not adversely affect the breeding population Population trend: Long term population trend stable or increasing Distribution: No significant decrease in the numbers or range of areas used by these species other than that occurring from natural patterns of variation These species breeding and foraging habitats are not present within or adjacent to the proposed application site. There will be no loss or fragmentation of these species' habitat within the SPA, however a deterioration in the wetland habitat or water quality could negatively affect the species listed. Site preparation and construction may cause disturbance to these protected bird species. Measures for the protection of water quality and to prevent disturbance are listed in section 6.
A002 Black-throated Diver *(Gavia arctica)* A003 Great Northern Diver *(Gavia immer)* A028 Grey Heron *(Ardea cinerea)* A046 Light-bellied Brent Goose *(Branta bernicla hrota)* A050 Wigeon *(Anas penelope)* A052 Teal *(Anas crecca)* A069 Red-breasted Merganser *(Mergus serrator)* A137 Ringed Plover *(Charadrius hiaticula)* A140 Golden Plover *(Pluvialis apricaria)* A142 Lapwing *(Vanellus vanellus)* A149 Dunlin *(Calidris alpina)*	SSCO: To maintain the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA. Population trend: Long term population trend stable or increasing Distribution: No significant decrease in the numbers or range of areas used by these species other than that occurring from natural patterns of variation These species are not present within or adjacent to the proposed application site. There will be no loss or fragmentation of these species' habitat within the SPA, however a deterioration in the wetland habitat or water quality could negatively affect the species listed. Site preparation and construction may cause disturbance to these protected bird species. Measures for the protection of water quality and to prevent disturbance are listed in section 6.

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Designated Feature/ Species & Code	Conservation Objectives & Rationale for Screening In
A157 Bar-tailed Godwit *(Limosa lapponica)* A160 Curlew *(Numenius arquata)* A162 Redshank *(Tringa totanus)* A169 Turnstone *(Arenaria interpres)* A179 Black-headed Gull *(Chroicocephalus ridibundus)* A182 Common Gull *(Larus canus)*	

5.7. Potential Significant Effects

5.7.1. Introduction

This section will establish whether the impacts of the proposed development at the Doorus Demesne site that were identified in the previous section, are likely to occur and whether they are significant. The identification of potential impacts and the assessment of their significance typically requires the identification of the type and magnitude of the impacts; whether impacts will be short term or long term, direct, indirect or cumulative and will they occur during construction or operation. These potential impacts will be examined with respect to the conservation objectives of the Natura 2000 site identified.

In the screening section of this report, the following possible future impacts on the Galway Bay Complex SAC and Inner Galway Bay SPA, were listed. These concerns are again listed below, and they will be dealt with in more detail in this section.

1. Deterioration of water quality in designated areas resulting from pollution from surface water run-off during site preparation and construction.
2. Destruction of supporting habitat adjacent to protected area during site preparation and construction
3. Disturbance to protected species during site preparation and construction
4. Deterioration of habitat in designated areas during the operation of the site.
5. Cumulative impacts with other proposed/existing developments.

5.7.2. Deterioration of water quality in designated areas resulting from pollution from surface water run-off during site preparation and construction.

The proposed development will involve the excavation of soil and pouring of concrete. Any additional surface water run-off, due to the construction works of the proposed works, has some limited potential to have a negative impact on the water quality in the Galway Bay Complex SAC and Inner Galway Bay SPA. The development has a 10m buffer zone between any building works and the wooded area of the SAC boundary to the south, and there is >100m of vegetated and

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raised ground between the development site and any sensitive receptor. The potential for any significant pollution event through surface water run-off is minimal. However, in accordance with the precautionary principal the development must be constructed and operated in accordance with best practice guidelines and follow recommended mitigation advice listed in Section 6.

5.7.3. Destruction of supporting habitat adjacent to protected area during site preparation and construction

The proposed development area includes the existing dwelling house, outbuilding sheds, garden and part of the surrounding field of improved agricultural grassland. Three ecological walkover surveys have been completed on the site and wider land holding, in November and December 2020 by ecologist Jen Fisher conducted and in April 2026 by Catherine Howarth of Coyle Environmental Ltd. In addition, a Bat Survey was completed in May 2026. The habitats within and directly adjacent to the proposed development site are of low biodiversity value and are not considered to be supporting habitats for any of the QIs of the nearby Natura 2000 sites. There is approximately a 50m buffer between the red line boundary and any ecologically valuable supporting habitat to the north and east and a 10m buffer between the site and the woodland to the south. The proposed development will not result in the destruction of any supporting habitat.

5.7.4. Disturbance to protected species during site preparation and construction

The proposed development may cause a slight short-term increase in noise, vibration and activity in the local area, which has the potential to cause temporary disturbance to protected species, such as Otter and birds utilising the surrounding habitats. Mitigation measures to manage disturbance are listed in Section 6.

5.7.5. Deterioration of habitat in designated areas during the operation of the site.

Negative impacts upon water quality in the Galway Bay Complex SAC and Inner Galway Bay SPA arising from the operation of the site have also been considered. The proposed new WWTS is a Tricel Novo Package Plant and Tricel Tero, designed to treat 900litres of wastewater per day. The Tricel Novo WWTS are in conformance with EN12566-3 and SR66. This WWTS will be installed, operated and maintained in accordance with EPA 2021 guidelines. This WWTS will be operated and maintained in accordance with EPA 2021 guidelines, as such all discharges to the environment will be well within accepted levels. It is considered unlikely that the additional works on the site will negatively affect the QIs of the SAC or SPA.

5.7.6. In combination effects with other proposed/existing developments

This section of the NIS examines whether any other plans or projects have the potential to act cumulatively or in-combination with the proposed development to adversely affect the integrity of the Natura 2000 site identified.

In-combination effects may arise from the development of other projects in the vicinity of the site, such as construction of housing, roads, rail, water and wastewater infrastructure, gas, electricity, provision of tourism facilities and telecommunications infrastructure, however, the in-combination

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effects of other developments would depend on factors such as the distance in relation to the site, the scale and the characteristics e.g. the types and quantities of emissions.

In the past 10 years there have been 22 applications for planning permission approved within the vicinity of the site. A check of the Galway County Council Planning Application Maps found only small-scale one-off housing and an extension projects in the area. The closest project to the proposed development at Doorus Demesne was granted permission in 2021 for the for the construction of a dwelling house, garage, effluent treatment system and all associated services. Gross floor space of proposed works: 165.8 sqm (house) & 31.85 sqm (garage) in Tawnagh East(Planning Ref. 212202).

Any future application in the area that has the potential to impact upon these Natura 2000 sites will be subjected to Appropriate Assessment as required under Articles 6(3) of the Habitats Directive. Following mitigation, this current development will have no cumulative impacts upon the SAC identified when considered in combination with any other development that has been screened for no impacts themselves (Stage 1) or where potential impacts have been mitigated against (Stage 2 AA / NIS).

Finally, the Galway County Development Plan, 2022-2028 has been reviewed and considered for possible in-combination effects with the proposed project.

With the implementation of the mitigation measures that are included as part of this NIS, the proposed development will not lead to cumulative impacts upon any designated site when considered in combination with other developments that have been properly screened for AA, or where an NIS was submitted.

6. Mitigation Measures

To protect Galway Bay Complex SAC and Inner Galway Bay SPA and to avoid any reductions in water quality in the area surrounding the proposed development site, several site-specific mitigation measures have been recommended, and these must be implemented and followed.

The implementation of these measures will ensure the protection of Natura 2000 habitats and species, and the local non-designated ecological receptors. The primary parties responsible for the implementation of these measures include the applicants, the project manager and the construction contractors.

6.1. General Good Practice and Initial Works

- Upon appointment of the construction contractor, this team will also be made aware of the sensitivity of the site and the mitigation measures required to protect habitats, groundwater and surface water quality. All measures will be undertaken from initial site works until the completion of all construction and landscaping works on site.

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- Prior to the commencement of developments on site, the site engineer and the contractors must be made aware of the ecological sensitivity of the site and its proximity and connection to the Galway Bay Complex SAC and Inner Galway Bay SPA.
- Guidelines in the following best practice documents should be adhered to:
  - Construction Industry Research and Information Association (CIRIA) (2005) Environmental Good Practice on Site (C692)
  - Construction Industry Research and Information Association (2001) Control of Water Pollution from Construction Sites, Guidance for Consultants and Contractors (C532)
  - Construction Industry Research and Information Association (2000) Environmental Handbook for Building and Civil Engineering Projects (C512)
  - Environmental Protection Agency (2015) List of Waste and Determining if Waste is Hazardous or Non-Hazardous
  - Environment Agency et al. (2015) Guidance on the Classification and Assessment of Waste, Technical Guidance WM3.

6.2. Management of Construction Waste and Soil

- All construction waste must be removed from site by a registered contractor to a registered site. Evidence of the movement and safe disposal of the construction waste must be retained and presented to Local Authority upon request.
- The applicants and construction contractors will be responsible for the safe removal of any construction waste generated on site. There must be no disposal of construction waste or topsoil in any designated site.
- All topsoil generated from site works should be stored within the application site until it is required for landscaping. It must not be stored outside the site boundaries, and it must not be used for the infilling of any area outside of the site. It must be stored at appropriate locations within the site, away from watercourses.
- If there is more topsoil than is needed for landscaping, it must be removed from site by a registered contractor for appropriate use elsewhere. The end location of the topsoil must be identified, and records presented to the local authority if requested.

6.3. Protection of Surface Water Quality and Management of Pollutants

- The development design includes a 10m buffer zone between any construction works and the Galway Bay Complex SAC to the south of the site. This must be adhered to.
- Efficient construction practices and sequences should be employed on site, and this will minimise soil erosion and potential pollution of local waterbodies with soil and sediment.
- Works within the site should be avoided during periods of heavy rainfall.
- It is vital that there is no deterioration in water quality in the nearby waterbodies. This will protect both habitats and species that are sensitive to pollution. Therefore, strict controls of erosion, sediment generation and other pollutants associated with the installation process should be implemented, including the provision of attenuation measures, silt traps or geotextile curtains to reduce and intercept sediment release into any local watercourses.

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- Silt fences and berms should be installed prior to the commencement of construction on site.
- The silt fences should be monitored daily to ensure that they remain functional throughout the construction of the proposed development. Maintenance of the fences should be carried out regularly. Fences should be inspected thoroughly after periods of heavy rainfall.
- Best practice concrete / aggregate management measures must be employed on site (these measures should be included where possible on a site plan). These will include:
    - Best practice in bulk-liquid concrete management should be employed on site addressing pouring and handling, secure shuttering, adequate curing times etc.
    - Stockpile areas for sands and gravel must be kept to a minimum size, well away from the drains (minimum 50m).
    - Where concrete shuttering is used, measures must be put in place to prevent against shutter failure and control storage, handling and disposal of shutter oils.
    - Activities which result in the creation of cement dust must be controlled by dampening down the areas.
    - Raw and uncured waste concrete must be disposed of by removal from the site;
    - Stockpile areas for sands and gravel will be kept to a minimum size, well away from the adjacent watercourse.
- Daily plant inspections must be completed by all plant operators on site to ensure that all plant is maintained in good working order. Where leaks are noted on these inspection sheets, the plant must be removed from operations for repairs as pollution control measures.
- No refuelling of plant equipment or vehicles should be conducted onsite.

6.4. Protection of Groundwater Quality

- This development has an existing wastewater treatment system present on site and requires an upgrade to the existing wastewater treatment on site.
- The new WWTS installed must match the design criteria to treat waste in accordance with EPA guidelines.
- The installation should be supervised and certified by the Environmental Engineer who carried out the site characterisation assessment and proposed design.
- The WWTS must be installed and maintained to manufacturer instructions to ensure there is no risk of pollution to groundwater from the installation or operation of the system.

6.5. Minimising Noise and Disturbance

To ensure that impacts on species that might use the habitats close to the site do not arise from the noise generated on site, measures to control noise on site must be undertaken.

- The construction plant and tools used on-site must comply with the relevant Irish regulations in relation to noise and vibration requirements.
- Site management must also ensure that each item of plant and equipment complies with the noise limits quoted in the relevant European Commission Directive 2000/14/EC.

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- It is recommended that all equipment used on site are newer models equipped with noise dampening systems and that the equipment is maintained in good condition and serviced regularly.
- All plant and equipment should be fitted with appropriate mufflers or silencers of the type recommended by the manufacturer.
- Only plant and equipment that has been designed for that task should be used and all equipment should be shut down or set to minimum when not being used.
- All vehicles / plant shall be turned off when not in operation. Idling engines shall not be permitted for excessive time periods

6.6. Invasive Species Biosecurity

- Quarries supplying material for the project should provide written confirmation to the client that material provided is free of non-native invasive species and noxious weeds.
- The site is in close proximity to the Galway Bay Complex SAC boundary, and no invasive species may be introduced. Biosecurity will be required for all equipment and machinery involved in site preparation. This will involve:
    - Visually inspect all equipment for evidence of attached plant or animal material, or adherent mud or debris. This will be carried out before entering the site.
    - High-pressure hot water cleaning, with water > 40 degrees C, is recommended for machinery that will be used on site prior to entering the site. Many roadside garages provide these facilities. If it is not possible to steam clean the equipment, a normal power hose must be used. After cleaning visually inspect the equipment to ensure that all adherent material and debris has been removed.
    - Apply disinfectant (e.g., 1% Virkon aquatic solution) on equipment, particularly to the undercarriage and wheels of the vehicle/machine before entering the site.
    - Remove any attached or adherent material (vegetation and debris) before leaving the site of operation.

6.7. Biodiversity Management and Enhancement

- The lighting design should use lighting that reduces light pollution for the benefit of nocturnal species. Lighting shall be controlled to avoid light pollution of green areas and shall be targeted to areas of human activity and for priority security areas. Motion-activated sensor lighting is preferable to reduce light pollution.
    - Dark corridor for movement of nocturnal species along the grounds of the site. Lighting shall be directed downwards and shall not illuminate vegetation.
    - All luminaires shall lack UV elements when manufactured and shall be LED
    - A warm white spectrum (ideally <2700 Kelvin) to reduce blue light component
    - Luminaires shall feature peak wavelengths higher than 550nm
- The stone outbuildings on site are used by nesting birds including Swallows (*Hirundo rustica*) and Great Tits (*Parus major),* demolition works may only be carried out outside of the bird

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nesting season. The outbuildings must be checked for active nests before any demolition works are carried out.

- All existing native hedgerow and trees should be retained where possible.
- Where woody vegetation must be removed it shall be done outside of the bird nesting season (1st March - 31st August) to comply with Section 22 of the Wildlife Act 1976 as amended.
- It is recommended that Irish provenance native planting is used in the landscaping.

7. NIS Conclusion

This current NIS has been undertaken to evaluate the potential impacts of the proposed development regarding the effects upon the conservation objectives and qualifying interests (including the habitats and species) of the Galway Bay Complex SAC and Inner Galway Bay SPA. It is considered that following mitigation, that the proposed project does not have the potential to significantly affect the conservation objectives of these Natura 2000 sites, and the integrity of these sites will not be adversely impacted.

The qualifying interests of the site and their potential to be impacted upon from the potential development were listed in Section 5. It is considered that these potential impacts can be successfully mitigated against. With implementation of the mitigation measures there will be no deterioration in water quality or impacts upon any designated habitat or any species dependent on these designated habitats. The integrity of these sites will not be adversely affected. Table 6 follows the integrity of the SAC / SPA checklist, which shows that the integrity of the site would not be affected by the proposed development.

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Table 6 – Integrity of Site Checklist (From NPWS, Information Checklist for AA, Box 6, EC (2002)

Conservation Objective: Does the project have the potential to:	**Yes / No**
Cause delays in progress towards achieving the conservation objectives of the site?	N
Interrupt progress towards achieving the conservation objectives of the site?	N
Disrupt those factors that help to maintain the favourable conditions of the site?	N
Interfere with the balance, distribution and density of key species that are the indicators of the favourable condition of the site?	N
Other Objectives: Does the project have the potential to:	**Yes / No**
Cause changes to the vital defining aspects (e.g. nutrient balance) that determine how the site functions as a habitat or ecosystem?	N
Other Objectives: Does the project have the potential to:	**Yes / No**
Change the dynamics of the relationships (between, for example, soil and water or plants and animals) that define the structure and/or function of the site?	N
Interfere with predicted or expected natural changes to the site (such as water dynamics or chemical composition)?	N
Reduce the area of key habitats?	N
Reduce the population of key species?	N
Change the balance between key species?	N
Reduce diversity of the site?	N
Result in disturbance that could affect population size or density or the balance between key species?	N
Result in fragmentation?	N
Result in loss or reduction of key features (e.g. tree cover, tidal exposure, annual flooding, etc.)	N

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Considering the above, it is deemed that the integrity and conservation objectives of Galway Bay Complex SAC, Inner Galway Bay SPA and other Natura 2000 sites will not be affected by the proposed works following the implementation of and adherence to the mitigation measures detailed in Section 6 of this NIS report. Following the implementation of these mitigation measures, no significant adverse effects on the integrity of Natura 2000 protected sites will occur as a result of the proposed development in Doorus Demesne and the conservation status of the Annex I habitats and Annex II species will not be compromised by the proposed works either directly, indirectly or cumulatively.



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Appendix 1

References & Species List

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Species List

Birds

Blackbird (*Turdus merula*)
Black-headed Gull (*Larus ridibundus*)
Chaffinch (*Fringilla coelebs*)
Common Buzzard (*Buteo buteo*)
Common Starling (*Sturnus vulgaris*)
Curlew (*Numenius arquata*)
Dunnock (*Prunella modularis)*
Eurasian Wren (*Troglodytes troglodytes*)
European Goldfinch (*Carduelis carduelis*)
European Robin (*Erithacus rubecula*)
Herring Gull (*Larus argentatus*)
Hooded Crow (*Corvus cornix*)
Linnet (*Linaria cannabina*)
Pied Wagtail (*Motacilla alba yarrellii*)
Rook (*Corvus frugilegus*)
Song Thrush (*Turdus philomelos*)
Swallow (*Hirundo rustica*)
Woodpigeon (Columba palumbus)

Flora

Annual Meadow Grass (*Poa annua*)
Ash (*Fraxinus excelsior*)
Beech (*Fagus sylvatica*)
Bird's-foot Trefoil (*Lotus corniculatus*)
Blackthorn (*Prunus spinosa*)
Bramble (*Rubus fruticosus agg.*)
Burnet Rose (*Rosa pimpinellifolia*)
Cock's Foot (*Dactylis glomerata*)
Common Cat's-ear (*Hypochoeris radicata*)
Common Centaury (*Centaurium erythraea*)
Cow Parsley (*Anthriscus sylvestris*)
Cowslip (*Primula veris*)
Creeping Buttercup (*Ranunculus repens)*
Crested Dog's Tail (*Cynosurus cristatus*)
Daisy (*Bellis perennis*)
Dandelion (*Taraxacum spp.*)
Docks (*Rumex spp.*).
Dog Rose (*Rosa canina*)

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False Brome (*Brachypodium sylvaticum*)
Greater Plantain (*Plantago major*)
Hawthorn (*Crataegus monogyna*)
Hazel (*Corylus avellana*)
Ivy (*Hedera helix*)
Knapweed (*Centaurium erythraea*)
Male Fern (*Dryopteris filix-mas*)
Nettle (*Urtica dioica*)
Ox-eye Daisy (*Chrysanthemum leucanthemum*)
Perennial Rye Grass (*Lolium perenne*)
Pignut (*Conopodium majus*)
Red fescue (*Festuca rubra agg.*)
Rough Meadow Grass (*Poa trivialis*)
Selfheal (*Prunella vulgaris*)
Snowberry (*Symphoricarpos albus*)
Spindle (*Euonymus europaeus*)
Sycamore (*Acer pseudoplatanus*)
Thistles (*Cirsium vulgare*)
Violet (*Viola sp.*)
White clover (*Trifolium repens*)
Willows (*Salix spp.*)
Yarrow (*Achillea millefolium*)
Yorkshire Fog (*Holcus lanatus*)

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Appendix 2

Photo Plates

Plate 1 – Aerial photos of the site

Doorus Demesne, Kinvarra. April 2026

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Plate 2 – Proposed development site

Doorus Demesne, Kinvarra. April 2026

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Plate 3 – Existing house and garden

Doorus Demesne, Kinvarra. April 2026

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Plate 4 – Existing outbuildings

Doorus Demesne, Kinvarra. April 2026

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Plate 5 –Grassland, hedgerow and treeline habitats surrounding the proposed development site

Doorus Demesne, Kinvarra. April 2026

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Plate 6 – Walled garden, calcareous grassland, hedgerow to the east and treelines to the north

Doorus Demesne, Kinvarra. April 2026

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Plate 7 – Ruined outbuildings beside walled garden, coastline, stone walls and woodland

Doorus Demesne, Kinvarra. April 2026

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