David Behan D>C

From: Garvan Hanley <garvan@hanleytaite.com>
Sent: Tuesday 17 February 2026 16:39
To: Appeals2
Cc: Daniel O'Connor
Subject: ACP-323867-25
Attachments: An Coimisiún Pleanála.pdf; PR letter 17 02 26.pdf; Declaration - Pat Ridge - 17 February 2026.pdf; Pat_Ridge_rNIS_2025 (FINAL_REV_02).pdf; Hugh_Technical_Note.pdf

Dear ACP official,

Further to your letter dated 28th January last relating to the above referenced file, I hereby respond on behalf of my client. The response comprises a covering letter with attachments. The attachments are: a letter to myself from my client, a copy of a sworn declaration from my client, a revised rNIS and a technical report from Mr. Hugh Fitzpatrick.

I would be obliged if you could confirm receipt of this email.

Many thanks,
Garvan.

Garvan Hanley
Hanley Taite Design Partnership

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An Coimisiún Pleanála,
64 Marlborough St.,
Dublin 1,
DO1 V902

16th February 2026

Re: ACP – 323867-25, Application for Substitute Consent pursuant of Section 177E of the Planning and Development Act 2000 (as amended) consisting of

1. **The replacement of a storm damaged metal clad roof with a new metal -clad roof.**
2. **The opening of 3 no. windows, previously blocked up with dry stone, without alteration to the original ope sizes. The placing of timber framed windows within the opes.**
3. **The reconstruction of an unsafe partially collapsed chimney.**
4. **The excavation of a trench to allow for the placement of an electricity supply duct along an existing laneway with loose stone.**
5. **The construction of a pillar to house an ESB meter cabinet and adjacent placement of a mini pillar.**
6. **The placement of CCTV cameras, wiring and an antenna on the façade and chimney of the unhabitable dwelling.**

Dear An Coimisiún Pleanála Official,

Further to your letter dated 28th of January last, I hereby make a submission on behalf of my client Mr. Pat Ridge. The submission is made in the interests of justice and is made in response to a submission made on the file ACP-323867-25 by Galway Co. Co. (dated Tuesday 27th January 2026 @ 18.08).

The legislative context and planning history set out in the GCC submission, relating to the subject site, are acknowledged and are dealt with in the original submission made by our office on behalf of our client. Indeed, it is the planning history that contributes to the exceptionality of this case, given Galway Co. Co. are refusing to validate a planning application for retention of the above-described works on the site (planning ref no: 24/60859).

In their submission (of 27th January), Galway Co. Co. have stated that they "*are not satisfied that the principle of development is acceptable at this site*", appearing to focus on the previous refusal by ABP (ref no. PL07.313445 – Retention permission sought for : A The reinstatement of a collapsed roof and making good of existing chimney; B The unblocking of windows and replacement of timber framed windows on the front elevation ……), whereby ABP determined that "*insufficient scope and detail was provided in the Appropriate Screening Report*". This is a change of opinion by G.C.C. as they previously decided to grant permission for the development (ref. no: 21/2405). It is not clear if this opinion has been formed having had due

regard to the rNIS submitted with this application as they state "*Galway County Council note the Remedial Natura Impact Assessment (NIS) prepared by OMC, submitted as part of the application. An Coimisiún Pleanála should be satisfied that the proposal has demonstrated that the development can be implemented without adverse effects on the integrity of the European Sites*". While G.C.C. "*note*" the rNIS, they appear to make the judgement that they are not satisfied that the principle of the development is acceptable, on the basis of the previous Appropriate Assessment Report. The difference in font size and spacing in this portion of text in their submission might suggest that the text originated in an earlier document G.C.C. also state that they have "*serious concerns regarding the potential of intensification of the site for habitable use considering the lack of sufficient services for this site and the existing substandard access road and the lack of information on the proposed right of way/access road to the site.*"

In responding to the issues raised by G.C.C. in their submission I separate them into 3 separate items hereunder:

1. The effects on the surrounding Natura 2000 Sites.

- Galway Co. Co. had previously decided to grant permission based on earlier Appropriate Assessment Report.
- The rNIS that was submitted in the application has been revisited and updated considering the G.C.C. submission. The updated rNIS (copy attached) followed a third site visit by the Ecologist. It allows for a comprehensive assessment of the completed works and their potential impact.
- Water sampling was undertaken and tested which found no evidence of pollution to the adjoining watercourse.
- An analysis of the gravel used to surface the approach laneway (sourced from Mannion's Quarry locally) found that the gravel, in terms of size, fabric and consistency, matches that of the stream bed although no evidence exists that any of this material would have fallen into the stream.
- The rNIS has robustly interrogated potential cumulative effects on the Natura 2000 sites and finds that "developments, either individually or cumulatively, are unlikely to give rise to significant or detectable in-combination effects with the application site".
- Extensive mitigation measures are also proposed in the updated rNIS. These include:
  - no further disturbance to the laneway by laying of material or alteration by tracked machines;
  - the establishment of vegetation buffer strips;
  - establishment of a stream water monitoring program, for 3 years minimum; and
  - the appointment of an Ecologist Clerk of Works to liaise with landowners, relevant authorities and coordinate monitoring, regular checking after heavy rain and the imposition of an adaptive management strategy.

  I can confirm that our client is happy to conform with all these mitigation measures.
- Our client commissioned Mr. Hugh Fitzpatrick, Environmental Scientist to review submissions made on the application (ref no. ACP - 32899 - 25) for proposed development on the subject site made under Section 37L of the Planning and Development Act, 2000 (as amended). Mr. Fitzpatrick prepared a report containing hydrology assessments which concludes:

° Work which was previously undertaken to resurface the road is unlikely to have adversely impacted to Callow river and may provide long - term benefit.
° This hydrological analysis indicates that:
° Surface runoff from the site predominantly flows Southwards toward the Callow River.
° The watershed analysis demonstrates that the laneway "outflow point" outside the site does not receive direct surface water flow from any portion of the site where construction will occur.
°Vegetated buffers within the site and between the laneway and the river further reduce the potential for sediment transport.
° Measures outlined in the CEMP and NIS add an additional degree of protection.
°On the basis of the above, no plausible, unmitigated hydrological pathway exists by which the proposed development could adversely impact the Callow River or Connemara Bog Complex SAC, alone or in combination, beyond all reasonable scientific doubt.

- Because many of the aspects of this report demonstrate that the preciously undertaken works could not have plausibly impacted on the Natura 2000 sites, the report is also attached to this submission for reference.
- It is considered that the previous determination that the AA Screening Report had insufficient scope and detail has now been overcome by the comprehensiveness of the updated rNIS and Hugh Fitzpatrick report, leaving no doubt that the works to which this application relates caused no significant effects on the conservation objectives of the nearby SAC & SPA. In fact, the rNIS states that the resurfacing works to the laneway would have had a positive effect by reducing the potential for ongoing erosion and surface degradation, decreasing the risk of sediment or particulate matter entering the SAC or SPA.
- On behalf of our client, I further wish to echo the G.C.C. statement that "*should the Coimisiún be minded to grant permission for this development the following conditions would be considered:*

  ***1.** The development shall be retained in accordance with the plans and particulars lodged with the application An Coimisiun Pleanala, except as may otherwise be required in order to comply with the following conditions:*
  Reason: In the interest of clarity.

  ***2.**The mitigation measures and monitoring commitments identified in the Remedial Natura Impact Statement submitted with the planning application shall be implemented in full by the developer, except as where may otherwise be required in order to comply with the following conditions.*
  Reason : In the interest of clarity and protection of the environment during the construction and operational phases of the proposed development.

  3. *(a) All surface water generated by the development shall be disposed of within the site to approximately sized soakaways in accordance with BRE Digest 365 or equivalent and shall not be discharged onto the road.*
  (b) Only clean uncontaminated storm water shall be discharged by soakaway system.
  (c) The development shall not impair existing land or road drainage.
  Reason: In the interest of proper planning and sustainable development"

  Condition 4, as suggested by G.C.C. is not considered relevant to this case.

- Furthermore, our client is prepared to accept any other conditions that ACP consider appropriate towards protecting the SAC & SPA, being imposed.

2. The potential of intensification of the site for habitable use.

- Concerning the potential of intensification of the site for habitable use, as set out in our application, the works to which the application relates were undertaken over a considerable period from the 1990's to 2020. No works have taken place since.
- The works were carried out to provide a place of respite during visits to the surrounding lands in inclement weather, a place to store items such as boots and rain gear and the placement of CCTV cameras following criminal damage to the property. It was never intended nor is it possible that the building would be made habitable by these works.
- It was always and remains the case that further works would be required to make the cottage habitable and that this would be, and is, subject to an entirely separate application. Our client is very aware of this and perhaps to appease G.C.C. should ACP be mindful to grant permission a condition could be imposed to this effect.
- It is also clearly evident that over 5 years since the last works were undertaken, no intensification of the use of the site has taken place.

3. The existing substandard access road and the lack of information on the proposed right of way/access road to the site.

- The application provides significant information on the access road to the site both in terms of its previous condition, the works undertaken to it and its current condition. (Refer to drawings and photographic images contained in the rNIS.)
- The laneway is used to access the farmlands surrounding the subject site by car, without difficulty, 2 - 3 times weekly.
- It again is accepted that any proposed works to the laneway would be subject to a further planning application. Again, our client has full awareness of this.
- Furthermore, our client has enjoyed unquestioned and unobstructed access to his cottage and lands over the access laneway since his acquisition of the site in the 1990's.

To conclude, prior to summarizing, I wish to reemphasize that our client has at no point knowingly intended to carry out any works that breached any statutory regulations. He undertook the works, considering them to be minor. He is aware that any future works require statutory approval. This application is sought to regularize works that require retention permission. To reverse these works would potentially cause more harm to the Natura 2000 sites. A question may arise as to would the works to reverse those already undertaken require a statutory permission or appropriate assessment? Galway Co. Co. are not validating planning applications relating to the site which would leave our client in continued limbo if this application were to be unsuccessful. The previous refusal (ref no. ACP – 313445-22), followed a decision to grant permission by Galway Co. Co., which was appealed by a third-party. The refusal under ACP – 313445-22was against the recommendation of the A.C.P. inspector.

Given the constrained timeframe to prepare this submission I also attach to this submission, a letter (and accompanying declaration from my client, whereby he requests that certain points be made in this submission and the following submission(ref no. ACP-323899-25) and requests that due consideration be given to the content of his letter as well as the above.

In summary I consider that the content of the application and this submission is comprehensive and robust and demonstrates that the works undertaken did not cause significant harm to the SAC and SPA. It is also demonstrated that the works did not lead to an intensification of use of the site. I am hopeful that A.C.P. will arrive at the same conclusion and will grant permission, subject of course, to appropriate conditions.

Yours sincerely

.....

Garvan Hanley
Hanley Taite Design Partnership
MRIAI, RIBA Conservation Architect G2

DECLARATION

I, **PATRICK RIDGE**, of Aillebrack, Ballyconneely, Co. Galway, H71XF90 aged 18 years and upwards do solemnly and sincerely declare as follows:

1. This declaration relates to the property at Emlaghmore, Ballyconneely, Co. Galway (the '**Property**'), which is subject to applications to An Coimisiún Pleanala:

    a. for Substitute Consent pursuant of Section 177E of the Planning and Development Act 2000 (as amended) reference number SU07.323867; and

    b. under Section 37L of the Planning and Development Act 2000 (as amended), reference number FD07.323899

    (together the '**Applications**').

2. I am the owner of the Property and the party who has made the Applications.

3. I say that the three land drainage pipes that traverse (underground) a laneway leading to the Property, were not placed by myself or for me and nor did I give instruction to any third party to install the said three land drainage pipes that traverse the laneway.

4. I make this solemn declaration conscientiously believing it to be true in support of the Application for the satisfaction of An Coimisún Official and pursuant to the provisions of the Statutory Declaration Act, 1938.

DECLARED before me

a practising solicitor

by **PATRICK RIDGE**

~~(who is personally known to me)~~
~~(or: who is identified to me by~~
~~who is personally known to me~~)
at Clarion House, Mount St Crescent,
in the City/~~County~~ of Dublin
this 17 day of February 2026

PATRICK RIDGE

Eoin MacCarry
Practising Solicitor

Eoin MacCarry
Amos LLP

28th January 2026
Hugh Fitzpatrick BSc. MSc.
9 Hammond Street,
Blackpitts,
Dublin,
D08X6C2

Planning Reference: FD07.323899
Planning Applicant: Patrick Ridge
EPA sub-catchment code: Recess_SC_020
River Callow EPA code: IE_WE_31C250230

This technical note has been prepared by Mr. Hugh Fitzpatrick. Hugh has more than 10 years' experience working as an environmental scientist and ecologist in Ireland and the U.K. specialising in GIS analysis, with a particular focus on water quality, developments and activities in ecologically sensitive rural areas. For the last four years, Hugh has worked in the West Connacht region as an ecologist on projects concerning peatland restoration, hydrology and water quality, including the Ballyconeely peninsula and surrounding areas. Hugh has spent much of this time based in the Ballyconeely area.

Master of Science, Environmental Sciences

Trinity College, University of Dublin

Bachelor of Science, Archaeology and Geology

University College Dublin

Harper Adams University - BASIS Soil and Water, Sustainable Land Management Certificate

I have reviewed the planning application and supporting documents submitted relating to the existing dwelling, which Patrick wishes to restore in the Emlaghmore townland, in addition to the previous applications and third-party observations put forward in response. I have also visited the site to investigate the claims made in these observations. I wish to make the following note in relation to these observations:

Many of these claims made are not supported by scientific evidence and do not hold up to scientific scrutiny. They are instead based on non-expert opinion, conjecture and unverifiable 'discussions' with a public body (Inland Fisheries Ireland). I have contacted Environmental/Fisheries Officer for the Western River Basin District to seek consultation and discussion on the matter.

No published data has been sited to support the claim that the Callow River is an Atlantic Salmon (Salmo salar) spawning river. This is because there is no peer-reviewed, scientific evidence available. However, as the Callow river forms part of the this river forms part of the Connemara Bog Complex SPA and is linked to the Connemara Bog Complex SAC, all possible measures must be taken to protect the river.

This road is a right of way access which is routinely used to access farmland beyond the proposed development. Maintenance of an unsealed road such as this by the laying of clean, locally sourced, stable aggregate. Laying gravel on roadways in this manor is a routinely utilised measure to reduce structural deficiencies, improve infiltration and prevent sediment loss. As the road has been and will continue to be in use for farm vehicles and livestock to enter the fields beyond the proposed site, the decision to resurface the road with gravel was appropriate to prevent rutting and poaching of underlying soil.

Aerial imagery used in observations made by Bryan Deegan of Altemar (in support othe observation made by Mr. &Mrs. Lee) were obtained from Google earth, and are not of sufficient resolution or clarity to support the claims made that the road was widened and that significant amounts of vegetation and scrub were removed during resurfacing works. Fig. 1 and Fig. 2 show the laneway directly prior to and following resurfacing. Fig. 3 and Fig 4. display aerial imagery obtained from Bluesky World (https://ireland .blueskymapshop.com/select) dated 08/05/2017 and 31/05/2023 respectively. Both the imagery and the photographs clearly show that the laneway has not been widened significantly and that no vegetation or scrub was removed from the riverbank. It should also be noted that no in-stream works of any kind took place.

Fig. 1. 25cm Aerial Photography showing the site and access laneway prior to resurfacing (08/05/2017; Blues kyWorld)

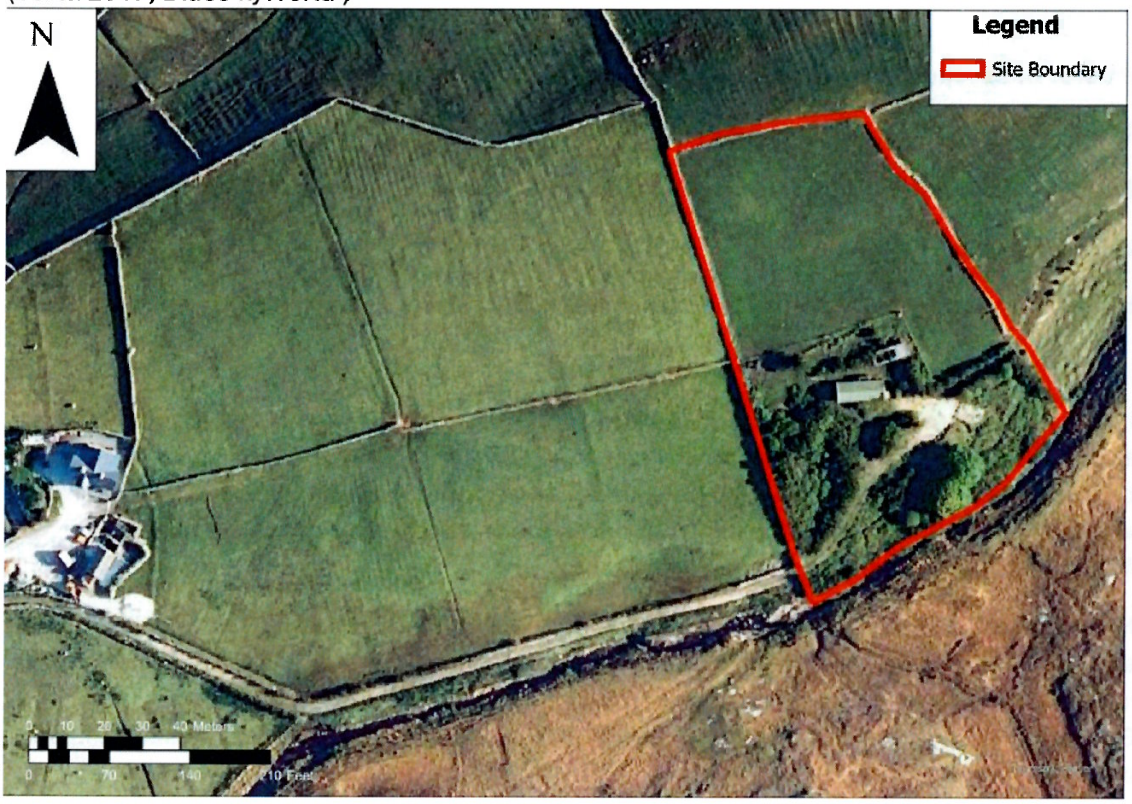


Fig. 2. 25cm Aerial Photography showing the site and access laneway after resurfacing (31/05/2023; Bluesky World).

Fig .3. Photograph of the laneway surface prior to works (03/05/2018) .

Fig. 4. Photograph of the laneway directly post-resurfacing (01/06/2019).

The drains and culvert which were identified in the observation by M s. Ae xine Time do not appear to relate to road drainage but instead appear to be the outlets of field drains emanating from the field to the North of the laneway (Folio GY5190), which is not owned by Patrick Ridge. Fig. 5 and 6 are photos taken in February 2026. Fig. 5 shows the culvert entrance with water entering from GY5190 and Fig. 6 shows the outflow of that culvert along the riverbank. These drains are not the responsibility of Patrick Ridge and pose no risk to water quality insofar as they pertain to use of the road for access. Furthermore, these drains have no relationship to the proposed development site from which they do not drain water. These drains therefore could not serve as a pathway for any pollutants whatsoever from the proposed site to the river.

Fig. 5. Inflow of water into culvert visible inside the fenceline of folio GY5190.

Fig. 6. Outflow of water from culvert along the bank of the Callow river.

Hydrology Assessment for the proposed development: FD07.323899

Below I have conducted a hydrological assessment of the site to assess the claim that there is a potential pathway for sediment to exit the site along the access laneway and enter the river. All analysis were conducted using the Hydrology suite of tools in ArcGIS Pro.

1. Introduction and Purpose

This section presents a hydrological assessment of the proposed development site to inform the Natura Impact Statement Addendum and to respond to concerns raised through Observations submitted by third parties. This section will examine the hydrological connectivity of the site, with the objective to identify potential surface water flow pathways from the site to the Callow river, which forms part of the Connemara Bog Complex SAC.

2. Site Context

The site is located within Recess_SC_020 sub-catchment on the Northern bank of the Callow River, between Barrowen Lough to the East and Maumeen Lough to the Southwest. The site is situated on the Southern slope of a drumlin watershed landform, consisting of glacial till. The surrounding landscape is predominantly blanket bog with smaller areas of improved and semi-natural grassland used for grazing. Surface water runoff from the site is primarily overland, with no formal drainage infrastructure within the site boundary. The site is relatively free draining. Surface runoff from the site typically appears to drain Southwards down a steep slope, toward the Callow River via an intervening area of vegetation and scrub. The site boundary is directly adjacent to the Connemara Bog Complex SPA and is 10m at the closest point to the Connemara Complex Bog SAC.

3. Data Sources and Methodology

Digital terrain analysis was conducted using a 5m Photogrammetric DTM sourced from Bluesky World (https://ireland.blueskymapshop.com/select).

The following GIS products were generated to characterise site hydrology:

- Slope map: illustrates the general gradient and directional flow tendencies across the site.
- Hillshade map: provides a visual representation of terrain form and surface slope aspects.
- Flow direction map; provides a visual representation for the direction of overland flow at all points across the site.
- Flow accumulation map: identifies areas contributing surface runoff and likely preferential flow pathways.
- Watershed map: delineates the area contributing runoff to a specific outflow point located on the laneway just outside the site.

4. Data limits

The digital terrain model is derived from interpolated elevation data and represents generalised ground form. While suitable for identifying dominant topographic flow directions and hydrological connectivity at the site scale, micro-topographic features can go undetected. Photographic evidence is used to subsidise the model and to account for data limits.

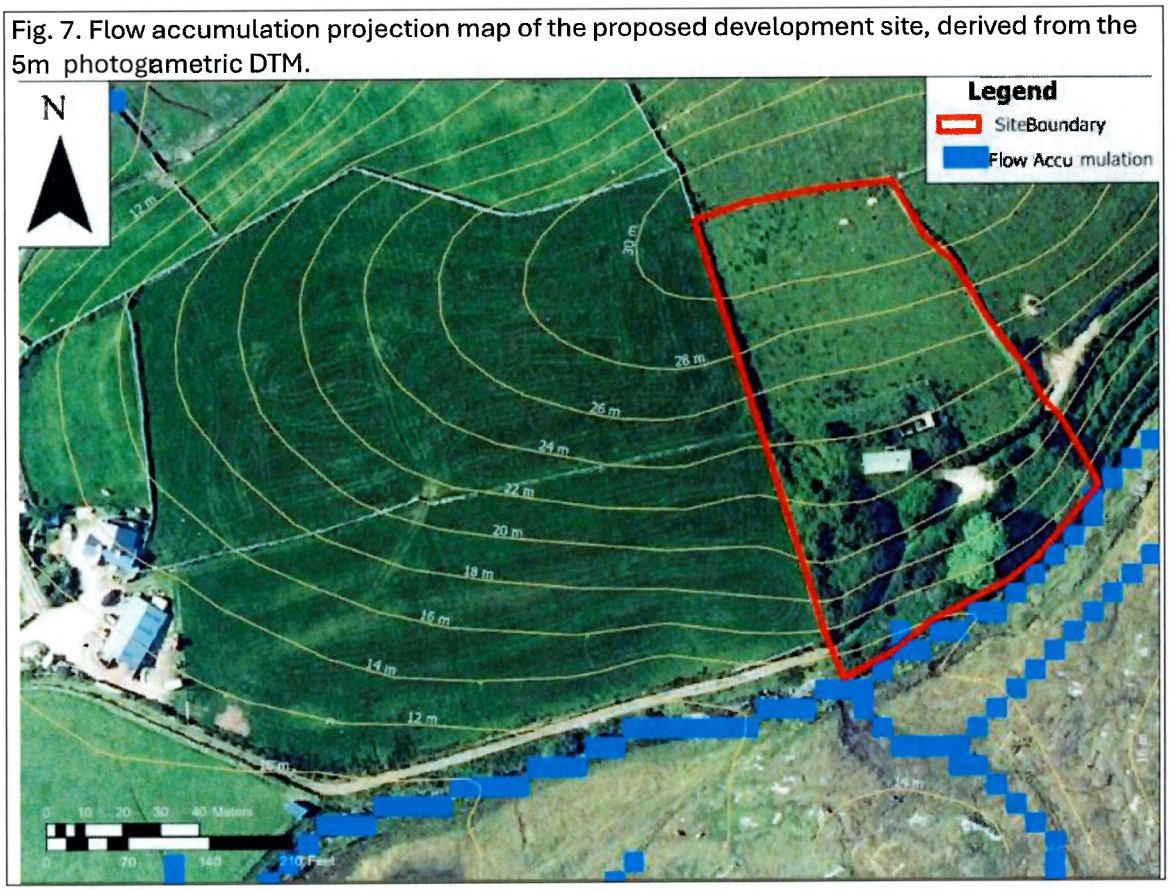
This model does not simulate rainfall, but assumes saturated ground conditions and continuous overland flow, representing a conservative worst-case scenario. This model does is not intended to assess subsurface flows and subsurface flow modelling was included.

5. Slope, Surface Water Flow and Watershed Analysis

5.1. Flow accumulation

Flow accumulation analysis in was conducted using the Fow Acc tool in ArcGIS Pro. The map below (Fig. 7.) indicates where surface runoff is likely to concentrate, identifying natural drainage pathways and the eventual discharge points. The analysis confirms the hydrological link between the site and the Callow river and indicates that the entire site does drain into the river as the eventual outflow.

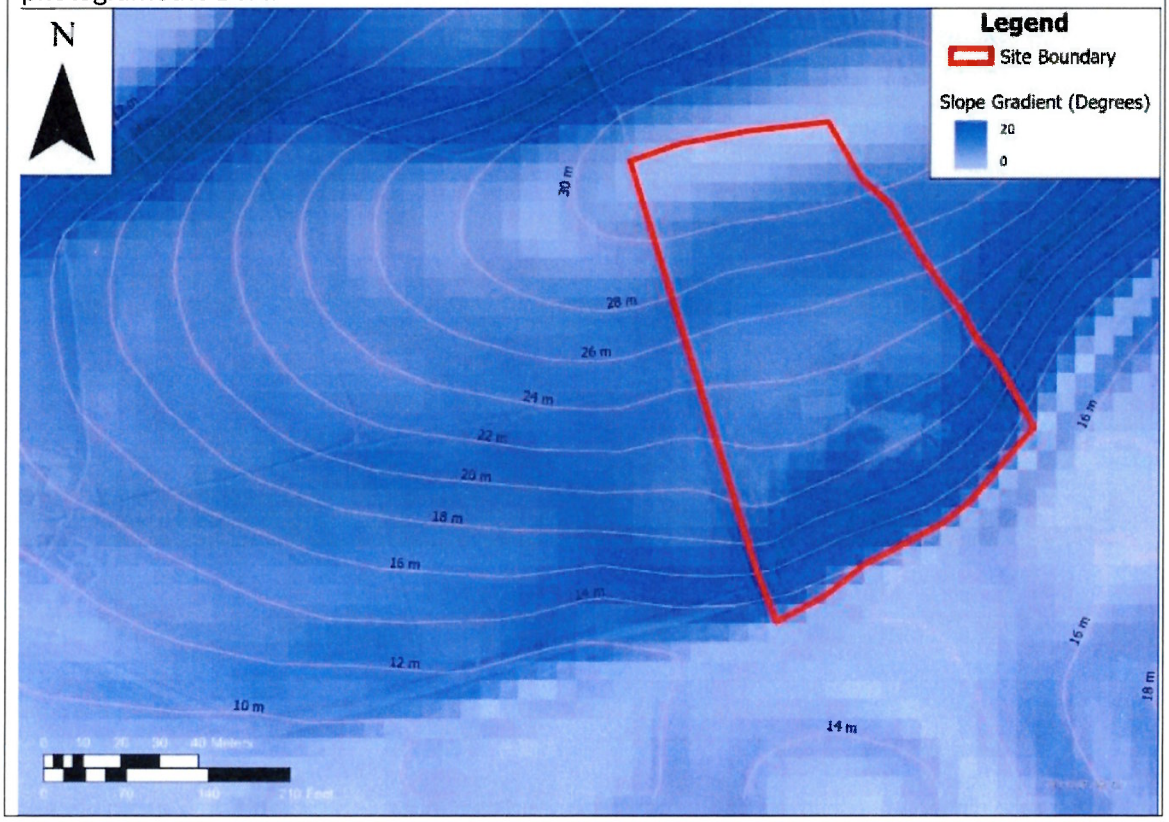
Fig. 7. Flow accumulation projection map of the proposed development site, derived from the 5m photogametric DTM.



5.2. Slope analysis

Slope analysis was conducted using the Slope tool in ArcGIS Pro. The analysis confirms the presence of a South-facing slope throughout the site, increasing in gradient with closer proximity to the river (Fig. 8) Steeper gradients can increase the velocity of surface water, which increases the load-bearing potential for suspended particles, which must be factored into mitigation measures.

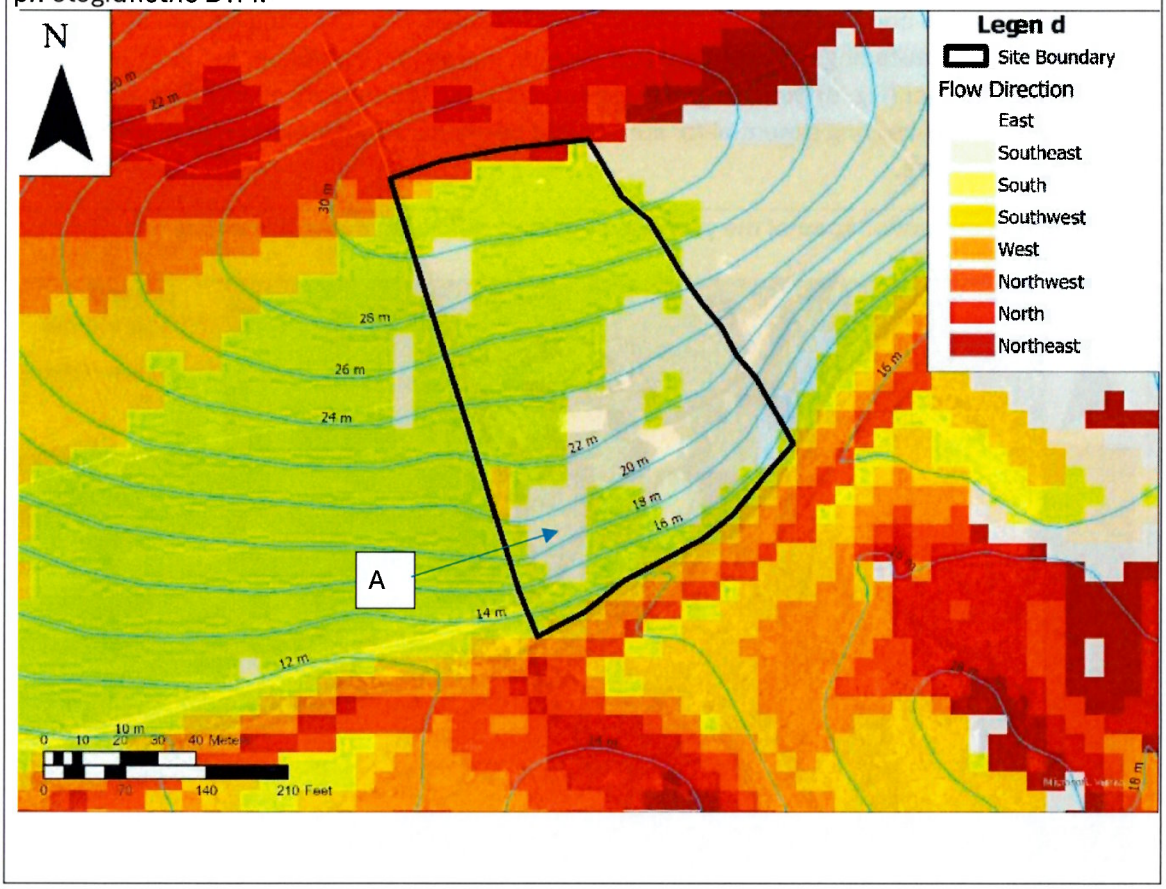
Fig. 8. Slope projection map of the proposed development site, derived from the 5m photogrametric DTM.



5.3. Flow direction analysis

The flow direction map (Fig. 9) was created using the Flow Dir tool in ArcGIS Pro, and provides a visual indication of the direction of surface runoff generated within the site. The map demonstrates that surface water follows the natural downslope gradient toward the Callow river. A portion of the site adjacent to the entrance can be seen to have a Southeastern flow direction (Fig. 9; Point A), which directs much of the surface-water emanating from the North of the site away from the entrance and back towards the vegetation buffer. The majority of surface water from the site can therefore be demonstrated to be outflowing through the vegetated buffer which exists between the site and the river.

Fig. 9. Flow direction projection map of the proposed development site, derived from the 5m ph otogrametric DTM.

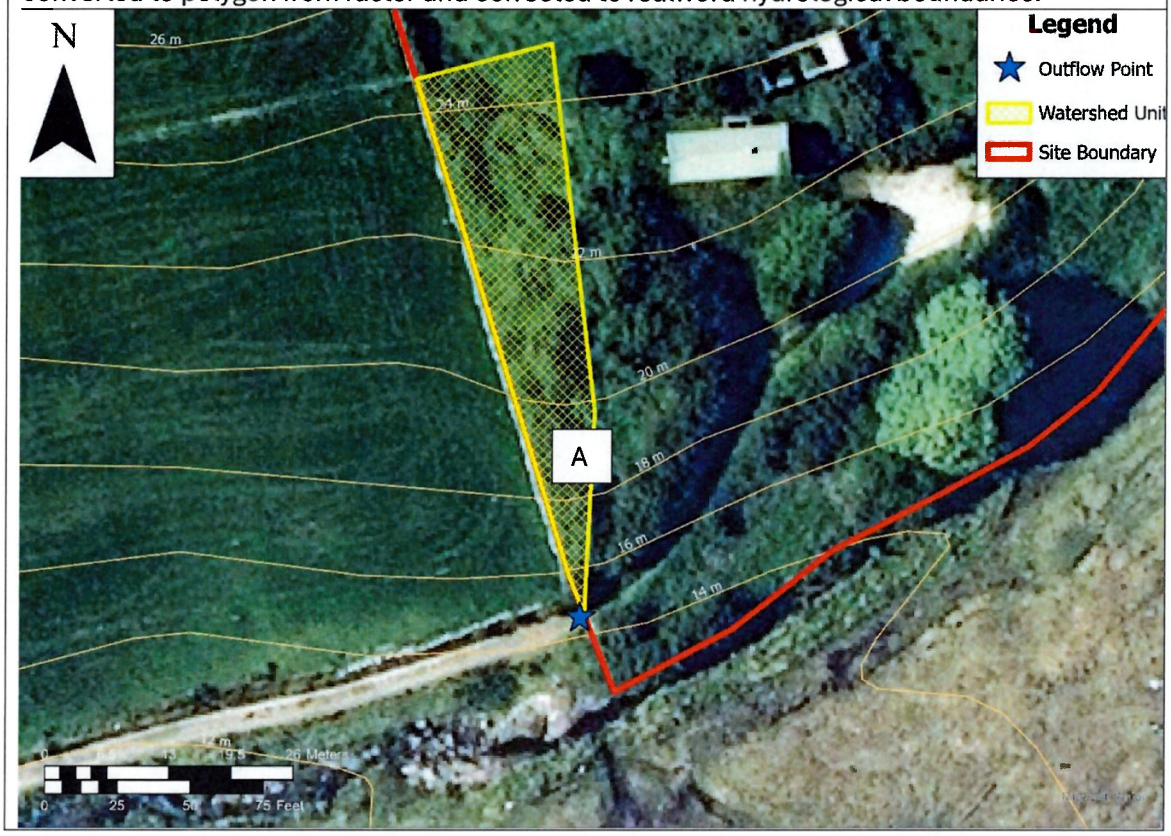


5.4. Watershed Analysis

The watershed map was created using the Watershed tool in ArcGIS Pro and provides a visual indication of the area from which surface water drains into a designated 'outflow point. For the watershed analysis, the 'outflow point' was placed immediately outside the site boundary on the access laneway, in order to evaluate the potential for surface runoff from the site to be transported along the laneway. Once projected, the watershed was corrected to the real-world surface flow hydrological barrier to the East and North, in the form of the stone wall. The watershed can be seen in yellow hatch in Fig. 10, which demonstrates that the direct surface water flow exiting the site boundary is emanating from the vegetated scrub area directly North of the site entry (Fig. 10; Point A), which is itself a buffer and is to remain largely undisturbed during the construct phase and thereafter.

It can be therefore demonstrated beyond any scientific doubt that no unmitigated sediment pathway exists from the portion of the site where works are to take place, to the access laneway via the driveway. Any sediment which may become mobile in surface water runoff during construction will therefore be sufficiently mitigated by the existing riparian vegetation buffers which exist onsite.

Fig. 10. Modelled watershed unit with outflow point directly outside the site boundary, converted to polygon from raster and corrected to realword hydrological boundaries.



Due to the limits present as the result of data resolution, Fig. 11 has been included to demonstrate the absence of any significant concave topography or defined channelisation along the laneway, together with the continuation of the natural ground slope across the laneway towards the river, supports the conclusion that the laneway will not receive sedimented surface water from the proposed site. Any surface water from the site is intercepted and attenuated by an intervening vegetated buffer before reaching the river.

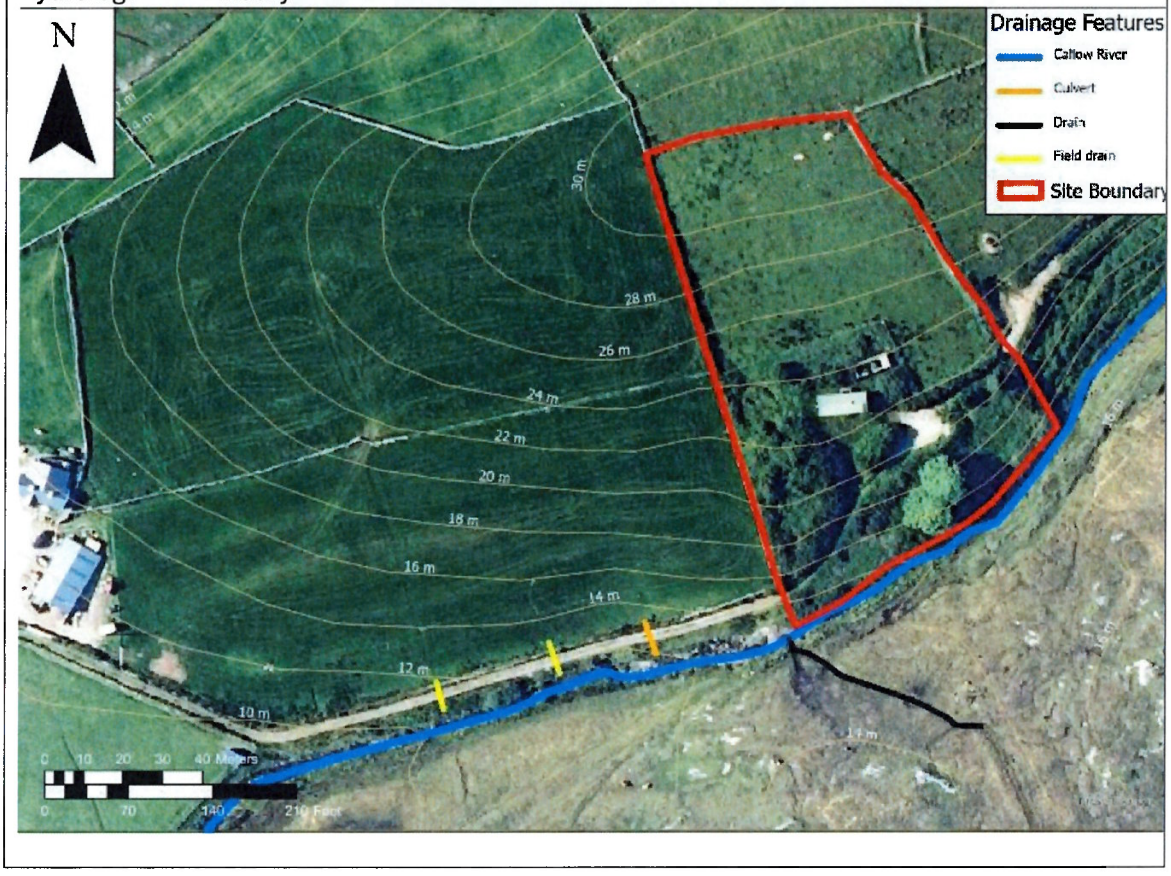
Fig. 11. Entrance to the site from the access laneway facing eastward. No concave topography or defined channelisation is present, and the road slopes southward towards the river. The arrow indicated predominant s lope direction.

6. Drainage Features and Hydrological Modifiers

The access laneway is transacted by an impermeable steel pipe culvert, and two permeable field drains which have been installed by a third party, the nearest of which is [>10m]. As demonstrated in the previous section, this location and these features have no draining effect within the site boundary. These drains appear to drain the field to the North of the laneway (Folio GY5190), which is unrelated to the site. Fig. 5 and 6 show waters from the field entering the culvert and outflowing into the river.

No formal drains, culverts, or field ditches are present within the site boundary that would convey water from the site directly into the Callow River. As such, the natural topography and surface vegetation provide the dominant control on runoff pathways.

Fig. 12. Hydrological features along the river adjacent to the site. No formal features exist within the site, although the site boundary consist of a stone wall to the West which acts as a hydrological boundary to surface water flow.

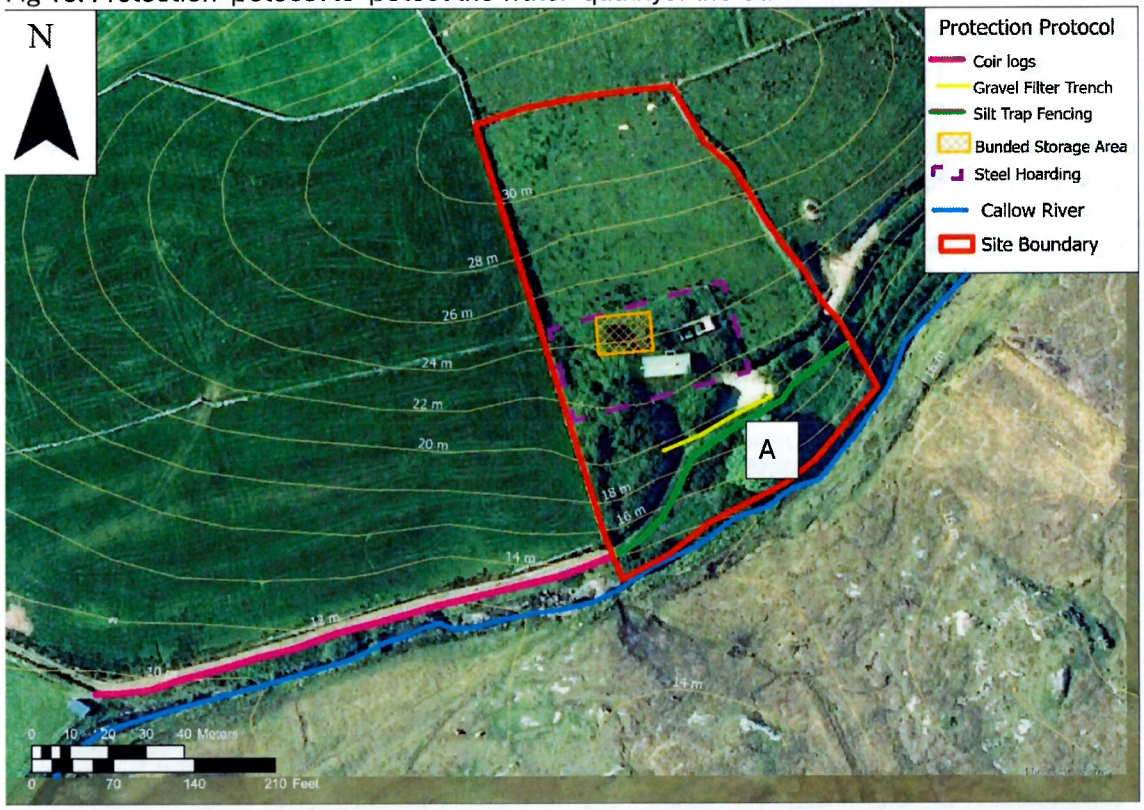


7. Groundwater Screening

The GSI Aquifer Map indicated that the site overlies a Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones. Groundwater pathways for pollutants during construction have been considered and screened out on the basis of site conditions and the nature of the proposed development.

8. Mitigation measures

Fig 13. Protection protocol to protect the water qualityof the Callow river.



It must be noted that in this application, much care has been taken to remove the possibility of creating any adverse environmental effects, both during construction and for the lifetime of the proposed dwelling. The Appropriate Assessment conducted by my colleagues at OMC Group and Natura Impact Statement document they produced is thorough and robust, with all necessary pressures relating to the proposed development addressed with appropriate measures, best practice and common sense. The addition of increased measures included in this submission goes beyond what is required and shows the willingness of the applicant to take any measures necessary to safeguard water quality, at considerable personable expense:

The maintenance of the existing riparian vegetation buffer (Fig. 13; Point X) between the drive and the proposed development and the Callow river is greater than 10m at all points and over 25m at the widest point. This buffer negates alone would negate the possibility of sediment loss both during construction and thereafter and is adequate for a site with a steep slope. The use of silt fencing outlined in the NIS and Construction Environmental Management Plan (CEMP) is standard practice for the protecting sensitive water bodies from sedimentation during and is considered adequate for large-scale disturbance and sources of sediment and pollution orders of magnitude greater than that which the proposed development could create. The addition of the filter trench across the driveway adds additional permanent protection and negates any possibility of the driveway acting as a pathway for sediment sourced from the active portion of the site where construction is proposed to take place.

The use of coir logs along the edge of the access laneway adds a definitive layer of protection should there be any sedimented surface water present on the road, and these can be left in place after the construction period.

9. Conclusions

- Work which was previously undertaken to resurface the road is unlikely to have adversely impacted to Callow river and may provide long-term benefit.
- This hydrological analysis indicates that:
- Surface runoff from the site predominantly flows Southwards toward the Callow River.
- The watershed analysis demonstrates that the laneway 'outflow point' outside the site does not receive direct surface water flow from any portion of the site where construction will occur.
- Vegetated buffers within the site and between the laneway and the river further reduce the potential for sediment transport.
- Measures outlined in the CEMP and NIS add an additional degree of protection.
- On the basis of the above, no plausible, unmitigated hydrological pathway exists by which the proposed development could adversely impact the Callow River or Connemara Bog Complex SAC, alone or in combination, beyond all reasonable scientific doubt.

References

The following documents outline best practice for assessing the potential for sediment and nutrient loss from unsealed road surfaces to surface waters, and recommendations for measures to prevent runoff. I have referenced these documents when assessing the aforementioned application.

1. Fenton, O., Daly, K., Rice, P., Tuohy, P., & Murnane, J. (2021). The Farm Roadway Visual Assessment Booklet. Teagasc, Ireland.
2. Fenton, O., Daly, K., Murnane, J., & Tuohy, P. (2024). *Roadway Run-off and Nutrient-loss Reduction* (EPA Research Report No. 456). Environmental Protection Agency, Ireland.
3. CIRIA (2015). *The SuDS Manual* (C753). Construction Industry Research and Information Association (CIRIA), London, U.K.
4. Bluesky International Ltd. (2023). Aerial View of Emlaghmore 25cm Resolution, Date of Photograph: 31/05/2023, Retrieved from https://ireland.blueskymapshop.com/select.
5. Bluesky International Ltd. (2017). Aerial View of Emlaghmore 25cm Resolution, Date of Photograph: 08/05/2017, Retrieved from https://ireland.blueskymapshop.com/select.
6. Bluesky International Ltd. (2017). Photogrammetric DTM of Emlaghmore 5m Resolution, Date of Photograph: 08/05/2017, Retrieved from https://ireland.blueskymapshop.com/select.

Patrick Ridge,
Aillebrack,
Ballyconnelly,
Co Galway.
H71 X790

Application Ref Nos: ACP - 323867 -25 and ACP - 323899-25

28 January 2026

Dear Garvan,

Further to the letter from ACP offering an opportunity to respond to submissions on our applications, I hereby request that you, on making the submission on my behalf, give consideration to the points hereunder:

I would like it to be restated that the property at Emlaghmore is of great importance to my family. We, as a family, are extremely committed to ensuring a just outcome to this process and have, and continue to do, whatever is necessary to arrive at this outcome. This is reflected in the extensive investment that I have put into the processes to date, both in terms of financial cost, and more importantly the engagement of expertise from ecologists and architects to legal advisors. More recently this is borne out by the thoroughness of the response that we have prepared to the latest submission on the ACP files, despite the very limited timeframe within which we can respond.

Many of the issues raised in the two observations have been addressed in the content of the applications themselves itself (reference nos: ACP -323867 -25 & ACP - 323899 -25) . I wish however to address hereunder certain of the points raised.

• The submission by Ms. Aleine Tinne states that "*the applicant has built 3 drains across the land that does not belong to him*", also it states that "*Mr. Ridge will need to seek planning permission would need to get his pipes across to the lake and subsequent drainage plans*". I wish to make it clear that the referenced drains are not my drains, I did not build the drains or direct their construction and nor did I have knowledge of them being placed there. Futhermore, from inspection it is apparent that the referenced drains which feed into the stream originate and drain water from an agricultural field (Folio GY5190) that is not in my ownership or control. The Land Registry currently records Mr. Peter Lee, a third party not connected to me or my family, as the registered owner of the agricultural field (Folio GY5190) from which the drains appear to emanate. Mr. Lee however, is one of the parties who has made a submission on this application. No part of the drains provide drainage from lands under my ownership or control.

• I also wish to clarify and confirm that, although the above quoted reference in the submission regarding a need for pipes to be laid across to the lake is unclear and ambiguous, I have no intention now or at any stage in the future to lay any drainage from my lands (the subject of the application) to discharge into or extract water the lake or stream.

•The observation by The Western Gamefishing Association states that "*any grant renewal or extension of any subsisting permission may only be consented to in the event that it can be demonstrated by the applicants, on the basis of the best available scientific knowledge in the field, and with certainty, beyond all reasonable doubt , that no adverse impacts to the protected sites, as the protected flora as fauna therein will result from any such grant as consent*". It also states that "*the introduction of silts, oil, lubricants and aggregate materials, are not compatible with the unique environmental constraints and natural heritage of this area*". I refer to the NIS submitted with the application which concluded that "*the proposed development, subject to the mitigation and monitoring commitments set out herein, will not result in adverse effects on the integrity of any Natura 2000 site, either individually or in combination with other projects.*" I also refer to the report prepared by Mr. Fitzpatrick (Environmental Scientist) where he states that claims made in the submissions relating to the Callow River are not supported by scientific evidence and do not hold up to scientific scrutiny. They are instead based on non-expert opinion, conjecture and unverifiable, 'discussions' with a public body (Inland Fisheries Ireland)".

•The statement referring to silts, oil and lubricants implies that there is a risk of such materials being generated or causing harm by the proposed development. A Construction Environmental Management Plan (CEMP) was also submitted with the application clearly setting out measures to be taken to deal with the protection of European Designated sites including a chapter specifically dealing with water protection. I can confirm that all aspects of the CEMP and it stated protection measures will extend to the streamside laneway approach to my property, including the placement of coir logs between the stream and the lane for the course of construction, should my 37L application be successful.

I wish to reiterate that I am extremely conscious of the importance of our biodiversity including flora, fauna and waterways and will continue to diligently ensure that no harm to same will arise from any activity on my lands now or in the future. In this regard, I am fully committed to the implementation of any proposed mitigation measures or any other appropriate undertakings deemed necessary by ACP to ensure the contained protection of the Natura 2000 sites.

Yours sincerely,

Patrick Ridge

REMEDIAL NATURA IMPACT STATEMENT

October 2025

Prepared for
Patrick Ridge

Site Address
Emlaghmore, Ballyconeelly, Co. Galway

Prepared by
Larry Manning

Contact
Email: larry.manning@omcgroup.ie
Phone: +353 87 3539990

REMEDIAL NATURA IMPACT STATEMENT

Rev.	Status	Date	Author
01	Draft	14/04/25	CM
02	Draft	16/10/2025	LM
03	Final	11/02/2026	LM

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Statement of Authority

This report was authored by Larry Manning B.Sc. (Hons). Larry Manning has over 14 years' experience as an ecologist, working across consultancy, research, and regulatory environments. He demonstrates high professional standards through rigorous application of environmental legislation, ethical practice, and clear scientific reporting. He maintains a strong CPD record, including specialist training in bat ecology, marine mammal mitigation, and acoustic fisheries research. Larry's expertise includes Appropriate Assessment, EcIA, EIAR (biodiversity chapters), and a wide range of specialist surveys (ornithology, mammals, reptiles, amphibians, bats, aquatic ecology). Larry has led ecological assessments for large-scale infrastructure, offshore renewable energy, and conservation projects, ensuring compliance with Irish and EU legislation. He is skilled in data management, GIS, statistical analysis, and the design of mitigation and monitoring strategies to achieve robust, evidence-based outcomes. As a Principal and Senior Ecologist, Larry has developed new ecological service offerings, prepared winning tenders, and contributed to business growth through strategy and client engagement. He has led successful stakeholder consultations with developers, agencies, NGOs, and local communities. Larry applies leadership and diplomacy to achieve project objectives while maintaining biodiversity protection as a core priority.

1.0 Introduction

OMC has been retained by Pat Ridge to carry out a remedial Natura Impact Statement (rNIS), prepared by Larry Manning for the retention of:

A) The reinstatement of a collapsed roof and making good of an existing chimney,
B) The unblocking of windows and replacement of timber framed windows on the front elevation,
C) CCTV cameras on the building to be in place for a temporary period;

Description: The replacement of a storm damaged metal-clad roof with a new metal-clad roof.

The opening up of 3 no. windows, previously blocked up with dry stone, without alteration to the original ope sizes. The placing of timber framed windows within the opes.

The reconstruction of an unsafe partially collapsed chimney.

The excavation of a trench to allow for the placement of an electricity supply duct along and existing laneway leading to the unhabitable dwelling. The infilling of the trench and resurfacing of the laneway with loose stone.

The construction of a pillar to house an ESB meter cabinet and adjacent placement of a mini pillar.

The placement of CCTV cameras, wiring and an antenna on the facade and chimney of the uninhabitable dwelling.

The site is approximately 2m from the Connemara Bog Complex SPA and approximately 10m from the Connemara Bog Complex SAC in the townland of Emlaghmore, Ballyconeelly, Co. Galway. As such, the potential impacts of the proposed works must be assessed by the competent authority, in accordance with Article 6(3) of the Habitats Directive 92/43/EEC (Assessment of Plans and Projects significantly affecting Natura 2000 sites). This report provides the necessary information for the completion of an Appropriate Assessment regarding the potential impact of the proposed works on sites of European importance.

1.1 Information sources and surveys

The site surveys were carried out on Fri. 7th June 2024 and Wed. 12th March 2025. Water sampling of the River Callow (EPA-010) was carried out on Monday 9th February. The Screening Statement for AA is, in part, informed by:

- The Department of the Environment, Heritage and Local Government (2010) Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities.
- European Commission (2002) Management of Plans and Projects significantly affecting Natura 2000 sites. Methodological guidance on the provision of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC. Office for Official Publications for the European Communities, Luxembourg.
- An Bord Pleanála (ABP), 2022. Guidance for Applicants on Substitute Consent under Part XA of the Planning and Development Act 2000 (as amended). Dublin: An Bord Pleanála.
- Department of Housing, Local Government and Heritage (DHLGH), 2021. Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Dublin: Government of Ireland.
- European Commission, 2019. Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC. Luxembourg: Publications Office of the European Union.
- Government of Ireland, 2000. Planning and Development Act 2000 (No. 30 of 2000). Dublin: The Stationery Office.
- Law Reform Commission, 2025. Revised Acts – Planning and Development Act 2000 (as amended), Sections 177E and 177G. Dublin: Law Reform Commission.
- www.floodinfo.ie
- en-ie.topographic-map.com

1.2 Requirement for Appropriate Assessment

Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, commonly referred to as the 'Habitats Directive', and Directive 2009/147/EC of the European Parliament, and of the Council on the conservation of wild birds (codified version of Directive 79/409/EEC as amended), hereon referred to as the 'Birds Directive' are European Community Legislations established for the conservation of biodiversity and natural habitats. Sites, species and habitats under protection of Directive 92/43/EEC (Habitats Directive) and Directive 2009/147/EC (Birds Directive) are referred to as Natura 2000 sites (also referred to as European sites in the 2011 Birds and Natural Habitats Regulations).

The term Natura 2000 sites will be used in this report. Two types of Natura 2000 site designation exist and are categorised as follows;

- the Special Area of Conservation (SAC), which is designated for the conservation of flora, fauna and habitats of European ecological importance under the Habitats Directive.
- the Special Protection Area (SPA), which is designated for the conservation of bird species and habitats of European ecological importance under the Birds Directive.

These 2 categories of sites collectively comprise a network of European protected areas, 'Natura 2000'.

The term 'Qualifying Interests' (QI) refers to the specific named habitats and/or non-bird

species which require protection and for which an SAC or SPA is designated. The term Special Conservation Interests (SCIs) refers to the named bird species which requires protection and for which an SPA is designated. However, the terminology of QI is predominantly used in practice for non-bird and bird species alike. The term Qualifying Interests is used throughout this report. Habitats which require protection are listed in Annex I of the Habitats Directive and include lakes, rivers, heaths and turloughs, as well as raised bogs and active blanket bogs. Species who's habitats require protection are listed in Annex II (Habitats Directive) and include Lesser Horseshoe Bat, Salmon and Otter. Endangered and migratory species which require SPAs are listed in Annex I of the Birds Directive. Naturally, protection is given on the basis of priority, with specific/heightened protection strategies pertaining to certain habitats/species.

The purpose of this report is to apply for substitute consent made directly to An Bord Pleanála under section 177E of the Planning and Development Acts.

The requirement for a Remedial Natura Impact Statement (rNIS) arises under Part XA of the Planning and Development Act 2000, as amended (the "Act"), which provides the legislative basis for the Substitute Consent process. This process enables an applicant to regularise a development that has been carried out without the appropriate environmental assessments required under EU law, namely an Environmental Impact Assessment (EIA) and/or an Appropriate Assessment (AA) under the Habitats Directive.

Under Section 177E of the Act, any person seeking substitute consent for unauthorised development must submit an application to An Bord Pleanála (the Board). That application must be accompanied by a remedial environmental impact assessment report (rEIAR), a remedial Natura impact statement (rNIS), or both, depending on whether the development is likely to have had significant effects on the environment and/or on European sites protected under the Habitats Directive. The rNIS is the core document through which the applicant retrospectively assesses the effects of the development on Natura 2000 sites (Special Areas of Conservation and Special Protection Areas) and demonstrates how such effects have been or will be remedied or mitigated.

Section 177E also sets out procedural requirements related to the submission and validation of the rNIS. Where the Board considers that a submitted rNIS does not comply with the content requirements of the Act, it must notify the applicant and direct that further information be submitted to bring the statement into compliance. If the applicant fails to provide the required information within the specified or extended period, the application for substitute consent is deemed to be withdrawn. Once a valid application, including the rNIS, is accepted, the Board transmits a copy of the application and accompanying documentation to the relevant planning authority, which is required to place it on its public planning register.

The content requirements for a Remedial Natura Impact Statement are prescribed in Section 177G of the Act. Under subsection (1)(a), an rNIS must contain a statement of the significant effects on the relevant European sites that have already occurred, are currently occurring, or can reasonably be expected to occur as a result of the development. This retrospective element distinguishes the rNIS from a standard Natura Impact Statement, as it specifically considers impacts that have already taken place due to unauthorised works.

Subsection (1)(b) of Section 177G requires that the rNIS include details of any remedial or mitigation measures undertaken or proposed by the applicant to remedy or mitigate those effects. It must also specify the time period within which any proposed measures will be implemented. In addition, under subsection (1)(c), the statement must contain any further information that may be prescribed under regulations made pursuant to Section 177N of the

Act.

Section 177G(2) provides that a remedial Natura Impact Statement may also include, where applicable, a statement of imperative reasons of overriding public interest (IROPI) and details of any compensatory measures proposed by the applicant to ensure the overall coherence of the Natura 2000 network. These provisions allow the applicant to address situations in which adverse effects on site integrity cannot be fully avoided or mitigated, but where the development may nonetheless proceed in accordance with Article 6(4) of the Habitats Directive. IROPI does not apply to this application.

Together, Sections 177E and 177G establish the statutory framework for the preparation and assessment of a remedial Natura impact statement. The rNIS serves both as a corrective and evaluative document, enabling the Board to carry out an appropriate assessment of the unauthorised development in line with the requirements of the Habitats Directive and to determine whether substitute consent may lawfully be granted. In essence, the remedial Natura Impact Statement is the mechanism through which compliance with European environmental law is retrospectively achieved in cases where development has occurred without prior appropriate assessment.

1.3 Methodology

Articles 6(3) and (4) of the Habitats Directive outline the testing mechanisms which underpin the decision-making process for the consideration of plans and projects that could significantly impact the ecological integrity of a Natura 2000 site. The Department of the Environment Heritage and Local Government guidelines (DOELHG, 2009) indicates the European Commission's methodological guidance (EC 2000, 2002, 2006, 2018), outlining the approach of how plans and projects should be carried out within Natura 2000 sites. This is categorised as a 4- stage process. Whether a further stage is required is dependent on the outcome of each successive stage.

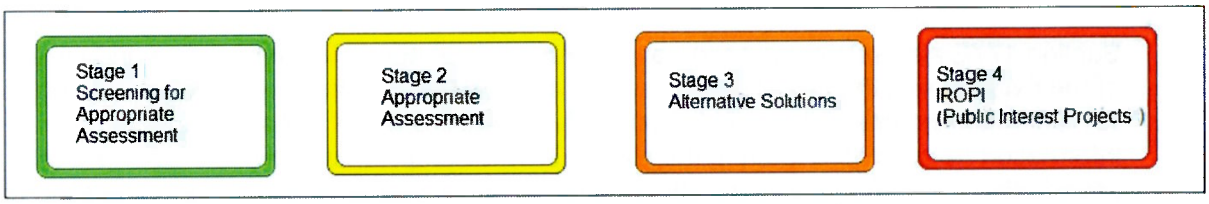


Figure 1: Stages of Appropriate Assessment

1.4 Screening

This examines the likely effects of a project or plan on a Natura 2000 site and determines whether it can be objectively concluded that these effects will not be significant. There are four steps involved in this process which are outlined as follows.

1. It must be considered whether the project or plan is inherently connected to or necessary to the management of the site.

2. A description of the project or plan, in conjunction with other projects or plans which, together, could possibly have a significant effect on the integrity of a Natura 2000 site.

3. Identification of the possible ecological effects on the Natura 2000 site.

4. An assessment of the significance of the potential effects.

1.5 Scope

The objective of the screening exercise is to determine the possible implications of the project, alone or in conjunction with other plans or projects on the conservation objectives and ecological integrity of Natura 2000 sites. This report has been prepared in accordance with the European Commission guidance document Assessment of Plans and Projects Significantly affecting Natura 2000 Sites: Methodological Guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC (EC, 2001) and the Department of the Environment's Guidance on the Appropriate Assessment of Plans and Projects in Ireland (Amended 2010)

Following the preliminary screening, if effects are deemed significant or indeterminate on the conservation objectives and the general integrity of Natura 2000 sites, further assessment under Article 6(3) is necessary and it is recommended that a Natura Impact Statement (NIS) be completed.

In the case of works already completed, a remedial NIS (rNIS) is completed retrospectively.

2.0 Description of development

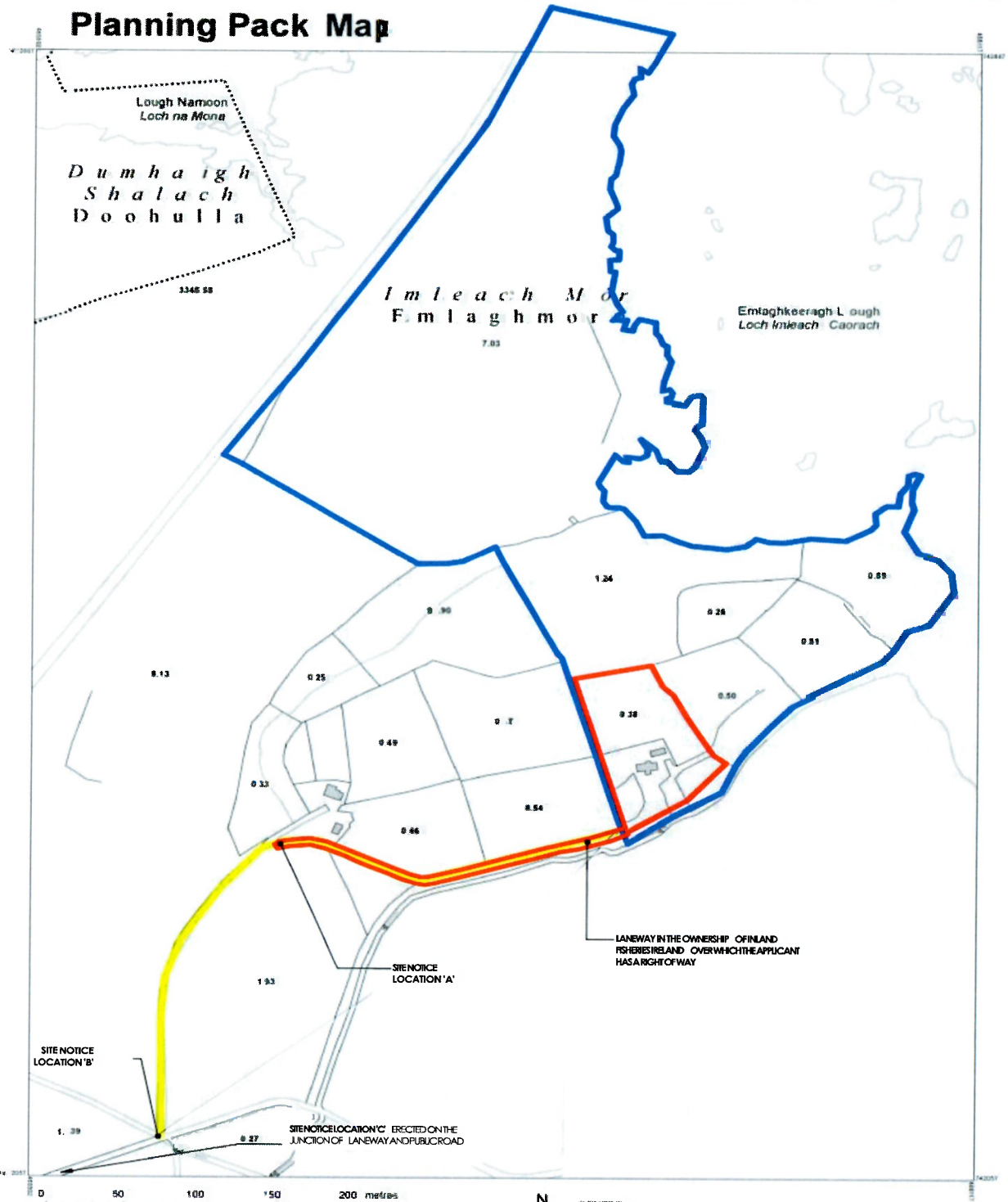
The development description is the first step to properly identifying possible impacts. This should include all features of the project so that each can be individually considered in respect of the conservation objectives of nearby Natura 2000 sites.

The replacement of a storm damaged metal-clad roof with a new metal-clad roof.
The opening up of 3 no. windows, previously blocked up with dry stone, without alteration to the original ope sizes. The placing of timber framed windows within the opes.
The reconstruction of an unsafe partially collapsed chimney.
The excavation of a trench to allow for the placement of an electricity supply duct along and existing laneway leading to the unhabitable dwelling. The infilling of the trench and resurfacing of the laneway with loose stone.
The construction of a pillar to house an ESB meter cabinet and adjacent placement of a mini pillar.
The placement of CCTV cameras, wiring and an antenna on the facade and chimney of the uninhabitable dwelling.

2.1 Site Location

The proposed development site is located in Emlaghmore, Ballyconeelly, Co. Galway See below. The site is accessed via a shared private road, approx. 8km south of Clifden Town. The proposed development site consists of an existing semi-ruinous dwelling and stone shed on an area of land which measures approximately 0.72 hectares in area. The site is surrounded in agricultural land, with few other residential properties in the area.

Planning Pack Map



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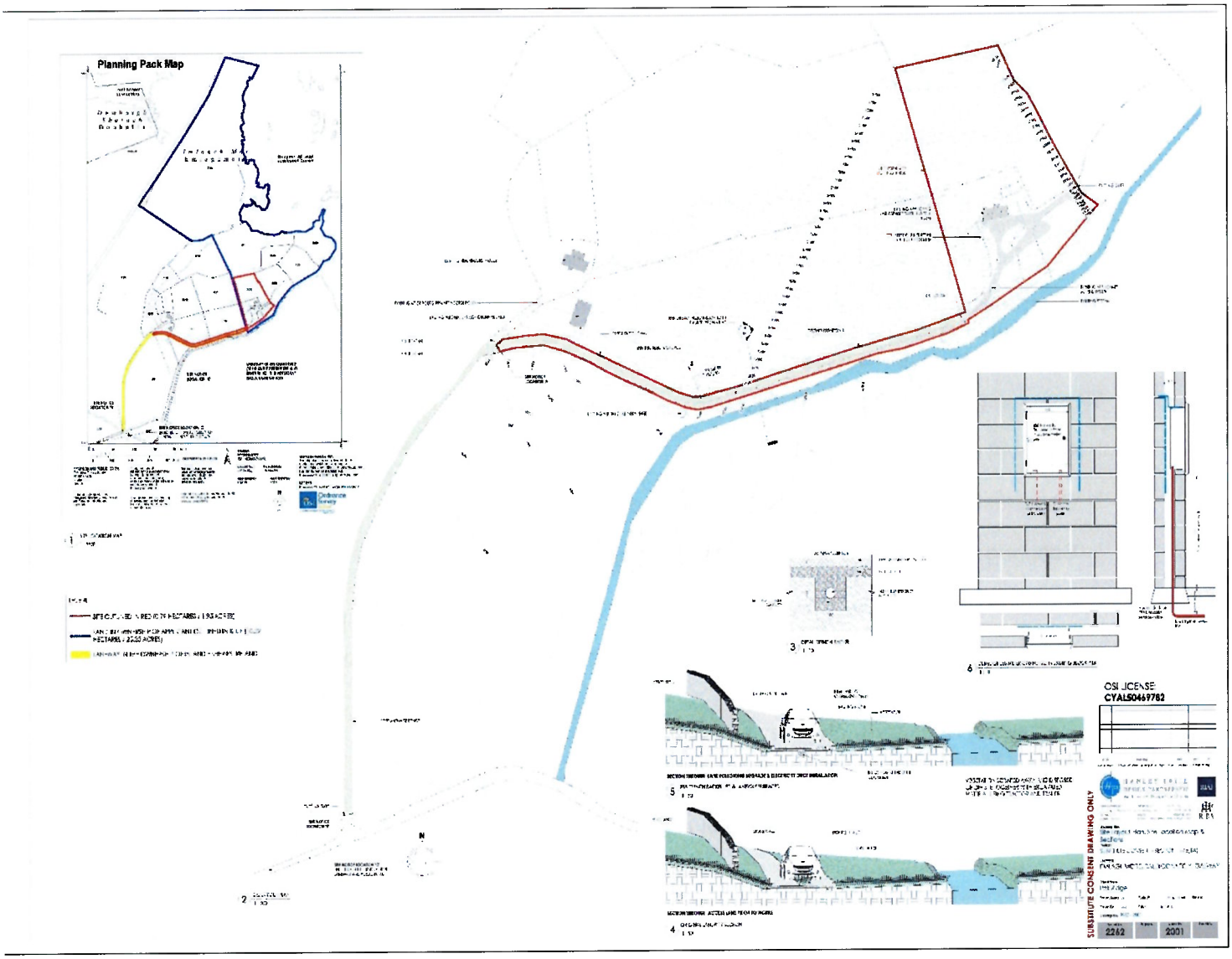
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2.2 Project description

The proposed project is to retain:

1. The reinstatement of a collapsed roof and making good of an existing chimney,
2. The unblocking of windows and replacement of timber framed windows on the front elevation,
3. CCTV cameras were erected on the building for a temporary period.

The approximate total area within the site boundaries is 0.72 Ha. The site is currently walled off from the surrounding landscape and is used periodically for low intensity grazing of cattle and sheep. The project is small in terms of size and scale.

Works carried out at the subject site to date have included:

1. Removal of collapsed tin roof

2. Construction of new wooden roof beam supports

3. Securing existing walls with concrete on top

4. Instatement of new tin roof

5. Unblocking of existing window opes (previously infilled with stone) and installation of timber framed windows

6. Rebuilding of existing chimneys to above roof level

7. Installation of electricity connections and temporary CCTV cameras.

More detailed description of the project is described below.

Roof

In the 1990's an old partially collapsed corrugated metal roof was removed by hand, placed in a trailer and taken off site by tractor and trailer for appropriate disposal. Some roof timbers were retained for reuse. A small load of gravel was delivered to site by tractor and trailer. A small quantity of concrete was mixed on site on the existing floors within the building. This concrete was then lifted by hand using buckets to the top of the external walls to allow for consolidation of the walls where necessary. New roof timbers and metal sheeting were delivered to the site by tractor and trailer. The new roof timbers and sheeting were fitted by hand from loaders. No waste was generated by these works.

Picture of the roof

Windows

In 2020 3 existing windows, which had dry loose stone, were reopened in exactly the same configuration as they originally were. This was done by removing the stone by hand. No alterations took place to the original reveals, sills or lintels.

The stones were retained on site for reuse in chimney repairs. Temporary timber framed windows, fabricated off site were fitted to ensure that the building could continue to be weathered but allow natural light in.

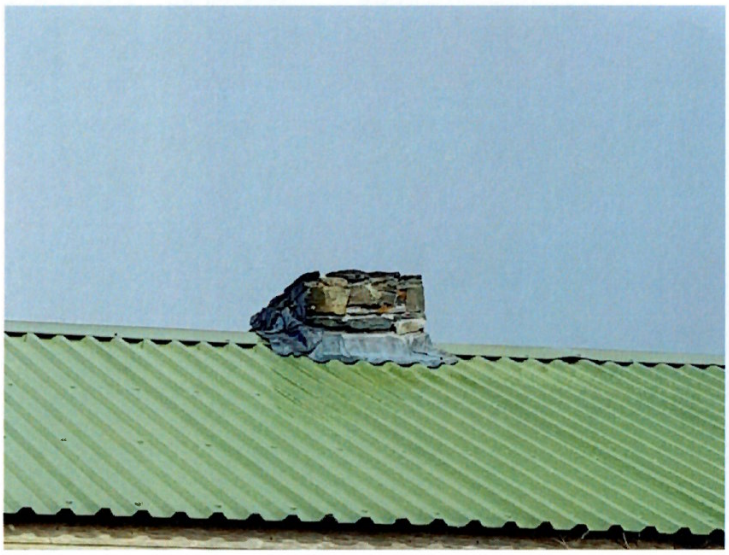
This work was undertaken to allow natural light into the building so that the building could be used as a place of refuge when visiting the farm as no other form of shelter exists on the land. The building could also be used to store items such as rain gear and wellington boots.

Original windows with stone removed

Window blocked with dry stone

Chimney

When carrying out the works to the windows an existing chimney breast was determined to be structurally unstable. Works took place to consolidate the chimney breast and make it good using the stone from the window and lime mortar which was mixed on the floor of the building internally using bagged sand and lime. There was no waste generated by these works.



Chimney repair

Access laneway resurfacing, including laying of electricity supply duct

Vegetation was scraped from the lane surface using an excavator and the material taken from the site using a tractor and trailer. Following this a trench was excavated along a portion of the access lane leading to the property, excavated material was again removed from the site by tractor and trailer, an electricity supply duct was placed in the trench, and the trench was backfilled with clean locally sourced gravel. Clause 804 stone is a high-quality crushed aggregate that meets the TII Specification for Roadworks and IS EN (Irish Standard 13242 &SR21) for unbound granular fill. On completion of the trench works a thin layer of clause 804 was laid on the laneway. The intention was to facilitate an electricity connection to the building to allow for the placement of a CCTV system following criminal damage, that was reported to An Garda Siochana, having taken place on the site. Also resurfacing the laneway was to make the farm more accessible to cars. The laneway is now covered in soil and grass and classed as recolonizing bare ground (Fossitts ED3).

Laneway before surfacing. Laneway after surfacing. Laneway in 2026.

Construction of a pillar to house the ESB meter cabinet

A small foundation measuring no more than 300mm deep x 300mm wide x 1200mm long was excavated. Premixed concrete was brought to the site in a car trailer and

poured into the foundation. A concrete block pillar was constructed, again with premixed mortar brought to the site from another construction site a few kilometers away. The ESB cabinet was fitted into the pillar and a duct laid between the pillar and the building. The intention was to facilitate an electricity connection to the building to allow for the placement of a CCTV system following criminal damage, that was reported to An Garda Siochana, having taken place on the site.

ESB meter Cabinet

Placement of cctv cameras and antenna on the building

At the cottage, 4 no. CCTV cameras and an antenna were mechanically fixed to the façade of the building and wired internally and externally without any intervention in the building fabric. The number of cameras has subsequently reduced to 3. The intention to allow for remote passive surveillance of the property following criminal damage, that was reported to An Garda Siochana, having taken place on the site.

CCTV Installation

CCTV Installation

CCTV installation.

All work at the cottage was completed at least 40m from the Connemara Bogs Complex SPA and 45m from the Connemara Bog Complex SAC.

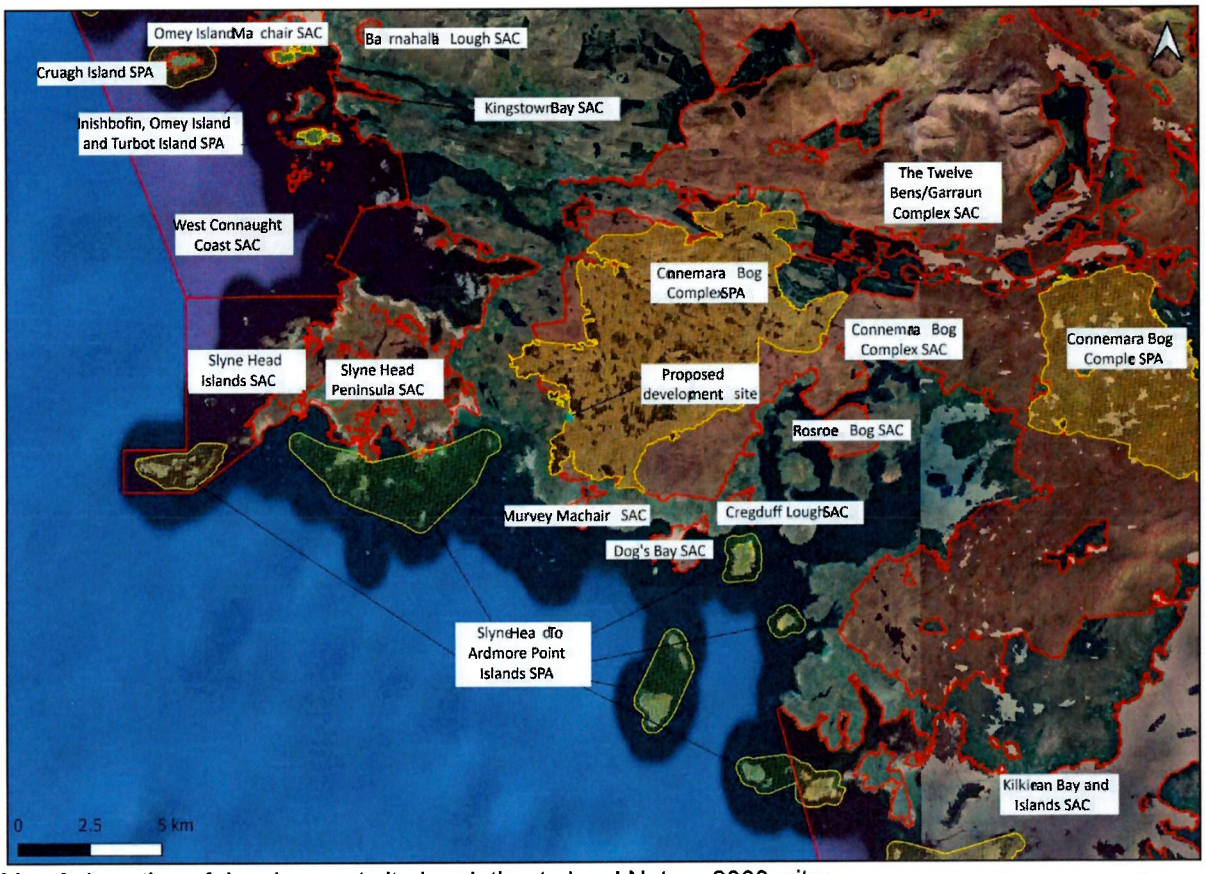
Map 1: Location of the proposed development site (blue outline), (Source: Bing maps)

2.3 Relationship to designated sites

As per NPWS guidelines, Natura 2000 sites within a 15km radius of the proposed project were initially posed for consideration. The table below lists Natura 2000 sites within the 15km screening radius.

Natura 2000 Site	Code	Distance
Inishbofin, Omey Island and Turbot Island SPA	004231	12.34km
West Connaught Coast SAC	002998	8.79km
Barnahallia Lough SAC	002118	14.53km
Twelve Bens/Garraun Complex SAC	002130	8.98km
Slyne Head Peninsula SAC	002074	3.15km
Kingstown Bay SAC	002265	12.27km
Connemara Bog Complex SAC	002034	0.01km
Connemara Bog Comples SPA	004181	0.00km
Slyne Head To Ardmore Point Island SPA	004159	2.52km
High Island, Inishshark and Davillaun SPA	004144	12.34km
Dog's Bay SAC	001257	4.95km
Cregduff Lough SAC	001251	6.1km
Rosroe Bog SAC	000324	8.57km

Table 1: Natura 2000 sites within 15km of the proposed development site



Map 3: Location of development site in relation to local Natura 2000 sites

2.4 Zone of Influence

The "Zone of Influence" can be defined as the difference between the spatial footprint of a project or development and the extent of the developments' effects on the surrounding environment, in relation to habitat and species populations.

When assessing effects on wildlife habitats and populations we must consider light, noise and hydrological connections. National guidance (DEHLG 2009) states that "Although a distance of 15km is currently recommended in the case of plans…[however] for projects, the distance could be much less than 15km, and in some cases less than 100m, but this must be evaluated on a case-by-case basis" Thus the Zone of Influence requires to be defined for each project.

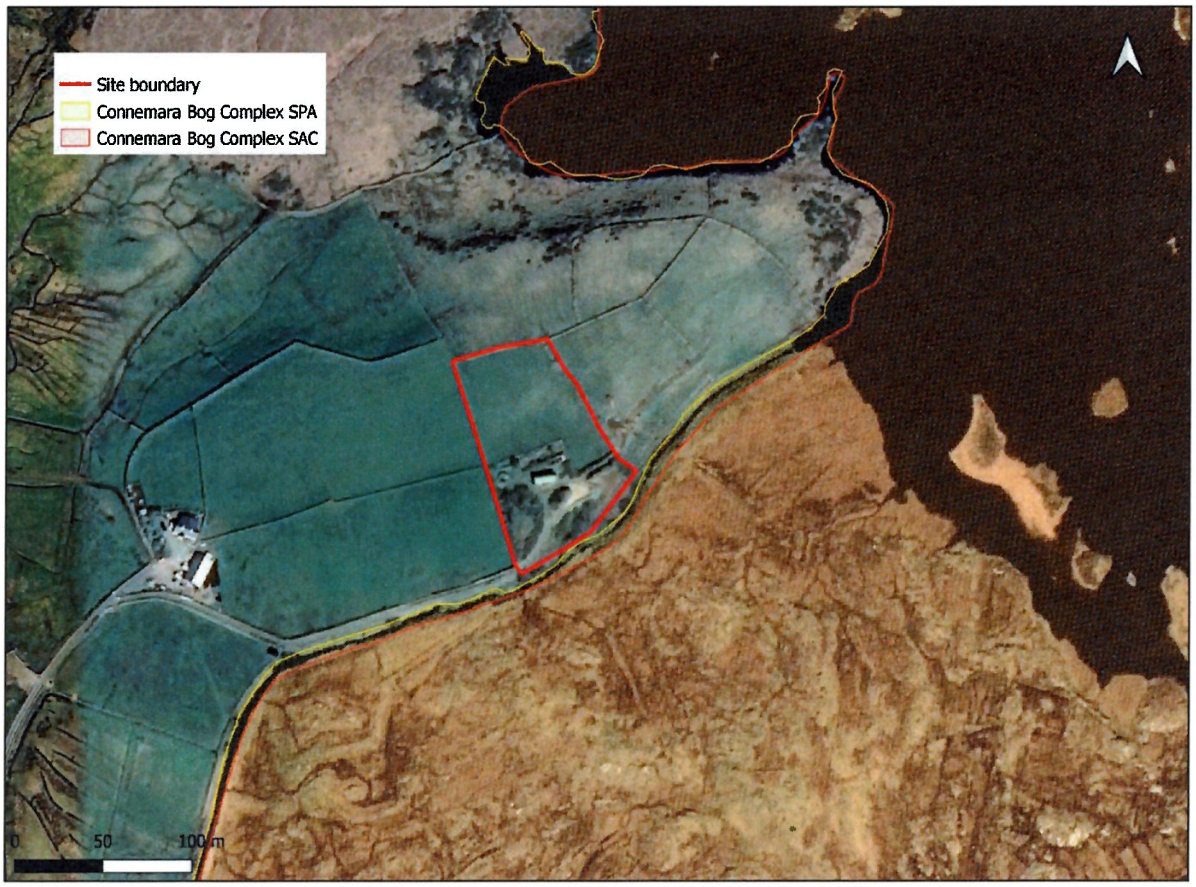
When defining the zone of influence, it is important to consider the following:

- Location of Natura 2000 sites
- The area extent to which downstream habitats could be polluted

- To what degree could noise and light impact ecological receptors

Due to the size and scale of the proposed project, in conjunction with its proximity and relevant connectivity to ecological receptors, the only sites which are recorded as being within the likely Zone of Impact are the Connemara Bog Complex SAC [site code: 002034] and the Connemara Bog Complex SPA [site code:004181].

No source-pathway-receptor chains were identified for the other sites within 15km. Thus, no further investigation is required.



Map 4: Location of proposed development site in relation to Natura 2000 sites being considered further

3.0 Description of the Natura 2000 Sites

The Habitats Directive states "Any plan or project not directly connected 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 implication for the site in view of the sites conservation objectives …the competent national authorities shall agree to the plan or project only having ascertained that it will not adversely affect the integrity of the site…" The conservation objectives form the basis of the Appropriate Assessment as it is against these objectives that the assessment is made.

The primary objective of the Habitats Directive is the upkeep of biodiversity through the conservation, maintenance and when appropriate, restoration of natural habitats and associated flora and fauna populations which have been deemed of community interest. Each Natura 2000 site has Conservation Objectives which have been set out on a case-by-case basis by competent authority for the management of SACs and SPAs, the National Parks and Wildlife Service (NPWS). European and national legislations enforce the proper maintenance of habitats and species in the Natura 2000 network in light of the conservation objectives, to ensure favourable conservation status at a national level.

3.1 Connemara Bog Complex SAC

Table 2: Conservation Objectives for Connemara Bog Complex SAC (Site Code 002034)

Code	Habitats/Species	Restore/Maintain
1150	Costal lagoons	To maintain the favourable conservation condition
1170	Reefs	To maintain the favourable conservation condition
3110	Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*)	To maintain the favourable conservation condition
3130	Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or *Isoeto- Nanojuncetea*	To maintain the favourable conservation condition
3160	Natural dystrophic lakes and ponds	To maintain the favourable conservation condition
3260	Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho- Batrachion* vegetation	To maintain the favourable conservation condition

4010		Northern Atlantic wet heaths with *Erica tetralix*	To restore the favourable conservation condition
4030		European dry heaths	To restore the favourable conservation condition
6410		Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)	To maintain the favourable conservation condition
7130		Blanket bogs (* if active bog)	To restore the favourable conservation condition
7140		Transition mires and quaking bogs	To restore the favourable conservation condition
7150		Depressions on peat substrates of the *Rhynchosporion*	To restore the favourable conservation condition
7230		Alkaline fens	To restore the favourable conservation condition

91A0		Old sessile oak woods with Ilex and Blechnum in the British Isles	To maintain the favourable conservation condition
1065		Marsh Fritillary (*Euphydryas aurinia*)	To maintain the favourable conservation condition
1106		Salmon (*Salmo salar*)	To restore the favourable conservation condition
1355		Otter (*Lutra lutra*)	To maintain the favourable conservation condition
1833		Slender Naiad (*Najas flexilis*)	To maintain the favourable conservation condition

3.2 Connemara Bog Complex SPA

Table 3: Conservation Objectives for Connemara Bog Complex SPA (Site Code 004181)

Code	Species	Restore/Maintain
A017	Cormorant (*Phalacrocorax carbo*)	To restore the favourable conservation condition
A098	Merlin (*Falco columbarius*)	To restore the favourable conservation condition
A140	Golden Plover (*Pluvialis apricaria*)	To restore the favourable conservation condition
A182	Common Gull (*Larus canus*)	To maintain the favourable conservation condition

In the event that significant negative effects on the conservation objectives of the Natura 2000 site are anticipated, the conservation condition of qualifying interests should be taken into account, and it should be noted that to "restore" favourable conservation condition is more difficult than to "maintain".

4.0 Receiving Environment

When assessing the receiving environment, it is important to consider which classifications of habitats are present on the proposed site, as well as hydrology in the surrounding area and the presence of invasive species.

4.1 Habitats

A walkover survey was carried out to classify the habitats present on site. The habitats recorded are classified in accordance with 'A Guide to Habitats in Ireland' (Fossitt, 2000), which designates habitat classifications based on the plant species present and management history of the area.

Map 4: Habitat map of proposed development site

The area surrounding the existing dwelling and shed is categorised as Improved Agricultural Grassland GA1. This area, along with the northern field, is periodically grazed by sheep. Species observed in this area include Orchard grass (*Dactylis glomerata*), White clover (*Trifolium repens*), Red clover (*Trifolium pratense*), Red fescue (*Festuca rubra*), Yorkshire fog (*Holcus lanatus*), Meadow-grass (*Poa trivialis*), Garden sorrel (*Rumex acetosa*), Ribwort plantain (*Plantago lanceolata*), Daisy (*Bellis perennis*), Creeping thistle (Cirsium arvense), Dandelion (*Taraxacum officinale*), Germander speedwell (*Veronica chamaedrys*), Silverweed (*Argentina anserina*), Cleavers (Galium aparine), Herb Robert (*Geranium robertianum*), Nettle (*Urtica dioica*), Yellow flag Iris (*Iris pseudacorus*), Creeping buttercup (*Ranunculus repens*), Lesser trefoil (*Trifolium dubium*), Common rush (*Juncus effusus*), Autumn hawkbit (*Scorzoneroides autumnalis*), Bull thistle (*Cirsium vulgare*).

This habitat (Improved Agricultural Grassland GA1) was also recorded in the field north of the dwelling and has lower species diversity. Species include Crested dogstail (*Cynocurus cristatus*), Garden sorrel (*Rumex acestosa*), Red clover (*Trifolium pratense*), Daisy (*Pellis perennis*), Sweet vernal grass (*Anthoxanthum odoratum*), Common rush (*Juncus effusus*), Silverweed (*Argentina anserina*). Some cows (no. 5-10) currently graze this area.

The majority of the scrub habitat found within the proposed development site can be described as Ornamental/ Non-native Scrub WS3, planted during previous inhabitation of the site. Fuchsia (*Fuchsia magellanica*) is the primary occupier of this area. Other species include Plum (*Prunus domestica*), Wild privet (Ligustrum vulgare) Blackthorn (*Prunus spinosa*), Ivy (*Hedera helix*), Montbretia (*Crocosmia X crocosmiiflora)*.

The scrub which adjoins the river in the most southern part of the site includes more native elements such as Willow (*Salix cinerea*), Ash (*Sorbus aucuparia*), Blackberry (*Rubus ulmifolius*), Brackenfern (*Pteridium aquilinum*). Non-native elements include Fuchsia (*Fuchsia magellanica*) and Sycamore (*Acer pseudoplatanus*). This area can be described as native Scrub WS1, forming mosaics with Ornamental/Non-native scrub WS3.

The semi ruinous dwelling is recorded as Buildings and Artificial Surfaces BL3 and the shed to the rear of the house is regarded as Stonewalls and Other stonework BL1 because of the less intact nature of the building.

The road leading up to the dwelling is categorised as Exposed Sand, Gravel or Till ED1. Here there are small patches of plants such as Yorkshire fog (Holcus lanatus),

Common birds-foot trefoil (*Lotus corniculatus*), and Daisy (*Bellis perennis*), Dandelion (*Taraxacum officinalis*).

No drainage ditches exist on site but an Eroding/lowland River FW1 (River Callow EPA code: IE_WE_31C250230) exists just beyond the southern site boundaries and flows in a south- westerly direction from Maumeen Lough with lies approx. 0.46 km from the proposed development site, to the shore (approx. 1.3km) and is within the Connemara Bog Complex SAC.

The primary land use in the area is agricultural with few residential developments.

4.2 Invasive Species

No invasive species listed in the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations (S.I. 477 of 2011) were documented during the survey conducted in June. (E.g. Rhododendron (*Rhododendrum ponticum*), Japanese knotweed (*Fallopia japonica*).)

Non-native ornamentals recorded during the site survey include Montbretia (*Montbretia crocosmia*). This is a low-risk invasive species according to the National Biodiversity Data Centre (NBDC).

4.3 Hydrology

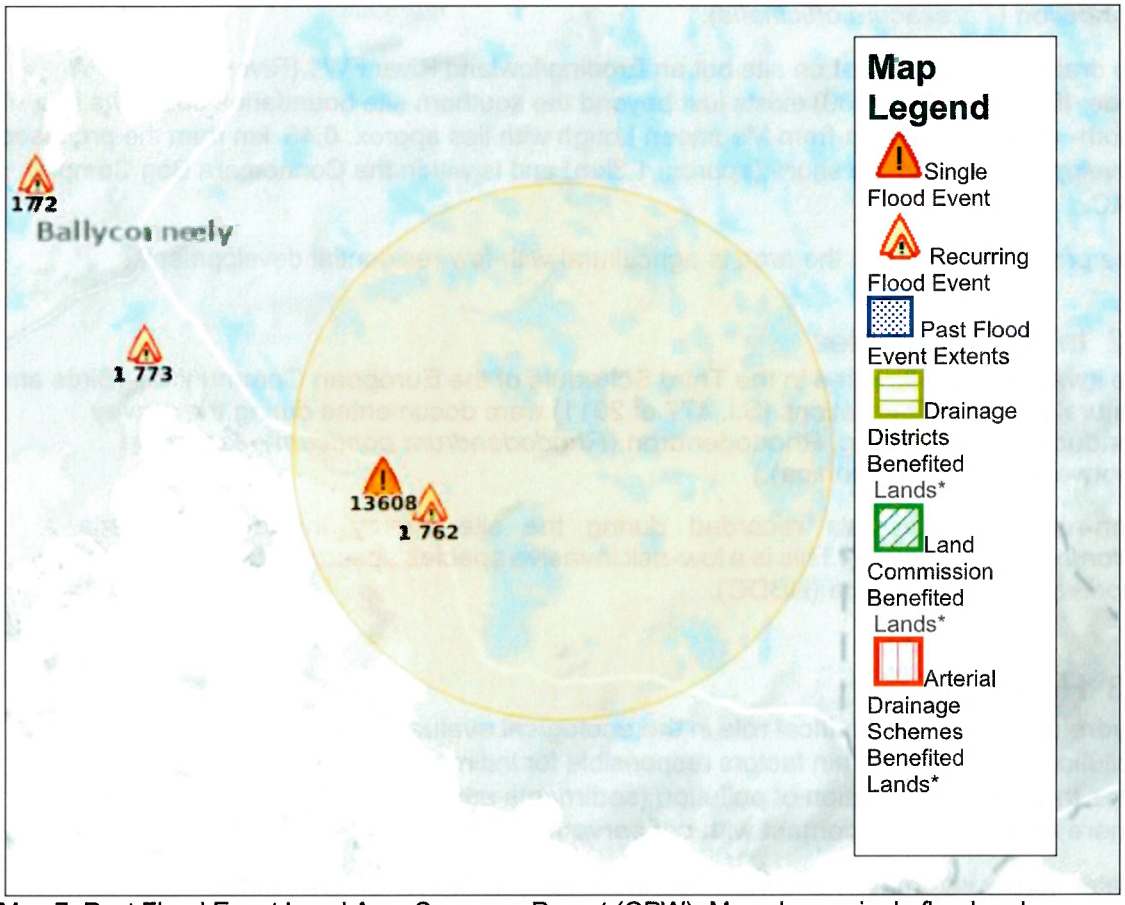
Hydrology assumes a critical role in the ecological evaluation of a site. Water pollution is one of the main factors responsible for indirect impacts on Natura 2000 sites through the migration of pollution (sediments and hydrocarbons) downstream where they come into contact with conservation objectives.

Water quality information and individual waterbody status for all river districts and coastal waters in Ireland can be accessed through the online EPA map viewer. This map viewer was consulted on 10th April 2025.

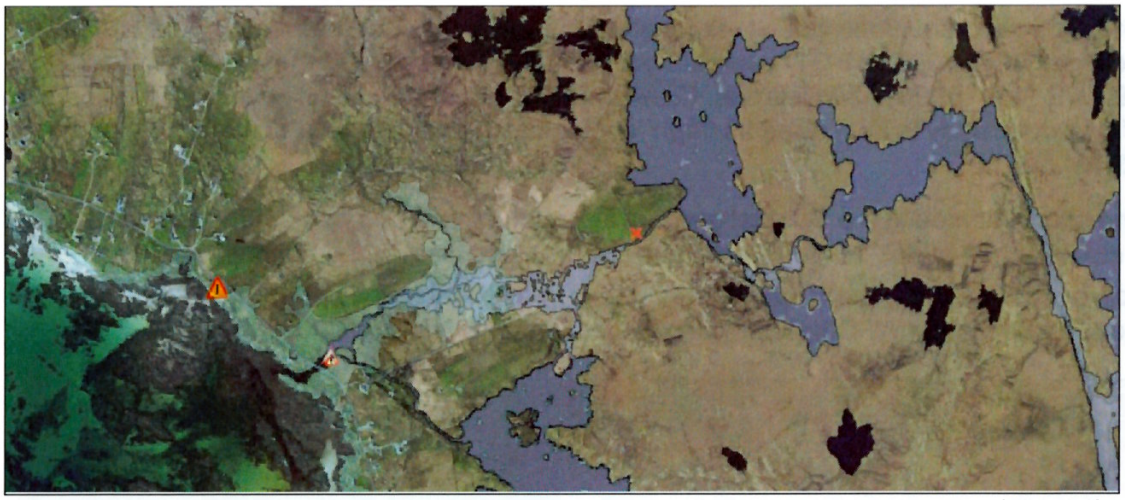
The proposed development site is located in the hydrological sub-catchment Recess_SC_020. The WFD coastal water bodies risk assessed the coastal waters (IE_WE_010_0000) Aran Islands, Galway Bay Connemara "Review". The overall status of this waterbody is described as 'high' ecological status in the WFD monitoring program (2016-2021).

The site is located in the Spiddal groundwater catchment and has been assigned a status of 'not at risk' in the Water Framework Directive (WFD) ground waterbody approved risk. The groundwater status of this catchment has been assigned as 'good' status in the WFD groundwater monitoring program (2016-2021).

Map 6: River flow direction (Source: EPA Maps)



Map 7. Past Flood Event Local Area Summary Report (OPW). Map shows single flood and recurring flood events West of the application site.



Map 8. Localised flooding extents recorded with the OPW and Flood Maps. Application site at red cross.

Historic flood extents were investigated to see whether the site lies in an area prone to flooding. Analysis of the available data indicates that flooding does not occur and has not occurred on the site. See maps 7 and 8. Map 7 shows where there is recurring flooding downstream of the application site to the Southwest on the R341 coastal road. Map 8 displays general flood extents in the area. In a worst-case scenario, the Geological Survey Ireland Groundwater Flooding - Low Probability data for the area was analysed. The Groundwater Flooding Low Probability map shows the expected flood extent of groundwater flooding in limestone regions for annual exceedance probabilities (AEP's) of 0.1%, which correspond with a return period of every 1000 years. The map was created using groundwater levels measured in the field, satellite images and hydrological models. The map is a vector dataset. Vector data

portray the world using points, lines, and polygons (area). The floods are shown as polygons. Each polygon has info on the data source, and the area of the flood. The flood extents were calculated using remote sensing data and hydrological modelling techniques with various precision levels. As such, it should be used with caution. This data showed that no such flooding scenario is modeled for the application site and that no such flooding events have been modeled in the area. Topographical maps were analysed to search for any possibility of flooding outside of the current data. The application site is situated on sloped higher ground where any extreme unforeseen flooding would drain away from the site to South and East and not occur on site.

4.4 Fauna

4.4.1 Birds

4.4.1.1 *Connemara Bog Complex SPA*

SCI species for this site include:

- A017 Cormorant (*Phalacrocorax carbo*)
- A098 Merlin (*Falco columbarius*)
- A140 Golden Plover (*Pluvialis apricaria*)
- A182 Common Gull (*Larus canus*)

The Connemara Bog Complex SPA borders the proposed site to the south and is therefore within the core foraging range of 4km for the Golden Plover (*Pluvialis apricaria*), 5km for the Merlin (*Falco columbarius*), 50km for the Common Gull (*Larus canus*) and 35km for the Cormorant (*Phalacrocorax carbo*).

[A017] Cormorant (*Phalacrocorax carbo*)

This species forages in freshwater and marine environments. The closest breeding colony to the development site is located approximately 6km northeast of the proposed development site.

[A098] Merlin (*Falco columbarius*)

This species breeds on lake islands and forage over moors and heathland, peat bogs and semi-natural grasslands. The nearest island that has the potential to support breeding merlin is located 200m from the site on Emlaghkeeragh Lough.

[A140] Golden Plover (*Pluvialis apricaria*)

This species are ground nesting birds that breed in open habitats such as blanket bog and other peatland habitats. The closest suitable nesting habitat is located 20m south of the site. Golden Plover forage at ground-level in a range of habitats including grasslands, lakeshores and other wetlands.

[A182] Common Gull (*Larus canus*)

This species breeds on lake islands and forage in terrestrial, freshwater and marine habitats in the broader area. The nearest islands which have the potential to support breeding gulls are located 200m from the proposed site in Emlaghkeeragh Lough.

Although a range of breeding and foraging habitats exist in close proximity to the proposed site, the proposed works, as described in Section 2, are not found to have resulted in disturbance levels which would significantly impact the above SCI species. The scrub areas which are to be retained within the site serve as a biological barrier between the construction works and the SPA and serve as natural noise mitigation. Furthermore, the works already completed which are confined to: 1) The reinstatement of a collapsed roof and making good of an existing chimney, 2) The unblocking of windows opes and replacement of timber framed windows on the front elevation, 3) CCTV cameras on the

building to be in place for a temporary period; are considered to be minimal in nature. The duration of the work already completed is estimated to be about 2 weeks, collectively, at most. Potential impacts are deemed to be short-term and insignificant.

No Cormorant (*Phalacrocorax carbo*), Golden Plover (*Pluvialis apricaria*), Merlin (*Falco columbarius*) or Common Gull (*Lanus canus*) were observed using the habitats within or adjacent to the site. However, with the precautionary principle in mind, mitigation for controlling noise levels during the future construction period is proposed in Section 6.

All bird species recorded during both the site visits are recorded in Table 3. Nine bird species were observed in total, two of which are of Amber conservation status and seven of which are green-listed and are regarded as common Irish bird species. No Annex I species were observed to be utilising habitats within the site during the site visit.

It is the author's opinion that the potential impacts or negative effects on the SPA and its SCI's arising from the developments described in this report are imperceptible in the short and long term.

Table 3: Bird species observed on site

Species	Observed	Date	Conservation Status
Robin (*Erithacus rubecula*)	On site	07/06/24, 12/03/25	Green listed
Great Tit (*Parus major*)	On site	12/03/25	Green listed
Blue Tit (*Parus parus*)	On site	12/03/25	Green listed
Blackbird (*Turdus merula*)	On site	07/06/24, 12/03/25	Green listed
Eurasian skylark (*Alauda arvensis*)	Flying over	07/06/24	Amber listed
Hooded crow (*Corvus cornix*)	Flying over	07/06/24, 12/03/25	Green listed
Dunnock (*Prunella modularis*)	On site	07/06/24	Green listed
Eurasian wren (*Troglodytes troglodytes*)	On site	07/06/24, 12/03/25	Green listed
Eurasian Linnet (*Linaria cannabina*)	On site	07/06/24, 12/03/25	Amber listed
Magpie (*Pica pica*)	Flying over	12/03/25	Green listed

4.4.2 Non-volant mammals

A walkover survey was carried out to assess the presence of a range of protected animal species, as well as their associated habitats. The results of the walkover survey concluded that no significant faunal species or habitat was recorded.

An otter survey was undertaken with the goal of assessing habitats on site for the suitability of otter. The watercourse which adjoins the site is identified as potential foraging/commuting habitat for otter. The site, including the adjoining watercourse, was searched for evidence of otter including holts, couches, spraints or tracks. No signs of otter were observed. However, it is presumed that otter may use the watercourse for commuting/foraging purposes. With this in mind, and considering the riparian vegetation which exists as a natural buffer area adjoining the stream and was unaffected by the works, in conjunction with the fact that works were minimal in nature and carried out within daylight hours, it is assessed that there is no identified potential for the described alterations to have resulted in significant impacts on otter.

A badger (Meles meles) survey was performed during the field survey which was in compliance with TII/NRA (2009) guidelines (Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes). The site was searched for setts, latrines, shuffle holes, and badger paths and prints.
The survey concluded that no evidence of badgers was recorded within the proposed development site.

4.4.3 Other species

The site was searched for evidence of species which are protected under the Irish Wildlife Act 1976-2018, including Irish hare, Irish stoat and pygmy shrew. These species are widespread in Ireland and are likely to be found in the broader area. However, no signs of species were located within the site boundaries.

5.0 Impact prediction and assessment

Following a description of the proposed project and of the nearby Natura 2000 sites, an assessment for possible impacts can be carried out. This is in compliance with the "Assessment of plans and projects significantly affecting Natura 2000 sites- Methodology guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC, European Commission, 2002".

5.1 Proximity and relevance of Qualifying Interests of Connemara Bog Complex SAC (site code: 002934) to the proposed development site

Code	Habitats	Proximity
1150	Costal lagoons	6.35km north. No hydrological pathways. No impact predicted.
1170	Reefs	6.54km north. No hydrological pathways. No impact predicted.
3110	Oligotrophic waters containing very few minerals of sandy plains (*Littorelletalia uniflorae*)	2.51m north at Lough Fadda. No hydrological links. No impact predicted.
3130	Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or *Isoeto-Nanojuncetea*	0.46km south at Maumeen Lough. The river which borders the site to the south is identified as a hydrological connection to the lake. Complete source-pathway-receptor link identified. Remedial mitigations will be required to ensure long term protection from silt or chemical imbalance as a result of the gravel track.
3160	Natural dystrophic lakes and ponds	1.2km southeast. No hydrological pathways. No impact predicted.
3260	Water courses of plain to montane levels with the *Ranunculion fluitantis* and Callitricho-Batrachion vegetation	Not mapped by NPWS. The river to the south of the site has the potential to qualify for this habitat. Complete source- pathway-receptor link identified. Remedial mitigations will be required to ensure long term protection from silt or chemical imbalance as a result of the gravel track.
4010	Northern Atlantic wet heaths with *Erica tetralix*	Not mapped by NPWS. Potentially within 30m south of the proposed development site. However, a river exists separating the potential habitat from the proposed construction area. No impact predicted.
4030	European dry heaths	Not mapped by NPWS. Potentially within 30m south of the proposed development site. However, a river exists separating the potential habitat from the proposed construction area. No impact predicted.

6410	Molinia meadows on calcareous, peaty or clayey-silt-laden soils (*Molinion caeruleae*)	Not mapped by NPWS. Potentially within 30m south of the proposed development site. However, a river exists separating the potential habitat from the proposed construction area. No impact predicted.
7130	Blanket bogs (* if active bog)	Not mapped by NPWS. Potentially within 50m of the proposed development site to the south. However, a river exists separating the potential habitat from the proposed construction area. No direct or indirect impacts are predicted.
7140	Transition mires and quaking bogs	Not mapped by NPWS. Potentially within 50m to the south. However, a river exists separating the potential habitat from the proposed construction area. No impact predicted.
7150	Depressions on peat substrates of the *Rhynchosporion*	Not mapped by NPWS. Potentially within 50m to the south. However, a river exists separating the potential habitat from the proposed construction area. No direct or indirect impacts are predicted to result from the proposed project.
7230	Alkaline fens	Not mapped by NPWS. Potentially within 50m to the south. However, a river exists separating the potential habitat from the proposed construction area. No direct or indirect impacts are predicted to result from the proposed project.

91A0	Old sessile oak woods with Ilex and Blechnum in the British Isles	10.83km northeast (NSNW: 1602). Removed from development site. No impact predicted.

1065	Marsh Fritillary (*Euphydryas aurinia*)	Not mapped by NPSW. This species requires the presence of Devil's bit Scabious (*Succissa pratensis*) which is recorded in close proximity to the existing cottage. However, the habitat itself is not prime conditioning for the species. Colonies can be found in a variety of locations including dry calcareous grassland, wet heath, degraded bogs, transition mires and fens of up to 300m (Regan et al. 2010). *Succissa pratensis* is common in Connemara and in relatively low abundance on site. This is not considered significant.
1106	Salmon (*Salmo salar*)	Not mapped by NPWS. Potentially present in oligotrophic lake Maumeen Lough which lies 0.46km south of the proposed development. Potential hydrological connectivity. Complete source-pathway-receptor link identified. Remedial mitigations will be required to ensure long term protection from silt or chemical imbalance as a result of the gravel track.
1355	Otter (*Lutra lutra*)	The river to the south of the site has the potential to be used for otters for foraging and commuting purposes. Complete source-pathway-receptor link identified. Remedial mitigations will be required to ensure long term protection from silt or chemical imbalance as a result of the gravel track.
1833	Slender Naiad (*Najas flexilis*)	0.46km south at Maumeen Lough. The river which borders the site to the south is identified as a hydrological connection to the lake. Mitigation is required. Complete source-pathway-receptor link identified. Remedial mitigations will be required to ensure long term protection from silt or chemical imbalance as a result of the gravel track.

The identified pathways for effects on Qualifying Interests of this site are as follows: Deterioration of water quality/ habitat quality during the construction and operational phase of the proposed development, resulting in pollution to surface waters, adversely impacting the aquatic influenced QI species within the SAC, in the absence of mitigation.

5.2 Impacts on Habitats

The habitats for which the proposed development has the potential to impact are:

[3130] Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or *Isoeto-Nanojuncetea*+-

[3260] Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation

The site was assessed as being hydrologically connected to the above QI habitats. There were no cements used near the vicinity of the nearby river. If construction materials such as cement and gravel were used within the vicinity of the river, potential for point and diffuse adverse changes in water quality would have been identified. Adverse changes arise from silt-laden run-off, the use of cement and hydrocarbons and the use of other potentially polluting chemicals or materials during construction. Such adverse changes could result in changes to the habitat and water quality downstream of the polluting event(s) which could indirectly result in a change of integrity on at least a temporary basis. This was not the case with the application site at Emlaghmore.

The works already carried out on the site which includes A) The reinstatement of a collapsed roof and making good of an existing chimney, B) The unblocking of windows and replacement of timber framed windows on the front elevation, C) CCTV cameras on the building to be in place for a temporary period; are considered to be of small scale, with an estimated collective duration of a 2 weeks. Those aspects will have negligible effects on the integrity of the nearby SAC and its QI's in the short and long term. The works required a small amount of concrete and gravel to be transported to the site via tractor and trailer. Concrete mixing was performed within the existing structure, at least 45m from the SAC. No evidence of pollution was recorded in the adjoining watercourse, or in the riparian scrub area between the cottage and the watercourse, which also assists with surface water attenuation towards the stream. The author suggests that to ensure the safety of the SAC and its QI's, in particular [3130] Oligotrophic to mesotrophic standing waters with vegetation of the *Littorelletea uniflorae* and/or *Isoeto-Nanojuncetea*+-[3260] Water courses of plain to montane levels with the *Ranunculion fluitantis* and *Callitricho-Batrachion vegetation*remedial mitigations must be put in place to ensure long term protection. No change of use has occurred at the site since the work was carried out. The site is still partly used for low-intensity agriculture.

5.3 Impacts on Species

The habitats for which the proposed development has the potential to impact are: [1106]

Salmon (*Salmo salar*)

[1355] Otter (*Lutra lutra*)

[1833] Slender Naiad (*Najas flexilis*)

The site was assessed as being hydrologically connected to the above QI species. If construction materials such as cement and gravel were used within the vicinity of the river, there is the potential for point and diffuse adverse changes in water quality. Adverse changes arise from silt-laden run-off, the use of cement and hydrocarbons and the use of other potentially polluting chemicals or materials during construction. Such adverse changes could result in changes to the habitat and water quality downstream of the polluting

event(s) which could indirectly result in a change of integrity of the above species on at least a temporary basis. It must be noted that no such materials were used in the construction of the laneway as above.

The works already carried out, as assessed above, are not predicted to have resulted in a deterioration of water quality at the subject site. Additionally, the nature, duration and timing of the works are not predicted to have resulted in significant disturbance to otter.

No change of use has occurred at the site since the work was carried out. The site is still partly used for low-intensity agriculture. Furthermore, it is deduced that the project has not significantly effected the integrity of the [1106] or [1355] or [1833] QI species with respect to the Connemara Bog Complex SAC either during construction or operation. Considering this, a precautionary approach must be observed whereby remedial mitigation measures are put in place to ensure the integrity of the SAC and its QI's. The current level of disturbance to any species is likely to be low due to the size and scale of the gravel track, but to ensure long-term conservation and adherence to the conservation objectives of the site, some mitigation measures will be laid out in section 6.

Well documented behaviour of species such as badgers and otters indicates that populations do sometimes change their sett or holt locations. Existing structures of any kind must not be altered from their current state until it has been confirmed that badgers and bats are not in the vicinity of the structures within boundaries limits outlined in *"Guidelines for The Treatment Of Badgers Prior To the Construction of National Road Schemes" published by the National Roads Authority.* Similar considerations will have to be made for otters, with reference to guidelines set out in *"Guidelines for The Treatment of Otters Prior To the Construction of National Road Schemes",* also published by the National Roads Authority.

5.4 Cumulative Impacts

Cumulative impacts are alterations to the environment arising from the combined impact of past, present and future anthropogenic activities and natural processes. When examining cumulative impacts, it is important to look at activities causing disturbance or pollution to the same Natura 2000 sites. Pressures on the ecosystem can be listed and evaluated on the basis of pressure positive, negative or neutral on the designated sites that are under consideration for the proposed project.

Plans/Activities in the Area	Relevance/Description
Galway County Development plan 2022-2028	National Heritage/Biodiversity NHB1- Natural Heritage and Biodiversity of Designated Sites, Habitats and Species. Protect and where possible enhance the natural heritage sites designated under EU Legislation and National Legislation (Habitats Directive, Birds Directive, European Communities (Birds and Natural Habitats) Regulations 2011 and Wildlife Acts) and extend to any additions or alterations to sites that may occur during the lifetime of this plan. Protect and, where possible, enhance the plant and animal species and their habitats that have been identified under European legislation (Habitats and Birds Directive) and protected under national Legislation (European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011), Wildlife Acts 1976-2010 and the Flora Protection Order (SI 94 of 1999). Support the protection, conservation and enhancement of natural heritage and biodiversity, including the protection of the integrity of European sites, that form part of the Natura 2000 network, the protection of Natural Heritage Areas, proposed Natural Heritage Areas, Ramsar Sites, Nature Reserves, Wild Fowl Sanctuaries (and other designated sites including any

	future designations) and the promotion of the development of a green/ ecological network. NHB2- European Sites and Appropriate Assessment. To implement Article 6 of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011. All such projects and plans will also be required to comply with statutory Environmental Impact Assessment requirements where relevant. NHB 3 – Protection of European Sites. No plans, programs, or projects etc. giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programs, etc. or projects.* NHB4 - Ecological Appraisal of Biodiversity. Ensure, where appropriate, the protection and conservation of areas, sites, species and ecological/networks of biodiversity value outside designated sites. Where appropriate require an ecological appraisal, for development not directly connected with or necessary to the management of European Sites, or a proposed European Site and which are likely to have significant effects on that site either individually or cumulatively NHB5 - Ecological Connectivity and Corridors Support the protection and enhancement of biodiversity and

	ecological connectivity in non-designated sites, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, stonewalls, geological and geo-morphological systems, other landscape features and associated wildlife areas where these form part of the ecological network and/or may be considered as ecological corridors in the context of Article 10 of the Habitats Directive. NHB9 - Protection of Bats and Bats Habitats. Seek to protect bats and their roosts, their feeding areas, flight paths and commuting routes. Ensure that development proposals in areas which are potentially important for bats, including areas of woodland, linear features such as hedgerows, stonewalls, watercourses and associated riparian vegetation which may provide migratory/foraging uses shall be subject to suitable assessment for potential impacts on bats. This will include an assessment of the cumulative loss of habitat or the impact on bat populations and activity in the area and may include a specific bat survey. Assessments shall be carried out by a suitably qualified professional and where development is likely to result in significant adverse effects on bat populations or activity in the area, development will be prohibited or require mitigation and/or compensatory measures, as appropriate. The impact of lighting on bats and their roosts and the lighting up of objects of cultural heritage must be adequately assessed in relation to new developments and the upgrading of existing lighting systems. Water Objectives WR 1- Water Resources. Protect the water resources in the plan area, including rivers, streams, lakes, wetlands, springs, turloughs, surface water and groundwater quality, as well as surface waters, aquatic and wetland

	habitats and freshwater and water dependant species in accordance with the requirements and guidance in the EU Water Framework Directive 2000 (2000/60/EC), the European Union (Water Policy) Regulations 2003 (as amended), the River Basin District Management Plan 2018 – 2021 and other relevant EU Directives, including associated national legislation and policy guidance (including any superseding versions of same) and also have regard to the Freshwater Pearl Mussel Sub-Basin Management Plans. WR 2 - River Basin Management Plans. It is a policy objective of the Planning Authority to implement the programme of measures developed by the River Basin District Projects under the Water Framework Directive in relation to: Surface and groundwater interaction, Dangerous substances, Hydro-morphology, Forestry, On site wastewater treatment systems, Municipal and industrial discharges, Urban pressures, Abstractions. RPO 5.4 Encourage the prioritisation of Site-Specific Conservation Objectives (SSCO) for all sites of Conservation Value, designated in EU Directive (i.e., SACs, SPAs) to integrate with the development objectives of this Strategy.
Northern & Western Regional Assembly Regional Spatial and Economic Strategy 2020 2032 (RSES)	RPO 5.5 Ensure efficient and sustainable use of all our natural resources, including inland waterways, peatlands, and forests in a manner which ensures a healthy society a clean environment and there is no net contribution to biodiversity loss arising from development supported in this strategy. Conserve and protect designated areas and natural heritage areas. Conserve and protect European sites and their integrity. RPO 5.7 Ensure that all plans, projects, and activities requiring consent arising from the RSES are subject to the relevant environmental assessment requirements including SEA, EIA, and AA as appropriate.

Planning applications in the area	A search was conducted on the Galway County Council website of local planning applications in the last 5 years which gave the following results: The development will consist of: a) the restoration of existing single storey cottage including elevation modifications (existing floor area 55 sqm), b) the provision of single storey extensions to side and rear (157 sqm). The development will include a new wastewater treatment system and new vehicular entrance from the existing private lane, along with associated site works. The application is accompanied by a Natura Impact Statement (NIS). Gross floor space of proposed works:157 sqm. (Planning Ref: 212242). refurbishment and upgrading works [including (where necessary) replacement of existing poles along the existing overhead electricity line, minor ground works e.g. replacement or installation of stays, and maintenance or improvement works]; and all associated ancillary works including the provision of temporary accessways. Replacement poles will be constructed at, or immediately adjacent to, the existing structures that they will replace. Replacement poles will have a maximum height of 12m abo (Planning Ref: 2360507).
Housing developments	A dispersed housing pattern can be observed in the local area.
Agriculture	Agricultural practices in the local area primarily consist of low-intensity cattle, sheep and pony grazing and associated activities such as herbicide and pesticide use.
Tourism	The site is in close proximity to the Wild Atlantic Way. Tourism has the potential to put pressure on the catchment due to increased water usage.
Peat cutting	Turf cutting within 500m south of the proposed development site incurring degradation, fragmentation and loss of protected bog habitat.

Table 6: Cumulative assessment

5.5 Cumulative assessment conclusion

Agricultural practices in the area are not excessive and have remained low intensity due to the low-quality agricultural attributes of much of the land. No significant negative impact is anticipated. The dispersed housing developments and holiday homes in the area, and associated water and peat use are the largest threat to the ecological integrity of the adjacent SAC.

The described works have not made the cottage habitable, and as such, the works have not contributed to peat cutting the Connemara Bog Complex SAC for the purposes of heating the dwelling house.

The proposed project has been assessed, both individually and in conjunction with the combining effects of other plans and projects in the area. It is assessed that the works have not resulted in any significant residual effects on any ecological receptors or Natura 2000 sites. Therefore, there is no potential for the proposal to contribute to any potential cumulative impacts, when considered in combination with other developments in the locality. No cumulative impact is identified.

5.6 In-Combination Effects

In Ireland, the requirement to assess *in combination* effects within a Natura Impact Statement (NIS) derives from Article 6(3) of the Habitats Directive (92/43/EEC) and is transposed into national law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011), as amended. Where a project is likely to have a significant effect on a European site, either alone or in combination with other plans or projects, the competent authority must undertake an Appropriate Assessment on the basis of a scientifically robust NIS. The assessment must be carried out in view of the site-specific conservation objectives of the relevant Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), and must enable the authority to determine, beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of any European site.

The in-combination assessment requires a clear and reasoned review of other permitted, proposed, or reasonably foreseeable plans and projects that may overlap spatially or temporally with the subject proposal and share potential impact pathways, such as habitat loss or fragmentation, disturbance, hydrological change, pollution, or increased recreational pressure. Even where the standalone effects of a development may appear limited, the cumulative interaction with other activities must be evaluated in accordance with best scientific knowledge and current guidance, including the European Commission's 2021 Commission Notice on the application of Article 6(3) and (4). In the context of the planning application at Emlaghmore, this approach ensures that the potential for cumulative effects on nearby European sites is systematically identified, assessed, and clearly presented to inform the competent authority's determination on site integrity. The table below represents the applications made to the County Council within an area relative to the application site of this report. The planning applications identified in the table below were selected due to their proximity to the application site and are also surrounding the Maumeen Lough and have a possible hydrological linkage.

Planning Permissions in the area within proximity, or hydrologically linked to the application site	Assessment of Effects in combination with application site

Planning Authority	Galway County Council	Such works are unlikely to add significant or detectable impacts on the nearby SAC, the Callow_010 watercourse or its QI's in combination with the application site pertinent to this report.
Planning Application Reference	2360507	
Description of Proposed Development	of refurbishment and upgrading works [including (where necessary) replacement of existing poles along the existing overhead electricity line, minor ground works e.g. replacement or installation of stays, and maintenance or improvement works]; and all associated ancillary works including the provision of temporary accessways. Replacement poles will be constructed at, or immediately adjacent to, the existing structures that they will replace. Replacement poles will have a maximum height of 12m above ground; and be similar in appearance to existing poles. Planning permission is sought for a 10 year period. A Natura Impact Statement (NIS) will be submitted to the Planning Authority with the application	
Development Address	Doonloughan - Foorglass ,	
Application Status	APPLICATION FINALISED	
Type of Application	PERMISSION	
Final Decision on Application	CONDITIONAL	
Decision Date	5/6/2024	
Planning Authority	Galway County Council	Such a small development is unlikely to add significant or detectable impacts to the nearby SAC the Callow_010 watercourse or its QI's in combination with the application site pertinent to this report.
Planning Application Reference	212242	
Description of Proposed Development	The development will consist of: a) the restoration of existing single storey cottage including elevation modifications(existing floor area 55 sqm) , b) the provision of single storey extensions to side and rear (157 sqm). The development will include a new wastewater treatment system and new vehicular entrance from the existing private lane, along with associated site works. The application is accompanied by a Natura Impact Statement (NIS). Gross floor space of proposed works:157 sqm. Gross floor space of work to be retained: 53 sqm. Gross floor space of any demolition: 2 sqm.	
Development Address	Emlaghmore	
Application Status	APPLICATION FINALISED	
Type of Application	PERMISSION	
Final Decision on Application	CONDITIONAL	
Decision Date	1/2/2022	
Planning Authority	Galway County Council	Such a small development is unlikely to add significant or detectable impacts to the nearby SAC the Callow_010
Planning Application Reference	17203	

Description of Proposed Development:	to retain stables, a paddock area, new entrance and internal roadway, and for full permission to develop site landscaping and all associated site works. (Gross floor space of area for retention: 129 sqm.)	watercourse or its QI's in combination with the application site pertinent to this report.
Development Address:	Emlaghmore	
Application Status:	APPLICATION FINALISED	
Type of Application:	PERMISSION	
Final Decision on Application:	CONDITIONAL	
Decision Date:	1/11/2017	
Planning Authority:	Galway County Council	This development was refused permission and as such is not considered to add any potential significant effects tot eh nearby SAC and its water courses in combination with the application site in this report.
Planning Application Reference:	2460875	
Description of Proposed Development:	to carry out works to existing cottage to minimize flood risk. These works will involve: (a) external alterations to elevations of existing cottage including (b) change of roof level and profile, (c) demolition of existing rear extension, (d) internal refurbishment to cottage, (e) raise existing finished floor level as set out per attached flood risk assessment report, (f) rebuild eroded sea wall existing on site, (g) installation of new proprietary sewage treatment system with filter area, (h) relocate existing entrance from public road, together with all associated site works. This planning application is accompanied by NIS. Gross floor space of any demolition: 8.34 sqm	
Development Address:	Emlaghmore , Ballyconneelly , Co. Galway	
Application Status:	APPEALED	
Type of Application:	PERMISSION	
Final Decision on Application:	REFUSED	
Decision Date:	3/9/2024	
Planning Authority:	Galway County Council	This development application was withdrawn and as such is not considered to add any potential significant effects tot eh nearby SAC and its water courses in combination with the application site in this report.
Planning Application Reference:	1840	
Description of Proposed Development:	to construct an extension to house and carry out all associated site development works. Gross floor space of proposed works 19.5 sqm.	
Development Address:	Emlaghmore Td	
Application Status:	DEEMED WITHDRAWN	
Type of Application:	PERMISSION	
Withdrawn Date:	12/9/2018	
Planning Authority:	Galway County Council	This development if it goes ahead is small int terms of size and scale and will not likely have any in combination effects on the nearby SAC and watercourse or its QI species and habitats.
Planning Application Reference:	2561274	
Description of Proposed Development:	to construct an extension to their house and carry out all associated site development works	
Development Address:	Emlaghmore , Ballyconneely , Co Galway	
Application Status:	FURTHER INFORMATION	
Type of Application:	PERMISSION	

FI Request Date	29/10/2025	
Planning Authority	Galway County Council	This development if it goes ahead or has already been built is small in terms of size and scale and will not likely have any in combination effects on the nearby SAC and watercourse or its QI species and habitats.
Planning Application Reference	211698	
Description of Proposed Development	(1) change of house design previously granted under PL Ref No 20/717 on revised site boundaries(2) change of location of proposed proprietary wastewater treatment system with polishing filter, previously granted under PL Ref No 20/717 and (3) construction of proposed boathouse/garage as well as all ancillary site works.	
Development Address	Callow	
Application Status	APPLICATION FINALISED	
Type of Application	PERMISSION	
Final Decision on Application	CONDITIONAL	
Decision Date	10/11/2021	
Planning Authority	Galway County Council	This development if it goes ahead or has already been built is small in terms of size and scale and will not likely have any in combination effects on the nearby SAC and watercourse or its QI species and habitats.
Planning Application Reference	20717	
Description of Proposed Development	to (1) Demolish existing rear elevation extension and replace with new single storey rear extension (2) Permission to construct single storey side elevation extension (3) Permission to make internal and external alterations to existing dwelling house (4) Permission to replace existing septic tank and percolation area with new proprietary sewage treatment system with polishing filter as well as all associated site works. Gross floor space of proposed works: 37.20 sqm. Gross floor space of work to be retained: 93.60 sqm	
Development Address	Callow	
Application Status	APPLICATION FINALISED	
Type of Application	PERMISSION	
Final Decision on Application	CONDITIONAL	
Decision Date	4/8/2020	
Planning Authority	Galway County Council	This development if it goes ahead or has already been built is small in terms of size and scale and will not likely have any in combination effects on the nearby SAC and watercourse or its QI species and habitats.
Planning Application Reference	2560006	
Description of Proposed Development	to construct a new storage shed with all associated works and ancillary services. Gross floor space of proposed works: 55 sqm(garage)	
Development Address	Callow , Roundstone , Co Galway	
Application Status	APPLICATION FINALISED	
Type of Application	PERMISSION	
Final Decision on Application	CONDITIONAL	
Decision Date	25/2/2025	

Planning Authority	Galway County Council	This development if it goes ahead is small in terms of size and scale and will not likely have any in combination effects on the nearby SAC and watercourse or its QI species and habitats.
Planning Application Reference	2660054	
Description of Proposed Development	to decommission existing septic tank system and install and construct a new wastewater treatment and disposal system, and all associated site works and services	
Development Address	Callow , Roundstone , Co. Galway	
Application Status	NEW APPLICATION	
Type of Application	PERMISSION	
Decision Due Date	16/3/2026	
Planning Authority	Galway County Council	This development if it goes ahead is small in terms of size and scale and will not likely have any in combination effects on the nearby SAC and watercourse or its QI species and habitats.
Planning Application Reference	20350	
Description of Proposed Development	to 1) construct new rear elevation porch, 2) change of roof design to the front and rear elevations of the existing dwelling house, 3) proposed external and internal alterations to existing dwelling house, 4) new external staircase to the side elevation of existing dwelling house, 5) replace existing septic tank and percolation area with new treatment system ad polishing filer as well as all ancillary site works. Gross floor space of proposed works 39.13sqm, Gross floor space of work to be retained 140.72sqm, Gross floor space of proposed works; 39.13sqm	
Development Address	Callow Roundstone	
Application Status	INCOMPLETED APPLICATION	
Type of Application	PERMISSION	
Date of Receipt of Application	19/3/2020	
Planning Authority	Galway County Council	This development if it goes ahead is small in terms of size and scale and will not likely have any in combination effects on the nearby SAC and watercourse or its QI species and habitats.
Planning Application Reference	2660054	
Description of Proposed Development	to decommission existing septic tank system and install and construct a new wastewater treatment and disposal system, and all associated site works and services	
Development Address	Callow , Roundstone , Co. Galway	
Application Status	NEW APPLICATION	
Type of Application	PERMISSION	
Decision Due Date	16/3/2026	
Planning Authority	Galway County Council	This development if it goes ahead is small in terms of size and scale and will not likely have any in combination effects on the nearby SAC and watercourse or its QI species and habitats.
Planning Application Reference	2260598	
Description of Proposed Development	(1) retention of existing dwelling house, (2) retention of existing garage, (3) removal of enurement clause. Gross floor area to be retained: 180.76 sqm (dwelling house) and 24.12 sqm (garage)	

Development Address	Callow , Roundstone , Co.Galway	
Application Status	APPLICATION FINALISED	
Type of Application	RETENTION	
Final Decision on Application	CONDITIONAL	
Decision Date	17/2/2023	

A review of planning applications within close proximity to, and hydrologically linked with, the application site was undertaken through the Galway County Council planning register and MyPlan.ie. The applications identified relate predominantly to small-scale domestic extensions, refurbishments, wastewater treatment upgrades, minor agricultural structures, and localised infrastructure works at Emlaghmore, Callow and Doonloughan–Foorglass. The majority of developments are modest in scale, ancillary in nature, and have been granted permission subject to conditions, refused, withdrawn, or remain at further information stage. Several applications were accompanied by Natura Impact Statements where required. In each case, the nature and scale of development is limited, generally involving extensions to existing dwellings, replacement or upgrading of septic systems, minor outbuildings, or like-for-like infrastructure works, without significant intensification of land use.

Having regard to the scale, nature and status of these permissions, and their relationship to the nearby SAC and the Callow_010 watercourse and associated Qualifying Interests, it is considered that these developments, either individually or cumulatively, are unlikely to give rise to significant or detectable in-combination effects with the application site. Where applications were refused or withdrawn, they do not present any pathway for cumulative impact. The remaining permitted or pending developments are small in terms of size and scale and do not introduce new impact pathways beyond those already considered in the assessment of the application site. On that basis, no adverse effects on the integrity of the European site are predicted to arise in combination with the above-referenced planning permissions.

The water sampling that was carried out represents a snapshot in time. The results indicate that no works carried out on the laneway have caused any long-term alterations or negative affects on the water chemistry of the SAC water body downstream of the proposed development. Due to the gravel used on the laneway having been sourced from a local quarry, the composition would have been very similar to that of the bedrock of the Callow_010 river. When taking into consideration the laneway was re-surfaced in 2018-2019, in-combination effects can be ruled out in this case, whereby several years have passed, and any silt deposited in such a fast-flowing river would have been carried down stream some years ago. In this instance it is the opinion of the author that past works must be excluded in this analysis.

The table above describes in detail each and every application around the area of the Maumeen Lough which is the discharge point for the Callow_010 river that runs past the proposed development site boundary. Ther are no developments in the planning history to the expanses of land to the Northwest, North, Northeast and East of the proposed development site for many kilometres.

6.0 Mitigation

It is the opinion of the author that remedial mitigations should be implemented on the laneway where Clause 804 gravel has been used for resurfacing. Mitigation measures are necessary for the protection of the nearby SAC and its QI habitats, species and their conservation objectives. These measures will allow for the continuation and support of the Galway County Development Plans (2022-2028) objectives, specifically

NHB1, NHB2, NHB3, WR1 and WR2.

The laneway must not be disturbed further by trying to lay yet another surface material or by altering it by tracked vehicles or otherwise to remove any material at the laneway. This could lead to unnecessary deposition or transition of particulate matter entering the nearby watercourse and SAC.

Establish vegetation buffer strips on both sides of the laneway where water flows toward watercourses. Widths depending on local topography (e.g. minimum 5-10 m, more if steep slopes). Plant with native species appropriate to the SAC (bog species, riparian shrubs, trees). Ensure riparian shade, cover, bank stability.

Establish baseline to monitor downstream/upstream water chemistry & turbidity/SS/TSS monthly for first year, then quarterly for years 2-5. Key parameters: suspended solids, turbidity, pH, conductivity, major salts, heavy metals. This should be done with the appointment of an Ecological Clerk of Works (ECoW). This will form the basis of a phased monitoring plan. This should be carried out annually for three years and reports sent to Inland Fisheries Ireland. Once baseline established, re-visiting after third year results in re-assessing whether continued monitoring should take place.

Monitor substrate quality in salmon spawning areas (percent fines, substrate permeability) annually for first 3 years.

Monitor *Najas flexilis* populations: abundance, extent, health (light penetration, water chemistry) annually for three years. Avail of a suitably qualified and experienced ECoW for all the monitoring and reporting. The ECoW will be responsible for liaising with the landowner and the relevant authorities.

Check drainage elements (channels, culverts, infiltration zones) after heavy rain; ensure that erosion or blockages are repaired.

As part of an adaptive management strategy, employ additional sediment traps, regrading or re-surfacing sections, replacing problematic material, diverting flows, installing retention ponds or swales, replanting buffer zones if needed after monitoring indicates degradation.

7.0 Conclusion

Following an assessment of the potential effects of the project on Natura 2000 sites, including an evaluation of all relevant source–pathway–receptor linkages for qualifying habitats and species, it is concluded that the completed works, as described in Section 2, are not likely to have resulted in any significant adverse effects on the integrity of any Natura 2000 site, either alone or in combination with other plans or projects.

The site is outside the boundaries of any Natura 2000 site therefore there is no potential for direct impacts. The potential for indirect impacts on QI and SCI species of the Connemara Bog Complex SAC and the Connemara Bog Complex SPA has been assessed and due to the nature, size and scale of the completed works, impacts have been ruled out for all elements of the work apart from the laneway. The laneway surface may well be safe, but the precautionary principle dictates that we must apply mitigation to ensure the conservation objectives of the nearby Connemara Bog Complex SAC and its habitats and species are protected in accordance with Article 6(3) of the Habitats Directive 92/43/EEC (Assessment of Plans and Projects significantly affecting Natura 2000 sites).

The works did not result in loss of any significant habitat for any Annex I or BoCCI red-listed bird species. The works did not have the potential to significantly interfere with the conservation status of any SCI of the Connemara Bog Complex SPA, or the broader Natura 2000 network.

Based on the findings of this report no observable significant effects on the conservation objectives of the nearby SAC and SPA have occurred as a result of this development. The building in question is currently uninhabited. Its existing condition and associated land use do not give rise to any direct or indirect pathways for impact on nearby Natura 2000 sites. In the event that the structure was to become occupied in the future, such a change in use would not be expected to give rise to any long-term or significant adverse effects on the qualifying interests, conservation objectives, or overall integrity of the adjacent SAC or SPA. This conclusion is based on the absence of any hydrological, hydrogeological, or ecological linkages between the building and the designated sites, and on the limited scale and nature of potential future occupation. It is important to note that the laneway was resurfaced to facilitate continued access for agricultural activities. The route previously consisted of an established gravel track that had deteriorated over time and required maintenance. The resurfacing works have therefore served to stabilise the existing access route, reducing the potential for ongoing erosion and surface degradation. In this context, the improved surface is likely to decrease, rather than increase, the risk of sediment or particulate matter being mobilised and entering the adjacent SAC or SPA. Water testing of the river Callow (EPA_010) was carried out on the 9th February 2026 to gather baseline data for upstream chemical testing and downstream chemical testing. The intention was to provide a snapshot in time of the current state of the watercourse in relation to perceived negative effects from the resurfaced laneway. The test results attached in Appendix A show that no deterioration is measurable parameters were found. The gravel used for resurfacing the road was a locally sourced material from a nearby quarry approximately 10.2 Km away to the Northeast by the N59 road to Clifden. The material used to lay the surface happens to be comprised of the same Hydrostratigraphic Rock Unit Group as the location of the laneway. This may well be a factor in the chemical testing of the water upstream and downstream of the laneway, which detected no difference in water chemistry oif the upstream and downstream samples. Chemical differences in the water parameters which may otherwise be caused by water runoff from the laneway into the nearby Callow water course were not detected. Therefore, the results may be used for future baseline information. It must be noted that these results do not infer that past deposition into he water took place. There may have been an amount of particulates entering the watercourse and had a temporary effect on very fine scale ecology. Fine scale ecological effects may have impacted salmonid breeding ecology and lifecycle stages if excessive and prolonged.

Quarry location Hydrostratigraphic Rock Unit Group Name. Taken From Geological Survey Ireland	
Hydrostratigraphic Rock Unit Group Unique ID	IE_GSI_rug_100K_4100
Hydrostratigraphic Rock Unit Group Code	PQGS
Hydrostratigraphic Rock Unit Group Name	Precambrian Quartzites, Gneisses & Schists
Laneway location Hydrostratigraphic Rock Unit Group Name. Taken From Geological Survey Ireland	
Hydrostratigraphic Rock Unit Group Unique ID	IE_GSI_rug_100K_3489
Hydrostratigraphic Rock Unit Group Code	PQGS
Hydrostratigraphic Rock Unit Group Name	Precambrian Quartzites, Gneisses & Schists

The initial work involved replacing a storm damaged roof in the 1990's purely to protect the building. The recent work (*The replacement of a storm damaged metal-clad roof with a new metal-clad roof. The opening up of 3 no. windows, previously blocked up with dry stone, without alteration to the original ope sizes. The placing of timber framed windows within the opes. The reconstruction of an unsafe partially collapsed chimney. The excavation of a trench to allow for the placement of an electricity supply duct along and existing laneway leading to the unhabitable dwelling. The infilling of the trench and resurfacing of the laneway with loose stone. The construction of a pillar to house an*

ESB meter cabinet and adjacent placement of a mini pillar. The placement of CCTV cameras, wiring and an antenna on the facade and chimney of the uninhabitable dwelling) was to allow for the building to be used as a place of refuge in bad weather while visiting the farm, for storing items such as rain gear and wellies and to provide for surveillance following damage to property on the farm. Future use will be the same unless planning permission is obtained for other improvements.

The author recommends that a dedicated Preliminary Bat Roost Assessment be carried out, and depending on the results of that survey, full emergence surveys then be carried out to properly assess any bat populations that might be using the structures. If translocation of bats is required or if specific mitigations are required to carry out any works at the site, derogation license must be sought from the National Parks and Wildlife Service. Any bat surveys, derogation licensing or mitigations with respect to the treatment of bast should only be carried out by suitably qualified and experienced professionals. No alterations to any structures should be allowed without the surveys, to prevent any disturbance to bats. Bats are protected by law in the Republic of Ireland under the Wildlife Act 1976 and subsequent amendments. In Northern Ireland, bats are protected under the Wildlife (Northern Ireland) Order 1985. In both jurisdictions there is a similar level of protection; it is an offence to intentionally disturb, injure or kill a bat or disturb its resting place and any work on a roost must be carried out with the advice of the National Parks and Wildlife Service in the Republic, or the Northern Ireland Environment Agency in Northern Ireland. In addition to domestic legislation bats are also protected under the EU Habitats Directive (92/43/EEC). The lesser horseshoe bat which is found in the Republic of Ireland only is listed in Annex II of the EU Habitats Directive, while all bat species are listed in Annex IV of the same Directive. The EU Habitats Directive has been transposed into both Irish and Northern Irish law with the European Communities (Birds and Natural Habitats) Regulations 2011 and the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 as amended.

The author recommends that a dedicated badger survey be carried out. Badgers are protected under the Wildlife Act of 1976 and the Wildlife Amendment Act of 2000 in Ireland. It is illegal to intentionally harm or kill a badger or to deliberately damage or destroy their setts. Badger baiting, which involves digging out badgers and killing them in a cruel and illegal manner, is also prohibited. The Animal Health and Welfare Act makes it illegal to cause or permit unnecessary suffering to any animal.

The author also recommends that a dedicated otter survey be carried out by suitably qualified and experienced ecologist to investigate any possibility of an otter holt on or near the property. The National Roads Authority states that "*Otters, along with their breeding and resting places, are protected under the provisions of the Wildlife Act, 1976, as amended by the Wildlife (Amendment) Act, 2000. Otters have additional protection because of their inclusion in Annex II and Annex IV of the Habitats Directive, which is transposed into Irish law in the European Communities (Natural Habitats) Regulations (S.I. 94 of 1997), as amended. Otters are also listed as requiring strict protection in Appendix II of the Berne Convention on the Conservation of European Wildlife and Natural Habitats and are included in the Convention on International Trade of Endangered Species (CITES). Many of Ireland's rivers, lakes, canals, and coastal areas, provide good habitat for otters in Ireland: such areas include wildlife conservation areas (designated as Natural Heritage Areas or Special Areas of Conservation). It is important that best practice mitigation measures are put in place to ensure that otters, and their populations, are not impacted during the construction and operation of national road schemes. Normally, such measures will require the provision of adequately designed culverts and bridges that allow for the free passage of otters. In addition, mammal-resistant fencing either side of these crossings is usually recommended at watercourse crossings used by otters. Otters may need to be evacuated from affected holts and, where necessary, alternative (artificial) holts will need to be created. The removal of otters from affected holts, and the subsequent destruction of these holts, must be*

conducted under a Section 25 derogation under the 1997 Habitats Regulations. The National Parks and Wildlife Service (NPWS), of the Department of the Environment, Heritage and Local Government, is responsible for processing these licenses. An application for a Section 25 derogation should be submitted to NPWS along with the relevant ecological information from otter surveys. At least three weeks is normally required to process a derogation application. Conditions will usually be attached to each derogation granted in respect of otters and operations at holts or in their vicinity. Closure of holts requires a monitoring period to ensure that there is no current otter activity at the holt. Derogations may not be provided by the NPWS for the closure of holts containing a breeding female or young otters. Derogations are also required for any works likely to cause disturbance (e.g. piling and blasting) to active breeding holts (when present within c.150m of a scheme). It should be noted that all activity related to otter surveys, evacuation procedures, and holt destruction should only be undertaken by personnel with adequate expertise in otter ecology".

References

DEHLG (2009) Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. GEHLG, Dublin.

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

European Commission 2000 managing Natura 2000 sites the provisions of Article 6 of the Habitats Directive 92 / 43 / EEC stop office for official publications for the European Communities Luxembourg

European Commission 2001 Assessment of plans and projects directly affecting Natura 2000 sites: Methological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC.

European Commission 2002 assessment of plans and projects significantly affecting that or 2000 sites methodological guidance on the provisions of Article 63 and 64 of the Habitats Directive 92 / 43 / EEC office for official publications for the European Communities, Luxembourg. European Commission.

European Commission 2006 nature and biodiversity cases ruling of the European Court of Justice office for the official publications for the European Communities Luxembourg. European Commission.

European Commission 2007 guidance document on article 64 of the Habitats Directive 93/42 EEC clarification of the concepts of alternative solutions imperative reasons of overriding public interest compensatory measures overall coherence and the opinion of commission. Office for Official Publications of the European Communities, Luxembourg. European Commission.

European Commission 2013 Interpretation Manual of European Union Habitats. Version EUR 28. European Commission, DG Environment.

EC (2018) Managing Natura 2000 Sites: the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC, Office for Official Publications of the European Communities, Luxembourg. European Commission.

Fossit, J. A. 2000. A Guide to Habitats in Ireland. The Heritage Council. EPA

(2010) McGarrigle *et al.*, Water Quality in Ireland 2007-2009

Regan, E.C., Nelson, B., Aldwell, B., Bertrand, C., Bond, K., Harding, J., Nash, D., Nixon, D. , & Wilson, C.J. (2010) Ireland Red List No. 4 – Butterflies. National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government, Ireland.

European Communities (Natural Habitats) Regulations, SI 94/1997, SI 233/1998 & SI 378/2005

Preston C.D. et al. (2002). New Atlas of the British and Irish Flora. Oxford University Press.

NPWS, 2022 (09/04/2025). Natura 2000 Form Connemara Bog Complex SAC (side code: 002034)

NPWS, 2022 (08/04/2025). Site Synopsis Connemara Bog Complex SAC (side code: 002034)

NPWS (08/04/2025). Conservation Objectives Connemara Bog Complex SAC (side code: 002034)

NPWS, 2022 (08/04/2025). Site Synopsis Connemara Bog Complex SAC (side code: 004181)

NPWS (08/04/2025). Conservation Objectives Connemara Bog Complex SPA (side code: 004181)

Site Synopses

Site Name: Connemara Bog Complex SAC Site

Code: 002034

The Connemara Bog Complex SAC is a large site encompassing the majority of the south Connemara lowlands in Co. Galway. The site is bounded to the north by the Galway–Clifden road and stretches as far east as the Moycullen–Spiddal road. The site supports a wide range of habitats, including extensive tracts of western blanket bog, which form the core interest, as well as areas of heath, fen, woodlands, lakes, rivers and coastal habitats.

The site is underlain predominantly by various Galway granites, with small areas along the northern boundary of Lakes Marble, schist and gneiss. The Roundstone Bog area has a diverse bedrock geology composed mainly of the basic intrusive rock, gabbro. An area of rock, possibly Cambrian in age, called the Delaney Dome Formation occurs in the north-west of this area. Gabbro also occurs in the Kilkieran peninsula and near Cashel. The whole area was glaciated in the last Ice Age which scoured the lowlands of Connemara.

The site is a Special Area of Conservation (SAC) selected for the following habitats and/or species listed on Annex I / II of the E.U. Habitats Directive (* = priority; numbers in brackets are Natura 2000 codes):

[1150] Coastal Lagoons*

[1170] Reefs

[3110] Oligotrophic Waters containing very few minerals [3130]

Oligotrophic to Mesotrophic Standing Waters [3160] Dystrophic

Lakes

[3260] Floating River Vegetation [4010]

Wet Heath

[4030] Dry Heath

[6410] Molinia Meadows [7130]

Blanket Bogs (Active)* [7140]

Transition Mires

[7150] Rhynchosporion Vegetation

[7230] Alkaline Fens

[91A0] Old Oak Woodlands

[1065] Marsh Fritillary (Euphydryas aurinia)

[1106] Atlantic Salmon (Salmo salar) [1355]

Otter (Lutra lutra)

[1833] Slender Naiad (Najas flexilis)

The Connemara Bog Complex is characterized by areas of deep peat surrounded by rocky granite outcrops covered by heath vegetation. However, the main habitat within this site is lowland Atlantic blanket bog, as most of the area is covered by blanket peat greater than 1 m in depth. A mosaic of different communities exists in association with the blanket bog, including hummock/hollow systems, inter-connecting bog pools, flushes, transition and quaking mires, freshwater marshes, lakeshore, lake and river systems. The key plant species of lowland blanket bog are Black Bog-rush (*Schoenus nigricans*), Purple Moor-grass (*Molinia caerulea*), Cross-leaved Heath (*Erica tetralix*), Deergrass (*Scirpus cespitosus*), Common Cottongrass (*Eriophorum angustifolium*), Bog Asphodel (*Narthecium ossifragum*), White Beak-sedge (*Rhynchospora alba*) and bog moss species (*Sphagnum spp.*). Rhynchosporion vegetation is found on the blanket bog by lake and pool margins, in wet hollows and in quaking areas. Species such as White Beak-sedge, Common Cottongrass, Bogbean (*Menyanthes trifoliata*), sundews (*Drosera spp.*) and bog mosses are common. Areas of wet heath are widespread throughout this site, where blanket peat becomes shallower. There is a limited amount of dry heath, with species such as Western Gorse (*Ulex gallii),* St. Dabeoc's Heath (*Daboecia cantabrica*) and Bell Heather (*Erica cinerea*) recorded.

Both oligotrophic and dystrophic lakes are found within Connemara Bog Complex SAC, with the greatest concentration in the west of the site. The latter type are generally smaller, have a mainly peaty bottom and there is generally an abrupt transition from blanket bog to open water. Oligotrophic lakes in this site typically have shallow margins, with a mixed rocky/peaty bottom. Typical plant species of the lake edges include Water Lobelia (*Lobelia dortmanna*), Pipewort (*Eriocaulon aquaticum*), Shoreweed (*Littorella uniflora*), Many-stalked Spike-rush (*Eleocharis multicaulis*) and Bulbous Rush (*Juncus bulbosus*). The rare species Slender Naiad (*Najas flexilis*) and Pillwort (*Pilularia globulifera*) have both been recorded from

oligotrophic lakes at this site. Species commonly encountered in dystrophic lakes/pools include the bog mosses *Sphagnum auriculatum* var. *auriculatum* and *S. cuspidatum*, along with White Beak-sedge, Lesser Bladderwort (*Utricularia minor*), Pipewort and Bogbean.

The main river systems within the site are the Owenmore (Ballynahinch) river, the Glashanasmearany and Derrygauna rivers (to the south of Lough Bofin), the Cashla river (which flows out of Glenicmurrin Lough), the Glengawbeg river (which connects Lough Agraffard and Lettercraffoe Lough) and the Owenboliska river and its tributaries (north of Spiddal). Vegetation associated with some of these waterways includes Alternate Water-milfoil (*Myriophyllum alternifolium*), Bulbous Rush, Floating Club-rush (*Scirpus fluitans),* water-lilies, Great Fen-sedge (*Cladium mariscus*), Bog Pondweed (Potamogeton polygonifolius), Broad-leaved Pondweed (P. natans), Water Horsetail (Equisetum fluviatile) and the liverwort *Scapania undulata*.

Within this site, areas of transition mire occur mainly along the margins of lakes and bog streams. The surface of such areas is typically quaking and there is often evidence of base-enrichment. Typical plant species include Bog-sedge (*Carex limosa*), Slender Sedge (*C. lasiocarpa*), Bog Pondweed, Bogbean, Blunt-flowered Rush (*Juncus subnodulosus*), Common Cottongrass, Purple Moor-grass and White Beak-sedge. Locally there may be some Great Fen-sedge or Black Bog- rush. The rare and legally protected species Slender Cottongrass (Eriophorum gracile) occurs in this habitat. Moss cover is variable.

Areas of Molinia meadow at this site contain species such as Purple Moor-grass, Meadow Thistle (*Cirsium dissectum*), Sharp-flowered Rush (*Juncus acutiflorus*) and Tormentil (*Potentilla erecta).* The community occurs on wet acid soils.

There are a number of areas of old oak woodland, but the woodland at Shannawoneen, north of Spiddal, is the best known. This woodland lies in the valley of the Owenboliska river. It provides a good example of a Sessile Oak (*Quercus petraea*) dominated canopy woodland, although there is also a lot of Downy Birch (*Betula pubescens*). Other examples of this habitat at the site are found at Ballynahinch, Glendollagh, Derrywaking Lake, as well as on some of the lake islands. The invasive alien shrub Rhododendron (Rhododendron ponticum) is found in some areas of woodland.

There are some limited, but nonetheless well developed, examples of alkaline fen at this site. These fens are often species-rich, and support species not typically found in association with blanket bog areas - e.g. Dioecious Sedge (*C. dioica*),

Black Bog-rush, Broad-leaved Cottongrass (*E. latifolium*), the moss *Campylium stellatum* and Lesser Clubmoss (*Selaginella selaginoides*).

Four main lagoons occur within this site: Lough Ahalia, Doire Bhanbh, Lough Aconeera and Salt Lake. All four are regarded as saline lake lagoons and they range in size from 1–90 ha. The smallest (Doire Bhanbh) is quite shallow and surrounded by Common Reed (*Phragmites australis*) swamp, while the three larger lagoons are relatively deep and are surrounded by moorland and exposed granite. Salt Lake contains a serpulid worm reef. Lough Ahalia consists of a series of basins, and these are deep in places, with an unusual salinity structure. The lowest lake is relatively shallow (0–4 m) and brackish throughout, while the middle lake is deep (13 m) and permanently stratified, with water below 3 m depth measuring 14 ppt. The flora and fauna of this lagoon system are extremely diverse, with many communities found. This, along with Lough Aconeera, is the only known site in Ireland for the Red Data Book stonewort *Chara balthica*. Another Red Data Book plant, Lamprothamnium papulosum, also occurs, as well as *Chara aspera* and *C. virgata*. An unusual form of Fennel Pondweed (*Potamogeton pectinatus*) occurs in high salinity water. There are a number of other notable records of plant and animal from this lagoon. Lough Aconeera is less remarkable in terms of flora and fauna, but nonetheless supports a sizeable number of lagoonal specialists.

Nine species protected under the Flora (Protection) Order, 2015, occur within this site: Forked Spleenwort (*Asplenium septentrionale*), Parsley Fern (*Cryptogramma crispa*), Bog Hair-grass (*Deschampsia setacea*), Slender Cottongrass, Bog Orchid (*Hammarbya paludosa*), Slender Naiad, Heath Cudweed (*Omalotheca sylvatica*), Pillwort and Pale Dog-violet (*Viola lactea*). Rare and threatened species such as Dorset Heath (*Erica ciliaris*), Mackay's Heath (*Erica mackaiana*) and Green- winged Orchid (*Orchis morio*) also occur within this site. All of the above species are listed in the Irish Red Data Book, and Slender Naiad is listed on Annex II of the E.U. Habitats Directive.

The Annex II butterfly species, Marsh Fritillary, is known to occur at this site.

Atlantic Salmon, a species listed under Annex II of the E.U. Habitats Directive, occurs in many of the rivers within the site. The Cashla and Ballynahinch systems are good examples of western acidic spate rivers which support the species. Good spawning and nursery grounds for the species occur in these systems. Arctic Char occurs in a number of lakes within the site: Ballynahinch Lake, Glenicmurrin Lough and Lough Shindilla. The species has also been reported from Lough Oorid and Lough Glendollagh in the past, but has not been recorded from

these lakes in recent years. Arctic Char is listed as threatened in the Irish Red Data Book.

Otter have been recorded as occurring in the Connemara Bog Complex. Irish Hare, another mammal listed in the Red Data Book, occurs on the site. Common Frog breeds on the site.

The site is of national importance for wintering populations of Greenland White- fronted Goose. Small flocks (up to 30) are found on Roundstone Bog and also use the bogs between Recess and Maam Cross. In April 1989 a synchronised ground and air census of the Connemara bogs located 7 flocks of Greenland White- fronted Goose, totalling 134–137 birds. In 1991/93 wintering numbers were considered to be approximately 60 birds.

There is an internationally important breeding area for Cormorants at Lough Scannive with 218 pairs present in 1985 in a colony which is known to have existed pre-1968. Golden Plover, a species listed on Annex I of the E.U. Birds Directive, nests at up to four locations in the site, with a maximum of two pairs noted at any one location. Another Annex I species known to be present in the site is Merlin. Lough Naskanniva is an important inland breeding site for Common Terns (up to 60 pairs in 1977 and 1992) and Choughs, both of which are also Annex I species under the E.U. Birds Directive.

The main damaging operations and threats in the Connemara Bog Complex are peat cutting, over-grazing and afforestation. Extensive peat extraction using 'Difco' machines has become common in the region in recent years, and cutting by excavator and hopper is also increasing. The hand-cutting of peat is less threatening as it is usually on a much smaller scale, but nonetheless it should be controlled within the site. Over-grazing and poaching by sheep and cattle is a widespread problem within the site, with erosion of peat ensuing. The above operations are the most extensive but other threats and potentially damaging operations include land drainage and reclamation, fertilization, quarrying and dumping.

In summary, the Connemara Bog Complex encompasses a large area of relatively undamaged lowland Atlantic blanket bog of high conservation significance both in Ireland and at a European level. The site also contains good examples of at least 13 other habitats listed on Annex I of the E.U. Habitats Directive, as well as four species listed in Annex II. Further, the site supports a number of threatened and protected plant species. The site is internationally important for Cormorant and nationally important for Greenland White-fronted Goose, and contains nesting sites for Golden Plover

Site Name: Connemara Bog Complex SPA Site

Code: 004181

The Connemara Bog Complex SPA is a large site encompassing much of the south Connemara lowlands of Co. Galway. The site consists of three separate areas - north of Roundstone, south of Recess and north-west of Spiddal. It is underlain predominantly by a variety of igneous and metamorphic rocks including granite, schist, gneiss and gabbro. The whole area was glaciated during the last Ice Age which scoured the lowlands of Connemara.

The Connemara Bog Complex SPA is characterized by areas of deep peat surrounded by heath-covered rocky outcrops. The deeper peat areas are often bordered by river systems and the many oligotrophic lakes that occur, resulting in an intricate mosaic of various peatland/wetland habitats and vegetation communities; these include Atlantic blanket bog with hummock/hollow systems, inter-connecting pools, Atlantic blanket bog pools, flushes, transition and quaking mires, as well as freshwater marshes, lakeshore, lake and river systems.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Cormorant, Merlin, Golden Plover and Common Gull.

Lough Scannive, located within Roundstone Bog, supports a nationally important breeding population of Cormorant (160 breeding pairs in 2001). Other breeding birds using the site include Merlin and Golden Plover. A partial survey in 2009 recorded 8 pairs of Merlin at various locations throughout the site; 15 breeding locations for this species were recorded at the site in an earlier survey undertaken in 1985/86. A survey of upland birds in 2004 recorded 27 pairs of Golden Plover within the site. The numerous lakes scattered throughout the site provide suitable breeding locations for Common Gull (45 pairs in 2000); a survey in 2010 recorded 40 pairs of this species at the site.

The site is also utilised by a wintering population of Greenland White-fronted Goose; small flocks of up to 30 birds have been recorded at various locations within the site.

Connemara Bog Complex SPA is of high ornithological importance, in particular for its nationally important breeding populations of Cormorant, Merlin, Golden Plover and Common Gull. It is of note that three of the regularly occurring species, Greenland White-fronted Goose, Merlin and Golden Plover, are listed on Annex I of the E.U. Birds Directive.

Appendix A

Bellow are the lab results of the water testing carried out at Emlaghmore.

Everpure Analysis Ltd

Address: Showgrounds rd. Ennis Co. Clare
Postcode: V95 XY60
Phone number: 0879022022
Email: info@everpureanalysis.com
Website: www.everpureanalysis.com

Date Sampled:09/02/2026	ID: River	Report No: 24
Date Received:11/02/2026	Ref: Downstream 1	Lab. No: 001

Chemistry:	Result	EU limits	Units
pH	7.2	6.5-9.5	
Conductivity	190	*	mg/l
Total Hardness	50	250/20°C	mg/l
Total Alkalinity	215	*	mg/l
Total Iron	0.02	0.20	mg/l
Manganese	0.01	0.05	mg/l
Ammonia	0	0.3	mg/l
Nitrite	0	0.5	mg/l
Phosphate	0.1	5	mg/l
Nitrates	3	50	mg/l

Analysis	Result	EU limits	Units
Odour	None	*	
Turbidity	25	*	NTU

*No reference limit recommended by European Communities (Drinking Water) (No. 2) Regulations 2023

Comments: No issues detected in this water sample all parameters fall within acceptable limits for river water.

Vat No. 3453835MH
IBAN IE60AIBK93538740661026

Everpure Analysis Ltd

Address: Showgrounds rd. Ennis Co. Clare

Postcode: V95 XY60

Phone number: 0879022022

Email: info@everpureanalysis.com

Website: www.everpureanalysis.com

Date Sampled:09/02/2026	ID: River	Report No: 25
Date Received:11/02/2026	Ref: Downstream 2	Lab. No: 001

Chemistry:	Result	EU limits	Units
pH	7.3	6.5-9.5	
Conductivity	205	*	mg/l
Total Hardness	60	250/20°C	mg/l
Total Alkalinity	195	*	mg/l
Total Iron	0.04	0.20	mg/l
Manganese	0.02	0.05	mg/l
Ammonia	0.1	0.3	mg/l
Nitrite	0.1	0.5	mg/l
Phosphate	0.1	5	mg/l
Nitrates	5	50	mg/l

Analysis	Result	EU limits	Units
Odour	None	*	
Turbidity	25	*	NTU

*No reference limit recommended by European Communities (Drinking Water) (No. 2) Regulations 2023

Comments: No issues detected in this water sample all parameters fall within acceptable limits for river water.

Vat No. 3453835MH

IBAN IE60AIBK93538740661026

Everpure Analysis Ltd

Address: Showgrounds rd. Ennis Co. Clare
Postcode: V95 XY60
Phone number: 0879022022
Email: info@everpureanalysis.com
Website: www.everpureanalysis.com

Date Sampled:09/02/2026	ID: River	Report No: 22
Date Received11/02/2026	Ref: Upstream 1	Lab. No: 001

Chemistry	Result	EU limits	Units
pH	7.5	6.5-9.5	
Conductivity	190	*	mg/l
Total Hardness	250	250/20°C	mg/l
Total Alkalinity	225	*	mg/l
Total Iron	0.04	0.20	mg/l
Manganese	0.01	0.05	mg/l
Ammonia	0.1	0.3	mg/l
Nitrite	0.1	0.5	mg/l
Phosphate	0.3	5	mg/l
Nitrates	4	50	mg/l

Analysis	Result	EU limits	Units
Odour	None	*	
Turbidity	25	*	NTU

*No reference limit recommended by European Communities (Drinking Water) (No. 2) Regulations 2023

Comments: No issues detected in this water sample all parameters fall within acceptable limits for river water.

Vat No. 3453835MH

IBAN IE60AIBK93538740661026

Everpure Analysis Ltd

Address: Showgrounds rd. Ennis Co. Clare

Postcode: V95 XY60

Phone number: 0879022022

Email: info@everpureanalysis.com

Website: www.everpureanalysis.com

Date Sampled:09/02/2026	ID: River 53.41490-10.015	Report No: 23
Date Received:11/02/2026	Ref: Upstream 2	Lab. No: 001

Chemistry:	Result	EU limits	Units
pH	7.4	6.5-9.5	
Conductivity	180	*	mg/l
Total Hardness	40	250/20°C	mg/l
Total Alkalinity	205	*	mg/l
Total Iron	0.04	0.20	mg/l
Manganese	0.01	0.05	mg/l
Ammonia	0.1	0.3	mg/l
Nitrite	0.1	0.5	mg/l
Phosphate	0.1	5	mg/l
Nitrates	3	50	mg/l

Analysis	Result	EU limits	Units
Odour	None	*	
Turbidity	25	*	NTU

*No reference limit recommended by European Communities (Drinking Water) (No. 2) Regulations 2023

Comments: No issues detected in this water sample all parameters fall within acceptable limits for river water.

Vat No. 3453835MH

IBAN IE60AIBK93538740661026

David Behan

From: Paula Galvin <PGalvin@mhplanning.ie>
Sent: Tuesday 17 February 2026 16:53
To: Laura Giffney; Appeals2
Subject: RE: Submission of Appeal Response - (Planning Authority Register Reference No. 2460766, ACP Case No. ACP-PL-500624-LH-26)

Why XX December?

From: Laura Giffney <lgiffney@mhplanning.ie>
Sent: Tuesday 17 February 2026 16:52
To: appeals@pleanala.ie
Cc: Paula Galvin <PGalvin@mhplanning.ie>
Subject: Submission of Appeal Response - (Planning Authority Register Reference No. 2460766, ACP Case No. ACP-PL-500624-LH-26)

To whom it may concern,

We write to An Coimisiún Pleanála to submit our appeal response in relation to the third-party appeals lodged against Louth County Council's decision to issue a Notification of a Decision to Grant Permission dated the XX of December 2025, in respect of Kellystown Wind Farm Development (Planning Authority Register Reference No. 2460766, ACP Case No. ACP-PL-500624-LH-26).

The appeal response is submitted by way of the documents attached to this email and comprises the following:

- An MHP Appeal Response Overview Report, which constitutes the primary appeal response, including an appendix containing a suite of supporting responses prepared by the project's specialist consultants, addressing the matters raised in the third-party appeals in detail.

Should you have any queries or require any further information please let me know.

Kind Regards,

Laura

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Planning Consultant
McCutcheon Halley
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