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Natura Impact Statement

PRESENTED TO

National Broadband Ireland

DATE

May 2026

Environmental Consultancy Services

DOCUMENT CONTROL SHEET

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Client	National Broadband Ireland
Project Title	Upgrade/Installation of Wireless Broadband Network at DA205 Inishbofin Island (Island Radio Link)
Document Title	Natura Impact Statement

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1 INTRODUCTION

1.1 Background

DNV was commissioned by National Broadband Ireland (NBI) to prepare an Appropriate Assessment (AA) Screening Report for the upgrade/installation of broadband services to buildings in the Inishbofin Island area (DA205).

The AA Screening Report concluded that a degree of uncertainty exists as to whether the Proposed Installation could give rise to potentially significant effects on one European site, namely, ***Inishbofin and Inishshark SAC (000278).***

Therefore, a Natura Impact Statement (NIS) has been prepared for the Proposed Installation Activity. The purpose of this NIS report is to provide information for the relevant competent authority to carry out a Stage 2 Appropriate Assessment in respect of the Proposed Development.

Hereafter, this NIS refers to the 'Project', 'Proposed Project' or 'Proposed Installation' when referring to the installation of radio link infrastructure and associated works for DA205 Inishbofin Island. This NIS has been prepared on the basis of design data presented in DA205 Inishbofin Island.

Further details relevant to the NIS process are laid out in the Appendices of this document:

- Legislation regarding the protection of European sites – Appendix 1,
- Policy Context, AA process, guidance followed and the steps of a Stage 1 assessment – Appendix 2,
- NIS Methodology – Appendix 3,
- Site Synopses of relevant European sites – Appendix 4.

1.2 Quality Assurance and Competency

DNV Biodiversity & Environmental Services (BES) is a multi-disciplinary consultancy specialising in the areas of the Environment, Waste Management and Planning. All DNV consultants carry scientific or engineering qualifications and have a wealth of experience working within the Environmental Consultancy sectors, having undergone extensive training and continued professional development.

DNV (BES) as a company remains fully briefed in European and Irish environmental policy and legislation. DNV staff members are highly qualified in their field. Professional memberships include the Chartered Institution of Wastes Management (CIWM), the Irish Environmental Law Association and Chartered Institute of Ecology and Environmental Management (CIEEM).

All surveying and reporting have been carried out by qualified and experienced ecologists and environmental consultants.

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1.3 Description of the National Broadband Plan (NBP)

1.3.1 Project Overview

The National Broadband Plan (NBP) aims to transform the country's broadband landscape through the delivery of high-speed broadband to all parts of Ireland where such services are not available commercially. NBI will make its services available to the entire rollout area which accounts for 23% of the population in approximately 537,000 homes, farms, schools and businesses. NBI will provide around 146,000 kilometres of fibre to connect over half a million homes, covering 96% of Ireland's land mass. Up to 1,800 people will be working on the project at its peak.

To deliver on the commitments outlined above, NBI has broken the country down into 227 separate project locations, known as Deployment Areas or DAs.

1.4 Description of DA205 Inishbofin Island Project

1.4.1 Deployment Area Location and Context

The Proposed Project entails the upgrade and installation of telecommunications infrastructure to buildings on Inishbofin Island (DA205). The entire Deployment Area (DA) is situated inside County Galway. The surrounding area is mainly rural and maritime.

DA205 Inishbofin Island will consist of the installation of a radio link at 1 location, on Galway County Council's Sheep Dipping Pin Lands, Middlequarter, Inishbofin Island (see Figure 1), and the potential impact upon European sites was assessed in a separate AA Screening Report (for further details see the AA Screening under separate cover for DA205 Inishbofin - Island Radio Link Screening_01.04.2026 (DNV 2026).

1.4.2 *Project Location and Context*

The radio link will be installed at Galway County Council's Land at Middlequarter, Inishbofin Island (see Figure 1). The surrounding area is mainly rural and maritime, with the Inishbofin Airport airstrip located to the west of the Site and agricultural lands in the immediate surroundings of the Site. The installation activities will involve the construction of compound and palisade fencing, construction of concrete base and concrete plinth for the single bay cabinet, 1 no. 18m structure, 1 no. chambers,1 no. outdoor cabinet, 15m of ducting and all associated works including earthing (discussed further in Section 1.4.3).

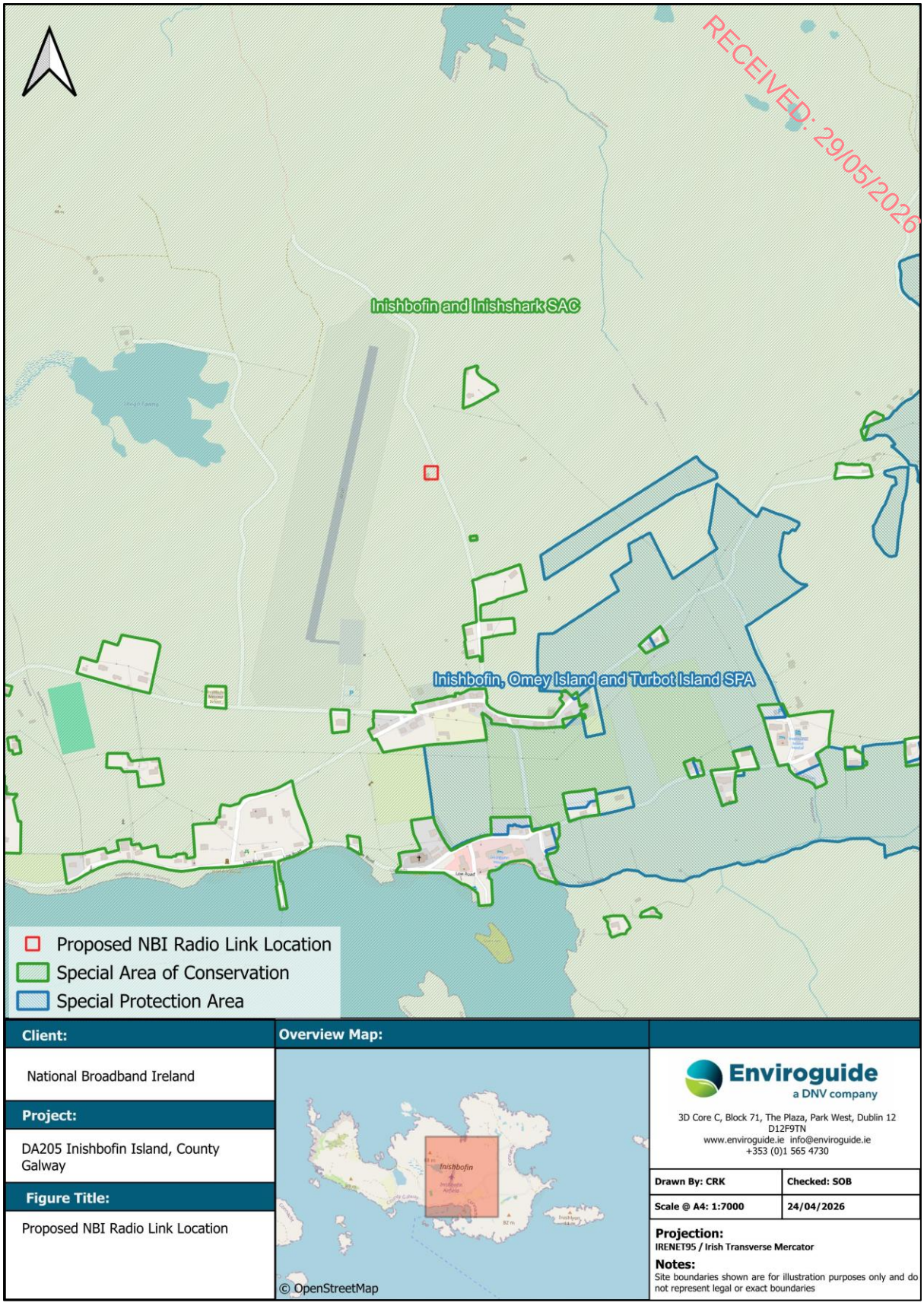


FIGURE 1: PROPOSED PROJECT LOCATIONS WITHIN DA205 INISHBOFIN ISLAND



FIGURE 2: PROPOSED PROJECT LOCATED WITHIN EUROPEAN SITES

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1.4.3 Project Specific Description

DA205 Inishbofin Island is expected to commence in September 2026 and will run for approximately 8 weeks.

The Proposed Project on Inishbofin Island will involve the installation of:

- Compound and palisade fencing
- Construction of Concrete Base
- Construction of Concrete Plinth for the single bay cabinet
- Erection of 18m structure
- 1 no. chamber
- 1 no. outdoor cabinet
- 15m ducting and all associated works including earthing

The installation of infrastructure will not require water course crossing, or instream works. Installation will be carried out during daylight hours and no night working is required as part of the Proposed Project.

1.4.4 Description of Installation Activities

All installation activities will be undertaken in accordance with a project specific risk assessment and method statement, provided by NBI. Ground works, construction, and installation is described in Sections 1.4.4.1 to 1.4.4.6. Figure 3 to Figure 5 highlight certain construction aspects. The following construction plant and vehicles are envisaged to be required on Site during the Construction Phase.

TABLE 1: CONSTRUCTION PLANT AND VEHICLES REQUIRED ON SITE DURING THE CONSTRUCTION PHASE

Vehicle	Duration
6-ton 360-degree excavator	10 days
3-ton site dumper	5 days
50-ton mobile crane	1 day
Concrete delivery lorries entering and exiting the site	2 days
Hiab tipper truck	3 days
Site personnel vans and jeeps on site on all working days in designated parking areas within Exchange.	

1.4.4.1 Construction of Concrete Base on site

- The structure concrete base will measure approx. 5.0m x 5.0m with the proposed base location will be excavated to a depth of 1.2m.
- Timber shutters will be erected to form the base and the structure's holding down stubs secured in place.
- Steel Rebar will be installed within the base area to manufacturers specification and design.
- ESB and Fibre Ducting will be placed with the base as per design.
- Concrete is poured in the base and finished to the correct specification.

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1.4.4.2 Construction of Concrete Plinth

The Plinth refers to the concrete base required for the Outdoor Cabinet.

- Timber shutters will be erected next to the structure base.
- Steel Mesh will be placed in the plinth area.
- The base will be poured at the same level as the finished concrete for the structure.

1.4.4.3 Erection of 18m Structure

- An 18m Structure will be erected on to the new CHS stubs on the concrete base.
- The structure sections will be delivered by a Low bed truck or similar to the compound location using the existing access road to the compound.
- Sections will be pre-assembled at the manufactures assembly yard and torqued to the manufactures specifications.
- Using a Teleporter or Crane, the first section will be lifted and lowered onto the base CHS stubs. The second and third sections are assembled together and lifted and secured to the top of the first section. The structure is torqued to the manufactured specifications.
- Structure Steelwork, Fall Arrest system, Lightning Finial, Earth down-conductor and Anti Climb Device will be mounted on the structure and secured as per manufactures specifications.
- The structure will be inspected and safe to climb and fall arrest certs issued.

1.4.4.4 Construction of Compound

The Compound relates to the area of ground to be taken for the structure and cabinet.

- Once the structure base and cabinet plinth are constructed, a palisade fence with pedestrian gate will be erected.
- A 600mm x 600mm precast chamber will be installed within the compound beside the structure base and an NBI steel cover secured on top.
- Fibre ducting will be connected into the chamber from the cabinet location.
- An ESB duct will be laid in a trench from the cabinet location and trenched to the nearest ESB pole to ESB installation specifications.
- Lightning protection earth tape will be laid in the compound area around the structure base and tails will connect all steel elements withing the compound including the fence and gate. Earth rods will be driven, and concrete Earth pots placed over the rods. Earth tests will be conducted to the system as per standard lightning protection specifications.
- A Terram layer will be laid in the compound area to prevent weed growth and water accumulation in the compound area.
- A layer of clean stone (washed gravel) will be laid and levelled in the compound to give a neat finish to the compound area.

1.4.4.5 Installation of Underground Chambers

- All chambers will be 600mm x 600mm internal opening. Including lid and concrete plinth this will extend to 900mm x 900mm plan area.
- A tracked mini-excavator or a wheeled backhoe such as a JCB will excavate a hole for the installation of a chamber at the infrastructure installation location(s), to the design depths required (the chambers are approximately 600mm deep internally).

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- Once the infrastructure has been installed the open excavation will be backfilled with imported Cl808 and topped off with previously excavated spoil and the ground reinstated.
- The quantity of excavated material is dependent on the length and depth of the required excavations; all surplus material is placed into suitable containers and removed from site by truck for compliant waste management.

1.4.4.6 Installation of Fibre Duct (Underground, Trench Method)

- A tracked mini-excavator or a wheeled backhoe such as a JCB will excavate a trench to a trench depth of 750 millimetres.
- Once the infrastructure has been installed the open excavation will be backfilled as per the Guidelines for the Opening, Backfilling and Reinstatement of Openings in Public Road (Department of Transport, Tourism and Sport, 2017).
- The quantity of excavated material is dependent on the length and depth of the required excavations; all surplus material is placed into suitable containers and removed from site by truck for compliant waste management.
- Two trench depths are utilised depending on environmental constraints such as soil and rock type at a local level: 'shallow trench' refers to a trench depth of 350 millimetres below surface, and 'traditional trench' refers to a trench depth of 750 millimetres below surface.

The methodologies outlined above are part of the embedded design plan for the National Broadband Project and are standard best practice.

1.4.4.7 Programme of Works (Construction Phase)

The below table provides a sample construction program which the client envisages:

TABLE 2: PROGRAMME OF WORKS

Work Type	Day	Scope of Works
Civil Works	1	Set up Health and Safety Signage at the site entrance. Mark out site location. Erect security fencing to form compound.
	2	Commence work on telecommunications compound.
	3-4	Excavation of structure foundation base using 360-degree excavator and 3tonne dumper truck to remove soil spoil to HIAB equipped tipper truck.
	5	Tying rebar for telecom structure foundation and form shuttering, install structure template.
	6	Pour concrete structure foundation base using standard concrete trucks.
	7-11	Compound construction and install ESB ducting, mini pillar and power meter cabinet.
	12-14	Build associated cable gantry/cable management systems. Install all site signage. Install all LP and test. Complete all associated power works.
	15	Take delivery of telecom structure and erect with 50-ton crane.
	16	Complete all civil works.

Work Type	Day	Scope of Works
	17	Final site inspection to ensure site is left clean and tidy and ready for operational phase.

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1.4.5 Description of Maintenance Activities (Operational Phase)

All maintenance activities will be undertaken in accordance with a project specific risk assessment and method statement, provided by NBI. Maintenance works are detailed in sections 1.4.5.1 to 1.4.5.3.

1.4.5.1 Compound

- Annual maintenance and inspection of the compound to include removal of weeds, check and repair and fence defects and inspect the earth system and fibre chambers.

1.4.5.2 Structure

- An annual climb down inspection of the structure will be conducted to check the following – structure holding down bolts and nuts, structure section bolts and nuts. A percentage of the bolts will be torqued to manufactures specification and defects noted and reported to NBI.
- Inspect and re-certify the Fall Arrest system on the structure.
- Inspect the Anti Climb Device.
- Inspect the earthing down conductors.
- Inspect the NBI licensed radio equipment on the structure including associated cabling.
- Re-issue a safe to climb certificate.

1.4.5.3 Cabinet

- Annual maintenance and inspection of the cabinet to include replacement of the ventilation filters and grills.
- Inspect and repair door locking barrels.
- Inspect and report any alarms visible in the cabinet to NBI Operations.

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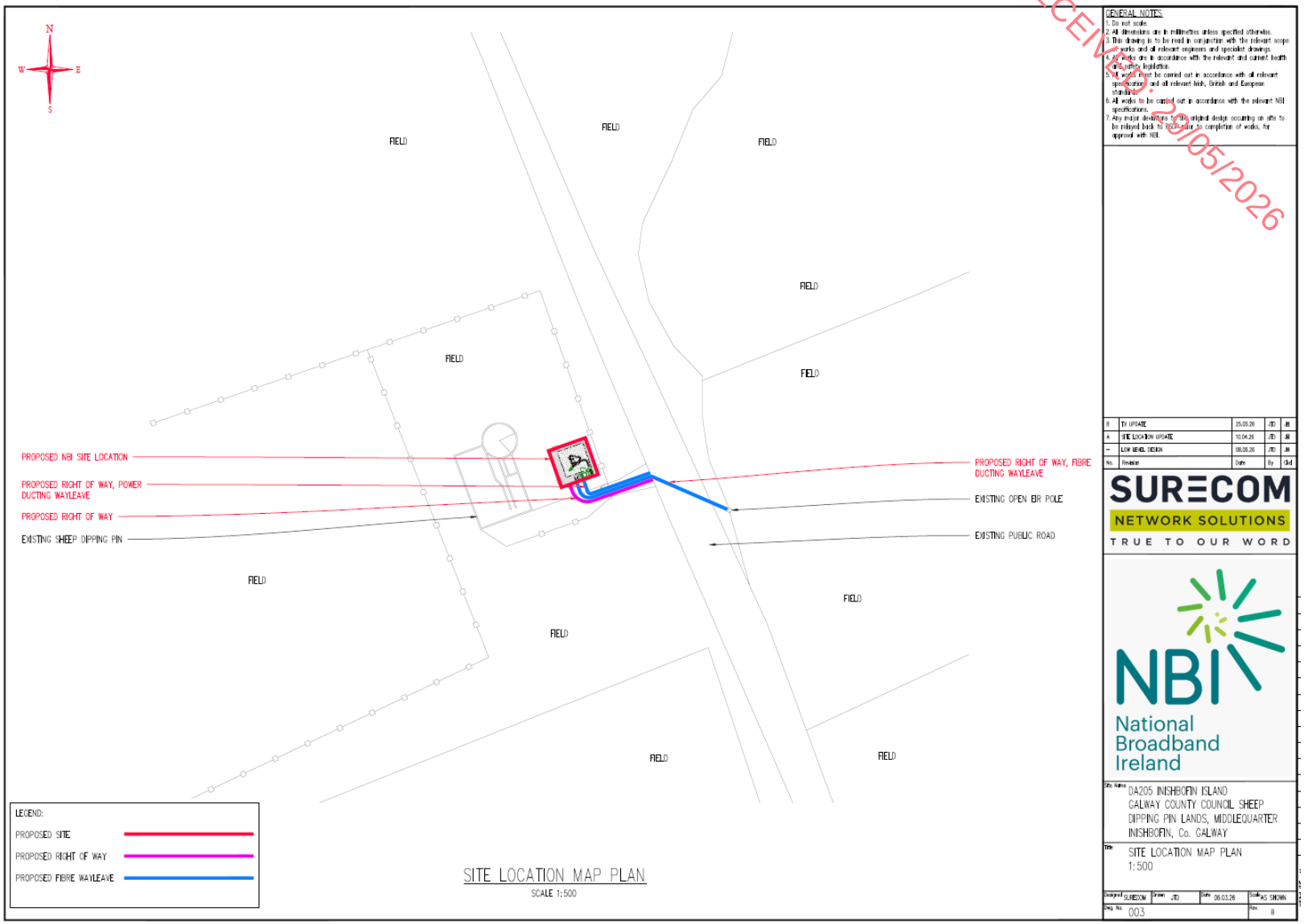


FIGURE 3: SITE LOCATION MAP PLAN (NBI 2026)

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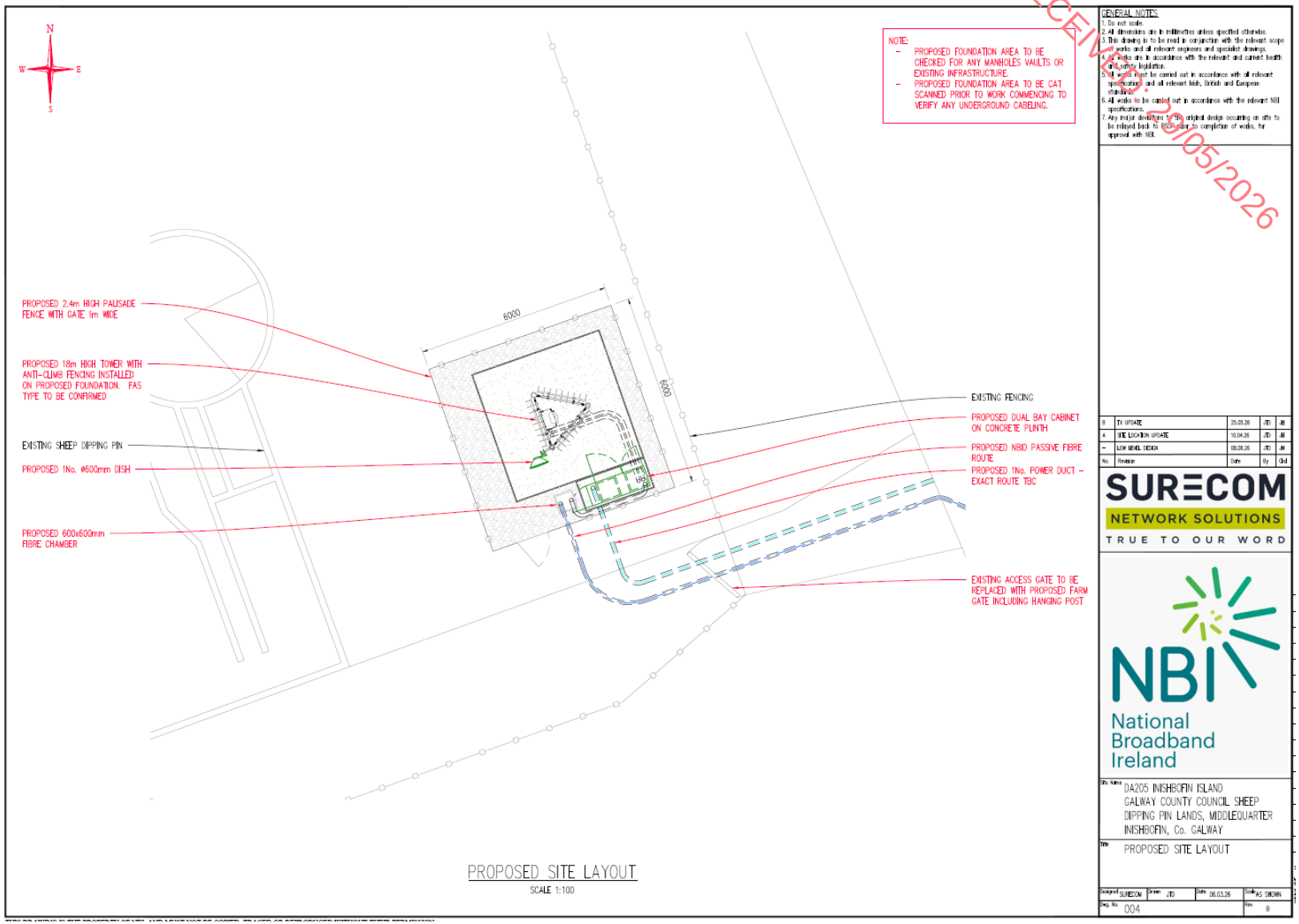


FIGURE 4: PROPOSED SITE LAYOUT PLAN WITH PROPOSED INFRASTRUCTURE AND COMPOUNDS (NBI 2026)

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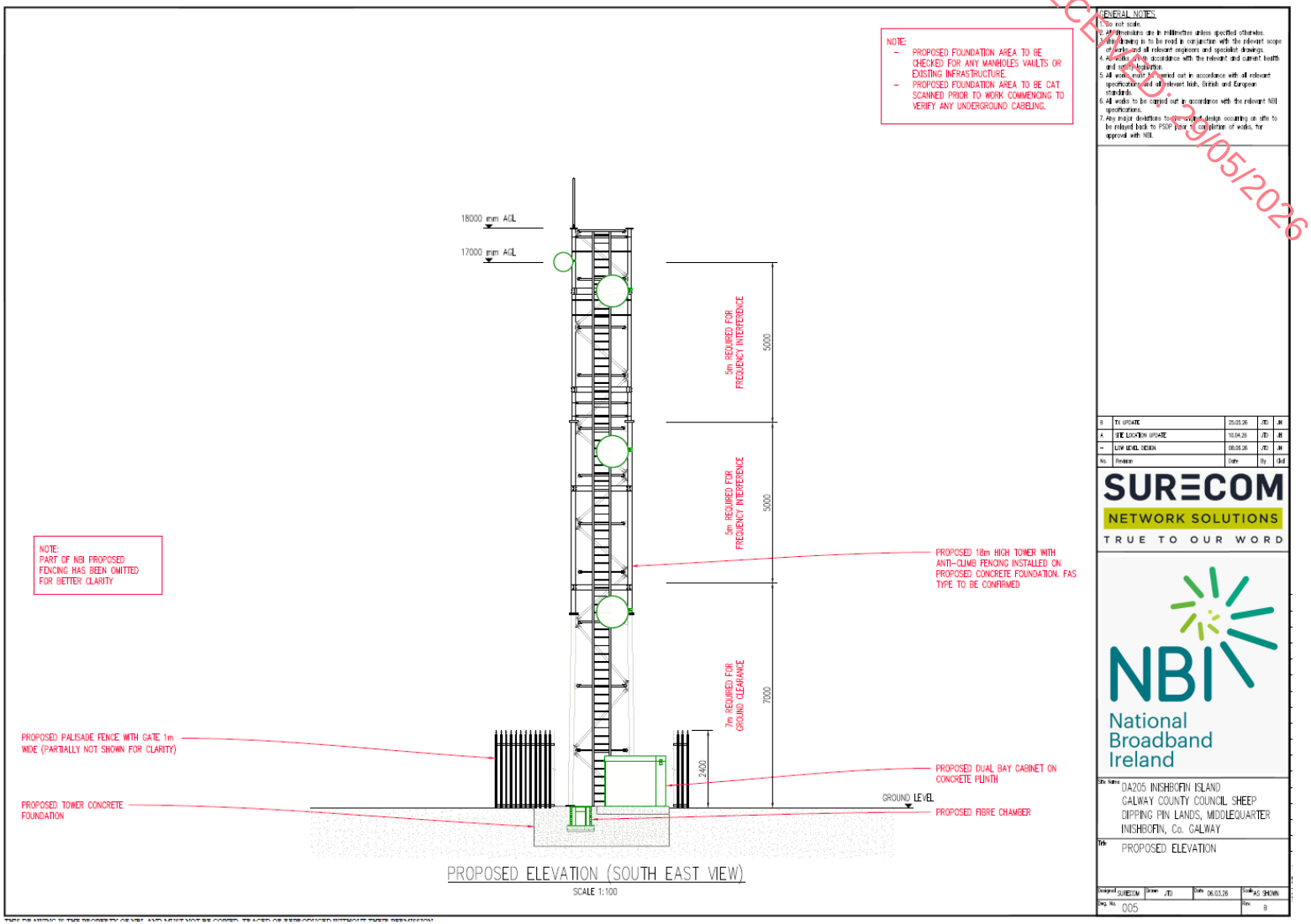


FIGURE 5: PROPOSED SITE ELEVATION FOR PROPOSED INFRASTRUCTURE (NBI 2026)

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FIGURE 6. SITE PHOTOGRAPH INDICATING THE PROPOSED LOCATION OF NBI EQUIPMENT (NBI 2026)

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FIGURE 7. SITE PHOTOGRAPH INDICATING THE PROPOSED ELEVATION OF NBI WORKS (NBI, 2026)

1.5 Stage 1: Appropriate Assessment Screening Conclusion

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The legal context, policy context, and methodology of the NIS are outlined in Appendix 1, Appendix 2 and Appendix 3 respectively. An AA Screening Report was prepared for the Proposed Installation by DNV in April 2026.

The conclusion of the AA Screening Report is as follows:

"The Proposed Project consisting of the installation of Broadband Network at DA205 Inishbofin Island (DA205), has been assessed taking into account:

- *The nature, size and location of the proposed installations and possible impacts arising from the installation activities.*
- *The qualifying interests and conservation objectives of the European sites.*
- *The potential for in-combination effects arising from other plans and projects.*

In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that, on the basis of objective information; the possibility **cannot be excluded** that the Proposed Project will have a likely significant effect on the European site listed below:

Inishbofin and Inishshark SAC (000278)

This NIS will assess the potential effects of the Proposed Installation on *Inishbofin and Inishshark SAC (000278).* A brief summary of *Inishbofin and Inishshark SAC (000278)* is available from the NPWS (Appendix 4).

This site is linked to the Proposed Installation via a land, air, and hydrological pathway.

1.6 Desk Study

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A desktop study was carried out to collate and review up to date information, datasets, and documentation sources relevant for the completion of the Screening Report. The desktop study, completed in April 2026 relied on the following sources:

- National Parks and Wildlife Service (NPWS) datasets.
- Geological Survey Ireland (GSI) online datasets and mapping.
- Environmental Protection Agency (EPA) mapping and datasets.
- OSI aerial imagery and Discovery Series mapping.
- Satellite imagery from various sources and dates (Google, Digital Globe, Bing).
- The Status of EU Protected Habitats in Ireland (NPWS).
- Office of Public Works (OPW) Flood Plans (https://www.floodinfo.ie/map/floodplans/).
- Department of Agriculture, Food and the Marine Forestry Licence Viewer (https://forestry-maps.apps.rhos.agriculture.gov.ie/)

For a complete list of the specific documents consulted as part of this assessment, see *Section 4 References.*

1.7 Impact Prediction

Potential impacts on the relevant European site(s) identified during the AA Screening are based on information regarding their QIs and/or SCI species, and the attributes and targets relating to their Site-Specific Conservation Objectives (SSCOs). These have been informed by the desk study and any field surveys carried out prior to the preparation of this report.

Impact prediction is based on the Source-Pathway-Receptor (S-P-R) model. The following describes the steps of the S-P-R approach taken in this NIS:

- Potential sources of effects were identified based on the Proposed Installation description and details, including changes to potentially suitable ex-situ habitats at the Site (i.e., habitats utilised by Species of Conservational Importance (SCI) bird species outside of their designated SPAs).
- Up-to-date GIS spatial datasets for water catchments as well as any information from relevant site investigations and/or field surveys were used to identify the QIs/ SCIs within the relevant European site(s) that have a notable S-P-R connection to the Proposed Development:
    - The catchment data were used to establish or discount potential hydrological connectivity between the Proposed Installation and any QIs/SCIs.
    - Groundwater and bedrock information used to establish or discount potential hydrogeological connectivity between the Proposed Installation and any QIs/SCIs.
    - Air and land connectivity assessed based on Proposed Installation details and proximity to QIs/SCIs.

- Consideration of potential indirect pathways, e.g., impacts to flight paths, *ex-situ* habitats, etc.

- Identification of the specific attributes and targets likely to be affected for those QIs/SCIs linked to the Proposed Installation via notable S-P-R connections, and a description of the potential impacts.

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Where the preceding steps identified any potential for adverse impacts on any QIs/SCIs or their SSCOs for the relevant European site(s), appropriate mitigation measures to eliminate any significant adverse effects are identified in this report.

1.8 Field Surveys

A preliminary habitat survey was carried out by DNV on 19th March 2026 to assess the range of the QI habitats in the context of the Site location, with a second survey undertaken on the 7th May 2026 during the optimal survey period for flora and heath habitats (NRA, 2009). No indicator species of *European dry heath* habitat was found within the redline boundary footprint of the Proposed Installation. Additionally, there were examples of regular disturbance such as patches of bare soil, as well as a presence of common floral species indicative of low ecological value agricultural land.

There were however examples of indicator species of *European dry heath* habitat located within 5m of the Proposed Installation to the north and east during both the March and May 2026 surveys. The species in question was heather (*Calluna vulgaris*) (see Figure 8). This indicated that whilst the footprint of the Proposed Installation is not located directly within the *European dry heath* habitat, it is located in the vicinity (<5m) of a mosaic habitat featuring *European dry heaths* and agricultural land, also indicative that *European dry heath* habitat is potentially in the vicinity and zone of influence of the Site (see Figure 9).

1.9 Limitations

No limitations were encountered which would prevent robust conclusions being drawn as to the potential impacts of the Proposed Installation on the relevant European sites.



FIGURE 8: HEATHER (*CALLUNA VULGARIS*) IN THE VICINITY OF THE PROPOSED INSTALLATION.



FIGURE 9: TRANSITIONING OF HABITATS FROM AGRICULTURAL TO EUROPEAN DRY HEATH VIA A MOSAIC HABITAT ZONE.

2 NATURA IMPACT STATEMENT

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2.1 Existing Environment

The Proposed Installation is situated in County Galway. The area is predominantly rural. The surrounding hydrology (catchments, lake waterbodies, river waterbodies and groundwater bodies and groundwater vulnerability) is illustrated in Figure 10. The project route is situated within the *Erriff-Clew Bay* catchment and is surrounded by the *Western Atlantic Seaboard (Has 32;33;34)* coastal waterbody. The project route is situated on the *Inishbofin* groundwater body, where the project activity will take place on groundwater systems described as “Rock at or near surface or karst” with regard to vulnerability. Nine Special Areas of Conservation (SACs), and three Special Protection Areas (SPAs) are located within the precautionary ZOI of the Proposed Project site, see Figure 10 below for details.

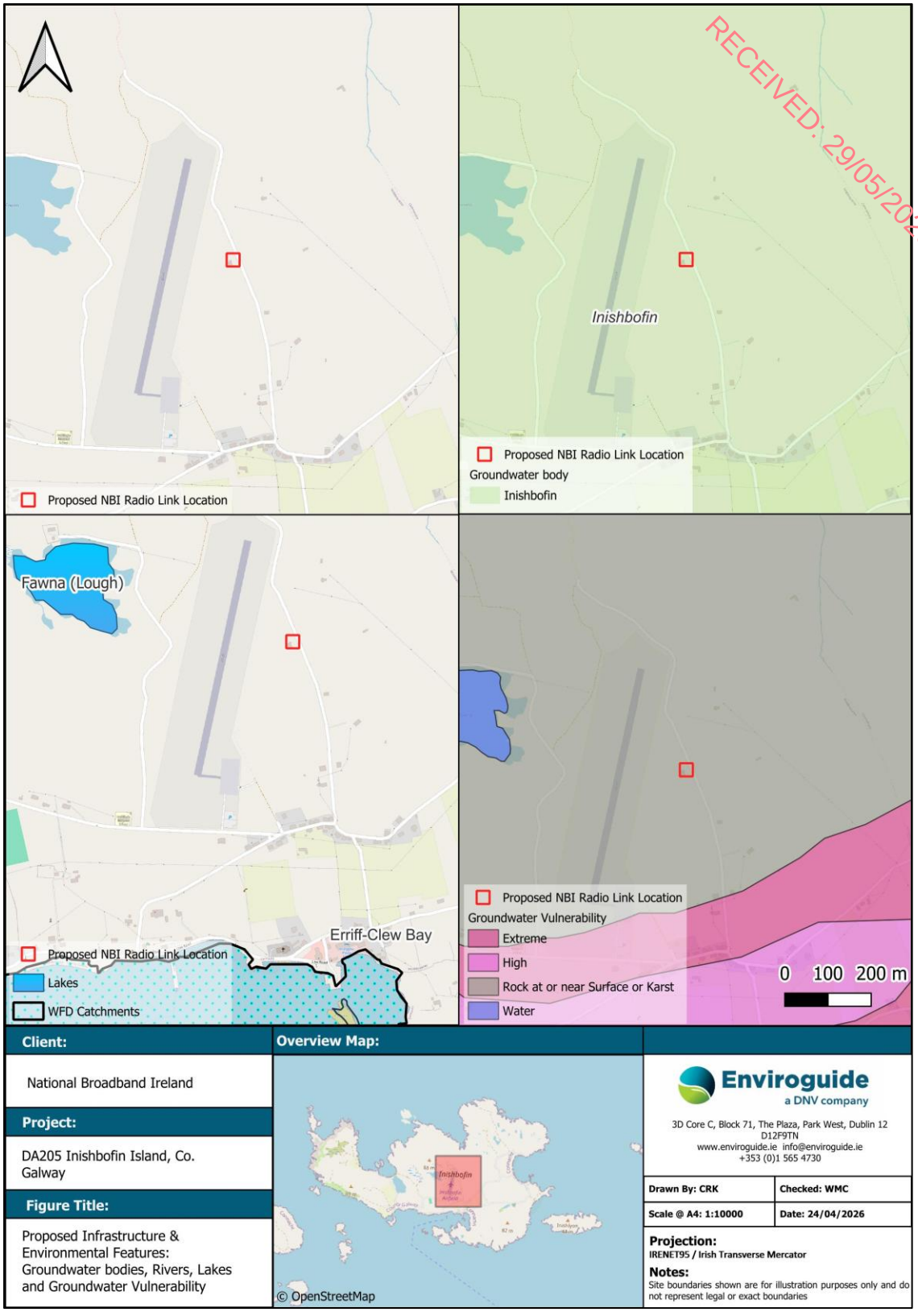


FIGURE 10: PROPOSED PROJECT LOCATION SHOWING THE LOCATION OF NEW INFRASTRUCTURE AND VARIOUS ENVIRONMENTAL FEATURES

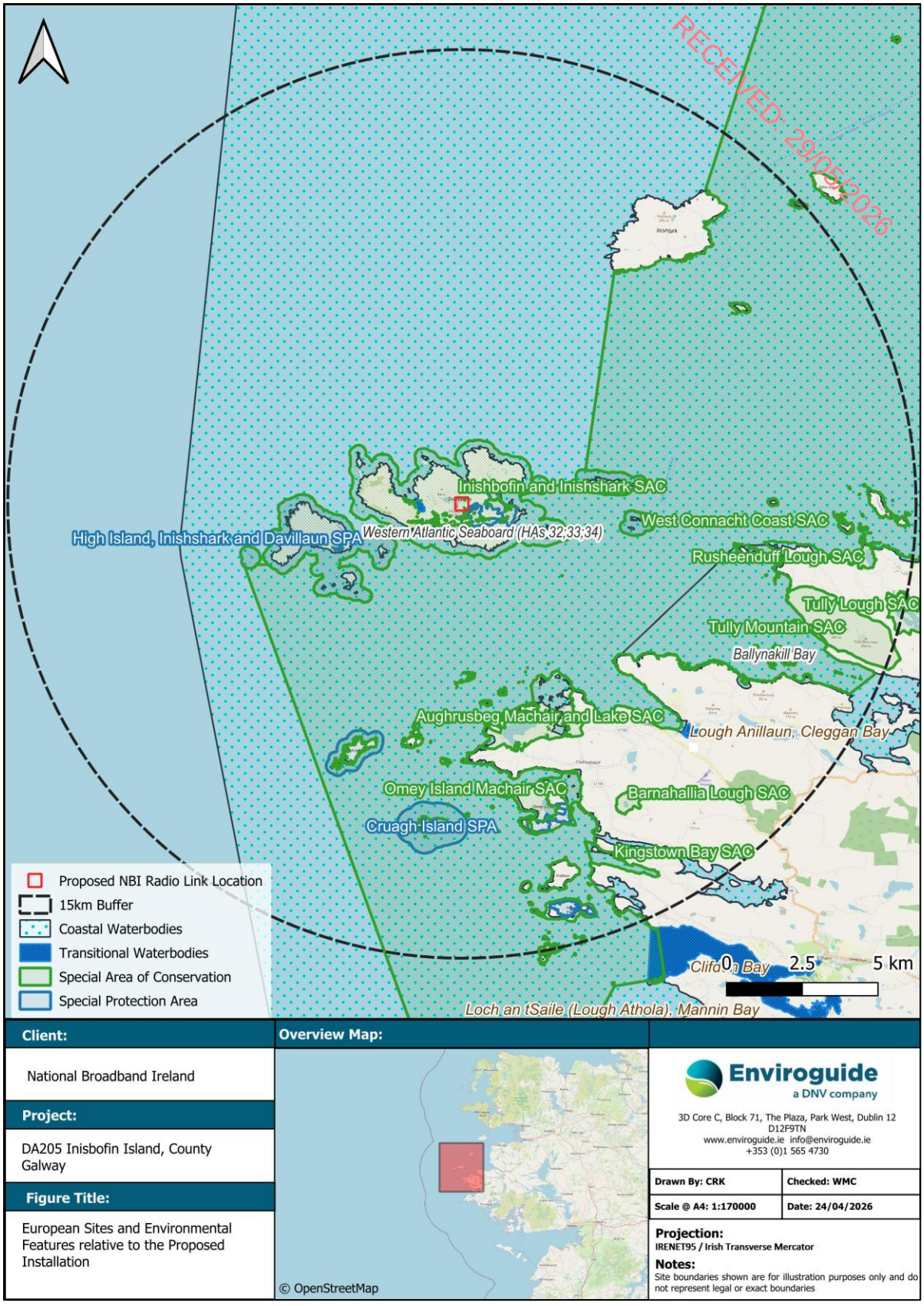


FIGURE 11: PROPOSED PROJECT LOCATION

2.2 Summary Of Relevant European Sites

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The following descriptions of the relevant habitats and species occurring within the European site considered in this NIS have been extracted from the Standard Data Forms (EEA 2026), Site Synopsis (NPWS 2015) and any supporting documents available for the relevant site.

2.2.1 Qualifying Interests and Conservation Objectives

The QIs/SCIs and their respective Conservation Objectives for each of the relevant European site(s) are detailed in Table 3.

It should be noted that, while not listed as a QI habitat for Inishbofin and Inishshark SAC, Blanket Bog [7130] habitat has been mapped within the Project Site by NPWS (Figure 12), however this habitat was not recorded on Site during the field surveys undertaken at the Site.

TABLE 3: QUALIFYING INTERESTS (QIS) / SPECIAL CONSERVATION INTERESTS (SCIS) AND THEIR CONSERVATION OBJECTIVES FOR THE RELEVANT EUROPEAN SITES. THE CONSERVATION STATUS OF EACH QI / SCI WAS SOURCED FROM THE RELEVANT STANDARD DATA FORM(S) (SOURCE: EEA (2026)).

Inishbofin and Inishshark SAC (000278)		
QI / SCI (* = priority habitat)	**Conservation Status**	**Conservation Objective**
4010 Northern Atlantic wet heaths with *Erica tetralix*	Average or Reduced	To **restore** the favourable conservation condition of these QI habitats in *inishbofin and Inishshark SAC.*
4030 European dry heaths	Average or Reduced	
1150 Coastal Lagoons	Excellent	
3110 Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*)	Average or Reduced	To **maintain** the favourable conservation condition of this QI habitat in *inishbofin and Inishshark SAC.*
1364 Grey Seal (*Halichoerus grypus*)	Excellent	To **maintain** the favourable conservation condition of this QI species in *inishbofin and Inishshark SAC.*
Other Relevant QI within proximity to the Project Site (NPWS, 2019)		
7130 Blanket Bog	Bad	N/A

2.3 Impact Prediction

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This section follows the S-P-R method as outlined in Section 1.7 to identify if and in certain cases how any of the QIs/SCIs of the relevant European site are linked to the Proposed Installation. Once the pathways have been identified, the potential impacts of the Proposed Installation on the QI habitats and the associated QI species within the **Inishbofin and Inishshark SAC (000278)** are assessed.

For the purposes of objectivity and clarity, mitigation measures **are not considered in the impact prediction.** This includes all measures that will act, limit or eliminate the potential for significant adverse impacts on the relevant European site.

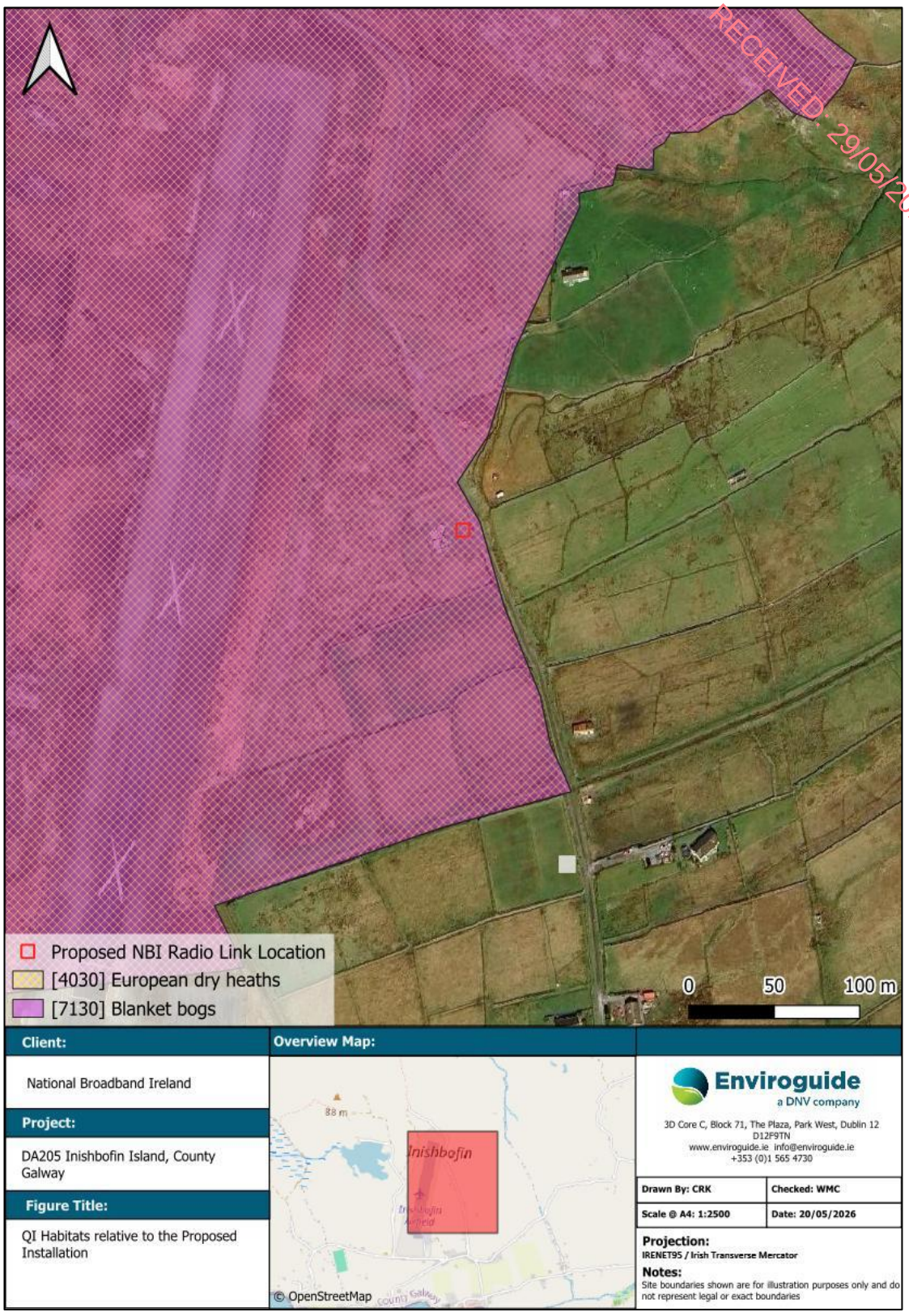


FIGURE 12: INFRASTRUCTURE TO BE INSTALLED WITHIN AREAS MAPPED AS ANNEX 1 HABITATS

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2.3.1 Source-Pathway-Receptor Connections

The following elements of the Proposed Installation were identified and assessed for their potential to cause likely significant effects on European sites (see Figure 11).

Construction/Installation Phase *(Estimated duration: 8 weeks)*

- Habitat loss or alteration and habitat fragmentation of QI or Annex I Habitats such as European Dry Heath [4030], due to the use of heavy machinery on land and any excavation or stockpiling activities associated with the installation activities (Figure 12).
- Indirect habitat loss QI or Annex I Habitats such as European Dry Heath [4030], due to hydrological pathway connection with the Proposed Project.

Operational Phase *(Estimated duration: indefinite)*

- The Operational Phase of the Proposed Installation will consist of occasional maintenance of Installations by NBI personnel; however, this will not constitute the use of heavy machinery. The increased human presence at the Site and in the vicinity as a result of the Proposed Installation will be occasional and **is not considered to be significant.**

TABLE 4: THE QUALIFYING INTERESTS (QIS) FOR THE RELEVANT EUROPEAN SITE, AND THEIR IDENTIFIED S-P-R CONNECTION TO THE PROPOSED INSTALLATION (IF ANY). THOSE QIS WHERE THE IDENTIFIED S-P-R CONNECTION REQUIRES FURTHER ASSESSMENT OF POTENTIAL IMPACTS ARE HIGHLIGHTED

Insihbofin and Inishshark SAC (000278)	
QI / SCI	**S-P-R connection**
4010 Northern Atlantic wet heaths with *Erica tetralix*	No direct or indirect land, air or hydrological pathways identified to these habitats or species.
1150 Coastal Lagoons	
3110 Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*)	
1364 Grey Seal (*Halichoerus grypus)*	
7130 Blanket Bog	No direct or indirect land, air or hydrological pathway identified to this habitat. This habitat was not recorded at or in the vicinity of the Site during the field surveys carried out in March and May 2026.
4030 European Dry Heath	**Yes.** These Annex I habitats are in close proximity to the Proposed Site, and therefore Installation Activity could result in direct habitat loss or alteration, and indirect loss or alteration of habitats due to changes in water quality and resources.

2.3.2 Potential impacts of the Proposed Installation on Key Habitats and Species

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Table 5 outlines the attributes and targets associated with the SSCOs for the relevant QIs/SCIs as identified in the preceding section. The potential significant effects of the Proposed Installation on these attributes and targets are also assessed. The assessment outlined below does not consider mitigation measures that will be implemented as part of the Proposed Development, but the nature of mitigation that will be required to eliminate the potential for significant adverse impacts is identified in the table, if any.

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TABLE 5: ASSESSMENT OF THE POTENTIAL IMPACT OF THE PROPOSED INSTALLATION ON SITE SPECIFIC CONSERVATION OBJECTIVES. THOSE ATTRIBUTES WHICH ARE AT RISK OF ADVERSE IMPACTS ARE HIGHLIGHTED IN GREEN.

Inishbofin and Inishshark SAC (000278)		
Attribute	**Target**	**Assessment of likely significant effects**
4030 European Dry Heath		
Habitat area	Area stable or increasing, subject to natural processes	**Yes:** 4030 European Dry Heath is confirmed to be in close proximity of the Proposed Installation Site but not within the Site boundary. Therefore, construction activity including excavation, stockpiling, and use of heavy machinery could result in habitat alteration or loss. This could result in considerable impacts to the conservation attributes of this habitat.
Habitat distribution	No decline, subject to natural processes	
Ecosystem function: soil nutrient status	Maintain soil nutrient status within natural range	
Vegetation composition: positive indicator species	At least two positive indicator species, as listed in Perrin et al. (2014), with combined cover of at least 50%	
Vegetation composition: bryophyte and non-crustose lichen species	At least three bryophyte or non-crustose lichen species present, excluding *Campylopus* and *Polytrichum* moss species	
Vegetation composition: rare/scarce species	No decline in distribution or population sizes of rare, threatened or scarce species associated with the habitat	
Vegetation structure: dwarf shrub species	Cover of bog myrtle (*Myrica gale*), creeping willow (*Salix repens*) and Western gorse (*Ulex gallii*) collectively less than 50%	
Vegetation composition: negative indicator species	Cover of negative indicator species collectively less than 1%	
Vegetation composition: non-native species	Cover of non-native species less than 1%	
Vegetation composition: native trees and shrubs	Cover of scattered native trees and shrubs less than 20%	
Vegetation composition: bracken	Cover of bracken (*Pteridium aquilinum*) less than 10%	

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Vegetation composition: soft rush	Cover of soft rush (*Juncus effusus*) less than 10%	
Vegetation structure: senescent ling	Senescent proportion of ling (*Calluna vulgaris*) cover less than 50%	
Vegetation structure: growth phases of ling	Outside boundaries of sensitive areas, all growth phases of ling (*Calluna vulgaris*) should occur throughout, with at least 10% of cover in mature phase	
Vegetation structure: signs of browsing	Last complete growing season's shoots of ericoids showing signs of browsing collectively less than 33%	
Vegetation structure: burning	No signs of burning inside sensitive areas	
Physical structure: disturbed bare ground	Cover of disturbed bare ground less than 10%	
7130 Blanket Bog		
No attributes were available for this Annex I habitat in the Inishbofin and Inishshark SAC (000278). However, it is present in the SAC, as confirmed by EPA maps, where it is found in close association with the European Dry Heath habitats.	No targets were available for this Annex I habitat in the Inishbofin and Inishshark SAC (000278).	**No:** The QI habitat is confirmed to be absent within and in proximity to the Proposed Installation Site.

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2.3.3 In-combination Effects

2.3.3.1 Existing Planning Permissions

A search of planning applications located within a 250m radius of the Site of the Proposed Installation was conducted using online planning resources such as the National Planning Application Database (NPAD) (MyPlan.ie) and Galway County Council Planning Applications online map. Any planning applications listed as granted or decision pending from within the last five years were assessed for their potential to act in-combination with the Proposed Installation and cause likely significant effects on the relevant European sites. Long-term developments granted outside of this time period were also considered where applicable. Furthermore, planning applications older than 3 years are included where the Proposed Installation is immediately adjacent to the project.

In this instance, no large or medium scale applications, or applications for which an AA or NIS were required, were identified within 250m of proposed infrastructure for DA205 Inishbofin Island. Therefore, it can be concluded that the Proposed Project activities will not have significant in-combination effects as a result of pending or granted planning permission applications.

2.3.3.2 Relevant Policies and Plans

The local policies and plans detailed in Appendix 2 were reviewed and considered for possible in-combination effects with the Proposed Installation. Each of these plans has undergone AA, and where potential for likely significant effects has been identified (e.g., in the case of the Galway County Development Plan), an NIS has been prepared which identifies appropriate mitigation. As such, it is considered that the plans and policies listed will not result in in-combination effects with the Proposed Development and that the plan has directly addressed the protection of European Sites and biodiversity through specific objectives. The above listed plans are not being relied upon to rule out potential significant effects on European sites.

2.4 Avoidance and Mitigation Measures

The following sections outline the avoidance and mitigation measures identified to eliminate the potential for significant adverse impacts on the relevant European site. Once the recommended measures outlined in the following sections are implemented in full, no adverse impacts on the relevant European site or their QIs are anticipated as a result of the Proposed Development. These mitigation measures will be included in a Construction and Environmental Management Plan (CEMP) that will be prepared prior to commencing works by the appointed construction contractor.

2.4.1 Embedded Mitigation

2.4.1.1 Control and Management of Materials

As per Construction Management Plan for DA205 Inishbofin Island (Obelisk 2026):

- Appropriate arrangements are made by the project team for the safe storage, handling and identification of materials which control and prevent potential damage, theft, misuse and pollution. No fuel or chemicals will be stored on site.
- On delivery, materials will be checked by the project team for damage and quantity and goods receipted into the operating system against the original order. These records are held within the Construction Phase Project File.
- Any materials which fail to meet the specified requirements will be quarantined and clearly labelled to prevent unintended use. Such materials will be reported to the Project Manager who will review the situation and where it is deemed necessary will raise a non-conformance against the supplier.
- For damaged or defective materials, the project team will liaise with the procurement department to decide for replacements and return of non-conforming items to the supplier.
- In addition, the Project Team will plan for stock control and replenishment and where necessary.

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2.4.1.2 Protection of Soil, Surface Waters, and Groundwater During Construction Stage

As per the Construction Management Plan for DA205 Inishbofin Island (Obelisk, 2026):

- All liquid and hazardous material will be stored in a designated and temporarily bunded area with appropriate signage. The temporary bunded area shall be located within the designated storage area located within the compound area of the site.
- There will be no discharge of effluent to groundwater or surface water during the construction phase. Temporary portable toilet facilities only shall be used at the site.
- Spill kits will be provided in areas where liquids are stored and refuelling area.
- Contractors will be responsible for ensuring the regular maintenance of construction plant and equipment, to prevent leaks.
- A wheel wash system shall be provided at the main site exit location if deemed necessary.
- Refuelling of plant during construction will not be carried out at the location of the proposed works but instead only within a designated refuelling area within the proposed temporary construction compounds.
- Only emergency breakdown maintenance will be carried out at the location of the works. The refuelling area will be furnished with fuel absorbent material and pads in the event of any accidental spillages. The fuel bowser/tank will be located on a level area in the construction compound when not in use and only designated trained and competent operatives will be authorised to refuel plant. Drip trays and spill kits will be kept available on site to ensure that any spills from vehicles are contained and removed off site. Fuels stored on site will be minimised. Any storage areas will be bunded appropriately for the fuel storage volume for the time period of the construction.
- Spill kits will be available to deal with accidental spillages.
- A regular review of weather forecasts for heavy rainfall will be required and the contractor will be required to prepare a contingency plan for before and after

such events. Weather conditions will be taken into consideration when planning construction activities to minimise risk of run off from site.

- All materials shall be stored at the temporary compound and transported to the works zone immediately prior to construction.
- Provision of exclusion zones and barriers (silt fences) between any piled excavated material and any surface water features to prevent sediment washing into the receiving water environment.
- The contractor shall ensure that silt fences are regularly inspected and maintained during the construction phase if being used; If very wet ground must be accessed during the construction process bog mats/aluminium panel tracks will be used to enable access to these areas by machinery. However, works will be scheduled to minimise access requirements during winter months.
- The contractor shall ensure that all personnel working on site are trained in pollution incident control response.
- The contractor will carry out visual examinations of local watercourses from the proposed works during the construction phase to ensure that sediment is not above baseline conditions.
- In the unlikely event of water quality concerns, the Environmental Manager will be consulted.
- Excavations will be left open for minimal periods to avoid acting as a conduit for surface water flows.
- Concrete or potential concrete contaminated water run-off will not be allowed to enter any watercourses. Any pouring of concrete (delivered to site ready mixed) will only be carried out in dry weather. Washout of concrete trucks shall not be permitted on site. The delivery point for concrete will be within the bunded designated construction compound areas. Any compressors or generators used for connecting operations will be fitted with drip trays to collect any potential fuel and oil spills.
- Entry by plant equipment, machinery, vehicles and construction personnel into watercourses or wet drainage ditches shall not be permitted. All routes used for construction traffic shall be protected against migration of soil or wastewater into watercourses.
- Where the removal of woody vegetation is required to facilitate the proposed development, vegetation removal will, where possible, take place outside the bird breeding season (March to August inclusive). Woody vegetation clearance will only occur during the breeding season following surveys carried out by a suitably qualified ecologist, which confirm the absence of breeding birds. In instances where nest sites are identified then clearance will not take place until the nest is vacated.

2.4.2 Targeted Mitigation

2.4.2.1 Protection of Habitats

Construction activity including excavation, stockpiling and use of heavy machinery could result in habitat alteration or loss, while any excavation activities associated with the installation of fibre ducting could result in habitat fragmentation. Habitats that can

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be impacted as a result of the Project Activities include European Dry Heath. To mitigate against potential impact, the following actions will be taken:

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- Installation will be completed using low-pressure tracked machinery; all machinery to be used on Site will be fitted with Rubber tracks to minimise the degree of physical alteration to the ground.
- Machinery will operate on bog matting, i.e., rubber mats pre-installed to prevent soil compaction, which will be removed once work is complete.
- No construction or operation of machinery will occur in wet weather or immediately after heavy rain
- An Ecological Clerk of Works (ECoW) will be appointed for the duration of the Construction/Installation phase, to supervise works within the SAC. Earth piles should be placed in a suitable area outside of QI habitats with placement area to be agreed with an ECoW.
- Silt fencing will be installed along the northern and eastern boundaries of the Proposed Installation Site to protect the heath habitat in the vicinity of the Site from surface water discharge from the Site.

2.5 Monitoring

2.5.1 Construction Phase

During the Construction Phase, the following monitoring will be carried out by the construction contractor to ensure the implemented mitigation measures are maintained effectively:

- An independent 3rd party environmental consultancy will be appointed to conduct regular checks of rubber mats and physical appearance of ground to ensure no disturbance.
- This environmental consultancy will also be required to monitor the status and efficacy of the silt fencing that will be installed along the northern and eastern boundaries of the Site.
- Keep a record of the above monitoring and retain for possible inspection by the 3rd party environmental consultancy.

The project ecologist will be consulted should there be deviation from any proposed mitigation measures.

3 CONCLUSION

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This Natura Impact Statement details the findings of the Stage 2 Appropriate Assessment conducted to further examine the potential direct and indirect impacts of the Proposed Installation planning application at Inishbofin Island, County Galway, on the following European Site: ***Inishbofin and Inishshark SAC (000278).***

The above site was identified by a screening exercise that assessed likely significant effects of a range of impacts that have the potential to arise from the Proposed Development. The Appropriate Assessment investigated the potential direct and indirect effects of the proposed works, both during construction/installation and operation, on the integrity and qualifying interests of the above European site, alone and in combination with other plans and projects, taking into account the Site's structure, function and conservation objectives.

Where potentially significant effects were identified, a range of mitigation and avoidance measures have been suggested to avoid them. This NIS has concluded that, once the avoidance and mitigation measures are implemented as proposed, the Proposed Installation will not have an adverse effect on the integrity of the above European site, individually or in combination with other plans and projects. Where applicable, a suite of monitoring surveys been proposed to confirm the efficacy of said measures in relation to ensuring no adverse impacts on the habitats of the relevant European sites have occurred.

As a result of the complete, precise and definitive findings in this NIS, it has been concluded, beyond reasonable scientific doubt, that the Proposed Installation will have **no significant adverse effects** on the QIs and on the integrity and extent of Inishbofin and Inishshark SAC (000278). Accordingly, the Proposed Installation will not adversely affect the integrity of any relevant European site.

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APPENDIX 1

LEGISLATIVE AND POLICY CONTEXT

Legislative Background

The Habitats Directive (92/43/EEC) seeks to conserve natural habitats and wild fauna and flora by the designation of Special Areas of Conservation (SACs) and the Birds Directive (2009/147/EC) seeks to protect birds of special importance by the designation of Special Protected Areas (SPAs). The Habitats Directive has been transposed into Irish law through the EC (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011). It is the responsibility of each member state to designate SPAs and SACs, both of which will form part of Natura 2000, a network of protected sites throughout the European Community.

SACs and SPAs are collectively known as “Natura 2000” or “European” sites. SACs are selected for the conservation of Annex I habitats (including priority types which are in danger of disappearance) and Annex II species (other than birds). SPAs are selected for the conservation of Annex I birds and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each site is selected correspond to the Qualifying Interests (QIs) and Special Conservation Interests (SCIs) of the sites; from these the conservation objectives of the site are derived.

An ‘Appropriate Assessment’ (AA) is an assessment required prior to the grant of planning permission to determine whether a plan or project, based on best scientific knowledge, will have an adverse effect on the integrity of a European site, either alone or in combination with other plans and projects. It is required for any plan or project not directly connected with or necessary to the management of a site but likely to have a significant effect on it.

An AA is required under Article 6 of the Habitats Directive where a project or plan may give rise to significant effects upon a Natura 2000 site. Paragraph 3 states that:

“*6(3) 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.”*

According to the ruling delivered in open court in Luxembourg on 15 June 2023 regarding the interpretation of Article 6(3) of Directive 92/43, the Article must be interpreted as meaning that:

“*In order to determine whether it is necessary to carry out an appropriate assessment of the implications of a plan or project for a site, account may be taken of the features of that plan or project which involve the removal of contaminants and which therefore may have the effect of reducing the harmful effects of the plan or project on that site, where those features have been incorporated into that plan or project as standard features, inherent in such a plan or project, irrespective of any effect on the site*”.

As such, standardised embedded mitigation (such as the use of Sustainable Drainage Systems (SuDS) in large-scale residential developments), that are incorporated into the design of a proposal or project and which may result in a reduction of effects impacting European sites, but where the primary reason of the embedded mitigation is **not** to protect a European site, are permitted for consideration during the undertaking of AA.

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Legislative Context

The obligations in relation to Appropriate Assessment have been implemented in Ireland under Part XAB of the Planning and Development Act 2000, as amended ("the 2000 Act"), and in particular Section 177T and Section 177V thereof in relation to Natura Impact Statements and Appropriate Assessment. The relevant provisions of Section 177T and 177V are set out below:

"***177T.—*** *(1) In this Part— (a) A Natura impact report means a statement for the purposes of Article 6 of the Habitats Directive, of the implications of a Land use plan, on its own or in combination with other plans or projects, for one or more than one European site, in view of the conservation objectives of the site or sites.*

(b) A Natura impact statement means a statement, for the purposes of Article 6 of the Habitats Directive, of the implications of a proposed development, on its own or in combination with other plans or projects, for one or more than one European site, in view of the conservation objectives of the site or sites.

(2) Without prejudice to the generality of subsection (1), a Natura impact report or a Natura impact statement, as the case may be, shall include a report of a scientific examination of evidence and data, carried out by competent persons to identify and classify any implications for one or more than one European site in view of the conservation objectives of the site or sites."

(3) …

(4) The applicant for consent for Proposed Installation may, or if directed in accordance with subsection (5) by a competent authority, shall furnish a Natura impact statement to the competent authority in relation to the proposed development.

(5) At any time following an application for consent for Proposed Installation a competent authority may give a notice in writing to the applicant concerned, directing him or her to furnish a Natura impact statement.

(6) ...

(7) (a) Without prejudice to subsection (1) a Natura impact report or a Natura impact statement shall include all information prescribed by regulations under section 177AD .

(b) Where appropriate, a Natura impact report or a Natura impact statement shall include such other information or data as the competent authority considers necessary to enable it to ascertain if the draft Land use plan or Proposed Installation will not affect the integrity of the site."

"177V.— *(1) An appropriate assessment carried out under this Part shall include a determination by the competent authority under Article 6.3 of the Habitats Directive as to whether or not a draft Land use plan or Proposed Installation would adversely affect the integrity of a European site and an appropriate assessment shall be carried out by the*

competent authority, in each case where it has made a determination under section 177U(4) that an appropriate assessment is required, before—

(a) the draft Land use plan is made including, where appropriate, before a decision on appeal in relation to a draft strategic development zone is made, or

(b) consent is given for the proposed development.

(2) In carrying out an appropriate assessment under subsection (1) the competent authority shall take into account each of the following matters:

(a) the Natura impact report or Natura impact statement, as appropriate;

(b) any supplemental information furnished in relation to any such report or statement;

(c) if appropriate, any additional information sought by the authority and furnished by the applicant in relation to a Natura impact statement;

(d) any additional information furnished to the competent authority at its request in relation to a Natura impact report;

(e) any information or advice obtained by the competent authority;

(f) if appropriate, any written submissions or observations made to the competent authority in relation to the application for consent for proposed development;

(g) any other relevant information.

(3) Notwithstanding any other provision of this Act, or, as appropriate, the Act of 2001, or the Roads Acts 1993 to 2007 and save as otherwise provided for in sections 177X, 177Y, 177AB and 177AC, a competent authority shall make a Land use plan or give consent for Proposed Installation only after having determined that the Land use plan or Proposed Installation shall not adversely affect the integrity of a European site.

(4) Subject to the other provisions of this Act, consent for Proposed Installation may be given in relation to a Proposed Installation where a competent authority has made modifications or attached conditions to the consent where the authority is satisfied to do so having determined that the Proposed Installation would not adversely affect the integrity of the European site if it is carried out in accordance with the consent and the modifications or conditions attaching thereto."

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APPENDIX 2

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Policy Context

Galway County Development Plan

The Galway County Development Plan 2022 – 2028, addresses the protection of European sites through policies and objectives in Volume 1 The Galway Gaeltacht and Islands.

Stages of Appropriate Assessment

The AA process is a four-stage process. Each stage requires different considerations, assessments and tests to ultimately arrive at the relevant conclusion for each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required.

The four stages of an AA, can be summarised as follows:

- **Stage 1: *Screening***. The Screening for AA considers whether a plan or project is directly connected to or necessary for the management of a European site, or whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a European site in view of its conservation objectives.
- **Stage 2: *Natura Impact Statement (NIS).*** Where Stage 1 determines that significant effects are likely, uncertain or unknown, the preparation of a NIS is required. The NIS must include a scientific examination of evidence and data to classify potential impacts on any European site(s) in view of their conservation objectives in the absence of mitigation. The NIS will identify appropriate mitigation to remove the potential for likely significant adverse effects on any European site(s). If the competent authority determines that the plan or project would have an adverse effect on the integrity of any European site(s) despite mitigation, it can only grant consent after proceeding through stages 3 and 4.
- **Stage 3: *Assessment of alternative solutions***. If the outcome of Stage 2 is negative i.e., adverse impacts to the sites cannot be scientifically ruled out, despite mitigation, the plan or project should proceed to Stage 3 or be abandoned. This stage examines alternative solutions to the proposal.
- **Stage 4: *Assessment where no alternative solutions exist and where adverse impacts remain***. The final stage is the main derogation process examining whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project to adversely affect a European site, where no less damaging solution exists.

The Habitats Directive promotes a hierarchy of avoidance, mitigation, and compensatory measures. First the project should aim to avoid any negative effects on European sites by identifying possible effects early in the planning stage and designing the project to avoid such effects. Second, mitigation measures should be applied, if necessary, during the AA process to the point where no adverse impacts on the site(s) remain. If the project is still likely to result in adverse effects, and no further practicable mitigation is possible, a refusal for planning permission may be recommended. In this case, the project will generally only be considered where no alternative solutions are identified and the project is required for IROPI, or, in the

case of priority habitats, considerations of health or safety, or beneficial consequences of primary importance for the environment or to other IROPI. Then compensation measures are required for any remaining adverse effects.

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NIS METHODOLOGY

Guidance

This NIS has been undertaken in accordance with the following guidance:

- *Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities.* (Department of Environment, Heritage and Local Government, 2010 revision);
- *Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities.* Circular NPW 1/10 & PSSP 2/10;
- *Communication from the Commission on the precautionary principle* (European Commission, 2000);
- *Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitat's Directive 92/43/EEC* (European Commission, 2019);
- *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* (European Commission, 2021);
- *Appropriate Assessment Screening for Development Management, OPR Practice Note PN01, Office of the Planning Regulator March 2021;* and
- *Amendments to section 42 of the Planning and Development Act 2000, as amended and associated Planning and Development Regulations 2001. Department of the Environment, Heritage and Local Government. (2021). Circular Letter: EUIPR 01/2021.*

NIS Steps

This NIS has been prepared following the steps described below:

- Description of the baseline existing environment at the Site of the Proposed Development;
- Review and description of available data for the relevant European site(s) potentially affected as identified in the Screening Report (Enviroguide 2024);
- Identification and description of potential effects on the relevant European site(s) and their designated QIs/SCIs;
- Assessment of the likely significance of the effects and/or impacts identified on the relevant QIs/SCIs in view of their Site-Specific Conservation Objectives (SSCOs);
- Description and characterisation of other projects or plans that in combination with the Proposed Installation have the potential for having significant effects on the relevant QIs/SCIS in view of their SSCOs; and

- Identification of appropriate mitigation measures to remove the likelihood of significant effects on any European site(s) and their QIs/SCI

Exclusion of sites where it can be objectively concluded that there will be no significant effects once mitigation measures are adhered to.

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A brief summary of each site with a pathway is provided below, extracted from the NPWS Site Synopses available from the NPWS.

Inishbofin and Inishshark SAC (000278)

"This site is situated off the Co. Galway coast, about 5.5 km from the mainland. It comprises two main islands, Inishbofin and Inishshark, with several islets and stacks. Part of the surrounding marine waters are also included. The islands are composed almost entirely of Silurian slates and shales and rise to heights of 89 m (Inishbofin) and 69 m (Inishshark).

Inishbofin is the only inhabited island in the group, with a population of about 300 people. Two-thirds of the island is commonage, where the main habitat type is heath, represented by both dry and wet heath communities. There are many areas of relatively intact dry heath present on Inishbofin, particularly around the middle and eastern quarter of the island. In most places this heath is associated with higher ground and exposed rock outcrops. Some areas of bog and marsh occur, and plantain (Plantago spp.) swards exist on the clifftops. Several small oligotrophic lakes are present. The largest waterbody, Lough Bofin, has a brackish character and is classified as a lagoon. A small area of sand dune occurs at the eastern side of the island. The remainder of the island is under cultivation, with most of the area under grass for pasture, and to a lesser degree, hay. Additionally, a small proportion remains where potatoes and grain-crops are planted.

In recent times, over-grazing by sheep, and to a lesser extent rabbits, has caused damage to the vegetation cover of the islands. Cutting of the shallow peat is also considered a problem. The site is of considerable conservation significance for the presence of an excellent example of a lagoon, a habitat listed with priority status on Annex I of the E.U. Habitats Directive, and for the good examples of heath, sea cliff, hay meadow and other vegetation communities typical of exposed western islands that it supports. The presence of a breeding colony of Grey Seal, a species that is listed on Annex II of the E.U. Habitats Directive, as well as populations of rare Red Data Book plant species and of important bird populations adds significantly to the importance of the site."

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About DNV

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