

Natura Impact Statement for a proposed development at Mulranny Village, Co. Mayo

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Compiled by OPENFIELD Ecological Services

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The Purpose of this document

This document provides information to allow Mayo County Council to carry out an Appropriate Assessment of the proposed development. This document will assess whether adverse effects to the integrity of the Natura 2000 network are likely to occur as a result of granting planning permission in accordance with Article 6(3) of the Habitats Directive and the Planning and Development (Amendment) Acts. It will determine whether mitigation measures are required to ensure that negative effects can be avoided to the Natura 2000 network.

This report is based on a separate Screening Report for AA which has been prepared by Openfield Ecological Services and which concluded that significant effects to the Clew Bay Complex SAC could not be ruled out.

Under the European Communities (Birds and Natural Habitats Regulations) 2011 an NIS:

...means a report comprising the scientific examination of a plan or project and the relevant European Site or European Sites, to identify and characterise any possible implications of the plan or project individually or in combination with other plans or projects in view of the conservation objectives of the site or sites, and any further information including, but not limited to, any plans, maps or drawings, scientific information or data required to enable the carrying out of an Appropriate Assessment.

It should be noted that under Article 42(1) of the aforementioned legislation it is the relevant competent authority, in this case Mayo County Council, which carries out any AA or screening for AA, stating:

A screening for Appropriate Assessment of a plan or project for which an application for consent is received, or which a public authority wishes to undertake or adopt, and which is not directly connected with or necessary to the management of the site as a European Site, shall be carried out by the public authority to assess, in view of best scientific knowledge and in view of the conservation objectives of the site, if that plan or project, individually or in combination with other plans or projects is likely to have a significant effect on the European site.

This NIS therefore aids in the decision-making process.

It should be noted that there is no prescribed format for an NIS. This report therefore follows the generally accepted format for AA provided by the European Commission.

Methodology

The methodology used for this assessment is set out in a document prepared for the Environment DG of the European Commission entitled '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' (EC, 2021).

An earlier document, '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' (Oxford Brookes University, 2001). Chapter 3, part 1, of this document deals specifically with screening while Annex 2 provides the template for an AA report to be used.

In accordance with this guidance, the following methodology has been used to produce this screening statement:

Step 1: Information Required

This assesses whether adequate information is available in order to complete the AA or if, taking the Precautionary Principle into account, additional data are required.

Step 2: Impact Prediction

This identifies the likely impacts that may arise as a result of the project.

Step 3: Conservation Objectives

An assessment of whether or not there will be adverse effects on the integrity of the Natura 2000 site as defined by the conservation objectives and status of the site.

Step 4: Mitigation Measures

Mitigation through avoidance of adverse effects must be proposed. Where it is likely that significant effects will remain despite mitigation then a full assessment of alternative options must be undertaken and an application for the project to proceed made under Article 6(4) of the Habitats Directive: Imperative Reasons of Overriding Public Interest.

The steps are compiled into an AA report, a template of which is provided in Appendix II of the EU methodology.

Reference is also made to guidelines for Local Authorities from the Department of the Environment, Heritage and Local Government (DoEHLG, 2009).

A full list of literature sources that have been consulted for this study is given in the References section to this report while individual references are cited within the text where relevant.

AA Report (Natura Impact Statement) as per Annex 2 of EU methodology:

Step 1 – Information Required

Describe the elements of the project (alone or in combination with other projects or plans) that are likely to give rise to significant effects on the Natura 2000 site (from the screening report prepared by Openfield)

The development site is located within the village of Mulranny, which is in the western part of Co Mayo and is close to the shores of Clew Bay.

The development site is currently occupied by a mix of open grassland, occasional trees, shrubs and rough vegetation and artificial surfacing. Mapping from the Environmental Protection Agency (EPA) shows no water courses flowing through or adjacent to the development site. There are a number of short water courses in this vicinity which run off the hills to the north into Clew Bay.

This location is shown in figures 1 and 2. The proposed site layout is given in figure 3.

The development is described thus, as per the planning application:

- a) *The construction of 2 No. three storey, stepped, terraced buildings comprising 10 No. own door, one bedroom, ground floor tourist apartments and 10 No. own door, 2 storey, two-bedroom duplex tourist apartments over first & second floor levels.*
- b) *The provision of secure, covered cycle parking at the rear of the proposed tourist accommodation.*
- c) *The provision of adjacent car parking facilities comprising 27 No. car parking spaces, associated access ramps, landscaped plaza, pollinator planting area and ancillary site works including drainage, boundary treatments and landscaping.*

The AA screening report provided follows accepted methodologies. It highlights the fact that the development site is adjacent to, and within the hydrological catchment of, the Clew Bay Complex SAC (site code: 1482).

The development site is not within any Natura 2000 site however it is close (c.67m) to the Clew Bay Complex SAC to the south. The Owenduff/Nephin Complex SAC can be found c. 90m to the north while the SPA of the same name lies c.200 to the north-east. The Corraun Plateau SAC can be found c.735m to the west.

The development site was surveyed for this study on June 11th 2025 in accordance with best practice standards (Smith et al., 2011). Habitats are described here as per standard classifications (Fossitt, 2000). June lies within

the optimal season for general habitat survey and so a full classification of all habitats on the site was possible.

The development site is composed of two plots, one to the north of the N59 road and one to the south. The plot to the north is a combination of **scrub – WS1** and **dense bracken – HD1**. Scrub includes Brambles *Rubus fruticosus* agg., Grey Willow *Salix cinerea*, Fuchsia *Fuchsia magellanica*, Leyland Cypress *Cuprocyparis leylandii*, Montbretia *Crococima x crocosima* and New Zealand Holly *Olearia macrodonta*. Also in this area is Rhododendron *Rhododendron ponticum* and Himalayan Balsam *Impatiens glandulifera*, both of which are listed as alien invasive species on SI No. 477 of 2011. The eastern portion of this plot is dominated by Bracken *Pteridium aquilinum*.

The southern plot slopes steeply down to the shore of Clew Bay. Much of this is composed of **wet grassland – GS4** interspersed with trees and, especially to the north, non-native, horticultural plants, such as Fuchsia and Japanese Rose *Rosa rugosa*. There are also patches of Bracken in this area. Trees include Grey Willow and Ash *Fraxinus excelsior*.

The southern portion, near the shore, and which is outside the development site boundary, is wetter with Iris *Iris pseudoplatanus*, Soft Rush *Juncus effusus*, Marsh Thistle *Cirsium palustre*, Meadowsweet *Filipendula ulmaria* and Hemlock Water-dropwort *Oenanthe crocata*. Himalayan balsam is also growing in this area. To the east an area has been cleared and is **artificial surfaces – BL3**.

A small **drainage ditch – FW4** flows through this part of the site and this is culverted under the N59.

There are no habitats which are examples of those listed in Annex I of the Habitats Directive while there is no evidence that species listed in Annex II of that Directive are regularly present.

The lands to the south, within the Clew Bay Complex SAC, are intertidal in nature and include **salt marsh CM1/2**.

Currently there is no attenuation of rain run-off and this enters the soil or finds natural, surface pathways to Clew Bay. In accordance with best practice this project will incorporate sustainable drainage systems (SUDS) that will ensure no changes will occur to the quantity or quality of run-off compared to the 'greenfield' rate.

According to the Engineering Services Report prepared for this development by Lohan & Donnelly Consulting Engineers:

It is proposed to provide 150 diameter surface water pipes to service the development. Flow from the new roofs will outfall to the sewer line and backup into the raingarden in the event of a 1 in 100-year storm event and outflow into the existing drainage ditch [...]. The car park and paths will be of a permeable

finish and any surface water generated on the permeable paving will be attenuated.

SUDS are standard measures which are included in all development projects and are not included here to reduce or avoid any effect to a Natura 2000 site. This is confirmed in the judgment recently issued from the ECJU (Case C-721/21, Eco Advocacy CLG v An Bord Pleanála) which confirms that where standard measures are included in the application they cannot be considered as mitigation in an AA context.

Wastewater from the development will be sent via mains sewer to be treated in the municipal treatment plant for Mulranny. This is operated by Uisce Éireann under licence from the EPA (ref: D0218-01) and discharges treated effluent to Clew Bay. The most recent Annual Environmental Report (AER), from 2024, indicates that this plant has a treatment capacity of 1,017 population equivalent (P.E.) and input is within this limit. The plant was not compliant with emission limit standards set under the Urban Wastewater Treatment Directive in 2024 and one exceedance each for total nitrogen and total phosphorous was reported. The AER states that this was due to “WWTP not designed for P removal”. Monitoring of receiving waters indicates that “The discharge from the wastewater treatment plant does not have an observable impact on the water quality.” The AER states that capacity at the plant is not likely to be exceeded within the next three years (i.e. from 2024).

Pathway Analysis (from AA Screening)

This project will not result in any direct loss of habitat within the boundary of any SAC/SPA. Figures 1 & 2 show the development location in relation to the SAC/SPA boundaries.

Nevertheless, the development site is close to the Clew Bay Complex SAC and it is also close to the Owenduff/Nephin Complex SAC/SPA and the Corraun Plateau SAC.

The drainage ditch on the development site provides a direct hydrological pathway to Clew Bay to the south. There will also be indirect pathways from surface water run-off and wastewater during the operational phase.

Therefore there are potential pathways from the development to:

- Clew Bay Complex SAC
- Owenduff/Nephin Complex SAC/SPA
- Corraun Plateau SAC

There are no pathways to any other Natura 2000 sites.

Step 2 - Impact Prediction

The AA screening report describes the elements of the project which “have the potential to cause environmental impact”. These are:

Habitat Loss

There can be no loss of habitat arising in any Natura 2000 site. Works are removed from the boundary of Natura 2000 sites by a minimum of 67m.

No significant effects to Natura 2000 are likely to arise from this source.

Habitat Disturbance

There is no pathway for disturbance to any Natura 2000 site due to the separation distances concerned. The types of disturbance which are likely to arise, i.e. from human activities, noise and lighting, must be considered against the existing baseline. These effects are not likely to increase over and above existing levels associated with Mulranny Village. The development does not include access to the wet grassland to the south and will not introduce human disturbance to this area. Therefore, this buffer will remain.

No significant effects to Natura 2000 are likely to arise from this source.

Ex-situ Impacts

There is no evidence that the development lands are of significance to bird species listed at qualifying interests of Natura 2000 sites, or specifically the birds for which the Owenfuff/Nepin Complex SPA is designated. Habitats on the development site are not of suitable for these species.

No significant ex-situ effects to Natura 2000 sites are likely to arise from this project.

Pollution during construction

During the construction phase, there will be earth works and the disturbance of soil. No works are proposed to the shoreline at Clew Bay. Nevertheless, works may result in some loss of sediment to Clew Bay and so, to the associated SAC.

The drainage ditch on the site, and which will be partly culverted under the proposed car park, provides a pathway for pollutants to the Bay.

Coastal marine habitats are not sensitive to sediment input in the way that freshwater habitats are. Nevertheless, using a precautionary approach, the potential for large quantities of silt or other construction pollutants to be washed downstream means that significant effects to the Clew Bay Complex SAC cannot be ruled out.

Pollution during operation - wastewater

There is sufficient capacity at the Uisce Éireann treatment plant in Mulranny to treat effluent from the proposed development to a high standard. Data from this plant indicates that the discharge of treated effluent is not having an impact upon water quality in the receiving environment (i.e. Clew Bay).

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Wastewater from this development is not likely to significantly affect Natura 2000 sites.

Pollution during operation – surface water

The surface water drainage strategy is fully complied with SUDS standards to maintain a 'greenfield' rate of run-off. These are not mitigation measures in an AA context.

No significant effects to Natura 2000 sites are likely to arise from this source.

Invasive Species

Two invasive species, Rhododendron and Himalayan Balsam are present on the development site. Allowing their spread is an offence under the Birds and Habitats Regulations. There is a risk that site works will result in movement of seeds or propagules into the Clew Bay Complex SAC as it is downstream/downhill of the development site. There is no risk to other Natura 2000 sites as there is no pathway for soil from the site to reach these areas which are physically distant and uphill/upstream.

No significant effects are likely to arise from this source to the Owenduff/Nephin Complex SAC/SPA or the Carraun Plateau SAC. Significant effects to the Clew Bay Complex SAC cannot be ruled out.

In combination effects

Individual impacts from one-off developments or plans may not in themselves be significant. However, these may become significant when combined with similar, multiple impacts elsewhere. These are sometimes known as cumulative impacts but in AA terminology are referred to as 'in combination' effects.

In terms of the conservation objectives of the Natura 2000 sites within the zone of influence of this project, maintaining the extent and condition of important habitats and species populations is vital.

Multiple built developments, particularly where construction is concurrent, can contribute to cumulative effects to water courses. Negative effects to water quality could therefore act, in combination, with other developments in the vicinity of the development lands and elsewhere in the catchment of Clew Bay. It has therefore been concluded that significant effects to the Clew Bay Complex SAC cannot be ruled out from this source.

Other than during the construction phase, there are no projects or plans which could act in combination with the current proposal to result in significant effects to Natura 2000 sites.

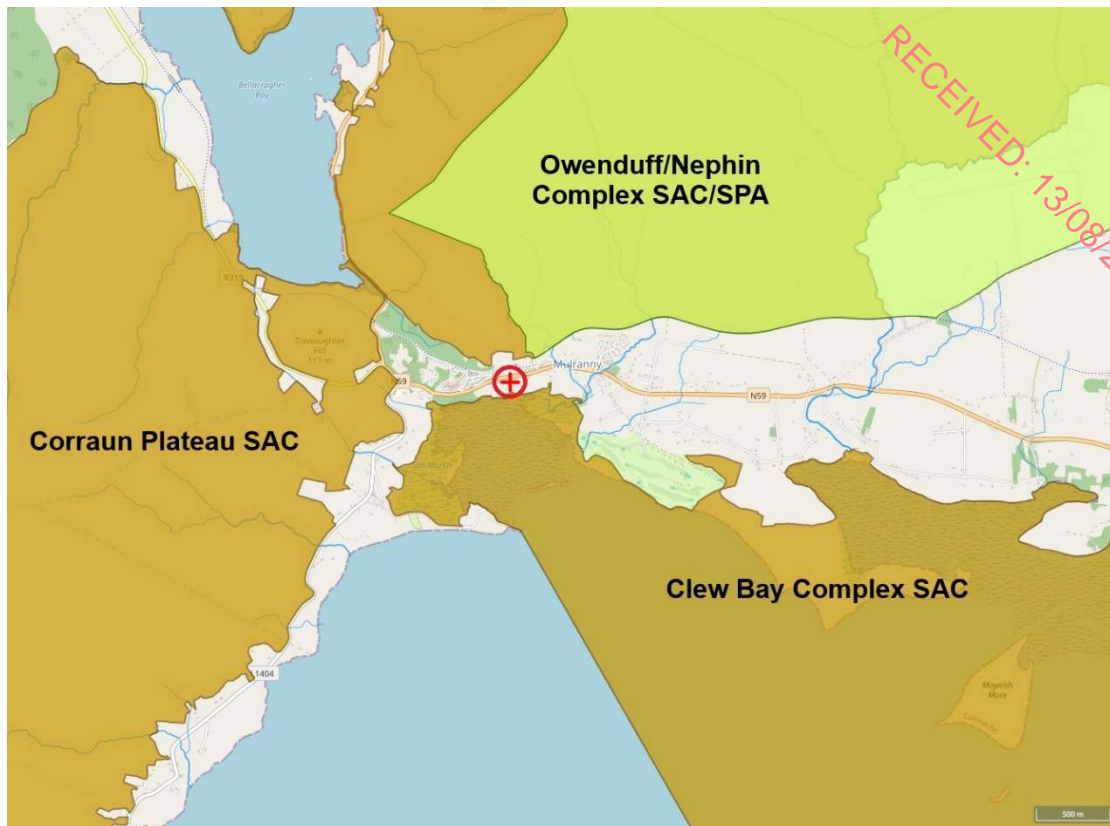


Figure 1 – Site location (red cross) showing proximity to Natura 2000 sites (from www.epa.ie).

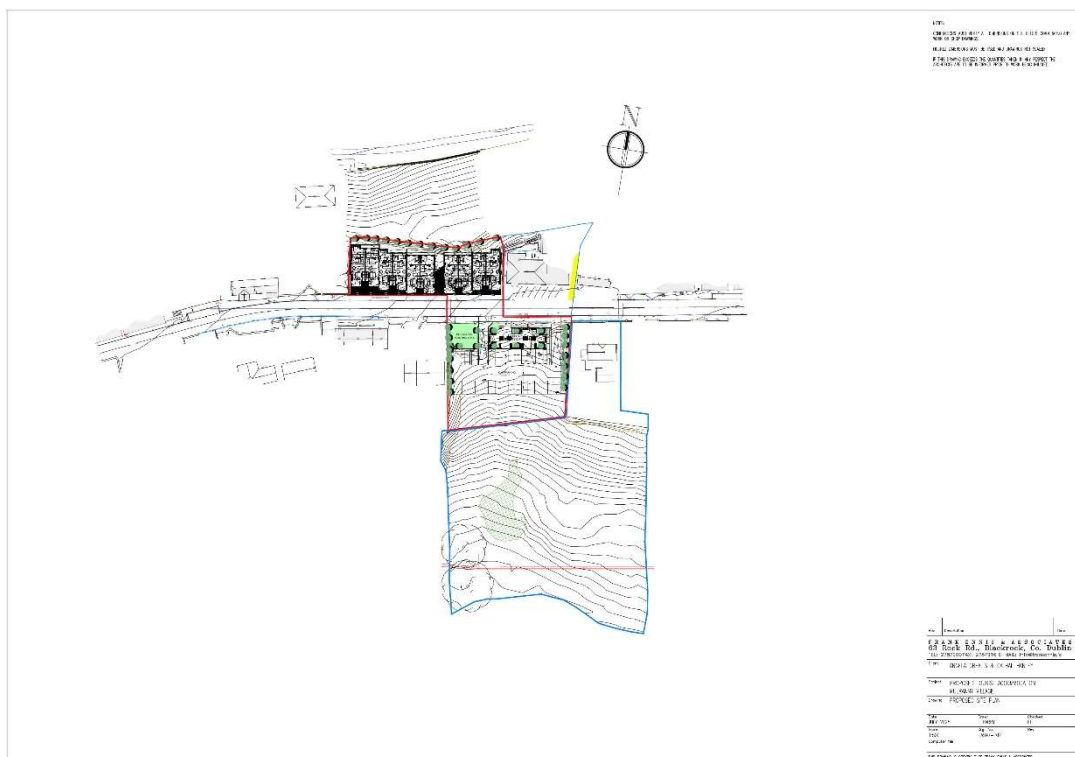


Figure 2 – Proposed development layout

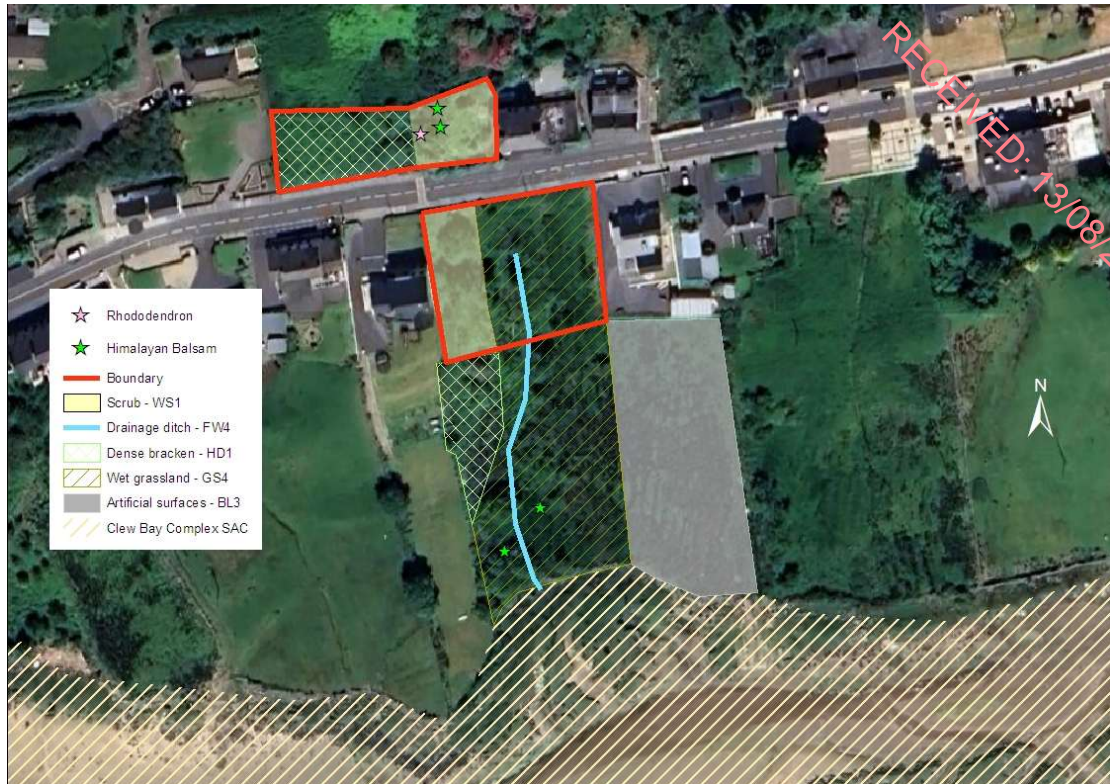


Figure 3 – Site boundary and existing habitats

Step 3 – Conservation Objectives

Set out the conservation objectives of the site

Following the Screening Report for Appropriate Assessment significant effects to the Clew Bay Complex SAC could not be ruled out. No significant effects are likely to arise to any other Natura 2000 sites.

Site specific conservation objectives have been published for this SAC (NPWS, 2011) and are summarised here:

Large shallow inlets and bays (code: 1160)

The permanent habitat area and distribution of the habitat are stable or increasing; The following communities should be maintained in a natural condition: Sand with *Chaetozone christiei* and *Tellina sp.* community; and Coarse sediment with *Pisidia longicornis* and epibenthic fauna community complex

Annual vegetation of drift lines (code: 1210)

Habitat areas stable or increasing subject to natural variation; no decline in habitat distribution; maintain physical and vegetation structure without any physical obstructions, maintain vegetation structure and composition subject to natural variations.

Perennial vegetation of stony bank (code: 1220)

Habitat areas stable or increasing subject to natural variation; no decline in habitat distribution; maintain physical and vegetation structure without any physical obstructions, maintain vegetation structure and composition subject to natural variations.

Embryonic shifting dunes (code: 2110)

Habitat areas stable or increasing subject to natural variation; no decline in habitat distribution; maintain physical and vegetation structure without any physical obstructions, maintain vegetation structure and composition subject to natural variations.

Shifting Dunes (2120)

Maintain habitat area and distribution including physical structure (functionality and sediment supply, percentage of bare ground, sward height). Maintain vegetation structure as measured by zonation, vegetation cover, typical species and sub-communities. Absences of the invasive *Hippophae rhamnoides*.

Machair (code 21A0)

Not provided

Atlantic Salt Meadows (1330)

Maintain habitat area and distribution including physical structure (sediment supply, creeks and pans, flooding regime). Maintain vegetation structure as measured by vegetation height, vegetation cover, typical species and sub-communities. Absences of the invasive *Spartina anglica*.

Mudflats (code 1140)

Permanent habitat area stable or increasing (estimated at 370 hectares); Maintain the extent of the *Zostera*-dominated community and the *Mytilus edulis*-dominated community, subject to natural processes; Conserve the high quality of the *Zostera*-dominated community, subject to natural processes; Conserve the high quality of the *Mytilus edulis* dominated community, subject to natural processes; Conserve the following community types in a natural condition: Sand to coarse sediment with *Nephtys cirrosa* and *Scolecopsis squamata* community complex; Estuarine sandy mud to mixed sediment with *Tubificoides benedii*, *Hediste diversicolor* and *Peringia ulvae* community complex.

Coastal lagoons – priority habitat (code: 1275)

Habitat area stable subject to slight natural variations; no decline in habitat distribution; maintain hydrological and salinity regimes; maintain the connectivity between the sea and the lagoon, maintain water quality as per standards for chlorophyll, molybdate reactive phosphorous, dissolved inorganic nitrogen, maintain typical plant and animal communities including that negative indicator species should be under control).

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Old sessile oak woods (91A0)

No decline in native tree cover; variety of native species present; negative indicator species absent, i.e. Beech *Fagus sylvatica*, Rhododendron *Rhododendron ponticum* and Cherry Laurel *Prunus laurocerasus*.

Otter

No significant decline in distribution; no significant decline in terrestrial/estuarine/freshwater/lake habitat; no significant decline in couching sites or holts; no decline in available fish biomass;

Harbour Seal (code: 0781)

Species range within the site should not be restricted by artificial barriers to site use; The breeding, moult haul out, resting haul-out sites should be maintained in a natural condition; human activities should occur at levels that do not adversely affect the harbour seal population at the site.

Describe how the project will affect key species and key habitats. Acknowledge uncertainties and any gaps in information.

Hydrological pathways exist to Clew Bay. Conservation objectives have been set to maintain the suitability of habitat for each of the qualifying interests of the SAC, as well as the numbers and range of individual species.

Given the potential for large quantities of sediment and other construction pollutants to enter Clew Bay, and so discharge to the SAC, it is considered that effects to species, and the habitats upon which they depend, cannot be ruled out.

Similarly, the potential for spread of invasive species within the SAC could affect the integrity if habitats in proximity to the development site, such as salt marsh.

Describe how the integrity of the site (determined by structure and function and conservation objectives) is likely to be affected by the project.

Very large quantities of sediment could increase deposition beyond normal levels, thereby affecting the areas of habitats which are qualifying interests of the SAC, such as salt marsh. Construction pollutants such as concrete or hydrocarbons could affect habitat functioning through toxic effects to marine life. This could affect the food chain and so the availability of prey which support the qualifying interests of the SAC, such as Otter.

The spread of invasive species could result in an effective reduction in areas of habitats within the SAC.

Step 4 - Mitigation

Describe what mitigation measures are to be introduced to avoid, reduce or remedy the adverse effects on the integrity of the site. Acknowledge uncertainties and any gaps in information.

- Pollution prevention during construction

Construction will follow guidance from Inland Fisheries Ireland (IFI, 2016) for the protection of fish habitat.

This will include the erection of a robust silt curtain (or similar barrier) along the southern boundary to prevent the ingress of silt to drainage ditches leading to Clew Bay. Water leaving the site, if this is required, will pass through an appropriately-sized silt trap or settlement pond so that only silt-free run-off will leave the site.

The culverting of the drainage ditch will take place 'in the dry', i.e.

There will be no direct discharge to Clew Bay.

No works, of any kind, are to be carried out at the shores of Clew Bay. A XXm buffer zone is to be maintained, within which there will be no movement of machinery or storage of materials. This will be fenced for the duration of works.

Dangerous substances, such as oils, fuels etc., will be stored in a bunded zone. Emergency contact numbers for the Local Authority Environment Section, Inland Fisheries Ireland, the Environmental Protection Agency and the National Parks and Wildlife Service will be displayed in a prominent position within the site compound. These agencies will be notified immediately in the event of a pollution incident.

Site personnel will be trained in the importance of preventing pollution and the mitigation measures described here to ensure same.

- Spread of invasive species

1. Rhododendron

The small stand of rhododendron in the northern plot of land will be cut and the stump treated with standard herbicide. This will be done during the 2025 growing season.

2. Himalayan Balsam

Stems of Himalayan Balsam will be manually pulled from the ground and placed in a plastic bag to decompose. This should be done early in the 2025 growing season, prior to any flowers setting seed.

Before the commencement of clearance works, the site will be surveyed for the presence of invasive species. Should either Rhododendron or Himalayan

Balsam be present at this time then a dedicated plan will be prepared to prevent further spread.

The Assessment of Significance of Effects – Conclusion of Stage 2

Following the Screening for AA, it is concluded that significant effects to the Clew Bay Complex SAC could not be ruled out. Specifically, this may arise from the impact to marine and coastal habitats from pollution during the construction phase as well as the spread of invasive species.

Arising from this assessment, mitigation has been proposed. With the implementation of these measures adverse effects to the integrity of the SAC will not occur. This conclusion is based on best scientific knowledge.

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References

Balmer D.E., Gillings S., Caffrey B.J., Swann R.L., Downie I.S., Fuller R.J. 2013. *Bird Atlas 2007-11: the breeding and wintering birds of Britain and Ireland*. BTO Books, Thetford, UK.

Boland H., Walsh A. & Crowe O. 2010. *Irish Wetland Bird Survey: results of waterbird monitoring in Ireland in 2008/09*. Irish Birds Volume 9 Number 1, pg55-66.

Bullock C., Kretch C. & Candon E. 2008. *The Economic and Social Aspects of Biodiversity*. Stationary Office.

Colhoun K. & Cummins S. 2013. *Birds of Conservation Concern in Ireland 2014 – 2019*. Irish Birds. Volume 9 Number 4 pg523-541.

Council Directive 79/409/EEC on the conservation of wild birds.

Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora

Council Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for the Community action in the field of water policy – more commonly known as the Water Framework Directive

Department of Environment, Heritage and Local Government. 2009. *Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities'*

Lack P. 1986. *The Atlas of Wintering Birds in Britain and Ireland*. T&AD Poyser.

Lewis L., Burke B., & Crowe O. 2016. *Irish Wetland Bird Survey: results of waterbird monitoring in Ireland in 2014/15*. BirdWatch Ireland.

NPWS. 2011. *Conservation Objectives: Clew Bay Complex SAC 001482. Version 1.0*. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht

NPWS. 2013. Clew Bay Complex SAC Site Synopsis. Version date: 01.09.2021.

NPWS. 2015. Owenduff/Nephin Complex SAC. Site Synopsis. Version date: 01.12.2015.

NPWS. 2016. Corraun Plateau SAC Site Code: 000485. Site Synopsis.

NPWS. 2017. *Conservation Objectives: Owenduff/Nephrin Complex SAC 000534. Version 1.* National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.

NPWS. 2019. *The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Report. Version 1.0.* Unpublished Report, National Parks & Wildlife Services. Department of Arts, Heritage and the Gaeltacht, Dublin, Ireland.

NPWS. 2025. *Conservation Objectives: Owenduff/Nephrin Complex SPA 004098. Version 1.* National Parks and Wildlife Service, Department of Housing, Local Government and Heritage.

Oxford Brookes University. 2001. *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, Environment DG.

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