Laura Grady Lawlor

Dan

From: Garvan Hanley <garvan@hanleytaite.com>
Sent: Wednesday 18 February 2026 17:01
To: Appeals2
Cc:
Subject: Daniel O'Connor
Attachments: Submission on file ref. no. ACP-323899-25 An Coimisiún Pleanála -18 Feb.pdf; PR letter 17 02 26.pdf; Declaration - Pat Ridge - 17 February 2026:pdf; Pat_Ridge_NIS_2025 (FINAL_REV_02) - Copy (2).pdf; Hugh_Technical_Note_V3.pdf; Pat Ridge_1475_CEMP_EMLAGHMORE2026 - Copy - Copy.pdf; Callow River - Lands at Emlaghmore, Ballyconneely, County Galway.eml

Good afternoon,

Please find attached a submission, on behalf of my client, made following receipt of a letter from your offices dated 29th January last.

The submission comprises a cover letter, a letter from my client to myself, a declaration associated with the letter from my client, an updated NIS, a technical report from Mr. Hugh Fitzpatrick to support the NIS, an updated CEMP and a copy of communication from AMOSS Solicitors to Inland Fisheries Ireland.

I would be very grateful if you could respond confirming receipt of this email and attachments.

Best regards,
Garvan.

Garvan Hanley
Hanley Taite Design Partnership

RIAI Registered Architect 2025 Conservation Architect G2

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An Coimisiún Pleanála
64 Marlborough St.,
Rotunda,
Dublin 1,
DOI V902

18th February 2026

Re: Reference NO: ACP – 323899-25. Application under Section 37L of the Planning and Development Act, 2000 (as amended) for proposed development at Emlaghmore, Ballyconneely , Clifden, Co. Galway being: (A) Restoration of existing unoccupied farm cottage, (B) raising of the wall plate level of existing farm cottage to allow for habitable loft space to comply with current building regulation standards, (C) forming a single storey extension linking existing cottage and adjoining outhouse, (D) restoration, conversion and extension of an existing outhouse to form part of overall single dwelling, (E) form new permeable parking area, (F) decommissioning of existing septic tank and to install a new proprietary sewage treatment system with filter area to comply with current EPA standards, (G) install a new rainwater harvesting system, (H) install surfacewater soakaways as well as associated site works.

Dear An Coimisiún Pleanála official,

Regarding the above application file, on behalf of our client, I hereby respond to your letter dated 29th of January last. Specifically in the interests of justice, this submission will deal with issues raised in the submissions made on this file by Alexine Tinne, Western Gamefishing Association and Peter and Bridget Lee. The content of our application addresses many of the issues raised and highlights precedent where similar development was granted planning permission nonetheless in the interest of providing a robust and clear response we respond hereunder and through the attached documents in support of our responses.

1. Alexine Tinne submission

Much of this submission focuses on perceived impact on the stream/river (Callow river) that runs to the south of the subject site, thereafter the impact on the adjacent Natura 2000 sites and there is some content in the submission relating to the impact of the development (past and proposed) on privacy, the landscape and the Natura Sites. To concisely deal with these issues they are addressed under the headings below.

(a) Impact on the adjoining stream.

- A claim is made that our client "*has had built 3 x drains across land that does not belong to him*". I draw attention to the attached letter from our client, the accompanying sworn declaration and the technical report prepared by Mr. Hugh Fitzspatrick, Environmental Scientist. These documents clearly set out that the drains were not constructed by our client, neither was their installation commissioned by him or anybody associated with him. Furthermore the report by Mr. Fitzpatrick states that the drains "*appear to be the outlets of field drains emanating from the field to the north of the laneway (Folio GY5190)*". A land registry search shows this land to be in the ownership of Mr. Peter Lee (also an observer in this application).
- A further claim relating to pipes made in the Tinne submission is that "*Mr. Ridge will need to seek planning permission would need to get his pipes across to the lake and any subsequent drainage plans*". This application sets out the drainage and water supply proposals for the development. There is no requirement or intention on the applicant to install any pipework within 20m of the stream or within of 150m of the lake.
- Reference is made to "*the track*" adjacent to the stream in the Tinne submission and that "*the flow would take all debris and pollution straight onto the spawning bed*". The subject site is accessed via a laneway that in part runs parallel to the adjacent stream, outside the subject site, and turns upwards away from the stream within the site. The laneway was in the past resurfaced with gravel. This work was explained and justified in the application ref no. ACP – 323867-25 which relates to this site. Nonetheless Mr. Fitzpatrick report, fig 3 shows the condition of the laneway prior to the resurfacing and fig 4 which indicates the condition post resurfacing works. As is evident there was little requirement to remove any overgrowth on the laneway itself and the verges on either side were not impacted upon. Furthermore Mr. Fitzpatrick report states "*laying of gravel on roadways in this manor is a routinely utilized measure to reduce structural deficiencies, improve filtration and prevent sediment loss*". He further states "*the decision to resurface the road with gravel was appropriate to prevent rutting and poaching of underlying soil*". In his hydrology assessment, Mr. Fitzpatrick demonstrates through modelling that "*any surface water from the site is intercepted and attenuated by an intervening vegetated buffer before reaching the river.*" This includes the portion of the laneway within the site boundaries (fig 10 & 11). Nonetheless an updated NIS has been prepared in light of the third-party submissions on this file. This NIS refers to water sampling that was undertaken on Monday the 9th of February last and states that "*the results*

indicate that no works carried out on the laneway have caused long-term alterations or negative effects on the water chemistry of the SAC waterbody downstream of the proposed development." The updated NIS also states "*due to 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 resurfaced in 2018 – 2019, in combination effects can be ruled out in this case*".

- The Construction Environmental Management Plan was also updated in response to the issues raised in the third-party submissions and this document is also attached for reference. In the CEMP extensive measures are prescribed to ensure the protection of the adjacent stream and Natura 2000 sites. These measures include the placement of silt trap fencing, the formation of a gravel filter trench, the placement of coin logs and the erection of steel hoarding. All of these measures are to ensure that no material of any sort can enter the stream or Natura 2000 sites. Further mitigation is provided for in that the appointment of an Ecologist Clerk of Works is recommended, as is a monitoring which includes regular water sampling during and post construction to verify no residual effects on the stream.

(b) Impact on the Natura 2000 sites.

- It is contended that an EIAR is not required for the subject development as it is considered "*sub-threshold*" and not to have significant effects on the environment. The update NIS has comprehensively interrogated all possible risks of significant effect on the Natura 2000 sites. A field survey found no presence of non – volant mammals, although further surveying is to be carried out prior to works commencing, and should such presence be identified, no work is to take place without appropriate actions being taken to protect the animals. The appointment of an ECoW will ensure that these actions take place. It finds that "*no loss or degradation of habitats supporting Annex I communities or Birdwatch Ireland BoCCI red-listed species is anticipated*". It states that "*following a comprehensive assessment of the potential impacts of the proposed development on Natura 2000 sites, including detailed consideration of all possible impact pathways and receptor sensitivities relevant to qualifying interest (QIs) and special conservation interests (SCIs), it is concluded that the project, when implemented in strict accordance with the mitigation measures outlined in this Natura Impact Statement (NIS) and the associated Construction Environmental Management Plan (CEMP), will not give rise to any significant adverse effects on the integrity of any Natura 2000 site , either alone or in*

combination with other plans or projects, in view of the sites conservation objectives". The materials specifically chosen for the proposed development were given careful consideration so as to ensure there is minimal potential for impact on the Natura 2000 sites. It is intended that materials such as sheet metal cladding, sips panels, timbers, rigid insulation, glass and stone sourced on the site will ensure that deliveries can be in small loads, by small vehicles and that wet or mixed materials will form a very low percentage of the building assembly. Concrete deliveries will be by Esker Quarries who have a mini delivery lorry.

(c) Impact on privacy.

- The placement of CCTV cameras on the cottage followed criminal activity having taken place on the site.
- None of these cameras capture any part of the landscape outside of our clients property.
- Should permission, (ACP-323899-25) also be granted permission, the proposed development will allow for the permanent removal of the CCTV system.

(d) Impact on landscape.

As outlined in the Design Statement submitted with this application the proposed development is for the restoration and extension of the existing cottage to form a practical usable dwelling.

- This dwelling is modest in scale and uses materials that are sympathetic to the location.
- The Design Statement contains photomontages that clearly demonstrate that there would be very little impact on the sensitive landscape.
- The close-up photos of the building in the Tinne submission are misleading and are obviously taken from well within the site boundaries.

2. Western Gamefishing Association submission.

The Western Gamefishing Association submission sets out concerns relating to *"salmonid fisheries and the river catchment at a whole"* and *"that any renewal, continuance, or consent in relation to any subsisting development consent must be subject to full Appropriate Assessment pursuant to S.6.3 of Habitats Directive"*. Our response to these issues is separated into the two parts below. However, to avoid repetitiveness only relevant points not previously made above in this document are

made. Much of the content in our response to the Tinne submission also address the WGA submission.

(a) Impact on salmonid fisheries and river catchment.

The WGA submission claims that "*the access path/road to the site has been eroded by the river in some parts*".

- I can confirm that the access laneway has not been eroded.
- A vegetative buffer exists between the access lane and the stream. This buffer ranges in width from 6m down to 1.2m in one localized location. A further claim is made that it would "*clearly be necessary to resurface this path/road with inevitable further adverse consequences for the aquatic environment due release of aggregates, silts, sand and other material into the river*". It is not necessary to carry out any further works to the laneway to facilitate the development. Our client's property is accessed 2-3 time s weekly by cars and a tractor without any difficulty or harm being caused. The design of the proposed development incorporates materials that will not require large or heavy vehicles to access the site. Earlier in this document and in the attached supporting documents prepared by an Ecologist and an Environmental Scientist, it clearly described that the risk of harm to the stream is to be safely mitigated.
- The WGA submission refers *to "proposals inherent in the application for the construction of 'instream' structure to support the road"*. There are no "*instream*" structures proposed as part of this development.

(b) Appropriate Assessment requirement.

- WGA appear to be unaware of the legislative basis under Part XA of the Planning and Development Act, 200 (as amended) which allows for the Substitute Consent process.
- Application ACP – 323867 -25 precedes this application and was made under Section 177E of the Act. This application is made under Section 37L of the Act. The preceding application included a remedial NIS and this application includes an NIS, supported by a technical report prepared by Mr. Hugh Fitzpatrick.
- An Coimisiún Pleanála are considered to be the competent Authority in determining that this development will not result on a significant negative impact on the environment or on the integrity of any Natura 2000 site from a statutory perspective.

3. Submission made on behalf of Peter Lee and Bridget Lee.

The submission made on behalf of Peter Lee and Bridget Lee, including the appended report from Altemar, raises a number of issues. These are addressed hereunder under separate headings. Again, some of the issues raised have been considered as part of our responses above and these are not repeated below in the interests of conciseness.

(a) Scale, intensity and typology.

- It is intended, through our proposals in this application, to provide for a modest home suitable for modern living.
- The design allows for an increased floor area with minimal impact on the bulk and scale of the existing structures on site.
- The roof is raised 1m above wall plate level to *"float"* above the existing stone cottage, allowing for the creation of rooms in the roof space.
- The description in the Doyle Kent report portraying the raised roof as a *"two storey residential form"* is entirely misleading.
- The design allows for contemporary interventions to the cottage and outbuilding that are lightweight and subservient to the original buildings.
- There remains clear legibility between the old and new.
- The old buildings will be restored using traditional materials, methods and techniques.
- The Design Statement prepared and submitted with the application highlights many precedents where larger more dominant extensions to dwellings in Galway were granted permission under Objective RH07.
- The Design Statement also provides examples of similar developments where the design principle proposed was successfully applied. One such example is the award winning The White House by WT Architecture *"recognized for its successful blend of historic conservation and modern residential design, creating a unique, sheltered and sustainable home in a rugged, exposed landscape*".
- It is also worth noting that under a previous planning application to Galway Co. Co. (ref. no. 20/112) for the development proposed in this application, the Planning Officers report remarked that "*the site is located in a class 4 landscape category area of the county. The visual impact assessment and design statement lodged in conjunction with the*

proposed plans and elevation meet with the satisfaction of the planning authority".

Considering the above we contend that the proposal does accord with Objective RH07 of the Galway County Development Plan.

(b) Visual and Landscape Impact.

Certain points are made above in response to the Tinne submission that are also relevant here.

- The increase in height and single storey link joining the cottage to the outbuilding are clearly not significant in terms they being overly perceptible in the wider landscape.
- The cottage benefits from some natural screening which also helps in terms of it being integrated into the landscape.
- Photos included in the Doyle Kent report are taken from private lands and do not portray how the site would appear from any other building or a public road. I again draw attention to the photomontages contained in the Design Statement which are a true and accurate representation of the visual impact.

(c) European site impact and Natura 2000 considerations.

- The Doyle Kent report states that "*the application omits unauthorized and proposed works along the access laneway from the site boundary*". This matter is dealt with earlier in this report and in the preceding application ref. no. ACP- 323867-25. The preceding application addresses the previously undertaken works to the laneway and there is no intention to carry out future works to the laneway, except for mitigation works outlined in the NIS and CEMP attached to this submission.

- The Doyle Kent report comments on "*the impacts of those works on the adjacent watercourse*". Again, these matters are addressed above and in the preceding application. Further comments will be made below in this document when addressing the report prepared by Altemar.

- The Doyle Kent report raises what they consider is a failure to assess impact on Atlantic salmon spawning habitat, a Qualifying Interest of

the SAC. Again, this perceived issue has been commented on above in this document, in the preceding application (ref. no. ACP- 323867-25), in the technical report by Mr. Hugh Fitzpatrick (attached) and in the updated NIS and CEMP (both attached). Further commentary is also set out below in our response to the Altemar report.

- The Doyle Kent report states that our application "*incorrectly asserts that no hydrological linkage exists between the development site and the European site*". In response to the submissions made on this file our client commissioned Mr. Hugh Fitzpatrick, Environmental Scientist, to prepare a technical report. Mr. Fitzpatricks report included detailed and accurate hydrological modelling. His conclusions are restated here as follows:

    - 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 predominately flows southwards towards 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, Connemara Bog Complex SAC or Connemara Bog Complex SAC, alone or in-combination, beyond all reasonable scientific doubt.

- The Doyle Kent report queries if "*a lawful in-combination effects assessment*" was undertaken in our application. There is particular reference here to previous works undertaken to the laneway. Again, I draw attention to the technical report prepared by Mr. Fitzpatrick and

the updated NIS. Both documents deal with the potential impact of the previous resurfacing of the laneway. Both reports find it unlikely for there to have been any harmful impact on the stream (known as Callow river). Mr. Larry Manning, our ecologist undertook sampling from the stream and found there to be no evidence of harm existing in the stream emanating from the laneway. The updated 'NIS, Chapter 6.0, In-combination Effects' thoroughly examines all potential development that could affect the stream and Natura 2000 sites, including previous work as outlined in the preceding application (ACP -323867-25) and finds *that "these developments, either individually or cumulatively , are unlikely to give rise to significant detectable in-combination effects with the application site".*

(d) Potable water supply

The Doyle Kent report claims that *"it has not been demonstrated that rainwater harvesting system can provide a secure or reliable potable water supply for a permanent dwelling at this location".*

- The rainwater harvesting system proposed as part of this development was specifically designed to ensure that the water harvested, following an appropriate multistage treatment process will comply with the EU (Drinking water) Regulations 2023.
- It is scientifically proven that properly treated rainwater is potable, as confirmed by numerous university studies and academic research papers. Scientific evidence is available from a pilot study undertaken in University College Dublin, research at Monash University (Australia), a Universiti Teknologi Malaysia review of rainwater treatment technologies, research published in PMCID (Indonesian National Institute of Health and a Ton Duc Thang University (Vietnam) study are some examples. All of the above stipulate multi-filtration.
- The system proposed has such a system including a reverse osmosis unit and a germicidal UV lamp filter. There are also examples in Ireland where such systems are successfully operational. Architectural and Metal Systems, Cork, being one example, they had such a system approved as part of their EPA Industrial Emissions Licence Application.
- Furthermore, Galway Co Co have previously approved planning permission for such a system to be used in a domestic setting (planning ref no: 24/60004).

4. Technical evidence – report from Altemar.

A number of claims are made, and issues raised in the report from Altemar. Again, some of these have been covered in the earlier parts of this document and in the preceding application (ACP- 323867-25). The documents attached to this submission, being the updated NIS, technical report from Hugh Fitzpatrick, the updated CEMP and copy of a request for information from Inland Fisheries Ireland made by AMOSS Solicitors, are also very relevant. Below I will comment on the issues not already addressed.

(a) Risk of sediment flowing into the river

- There are no works proposed to the laneway or driveway as part of this development as set out above. It is proposed to form a small parking area adjacent to the cottage on an area that is currently brownfield. This area is separated from the stream by in excess of a 25m established vegetative buffer and therefore as set out in the report from Mr. Fitzpatrick there is little, if any, risk for potential sediment transport to the river.
- The Altemar report claims that *"gravel would have fallen into the watercourse"* from the previous works. There is no evidential basis for making this claim and in fact I again refer to the Fitzpatrick report, our updated NIS and the water sampling result, all of which suggest that there was no impact on the stream by previous works.

(b) In – combination effects

The Altemar report highlights the absence of a section on in – combination effects in the NIS submitted with the application. This matter is commented on above, however again I refer to the updated NIS submitted with this document which has a chapter specifically dealing with in-cumulative effects for the avoidance of ambiguity.

- The Altemar report provides Google Earth imagery to support a claim *that "silt from the works would have resulted in the blocking of interstitial spaces in spawning gravels, directly impacting on the spawning capacity of this area of the river ".* Mr. Fitzpatrick's report deals with this matter and provides more accurate aerial imagery.
- The photo's fig. 3 and fig. 4 in the Fitzpatrick report also clearly show that there was no impact on the vegetative buffer between the laneway and the stream.

- It is Mr. Fitzpatrick's opinion that many of the claims of harm to the stream are *"not supported by scientific evidence and do not hold up to scientific scrutiny."* He further states that "*they are instead based on non- expert opinion, conjecture and unverifiable 'discussions' with a public body (Inland Fisheries Ireland)".*
- Efforts to obtain details of discussions involving IFI, made in the interest of establishing what evidence, if any existed of the Callow river being an Atlantic Salmon spawning river or any harm having been caused to it, have as yet been unsuccessful following efforts by AMOSS Solicitors and Mr. Fitzpatrick.
- While the Callow river forms part of the SPA and SAC Mr. Fitzpatrick states that *"No published data has been cited 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*".

(c) Control of runoff, sediment and pollutants during construction.

The Altemar report questions the adequacy of details provided in our application to deal with the above. This question has been addressed above and is comprehensively considered in the technical report by Mr. Fitzpatrick, (containing the hydrological modelling), the updated NIS and the updated CEMP.

- Mr. Fitzpatrick's report concludes that the laneway will not receive sedimented surface water from the proposed site and that surface water from the site is intercepted and attenuated by an intervening vegetated buffer before regarding the river.
- The updated NIS and CEMP set out measures to be taken during the construction phase to ensure runoff towards the stream is controlled.

(d) Effect on protected animal species.

- As part of the preparation of the NIS a walkover survey, undertaken to assess the presence of a range of protected animal species, concluded that no faunal species or habitat was recorded. Notwithstanding that the site would potentially be conducive to the presence of bats, badgers and otters. In this regard and considering that the site could in the future become habitat for such animals the updated NIS prescribes that a pre-construction survey be carried out for activity associated with these animals.
- Our client would be accepting that a planning condition be imposed should this application be successful also that any actions or derogations

required will be sought through a suitably qualified ecologist. A suggested wording could be "*bat, badger and otter surveys shall be undertaken before any works take place and the findings shall be submitted and agreed in writing with the planning authority. If any active habitat for these animals are located appropriate mitigation is to be undertaken in accordance with NPWS requirements*".

(e) Assessment of the proposed sewage disposal system in the NIS.

The Altemar report states that "*details of the septic tank have not been included in the NIS and the impact of this element has not been assessed in detail*".

- The updated NIS clearly assesses all elements of the proposed development including the *"installation of EPA compliant effluent treatment system and polishing filter*".
- In assessing this system, due consideration was given to the EPA Site Characterization Report submitted with the application. This report, prepared by Enda O'Malley (Engineer) found the site to be suitable, subject to complying with EPA Code of Practice Guidelines.
- It is also accepted by our client that a planning condition be imposed requiring the installation of the system be inspected by a suitably qualified person, should this application be successful.

To conclude, prior to summarizing I reemphasize that our client, being from the area and having owned the property for in excess of 25 years, has no desire to cause any harm or potential harm to the environment or scenic landscape of the area. He is seeking to restore and extend his unhabitable cottage for use by he and his family exclusively and to be able to reside on his farm. A measure of his commitment to ensuring that the development is appropriate, is the time, cost and expertise that he has invested into ensuring that it is unequivocally clear that the development is appropriate to this location and meets all statutory requirements.

In summary, we contend that the issues raised in the third part submissions on this file have been properly addressed and that the issues raised and our responses have ensured that overall this application is of very high quality and satisfies all relevant policies and objectives of the Galway County Development Plan and the rigorous process of demonstrating that, as required under the

European Directives related to the Natura 2000 sites, no harm will occur to the Natura 2000 sites by the development. We are hopeful that An Coimisiún Pleanála will agree with this contention and will grant permission for the proposed development.

Yours sincerely

.....

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

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

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 Clarington House, Mount St Crescent,
in the City/~~County~~ of Dublin
this 17 day of February 2026

PATRICK RIDGE

Eoin MacCarry
Practising Solicitor

Eoin MacCarry
Amoss LLP

NATURA IMPACT STATEMENT

February 2026

Prepared for
Patrick Ridge

Site Address
Emlaghmore, Ballyconeelly, Co. Galway

Prepared by
Larry Manning

Contact
Email: larry.manning@omcgroup.ie Phone: +353 87 668 5526

NATURA IMPACT STATEMENT

Rev.	Status	Date	Author
01	Draft	14/04/25	CM
02	Draft	23/04/25	CM
03	Draft	17/10/2025	LM
04	Final	16/02/2026	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 an Appropriate Assessment/ Natura Impact Statement (NIS), prepared by Larry Manning for;

Construction to 1) Restore existing unoccupied farm cottage (2) Raise wall plate level of existing cottage to allow for habitable loft space to comply with current building regulation standards (3) Form single storey extension to cottage and adjoining outhouse (4) Convert, extend and restore existing outhouse to form part of overall single dwelling (5) Install new proprietary sewage treatment system with filter area as well as all associated site works.

The site boundary 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. 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.

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 require 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 whose 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.

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.

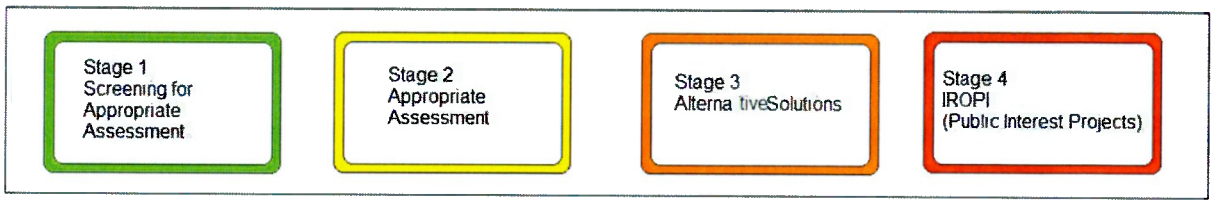


Figure 1: Stages of Appropriate Assessment

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 for the application of retention with An Coimisiún Pleanála. It must be noted that this NIS report and the rNIS will be treated separately. The project descriptions and scope of the two different reports require separate analysis.

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.

2.1 Site Location

The proposed development site is located in Emlaghmore, Ballyconeelly, Co. Galway. 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 by agricultural land, with few other residential properties in the area. See site layout plan in figure 1.

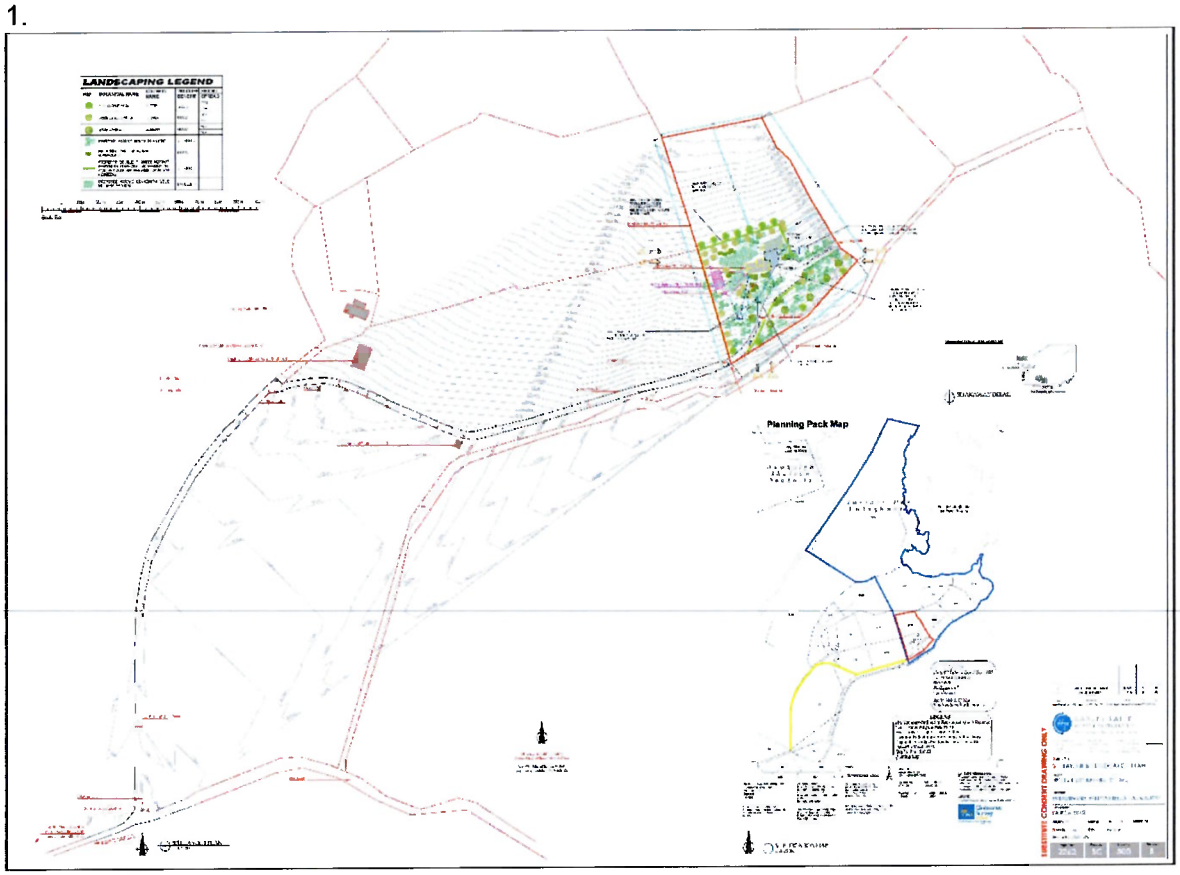


Figure 1. Site layout plan.

2.2 Project description

The proposed project is to:

1. Restore existing unoccupied farm cottage.
2. Raise wall plate level of existing cottage to allow for habitable loft space to comply with current building regulation standards.
3. Build single story extension to cottage and adjoining outhouse.
4. Convert, extend and restore existing outhouse to form part of overall single dwelling.
5. Install new proprietary sewage treatment system with filter area as well as all associated site works.

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. See figure 2 below for project design.

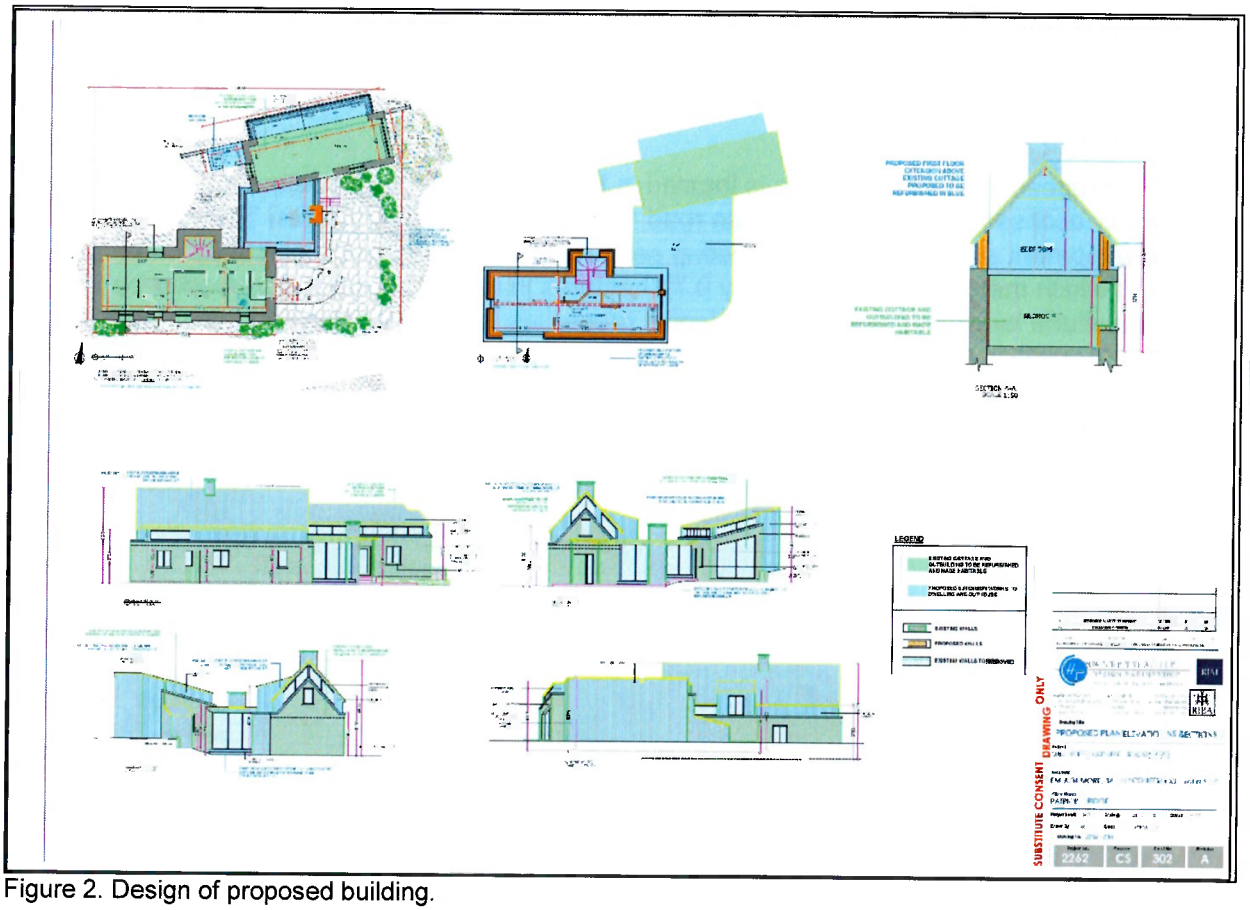


Figure 2. Design of proposed building.

Proposed works for the subject site include:

- Clearing unnecessary materials and debris so that construction can begin.
- Groundworks and excavations
- The existing walls will be retained, a concrete ring beam formed at wallplate level to support the new roof and the existing stone will be repointed externally with a Diathonite lime plaster applied internally.
- The extension will be timber framed with timber cladding, reducing the requirement for wet trades such as block layers and plasterers.
- Concrete pour foundations constructed
- Installation of plumbing and electricity connections
- Soak ways and drainage on site
- Gravel fill to be imported to finish off driveway etc.
- Installation of EPA compliant effluent treatment system and polishing filter***** The waste water treatment system is included in an accompanying site characterisation report. The treatment system fully complies with regulations set out in the EPA Code of Practice Domestic Waste Water Treatment Systems (Population Equivalent ≤ 10).
- Planting of trees and shrubs.

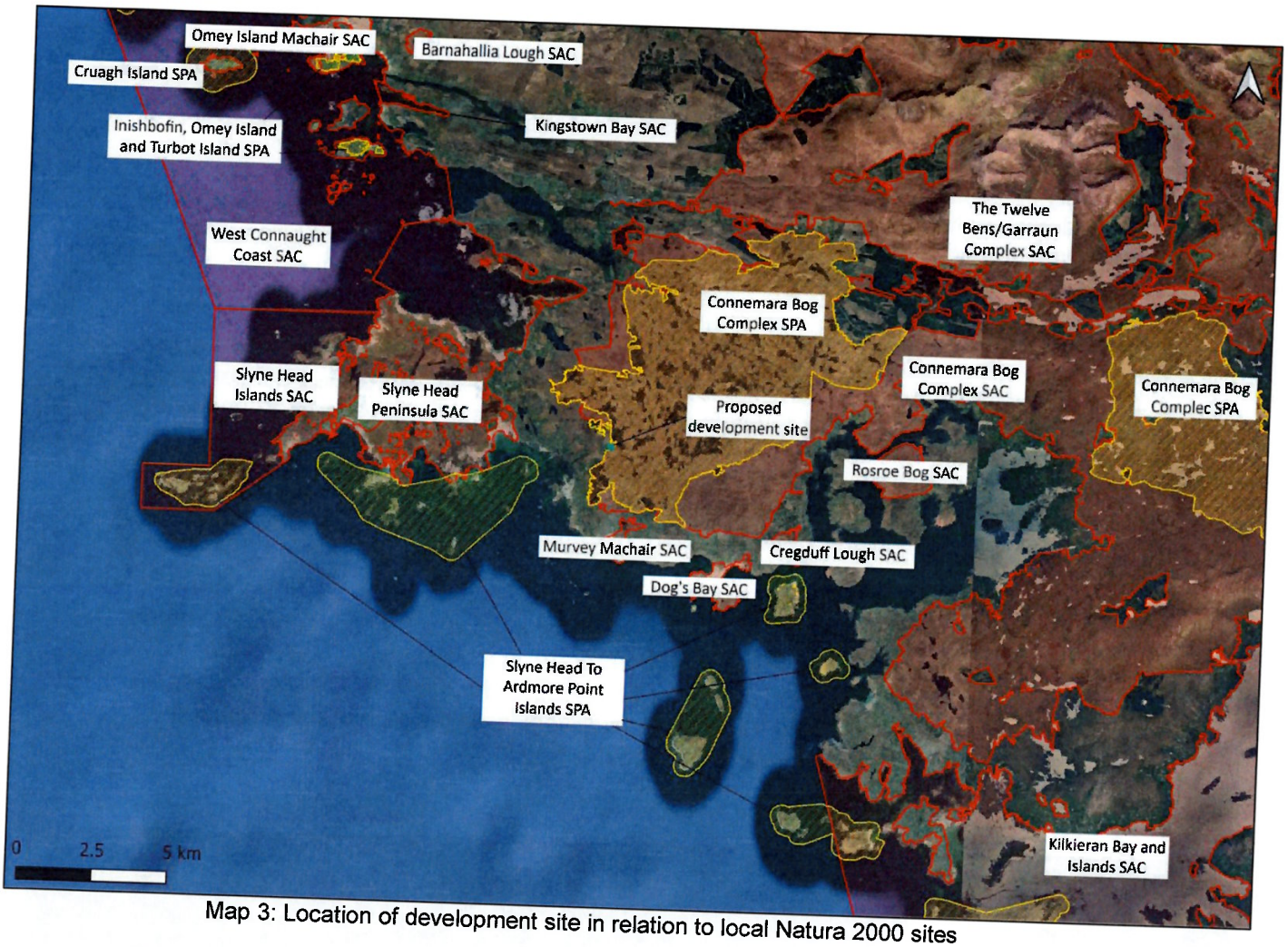
Map 1: Location of the proposed development site, (Source: Bing maps)

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 Complex 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 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

Components of the SPR Model are as follows:

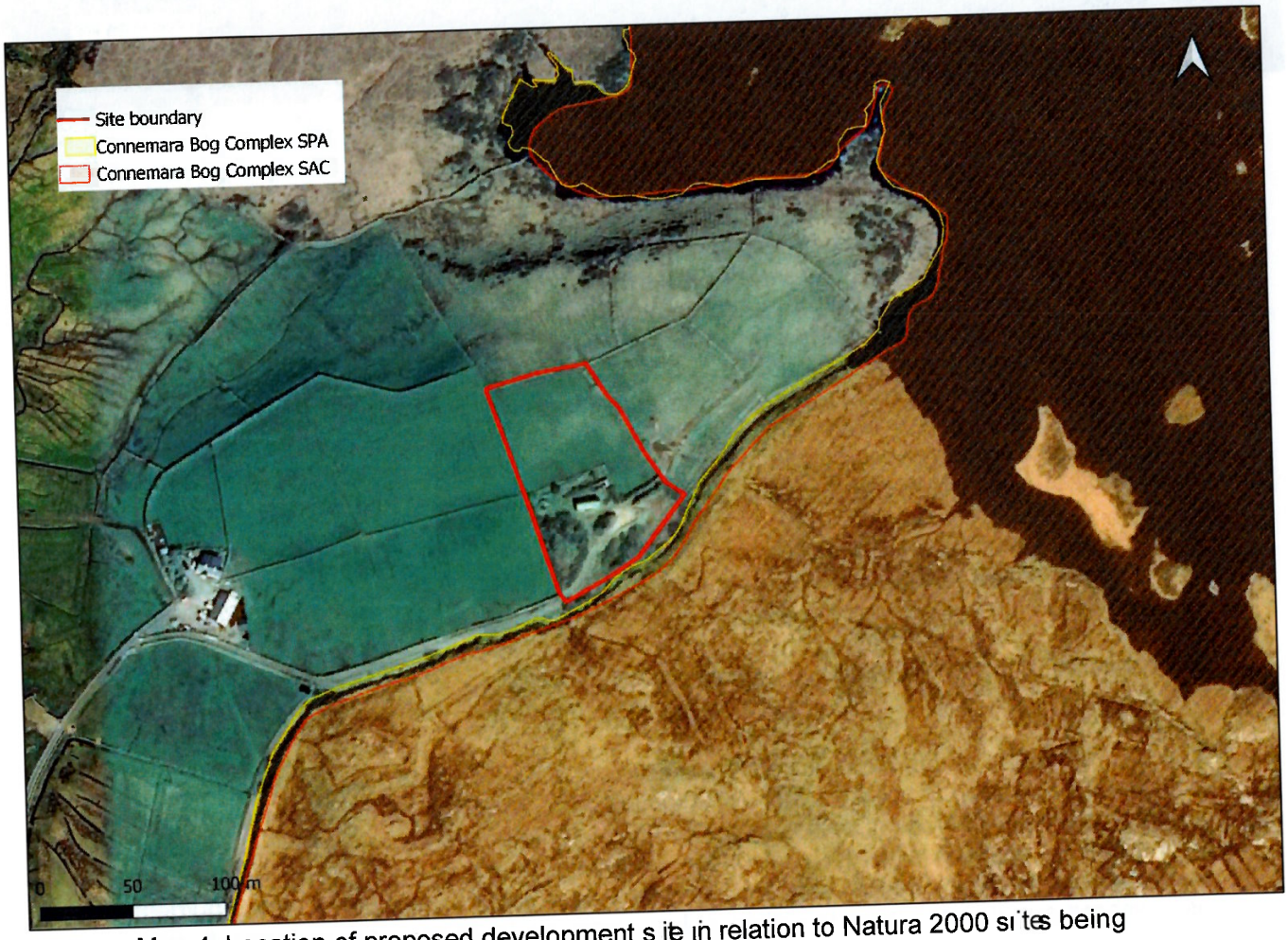
Source

The 'source' refers to the origin of a potential stressor or pressure. In AA terms this can be a pollutant discharge (point or diffuse), habitat disturbance, hydrological change (e.g. drainage, abstraction), nutrient loading, noise, light, etc. Characterisation of the source requires quantification where possible: type of substance or disturbance, magnitude/volume, timing, spatial extent, and persistence. In Ireland, for example in groundwater protection or nutrient risk assessment, source characterisation includes contaminant type, loading, hydraulic load, depth of release.

Pathway
The pathway is the route by which the source's impact may travel to the receptor. This can involve physical, chemical, biological transport or transmission mechanisms: groundwater flow, surface runoff, overland flow, soil leaching, atmospheric dispersion, hydrological connectivity. It also includes attenuation, delay, or transformation along the route. The pathway determination involves understanding soil, subsoil, geology, hydrology, connectivity, etc. Ireland's groundwater vulnerability mapping, studies such as "PATHWAYS" and the development of Pollution Impact Potential (PIP) maps reflect this component.

Receptor
The receptor is the ecological or human target which may be affected by the source via one or more pathways. In AA this often means the Qualifying Interests or Species Conservation Interests of European Sites, their habitats, species, hydrological features (e.g. groundwater bodies, surface water bodies), ecosystem functions, etc. The receptor's sensitivity, location, spatial extent, ecological requirements, thresholds, exposure susceptibility are critical elements. For example, in groundwater protection the receptor may be the aquifer itself, or springs, wells, or Groundwater Dependent Ecosystems.

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]. These two sites are also further carried forward in this NIS due to hydrological linkages with the proposed development site as identified in the SPR model.



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.

A desk study was conducted to provide an overview of the current ecological baseline conditions prior to the proposed site works, where baseline conditions refer to those which exist in the absence of proposed activities (CIEEM 2018). The desk study included a review of available ecological data including a review of online web-mappers including those provided by the National Park and Wildlife Service (NPWS), National Biodiversity Data Centre (NBDC), Water Framework Directive (WFD), Environmental Protection Agency (EPA), Office of Public Works (OPW Flood Maps), Geological Survey Ireland (GSI) and topographical maps. A review of the NPWS Article 17 maps was also included.

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).

Mitigation measures relating to invasive species are outlined in Section 6.2.13.

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.

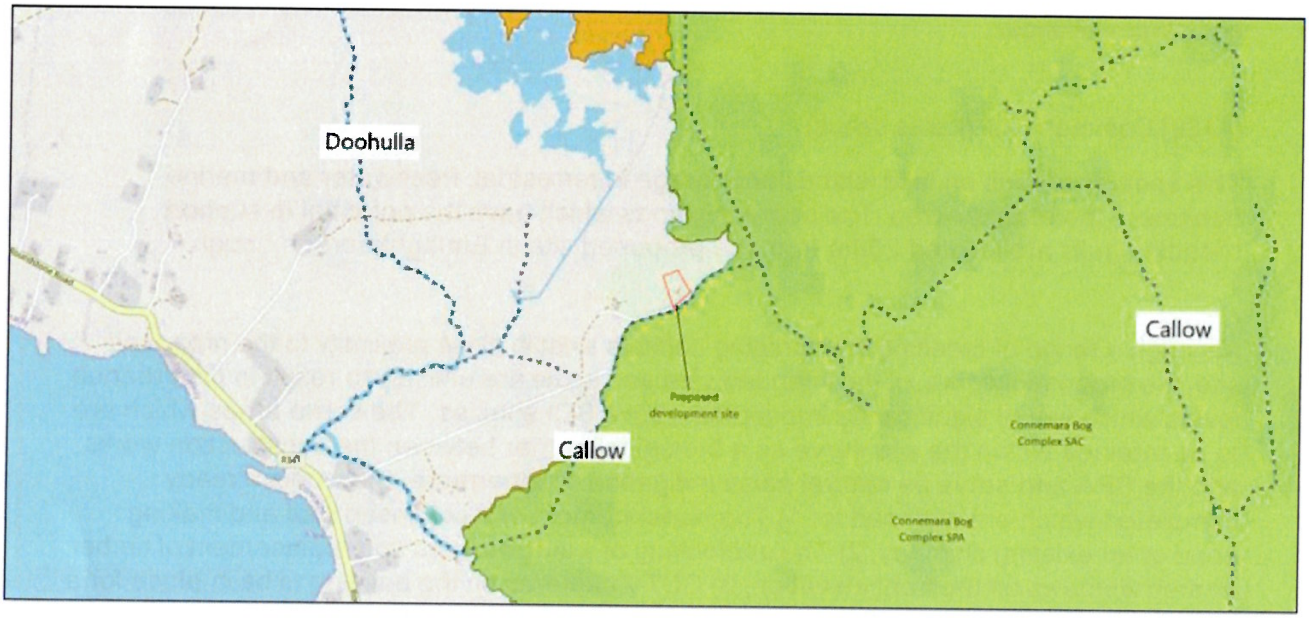
Water quality information and individual waterbody status for all river districts and coastal waters in Ireland can be accessed through the online EPA map viewer. This map viewer was consulted on 10th April 2025.

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).

The proposed development is bounded to the South a narrow fast flowing riffle (EPA Callow_010) which is comprised of fast flowing heavy riffle areas as well as glide.

Water sampling was carried out on Monday 9th February to investigate the possibility of detrimental affects on the water chemistry and composition of the water. This was carried out to test whether any negative impacts are measurable from the addition of the gravel on the laneway in 2018-2019. The water sampling represents a snapshot in time of the river Callow current composition based on the analysis carried out by Everpure Analysis Ltd. Two 500 ml samples were taken upstream of the laneway, GPS coordinates: 53°24'53.8"N 10°00'54.2"W and two 500 ml samples were taken downstream, GPS coordinates: 53°24'49.6"N 10°01'02.4"W. The water sampling carried out at Emlaghmore from the river is intended to be used as a baseline from which mitigations implementation can be assessed against. The mitigations outlined in this report are designed to protect the nearby SAC and its QI's. An appointed ECoW for the project must be responsible for water sampling on a monthly basis during the period of works and one month after the works are finished.



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

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, of the intended size and scale are unlikely to result 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 works already completed is estimated to be a few weeks, collectively, at most. 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.

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 ma'jor*)	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 ,	Green listed

		12/03/25	
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 otters. 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 otters including holts, couches, spraints or tracks. No signs of otter were observed. However, it is presumed that otters may use the watercourse for commuting/foraging purposes. Mitigation is proposed in Section 6. It is recommended that a pre-construction survey be carried out for otter holts and otter activity to prevent possible disturbance.

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 sets, latrines, shuffle holes, and badger paths and prints. The survey concluded that no evidence of badgers was recorded within the proposed development site. It is recommended that a pre-construction survey be carried out for badger setts and badger activity to prevent possible disturbance if badger have moved into the area.

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 of 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. Mitigation is required.
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 vegetaton	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. Mitigation is proposed with the precautionary principle in mind.
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. However, cumulatively speaking, inhabitation of the prosed dwelling and the subsequent increase in population in the area may contribute to fragmentation or loss of this habitat due to harvesting of turf for heating. Complete source- pathway-receptor link identified. Mitigation is proposed.
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.

		However, cumulatively speaking, inhabitation of the prosed dwelling and the subsequent increase in population in the area may contribute to fragmentation or loss of this habitat due to harvesting of turf for heating. Complete source- pathway-receptor link identified. Mitigation is proposed.
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. However, cumulatively speaking, inhabitation of the prosed dwelling and the subsequent increase in population in the area may contribute to fragmentation or loss of this habitat due to harvesting of turf for heating. Complete source- pathway-receptor link identified. Mitigation is proposed.
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. Complete source-pathway-receptor link identified. With the precautionary principle in mind, mitigation is proposed.
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. With the precautionary principle in mind, mitigation is proposed.
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.

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 construction of the project could result in 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. Materials such as gravel spillage from the laneway could have a deleterious effect on the adjacent salmon spawning grounds. 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. It is considered that the use of good construction practice and both standard and site-specific mitigation measures will avoid and reduce the likelihood of such adverse changes in water quality within the Connemara Bog Complex SAC, downstream of construction.

During the operational phase of the project, the retained scrub habitat which adjoins the river will act as a buffer zone which will serve as a physical barrier to prevent run-off entering the stream. Therefore, there are no direct and / or indirect adverse effects anticipated during the operational phase of the project. Subject to the application of mitigation measures, the requirement for identified above, it is considered that the project will not impact on the integrity of the [3130] or [3260] habitat within the Connemara Bog Complex SAC either during construction or operation.

See Section 5.4 and 5.5 below for assessment of cumulative impacts on peat habitats:

[7130] Blanket bogs (* if active bog)

[7150] Depressions on peat substrates of the *Rhynchosporion* [7230] Alkaline fens

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 construction of the project could result in point and diffuses in 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 water quality downstream of the polluting event(s) which could indirectly result in a change of integrity of the conservation objectives of the SAC on at least a temporary basis. It is considered that the use of good construction practise and both standard and site-specific mitigation measures will avoid and reduce the likelihood of such adverse changes in water quality within the Connemara Bog Complex SAC, downstream of construction.

Activities related to the future construction of the development which include excavation, building and associated movement of machinery and site personnel also have the potential to impose a degree of localised disturbance on Otter [1355] which may be using the stream for foraging/commuting purposes.

The scrub habitat in the southern portion of the site is to be retained. No work will be carried out in this area. This will serve to minimise disturbance to otters during construction, as well as preventing site materials from entering the watercourse. Silt trap fencing will be erected prior to construction and as per the instructions in Section 6.3.3. See Section 6 for a full list of proposed mitigation measures.

Similarly, during the operational phase of the project, the retained scrub habitat which adjoins the river will act as a buffer zone which will serve as a physical barrier to minimise disturbance to otter and prevent run-off entering the stream, thus protecting downstream ecological receptors. Therefore, there are no direct and / or indirect adverse effects anticipated during the operational phase of the project. Subject to the application of mitigation measures, the requirement for identified above, it is considered that the project will not impact on the integrity of the [1106] or [1355] or [1833] QI species with respect to the Connemara Bog Complex SAC

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.

Galway County Developme nt 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 requires 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

Northern & Western Regional Assembly Regional Spatial and Economic Strategy 2020 2032 (RSES)	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. 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

Following a comprehensive assessment under Article 6(3) of the Habitats Directive and Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), it is concluded that the proposed development, including its construction and ongoing use as a dwelling house, will not result in any significant adverse effects on the Connemara Bog Complex SAC (Site Code 002034), its Qualifying Interests (QIs), or the integrity of the site.

The Connemara Bog Complex SAC is designated for a range of sensitive habitats and species, including active blanket bogs (7130), transition mires and quaking bogs (7140), depressions on peat substrates of the *Rhynchosporion* (7150), oligotrophic waters (3110), and watercourses with *Ranunculion fluitantis* and *Callitricho-Batrachion* vegetation (3260), as well as species such as otter (*Lutra lutra*, 1355), salmon (*Salmo salar*, 1106), and marsh fritillary (*Euphydryas aurinia*, 1065). The conservation objectives for these QIs require that habitat area, structure, function, and supporting processes (such as hydrology and water quality) are maintained or restored to favourable condition.

The proposed site lies outside the SAC boundary and has no direct hydrological, physical, or ecological linkages to any of the qualifying habitats or species. The surrounding environment is characterised by low-intensity agriculture, with limited nutrient inputs due to poor-quality soils. As such, background pressures are modest, and the site does not contribute meaningfully to any of the identified threats to the SAC. The principal existing pressures on the Connemara Bog Complex SAC are water pollution, peat extraction, and habitat fragmentation associated with dispersed housing and holiday homes. The proposed development has been designed specifically to avoid contributing to any of these pressures, both during construction and throughout its continued occupation. The most sensitive aspect to the proposed development is its proximity to the nearby watercourse (EPA Callow_010). The watercourse is potentially used by salmonids (*Salmo salar*) and by otter (*Lutra Lutra*), and despite no evidence of otter observed on or near the site, strict precautionary measures will be implemented to prevent possible harm in a worst-case scenario.

No peat extraction or peat use will be undertaken within or adjacent to the SAC for the purposes of heating or maintaining the dwelling. The proposed wastewater treatment system has been designed and will be installed in accordance with the Environmental Protection Agency (EPA) Code of Practice for Domestic Wastewater Treatment Systems (2021). The system, including a certified treatment plant and an appropriately designed polishing filter, will ensure full and effective treatment of all domestic effluent and surface water before discharge. The treatment system will be maintained on an ongoing basis, in compliance with EPA and manufacturer requirements, ensuring sustained protection of local water quality throughout the lifetime of the dwelling.

A Construction Environmental Management Plan (CEMP) will be implemented to control runoff, sediment, and pollutants during construction. Once operational, the dwelling will not generate emissions, discharges, or activities capable of affecting hydrology, groundwater quality, or habitat structure within the SAC. Routine domestic use will be limited to a single household and will not increase nutrient loading, water abstraction, or disturbance to local flora or fauna. Accordingly, the continued occupation and maintenance of the dwelling, including all wastewater and surface water management measures, will not have any potential to cause direct, indirect, or secondary impacts on the Connemara Bog Complex SAC or its QIs.

An in-combination assessment has also been undertaken with regard to other existing and permitted developments in the locality. The low-intensity agricultural land use and the dispersed settlement pattern in this area mean that cumulative pressures on the SAC are limited. Given the very small scale of the proposed development, its full compliance with EPA wastewater standards, and its prohibition of peat cutting, there is no potential for the project to contribute to any cumulative or in-combination effects.

In summary, the assessment confirms beyond reasonable scientific doubt that the proposed dwelling—both during construction and during its long-term use and occupation—will not adversely affect the integrity of the Connemara Bog Complex SAC or any other Natura 2000 site. The proposal will not result in any loss, degradation, disturbance, or alteration of qualifying habitats or species, nor will it interfere with the ecological or hydrological processes supporting them. The ongoing use of the property as a dwelling will remain environmentally neutral and will not introduce any new or sustained source of impact to the SAC or its conservation objectives.

Accordingly, it is concluded that the proposed development, individually and in combination with other plans or projects, will have no significant effect on the Connemara Bog Complex SAC or its Qualifying Interests, either during construction or throughout its continued use as a dwelling house.

6.0 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 watercourse or its QI's in combination with the application site pertinent to this report.
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.)	
Development Address	Emlaghmore	
Application Status	APPLICATION FINALISED	
Type of Application	PERMISSION	
Final Decision on Application	CONDITIONAL	
Decision Date	1/11/2017	
lanning 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
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	the application site in this report.
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

Planning Application Reference	20350	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.
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.

7.0 Mitigation

Once potential adverse effects on Natura 2000 sites have been identified through the impact assessment process, the development and refinement of appropriate mitigation measures can commence. Mitigation, in this context, refers to the specific, targeted actions designed to avoid, reduce, or remedy predicted adverse effects on the qualifying interests (QIs) and special conservation interests (SCIs) of a designated site. These measures must be directly linked to the identified impact pathways and must be sufficiently detailed, practical, and enforceable to ensure their effectiveness throughout the construction, operational, and, where relevant, decommissioning phases of the project.

The implementation of mitigation measures represents a critical stage in the Appropriate Assessment (AA) process, as established under Article 6(3) of the EU Habitats Directive (92/43/EEC). The purpose of these measures is to ensure that any identified adverse effects are either fully avoided or reduced to a level where they no longer have the potential to affect the integrity of a Natura 2000 site, having regard to its structure, function, and conservation objectives.

A project may only proceed where, following the incorporation of mitigation, it can be concluded beyond reasonable scientific doubt that the proposed development will not result in significant adverse effects on the integrity of any Natura 2000 site, either alone or in combination with other plans or projects. In practice, this requires that mitigation measures are not only technically feasible but also effectively implemented, monitored, and maintained over time, under the supervision of a suitably qualified ecologist or

environmental manager.

Mitigation should be distinguished from compensatory measures, which are only considered under Article 6(4) of the Directive in circumstances where residual adverse effects cannot be avoided. In the case of this project, the emphasis remains firmly on preventive and protective mitigation designed to ensure full compliance with the precautionary principle and the conservation objectives of the relevant Natura 2000 network sites.

The mitigation measures below are specific to the site at Emlaghmore and are intended to provide strict protections for the habits of the nearby SAC and the watercourse (EPA Callow_010), which is potentially home to salmonids and other QI's of the SAC. The applicant has committed to ensuring no further disturbance to the laneway, including refraining from adding any additional surface material and from removing any existing material.

Mitigation methods have been divided into three classifications and are as follows:

1. Avoid
2. Manage
3. Physical mitigation

7.1Avoid

Recommendations for this site include:

7.2 Introduction of invasive species on site

All gravels/surface fill to be acquired from certified invasive species free sources to minimise the chances of site contamination.

7.3 Unnecessary disturbance to wildlife

Construction should only be carried out during daylight hours to reduce risk of disturbance to Otter [1355].
No work should take place within the area of scrub in the southern section of the site, or within 10m of the southern development boundary. This zone of exclusion will act as a buffer to minimise disturbance to otters.

7.4 Peat cutting

Inhabitation of the site should not contribute to any additional turf cutting within the Connemara Bogs SAC for the purposes of heating the proposed dwelling house

7.5 Management

In respect of development in areas of ecological importance, proper site management is a key aspect of maintaining the integrity of local Natura 2000 sites. Ensuring correct procedure at all stages of development can greatly limit or eradicate impacts on sites of European importance.

7.6 Ecological Clerk Works

An Environmental Site Officer/Ecologist will be designated by the Contractor. It is the duty of the Environmental Site Officer to engage and liaise with parties which include the Galway County Council, the Environment Agency and also with the Construction manager, while ensuring the implementation of all mitigation and as part of the monitoring process. This will

be achieved through observations made throughout all stages of the building. Any and all deviations from the mitigation measures outlined in this NIS will be logged in a logbook, in conjunction with the action taken and the general conditions at the time. Following identification of issues, the Applicant will be notified of any such deviations and associated corrective measures.

7.6.1 Site setup

Fenced Work Area: The minimum necessary works area will be fenced with a steel hoarding, and no access will be permitted outside this fenced area. All construction activities will be confined within this existing fencing. Access Routes: Access routes will be clearly marked. Access during construction will be strictly regulated to ensure compliance with the designated pathways and minimize disturbance outside the fenced area.

7.6.2 Suspended Solids Pollution

The following measures for erosion and sediment control shall be adhered to by the Contractor appointed to undertake the works and implemented in full. These measures will be implemented as required to restrict release of suspended solids from entering water courses directly within or associated via downstream connectivity to the identified European sites. See map seven below for bespoke mitigation strategy.

- Coir logs must be placed along the side of the road as further prevention of particles entering the water. These are biodegradable and can be left in place.
- Only phased earthworks can be carried out to prevent exposed sediment.
- Addition of stone filter trench with geotextile at exit of site & another at end of road at the South West corner.
- There will be no direct discharge of surface water from any element of the works
- without suitable attenuation and treatment.
- Silt fences, silt traps shall be provided for the protection of the watercourse during construction and will adhere to IFI (2016) Guidelines. This particular project should only use wire mesh backed silt traps with steel staves.
- Silt traps along laneway for duration of construction (subject to approval from IFI) & controlled outflow away from river.
- Silt control measures will be installed correctly and monitored regularly to ensure their effectiveness (EirGrid, 2020).
- The level of suspended solids in any discharges to fisheries waters as a consequence of construction works shall not exceed 25mg/l33 nor result in the deposition of silts on gravels or any element of aquatic flora and fauna (as per IFI (2016) guidelines);
- Excavations for foundations will be carried out so as to minimise sediment runoff (e.g. soil excavation will not be completed during periods of prolonged or heavy rain). Stockpiles within 200m of watercourses will be covered.
- Works only permitted during the driest of months.
- Temporary silt fencing along the vegetation buffer inside the site to be in place prior to stone trench and remain in place for duration of construction.
- Clearly defined working areas, delineated by temporary protective fencing where required, are essential and will be implemented to ensure there is a sufficiently large buffer zone between the working area and nearby watercourses and to avoid accidental incursion by personnel, materials or equipment. A vegetated buffer zone of 10m shall be maintained where the existing vegetation buffer between the laneway and the river currently exists to further stop sediment and nutrien tsfrom entering local watercourses.

- Steel hoarding surrounding the intended site will enclose the area and protect the surrounding environs from sediments, construction material and rubbish from entering the nearby watercourse (Callow_010) and the adjacent SAC.
- All works and storing of machinery or materials in the buffer zone will be avoided because compaction of the ground can provide flow paths for sediment and contaminants into local watercourses (EirGrid, 2020);
- Any ground damage to buffer areas will be reported to the EcoW and remediated by, for example rolling, rotavating and re-seeding, or any alternatives as deemed necessary. Where this occurs in semi-natural or natural habitat, consultation with the relevant conservation agency will be undertaken.
- The contractor will monitor weather forecasts. Construction processes that pose a risk of activating sediment laden runoff, such as excavation, will be halted during periods of extreme rainfall. A review of all work practices for periods of heavy rainfall will be undertaken. The magnitude of rainfall which would prompt a review will depend on local conditions.
- An Environmental Incident and Emergency Response Plan detailing the steps to be undertaken in the event of spillage of chemical, fuel or other hazardous wastes (e.g. concrete) will be in place prior to commencement of construction and will prescribe the process from investigation of the spillage to generating a plan to avoid a future incident occurring; and

7.6.3 Pollution with Other Substances

The following guidelines based on Chilibeck et al., (1992) and NRA (2005) shall be followed for the protection of all watercourses from pollution with other substances:

- The option to incorporate a permanent solution to the laneway subject to IFI approval is to the leave stone filter trench with geotextile & water bars, create a drain parallel to road on river side for permanent protection & discharge off site.
- The storage of oils, fuel, chemicals, hydraulic fluids etc. will not occur within 100m of all watercourses and will be undertaken in accordance with current best practice for oil storage (Enterprise Ireland, BPGCS005) on an impervious base within a bund and appropriately secured.
- All machinery will be cleaned in advance of work and routinely checked to ensure no leakage of oil or lubricants occurs during the works.
- All fueling of machinery will be undertaken at least 100m setbacks from all watercourses.
- Wash down water from exposed aggregate surfaces, cast-in-place concrete and from concrete trucks will be trapped on-site to allow sediment to settle out and reach neutral pH before clarified water is released to the stream or drain system or allowed to percolate into the ground. Concrete trucks should not be allowed up the laneway as they exceed 3.5 tons.
- Any spillage of fuels, lubricants or hydraulic oils will be immediately contained, and the contaminated soil removed from the site and properly disposed of.
- Oil booms and oil soakage pads will be kept on site to deal with any accidental spillage.
- Fuel, hydraulic oils and lubricants will be stored in designated bunded areas in accordance with established best practice guidelines. Refueling of construction equipment and the addition of hydraulic oil or lubricants to vehicles/equipment will take place in designated bunded areas away from drains and other watercourses.
- The contractor will be required to have available on-site spill kits and hydrocarbon absorbent packs; and
- Spill-kits and hydrocarbon absorbent packs will be stored in the cabin of vehicles working

near watercourse and operators must be fully trained in the use of this equipment.

7.6.4 Cement

Concrete and cement are used in foundations. During the installation foundations there is a requirement to have concrete brought to site. If unmanaged, cement and concrete can cause serious pollution to both surface and groundwater due to the highly alkaline and corrosive properties of fresh concrete (EirGrid, 2020).

Where the transportation and use of concrete near water cannot be avoided, (e.g. for in situ stitching), the following control measures will be employed:

- Covered bunded storage area will be created to the North of the existing structure on a flatter portion of the site. This location will be used to store building materials to prevent any pollutant or sediment runoff(see map seven for mitigation strategy.
- Concrete will be delivered by the supplier to the closest convenient point in order to reduce any unnecessary movement of it within the site.
- Any plant operating close to the water will require special consideration of the transport of concrete from the point of discharge from the mixer to final discharge into the delivery pipe (tremie). Care will be exercised when slewing concrete skips or mobile concrete pumps near surface waters.
- The preferred method for delivering concrete during construction is to dispatch the concrete directly from the concrete truck into the foundation or trench excavation. This allows for the most environmentally suitable management of the concrete as it is contained within the concrete truck until it arrives directly at the point of use.

- This method may not always be possible or desirable in sensitive locations. Concrete may need to be transferred from the concrete truck to a smaller 6T dumper truck where access is difficult.
- There will be no hosing of concrete, cement, grout or similar material spills into surface water bodies/drains. Such spills shall be contained immediately and run off prevented from entering the watercourse.
- Machinery and equipment participating in concreting operations on site will require washout and clean up after use. A dedicated concrete washout area will be provided at the site compound and shall be maintained regularly.
- Washouts will be carried out at designated locations only. These locations will be signposted. The concrete plant and all delivery drivers will be informed of their location with the order information and on arrival on site.
- Washout locations will be provided with appropriate designated, contained impermeable area and treatment facilities including adequately sized settlement tanks.
- Raw or uncured waste concrete will be disposed of by removal from the site; and
- The clear water from the settlement tanks shall be pH corrected prior to discharge (which shall be by means of one of the construction stage settlement facilities) or alternatively disposed of as waste to a licensed facility.

7.6.5 Dust Suppression

Wheel washes will be self-contained systems that do not require discharge of the wastewater to water bodies and water misting or sprays shall be used as required if particularly dusty activities are necessary during dry or windy periods. A speed limit of 20km/h will be introduced for all relevant plant and machinery in and around the site. Site roads shall be cleaned and maintained as appropriate. Hard surface roads shall be swept to remove mud and aggregate materials from their surface while any un-surfaced roads shall be restricted to essential site traffic only. Any site roads with the potential to give rise to dust will be watered, as appropriate, during dry and/or windy conditions (also applies to vehicles delivering material with dust potential). Stockpiling of materials shall be designed and laid out to minimise exposure to wind.

Any scaffolding must have dust sheets covering the scaffold from floor to its top rails and affixed securely and able to withstand high winds. Use of an angle grinder must not be permitted during high winds, and water should be used to prevent dust plumes. No angle grinding should be permitted where winds are coming from the North. Northerly winds could spread dust and particulates into the Callow water course South of the proposed development.

7.6.6Noise Suppression

Any works on the project site will be compliant with the contents and recommendations of British Standard 5228: Code of Practice for Noise Control on Construction and Demolition Sites, as well as the Safety, Health and Welfare at Work (General Application) Regulations 2007. All plant and machinery used during the work will be the quietest of its type available for carrying out the work required and will be maintained in good condition with regard to minimising noise output.

To avoid significant construction noise impacts during the construction phase, the following mitigation measures will be adopted:

- To protect residential amenities, and avoid disturbance to local wildlife species, construction practices will take place only within daylight hours. It may on occasion during certain stages of construction be necessary to work outside of the permitted working hours. In the event that these hours need to be extended, agreement will be sought from the Local Authority in advance.

- An on-site speed limit of 20 Kph will be enforced for all construction traffic.

- The contractor will ensure the use of quiet working methods will be selected, and the most suitable plant will be selected for each activity, having due regard to the need for noise control.

- Best practicable means will be employed to minimise noise emissions and will comply with the general recommendations of BS 5228;

- All plant will be maintained in good working order. Where practicable, machinery will be operated at low speeds and will be shut down when not in use.

- Mechanical plant used on site will be fitted with effective exhaust silencers.

- Vehicle reverse alarms will be silenced appropriately to minimise noise breakout from the site while still maintaining their effectiveness.

- If required, compressors will be of the "noise reduced" variety and fitted with properly lined and sealed acoustic covers.

- All pneumatic percussive tools will be fitted with mufflers or silencers as recommended by the equipment manufacturers. All static mechanical construction plant will be enclosed by acoustic screens.

- Employees working on the site will be informed about the requirement to minimise noise and undergo training on the following aspects:

- The proper use and maintenance of tools and equipment,
- The positioning of machinery on-site to reduce the emission of noise to the noise sensitive receptors,
- Avoidance of unnecessary noise when carrying out manual operations and when operating plant and equipment,
- The use and maintenance of sound reduction equipment fitted to power pressure tools and machines.

• It is recommended that complaints should be received from nearby residential properties periodic noise monitoring be undertaken during construction works to determine noise levels at noise sensitive receptors. Based on the findings of such noise monitoring, appropriate noise mitigation measures will be implemented to further reduce noise impacts. Where excessive noise levels are recorded, further mitigation measures will be employed, which may include temporary screening of the nearest receptor to on-site activities.

• Public Liasson - It is recommended that the Contractor will appoint a responsible and trained person who will be present on site and who will be willing to answer and act upon complaints and queries from the local public.

7.6.7 Environmental Incidents and Accidents

In the case of environmental incidents or accidents occurring during the construction phase or the operational phase of the proposed development works, the following measures will help to prevent/contain the contamination of the potential source-vector pathways for negative impacts to proximal European sites (Callow_010):

- The water sampling carried out at Emlaghmore from the river is intended to be used as a baseline from which mitigations implementation can be assessed against. The mitigations outlined in this report are designed to protect the nearby SAC and its QI's. An appointed ECoW for the project must be responsible for water sampling monthly during the build.

- An emergency-operating plan will be established to deal with incidents or accidents during construction that may give rise to pollution in watercourses close to the works. This will include means of containment in the event of accidental spillage of hydrocarbons or other pollutants (e.g. oil booms, soakage pads). This must be in place despite the works being small in nature and no tracked vehicles will be on site.

- Throughout all stages of the construction phase of the proposed development the contractor will ensure that good housekeeping is maintained at all times and that all site personnel are made aware of the importance of the freshwater environments and the requirement to avoid pollution of all types.

- All hazardous materials on site will be stored within secondary containment designed to retain at least 110% of the storage contents.

- Temporary bunds for oil/diesel storage tanks will be used on the site during the construction phase of the Proposed Development as appropriate.
- Safe handling of all potentially hazardous materials will be emphasised to all construction personnel employed during this phase of the Proposed Development and an emergency response plan shall be in place in case of accidental spillage.
- Raw or uncured waste concrete will be disposed of by removal from the site; Any spillage of fuels, lubricants or hydraulic oils will be immediately contained and the contaminated soil removed from the site and properly disposed of; and
- There will be no discharge of un-attenuated water to water courses proximal to the works. Oil and Chemical spillages
- The type, size and location of the spill will be identified.
- If possible, stop the source of the spill and control the area of the spill.
- If the oil spill is small in nature, it can be treated with an appropriate spill kit to reduce the effect of the spillage i.e. a suitable absorbent material will be used to absorb/remove the spill.
- In the event of a significant oil spill occurring, an appropriate licensed contractor will be employed to determine the extent of the area affected and to implement an appropriate clean-up operation in line with suitable standards.
- Material will be removed and disposed of in accordance with the Waste Management Plan.
- In the event of a chemical spill, stop the source of the spill and control the area.
- If the spill is hazardous or toxic in nature warn all in the vicinity use an appropriate clean up kit or if a large spill occurs employ a licensed contractor to carry out remediation works.
- A program of mitigation will be put into place to address the spill.
- All fuels, oils and chemicals will be stored in a designated bunded storage area and stored in a manner that will ensure no environmental impacts occur; and
- Bunds or bunded containers will have a bunded capacity of 110% of the largest tank or 25% of the total volume of material stored.

7.6.8 Plant Management

- To reduce traffic along road during construction, including minimised size of vehicles, covered/enclosed transport of materials & aggregate, plant machinery <=3.5T. Any vehicles to remain adjacent to site owned by applicant & refueled away from site boundary to minimise traffic on road.
- No tracked vehicles should be given access to the laneway. Back hoed tractor only, to be permitted along the lane way, and tractor access to agricultural filed beyond periodically.
- Any vehicles used for foundation works or to transport materials should be wheeled and not exceed 3.5 tons in weight.
- All plant will be checked, and active monitoring carried out to prevent leaking of hydrocarbons/chemicals.
- Stationary plant machinery will have drip trays located beneath if located within an environmentally sensitive area.
- When refueling, care will be taken to prevent spills by using appropriate equipment; and Where feasible, refueling will take place at least 50-100m away from watercourses. Unauthorised Waste Disposal
- All waste generated on site will be transported by a permitted waste carrier and suitably disposed of at a licensed waste facility.
- No waste will be buried, burnt, dumped on-site or in land adjacent to the site as this will be considered as unauthorised waste management; and
- In the event of unauthorised waste management, the cause and impact will be assessed, and all appropriate steps will be undertaken.
- In the event of damage occurring to protected flora/fauna or designated area, the cause of the incident will be identified and reported to the appointed ECoW and then communicated with Galway County Council.
- If on-site vehicles or personnel were the cause of the incident, all work will cease until the Health and Safety Officer declares the site a safe working area.
- When the site is declared secure, an assessment of the incident will be carried out.
- In the event of the death of any faunal species, species details, photographs and any other available information will be recorded.
- The ECoW and a county council representative will be informed of the incident.
- The NPWS will be notified of the incident by the Site Ecologist; and suitable incident-specific mitigation measures will be put in place to manage the incident.

7.6.9 Lighting

No lighting will be necessary during the construction phase because works will be confined to daylight hours. In the event that lighting is sought during the construction phase, permission should be sought from the local authority in advance.

Any outdoor lighting used during the operational phase should be low-level directional. The layout and spacing of the lighting should ensure that there is no light spill outside of the site boundary or within the area of scrub to the south of the site.

7.6.10 Invasive Species

- Site Hygiene: Good construction site hygiene will be practiced preventing the introduction and spread of problematic invasive alien plant species (e.g., Rhododendron, Japanese Knotweed, Giant Rhubarb).
- Machinery Cleaning: All machinery will be thoroughly cleaned before arriving on the site to avoid spreading invasive species from other locations. Due to the presence of Montbretia (*Crocosmia X crocosmiiflora)* within the proposed development site, machinery will be thoroughly cleaned before exiting the site to prevent spreading invasive species elsewhere.
- Personal Cleaning: Before entering and leaving the site, all boots and clothing will be thoroughly brushed down to remove any potential contaminated material.
- Cleaning Method: Clean down will be performed using brushes and shovels. Power washing will be avoided as much as possible to prevent potentially contaminated runoff from spreading outside the site.
- Final Cleaning: Once machinery has been cleaned as thoroughly as possible, it will be power-washed or air-blasted to remove any remaining material.
- Soil Sourcing: Any soil and topsoil required on the site will be sourced from a supply that has been screened for the presence of invasive species, ensuring none are present.
- Material Screening: Any material imported to the site will be screened for invasive species by a suitably qualified ecologist before transportation.

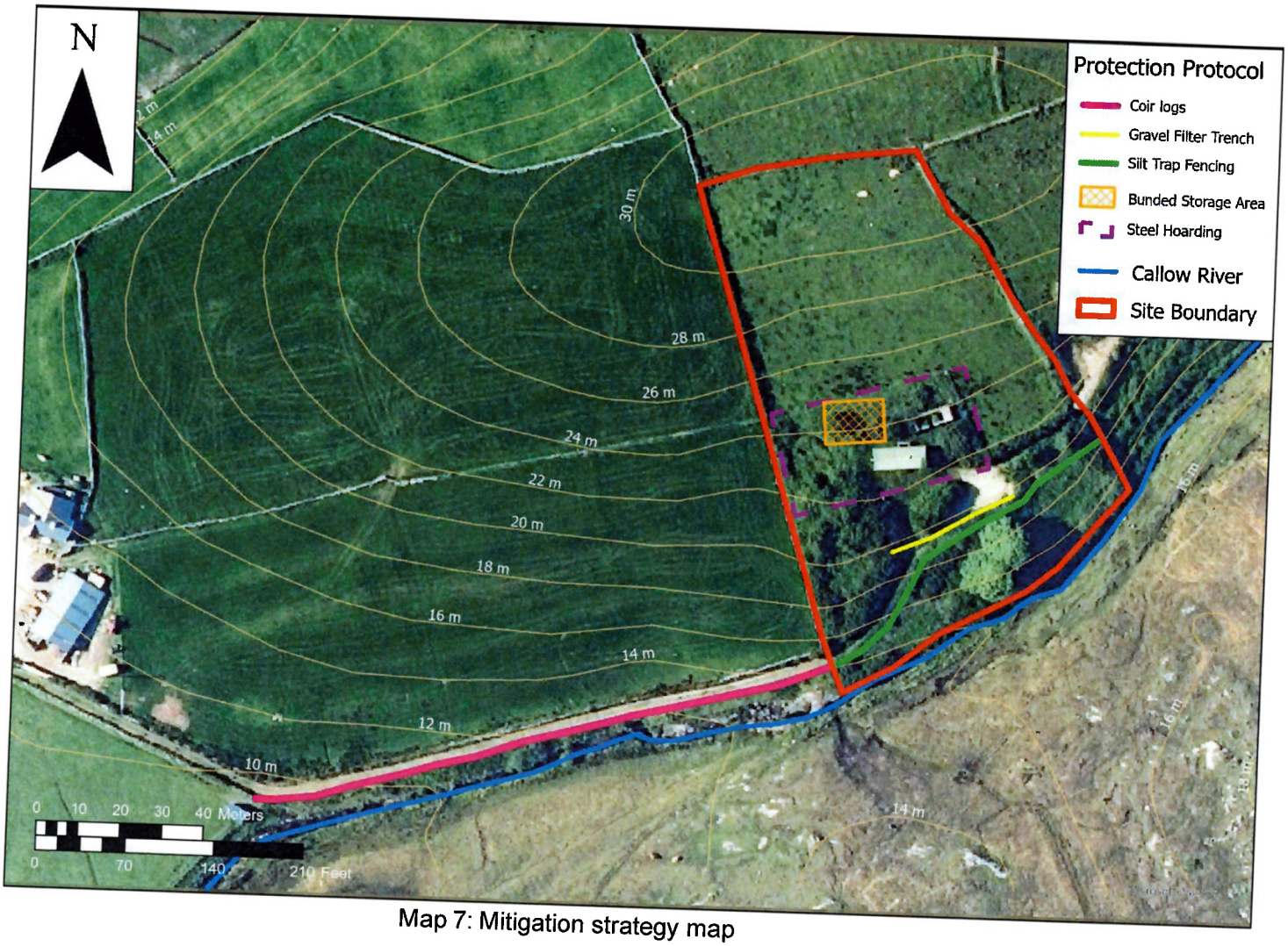
6.3.12 Silt fencing

Silt fences are required between works areas and water features to prevent potentially contaminated surface water run-off from works areas reaching the surface water feature. Silt fences will be deployed as Map 7 below, prior to the commencement of construction. The ground will be prepared to ensure proper installation and the fabric will be secured to the supporting joint posts.

- Silt fences will be installed downgradient of the potential source of the silt / sediment.
- The silt curtain will contain the area where silted waters are being generated and shall terminate on high ground.
- They shall be constructed using permeable filter fabric (Hy-Tex Terrastop silt fence or similar). The silt trap fence must be wire mesh backed, and the staves should be of a steel material to withstand any adverse weather effects and any additional water runoff from unforeseen weather events such as unprecedented rainfall or high winds. This condition is a must.
- Its base shall be embedded at least 15cm into the ground and staked at 2m intervals.
- The vegetated turves shall be peeled back and not detached from the ground, the materials inserted and the turves replaced to hold the base in place.
- The bottom of the fabric will be folded and backfill will be placed over it. Each section of fence turned up wards to prevent runoff from the end cutting.
- The silt fence will be inspected regularly by the Environmental Site Officer and contractor during the working day and weekly during construction, and in particular following heavy rainfall.
- Silt fences shall remain in-situ until the vegetation on the disturbed ground is re-established.
- The fence shall not be pulled from the ground, but cut at ground level and the stakes / posts removed.
- Should water build up behind the fences, the sediment will settle to the bottom.
- Water can be released, but sediments will remain.
- Areas which may be subject to increased sediment deposition should be noted. If significant runoff or sediment deposition is anticipated, or in areas of increased flood risk, a second fence parallel to the original one for added capacity will be installed. This will follow a judgement call by the Environmental Site Officer.
- Additional silt-trap fencing should be erected, if necessary, at locations which should be decided by the Environmental Site Officer.

Additional silt trap fencing may be required during the treatment of invasive species. The Environmental Site Officer will oversee all control actions relation to the eradication of invasive species.

- Checks and maintenance in these areas will be carried out daily.
- Silt fences will not be a replacement for good housekeeping and measures to minimise runoff from the site will be carried out, e.g. covering of materials and spoil, checking and maintaining equipment, working in dry weather conditions etc.
- Silt-fence systems will provide sufficient room for sediment to be deposited behind the silt fence and for sediment removal equipment to access the deposits.
- A record of its installation, inspection and removal must be maintained by the Environmental Site Officer;
- The silt fence will remain until all the site has stabilised or until such time as agreed with an Ecological Clerk of Works for the project.
- Upon failure of the silt trap fence to prevent materials generated on site (e.g. sediment, concrete hydrocarbons) by means of a tear, lack of proper installation, or other, the incident will be reported to the Site Ecologist, who will notify the NPWS and the relevant planning authority if and when it occurs and appropriate and incident-specific remedial measures will be taken.



Map 7: Mitigation strategy map

7.0 Conclusion

Following a comprehensive assessment of the potential impacts of the proposed development on Natura 2000 sites, including detailed consideration of all possible impact pathways and receptor sensitivities relevant to qualifying interests (QIs) and special conservation interests (SCIs), it is concluded that the project, when implemented in strict accordance with the mitigation measures outlined in this Natura Impact Statement (NIS) and the associated Construction Environmental Management Plan (CEMP), will not give rise to any significant adverse effects on the integrity of any Natura 2000 site, either alone or in combination with other plans or projects, in view of the sites' conservation objectives. Installation of EPA compliant effluent treatment system and polishing filter (The Waste Water Treatment System) is included in an accompanying site characterisation report. The treatment system fully complies with regulations set out in the EPA Code of Practice Domestic Waste Water Treatment Systems (Population Equivalent ≤ 10). It will be set back form the nearby water course at a sufficient distance as per regs and the make and model is entirely sufficient to deal with the levels of waste for that site and will be compliant with EPA standards.

The proposed development site lies entirely outside the boundaries of any designated Natura 2000 site, thereby precluding any potential for direct habitat loss within an SAC. Potential indirect effects were identified and assessed in relation to both historical and proposed construction activities, as well as the subsequent operational phase. These include potential pathways associated with surface water runoff, habitat fragmentation,

and noise or disturbance to QI and SCI species. The strict mitigations outlined in this report will go above and beyond the usual requirements for a single residential dwelling. Implementing these robust techniques with a view to prevention of ecological harm, even in extreme unforeseen weather events, it is envisioned that a best-in-class approach to environmental management should be adopted through the implementation of the mitigation strategy outlined in this report.

The site comprises primarily semi-improved land, reflecting previous anthropogenic modification and limited ecological value. A watercourse located to the south of the site provides potential hydrological connectivity to the Connemara Bog Complex SAC (Site Code: 002934), necessitating a precautionary approach to managing surface water and sediment transport. The assessment has identified potential risks to the Qualifying Interests of this SAC, in the context of its Conservation Objectives, and targeted mitigation measures have been developed to ensure the protection and maintenance of these interests.

No loss or degradation of habitats supporting Annex I communities or BirdWatch Ireland BoCCI red-listed species is anticipated. Furthermore, the proposed works are not expected to adversely affect the conservation status of any SCI species associated with the Connemara Bog Complex SPA. Application of the precautionary principle has guided the inclusion of robust mitigation measures aimed at preventing disturbance to both QI and SCI species during all phases of the project.

Implementation of these measures will be overseen by a suitably qualified ecologist to ensure full compliance and to monitor the effectiveness of mitigation and any unforeseen issues that may arise. With adherence to these measures, no significant residual effects on the structure, function, or overall ecological integrity of any Natura 2000 site are predicted.

Access to the agricultural fields past the proposed development to the East requires access via the laneway, as this is the only access point to the fields. It is the opinion of the author that the laneway must be maintained to a sufficient standard to facilitate agriculture. The laneway in its current state as of February 2026 is capable of supporting a tractor to carry out agricultural practices without causing excessive deposition of detritus and silt into the adjacent SAC watercourse (EPA Callow_010). The mitigation measures outlined in this report are an extremely conservative approach, which goes to lengths to account for worst case scenario planning, taking into consideration adverse weather events and increased surface water runoff from the site and the laneway, while trapping any silt or particulates and preventing them from entering the watercourse. It must be noted that no further alterations, improvements or works are intended for the laneway.

The mitigations proposed also account for long-term operational phase effects, offering permanent solutions, as well as construction phase effects above and beyond what is required. Salmonids which are Qualifying Interests of the SAC are highly sensitive species and their ecology and lifecycles, particularly around the laying and hatching of their eggs and formation of the reds in which they deposit the eggs. Siltation and sedimentation are serious threats to egg hatching rates and the survival of fry to later life cycle stages. Every precaution has been taken within the mitigation strategy of this report to prevent any short term or long-term negative effects on local salmonid populations. Another serious consideration for salmonid health is the water chemistry in which they live out their lifecycles. This report has investigated the water chemistry of the Callow_010 water course adjacent to the laneway to provide an up-to-date snapshot in time of the water chemistry relative to the gravels used on the laneway. It was intended to give a scientifically robust result of the status of the water in its current state. Upstream and Down-stream samples were taken to analyse the possibility of deleterious effects on the water course by the gravels that were laid down in 2018/2019. If a difference in critical

parameters were to be detected, it would be safe to assume that the gravel pathway was, in part at least, a contributing factor. Two upstream and two downstream samples were sent to a laboratory for external testing by another company. The results table can be seen in appendix A. The upstream samples were taken from the inlet from the lake to the river, the downstream samples were taken from near the Southern extremity of the property and both samples were extracted approximately 20 cm from the riverbank to ensure that any turbidity or particulates were captured. The samples were taken approximately 195.4 meters apart, giving plenty of opportunity to detect negative effects such as differences in pH, Alkalinity, Turbidity, Phosphates, Ammonia, Nitrates and Nitrites. The results showed an imperceptible/negligible difference between the upstream and downstream samples. It is safe to say that the laneway, currently classified from on-site observations to be comprised of recolonising bare ground (Fossitts ED3), is having no deleterious effect on the water chemistry of the river Callow_010.

Accordingly, it is the professional opinion of the author 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, in accordance with Article 6(3) of the EU Habitats Directive (92/43/EEC). The author recommends that full Badger, Bat and Otter surveys be carried well in advance of any construction and at the earliest possible opportunity should engage with a suitably qualified ecologist. The applicant has agreed to full surveys to ensure that the local flora and fauna have the strictest protections in line with CIEEM/NPWS and TII Guidelines. The applicant has also agreed that any actions or derogations required will be sought through a suitably qualified ecologist.

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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

Results of the water testing of the river Callow_010 below.

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 Received:11/02/2026	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

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

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, including the Ballyconeely peninsula and surrounding areas, as an ecologist on projects concerning peatland restoration, hydrology and water quality. 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 the applicant 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, requesting clarification regarding the following claims made in the technical note by Mr. Bryan Deegan of Altemar (in support of the observation made by Mr. & Mrs. Lee), regarding previous resurfacing & increase use of an access laneway:

1. *"There is no large buffer between this laneway and the watercourse. Gravel from the works were visible at the edge of the watercourse during the site visit and silt and gravel would have fallen into the watercourse from the works. These works have previously*

impacted the SAC in an Atlantic Salmon spawning area (as outlined in discussion with IFI)"

In the response from IFI, this claim was not addressed. No gravel was visible at the edge of the watercourse during my site visit and no evidence of this claim has been provided to the contrary.

2. *"Based in discussion with Inland Fisheries Ireland this river is a salmon spawning river"*

In the response from IFI, the primary evidence for this portion of the Callow river, which is also known as "the new cut" due to the channel being originally man-made, is the book: "Ponds, Passes and Parks" by Noel P Wilkins, published in 1989. IFI also sited rod catch records held at Emlaghmore Lodge, which have not been provided as evidence and the date of which is unclear.

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 Connemara Bog Complex SPA and 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. The use of this road for access to the proposed site does not, in my view, pose additional risk of sedimentation for the river. The applicant is willing to continue to engage with IFI to incorporate additional permanent protection for the river.

Aerial imagery used in observations made by Bryan Deegan of Altemar (in support o the 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 display aerial imagery obtained from Bluesky World (https://ireland.blueskymapshop.com/select) dated 08/05/2017 and 31/05/2023 respectively. Fig. 3 and Fig 4 show the laneway directly prior to and following resurfacing. 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; Bluesky World).

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

Fi g.3. P hotograph of the laneway surface priorto 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 Ms. Alexine Tinne 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 the Connemara Complex Bog SAC, however no construction work is planned within 40m of either designated site.

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.

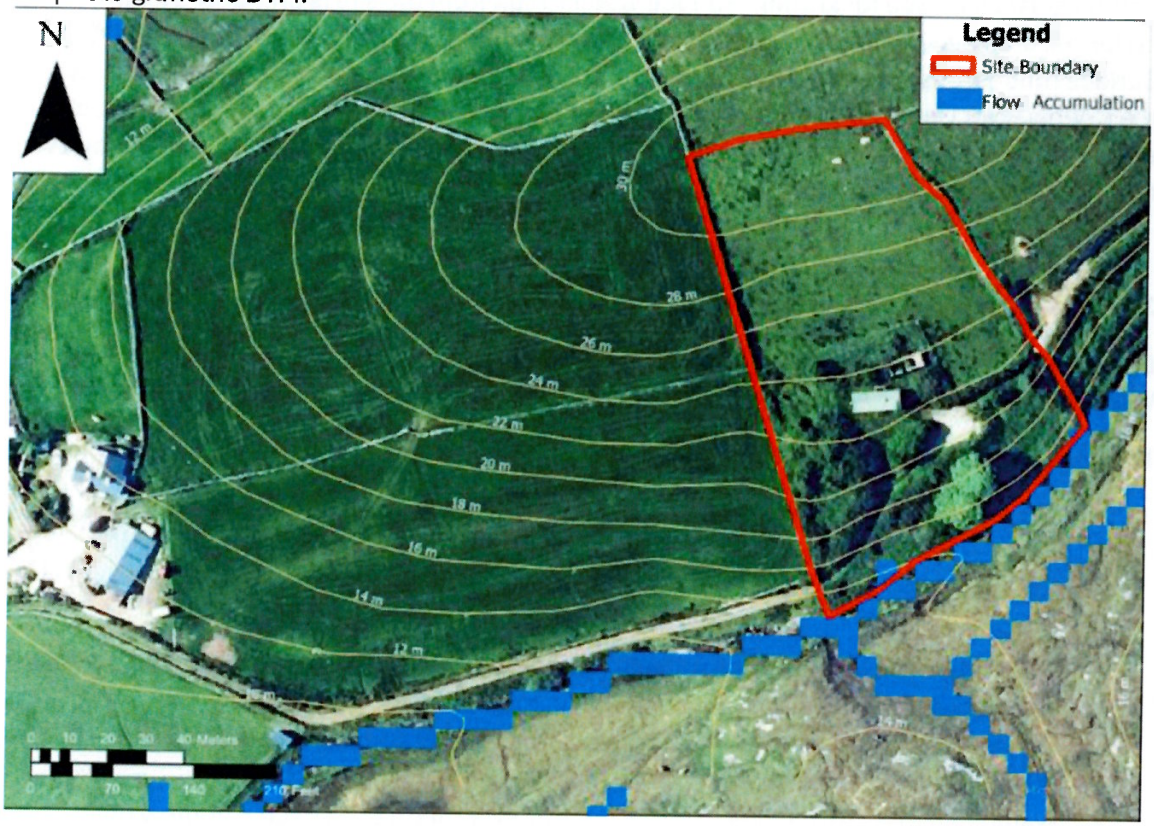
This model does not simulate rainfall, but assumes saturated ground conditions and continuous overland flow, representing a conservative worst-case scenario. This model does is not intended to assess subsurface flows and subsurface flow modelling was included.

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.

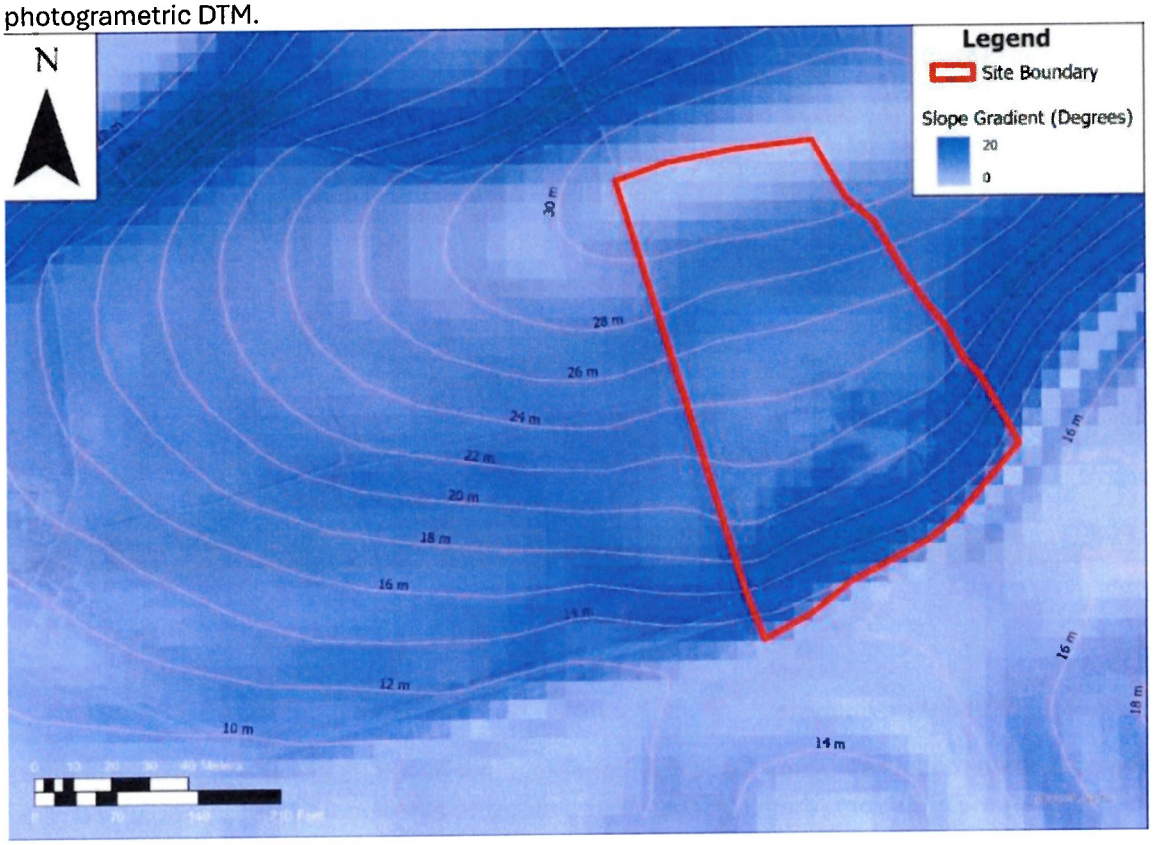
Fig. 7. Flow accumulation projection map of the proposed development site, derived from the 5m photo grametric DTM.



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.

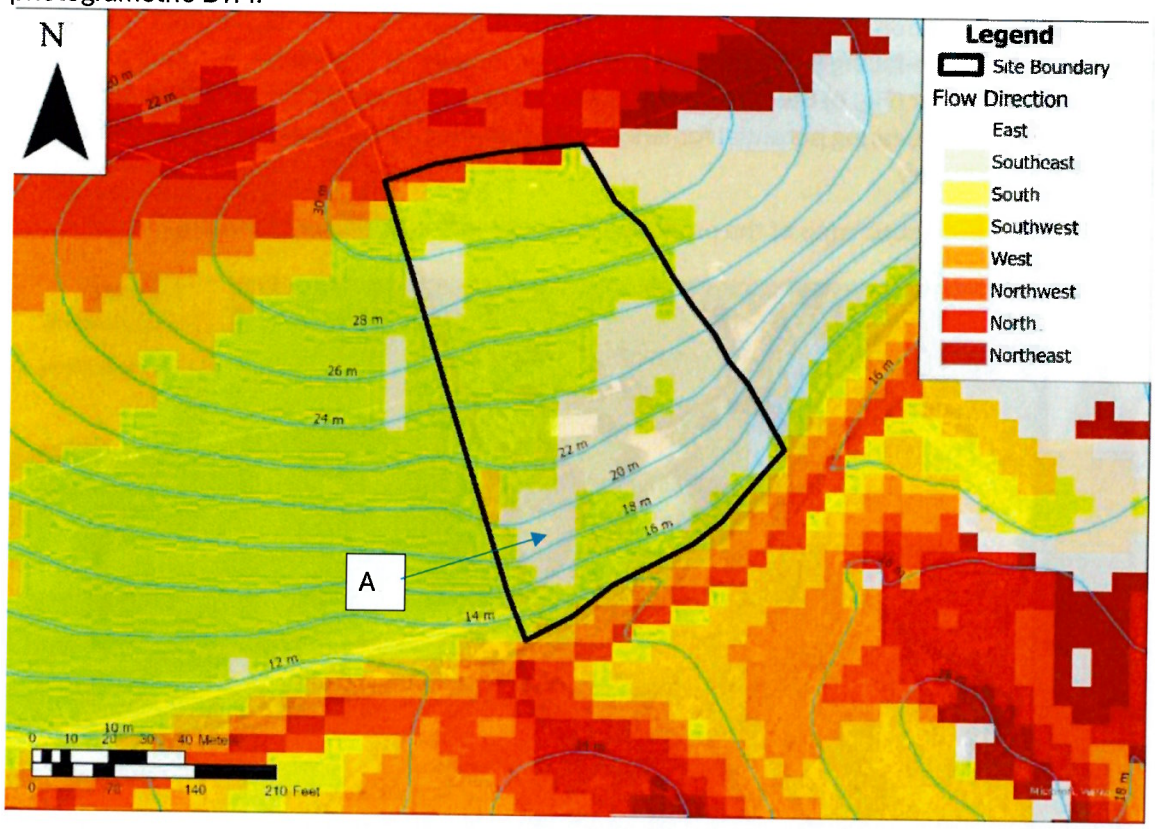
Fig. 8. Slope projection map of the proposed development site, derived from the 5m photogrametric DTM.



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 photogrametric DTM.

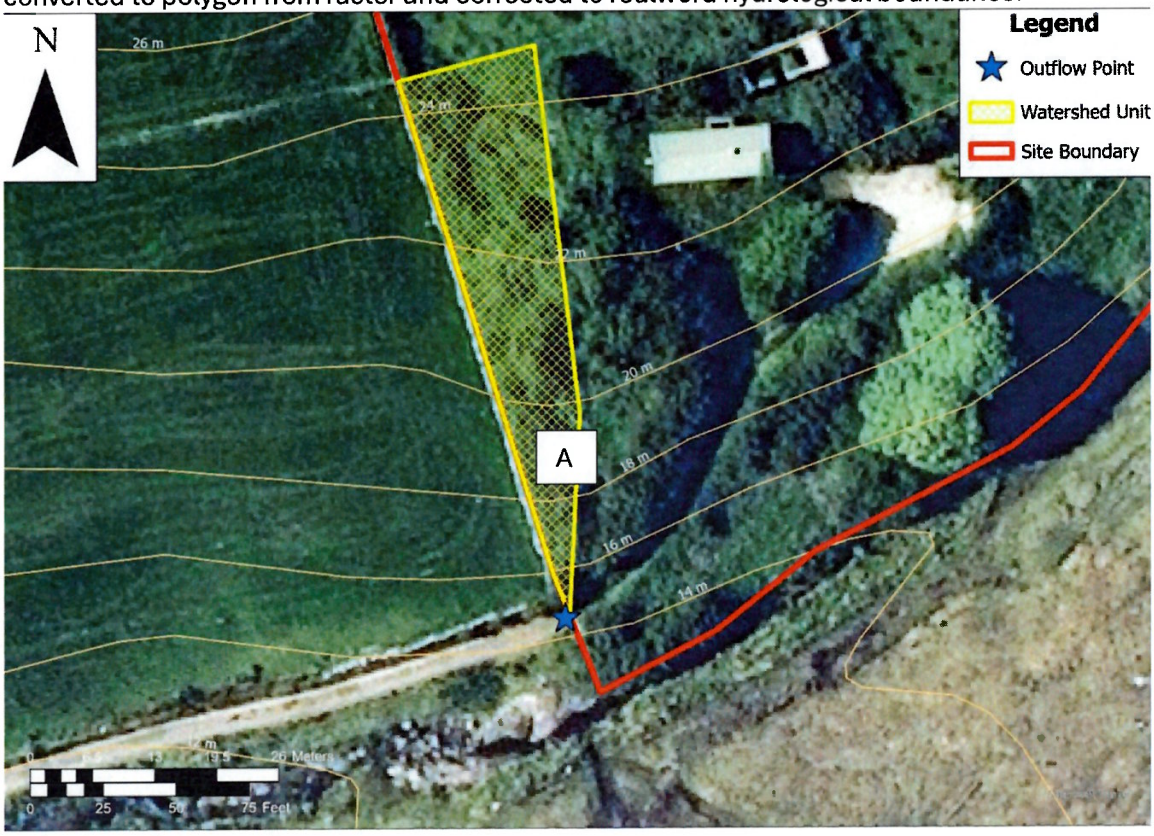


5.4. Watershed Analysis

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.

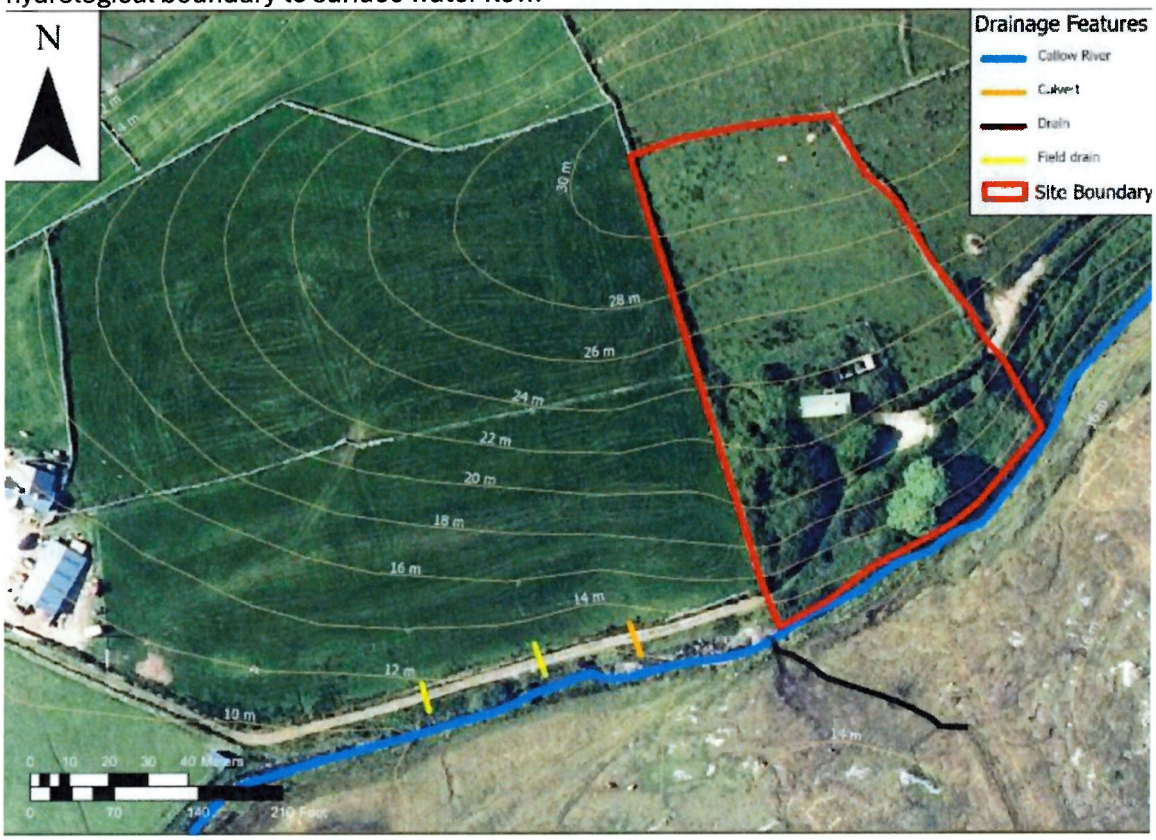
Fig. 11. Entrance to the site from the access laneway facing eastward. No concave topography or defined channelisation is present, and the road slopes southward towards the river. The arrow indicated predominant slo pedirection.

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.

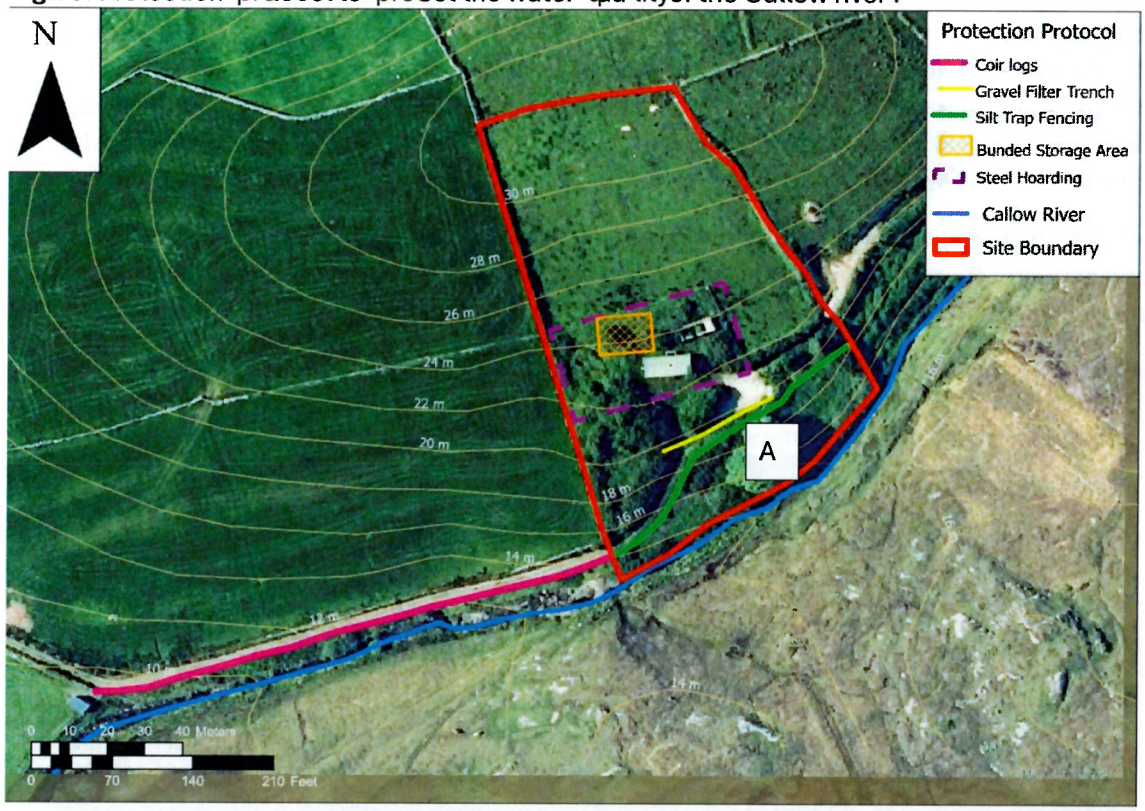


7. Groundwater Screening

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 quality of 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, Connemara Bog Complex SAC 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.
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7. Wilkins, Noel P. (1989). Ponds, Passes and Parks: Aquaculture in Victorian Ireland (Hardcover). Dublin: Glendale Press.

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (CEMP)

February 2026

Prepared for
Patrick Ridge

Site Address
Emlaghmore, Ballyconeelly, Co. Galway

Prepared by
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Construction Environment Management Plan (CEMP)

Rev.	Status	Date	Author
01	Draft	14/04/25	CM
02	Draft	23/04/25	CM
03	Draft	17/10/2025	LM
04	Final	16/02/2026	LM

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1.0 Introduction

This Construction Environmental Management Plan (CEMP) provides a detailed, structured and enforceable environmental management framework for all enabling works, construction activities and immediate post-construction operations associated with the proposed development at Emlaghmore, Ballyconneely, Co. Galway. OMC has been retained by Pat Ridge to carry out a Construction Environment Management Plan (CEMP) prepared by Larry Manning for;

Construction to 1) Restore existing unoccupied farm cottage (2) Raise wall plate level of existing cottage to allow for habitable loft space to comply with current building regulation standards (3) Form single storey extension to cottage and adjoining outhouse (4) Convert, extend and restore existing outhouse to form part of overall single dwelling (5) Install new proprietary sewage treatment system with filter area as well as all associated site works.

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.

This document forms an integral part of the project description for the purposes of Appropriate Assessment under Article 6(3) of Council Directive 92/43/EEC (the Habitats Directive). It provides a clear pathway to the relevant mitigation measures identified within the accompanying Natura Impact Statement (NIS) and provides the mechanism by which those commitments will be implemented, monitored and verified.

The measures contained herein are mandatory and binding. Failure to implement the controls described in this document would invalidate the conclusions of the Full Appropriate Assessment (NIS).

This CEMP adopts a precautionary and evidence-based approach founded upon the Source–Pathway–Receptor (SPR) model. Potential sources of impact during construction have been identified, the pathways through which effects could occur have been analysed, and the sensitive receptors, particularly the Connemara Bog Complex SAC (002034) and Connemara Bog Complex SPA (004181) have been considered in detail. The document also establishes a robust monitoring regime, including monthly water quality monitoring during construction and a verification sampling event one month following completion of works, in accordance with commitments made within the NIS

2.0 Legislative and Policy Framework

Article 6(3) of the Habitats Directive requires that any project likely to have a significant effect on a European Site be subject to Appropriate Assessment. The competent authority must ascertain, beyond reasonable scientific doubt, that the project will not adversely affect site integrity.

The European Communities (Birds and Natural Habitats) Regulations 2011–2021 transpose these requirements into Irish law. Regulation 42 establishes the legal obligation for Appropriate Assessment.

The site is hydrologically connected to EPA waterbody Callow_010, which ultimately discharges to Maumeen Lough within the SAC. The waterbody currently holds High ecological status under the

Water Framework Directive. Under the River Basin Management Plan 2022–2027, there is an obligation to prevent deterioration of status.

The Galway County Development Plan 2022–2028 requires development proposals to protect Natura 2000 sites, avoid water quality deterioration and maintain ecological corridors. This CEMP provides the operational framework necessary to comply with those objectives.

3.0 Conservation Objectives and Mitigation Linkage with NIS

3.1 Connemara Bog Complex SAC (002034)

The overall Conservation Objective for the SAC is to maintain or restore the favourable conservation condition of the Qualifying Interests for which the SAC has been designated.

For Annex I habitats such as 3130 (Oligotrophic to Mesotrophic Standing Waters), the objective includes maintenance of water quality, hydrological regime, habitat area and absence of nutrient enrichment.

For 3260 Watercourses, objectives include maintenance of natural flow regime, channel morphology and absence of sediment deposition.

For 7130 Blanket Bog and 7150 Depressions on Peat Substrates, objectives include maintenance of peat-forming processes and hydrological stability.

For Annex II species such as Atlantic salmon (1106), objectives include maintenance of spawning habitat quality and absence of fine sediment deposition.

For Otter (1355), objectives include maintenance of resting sites and foraging corridors free from disturbance.

Mitigation Linkage: The sediment control strategy, turbidity thresholds, concrete containment measures, 10m riparian buffer retention and lighting restrictions directly address these conservation objectives.

3.2 Connemara Bog Complex SPA (004181)

The Conservation Objective for the SPA is to maintain or restore the favourable conservation condition of the bird species for which the SPA has been designated.

This includes maintaining population size, breeding success, feeding habitats and absence of disturbance during sensitive periods.

Mitigation Linkage: Restriction of works to daylight hours, prohibition of floodlighting, directional lighting design and avoidance of vegetation clearance during breeding season directly address these objectives. Full details to be followed at end of document.

APPENDIX A – Water Framework Directive Technical Assessment

- Receiving Waterbody: Callow_010
- Catchment: Recess_SC_020
- Surface Water Status: High Ecological Status
- Groundwater Body: Spiddal – Good Status

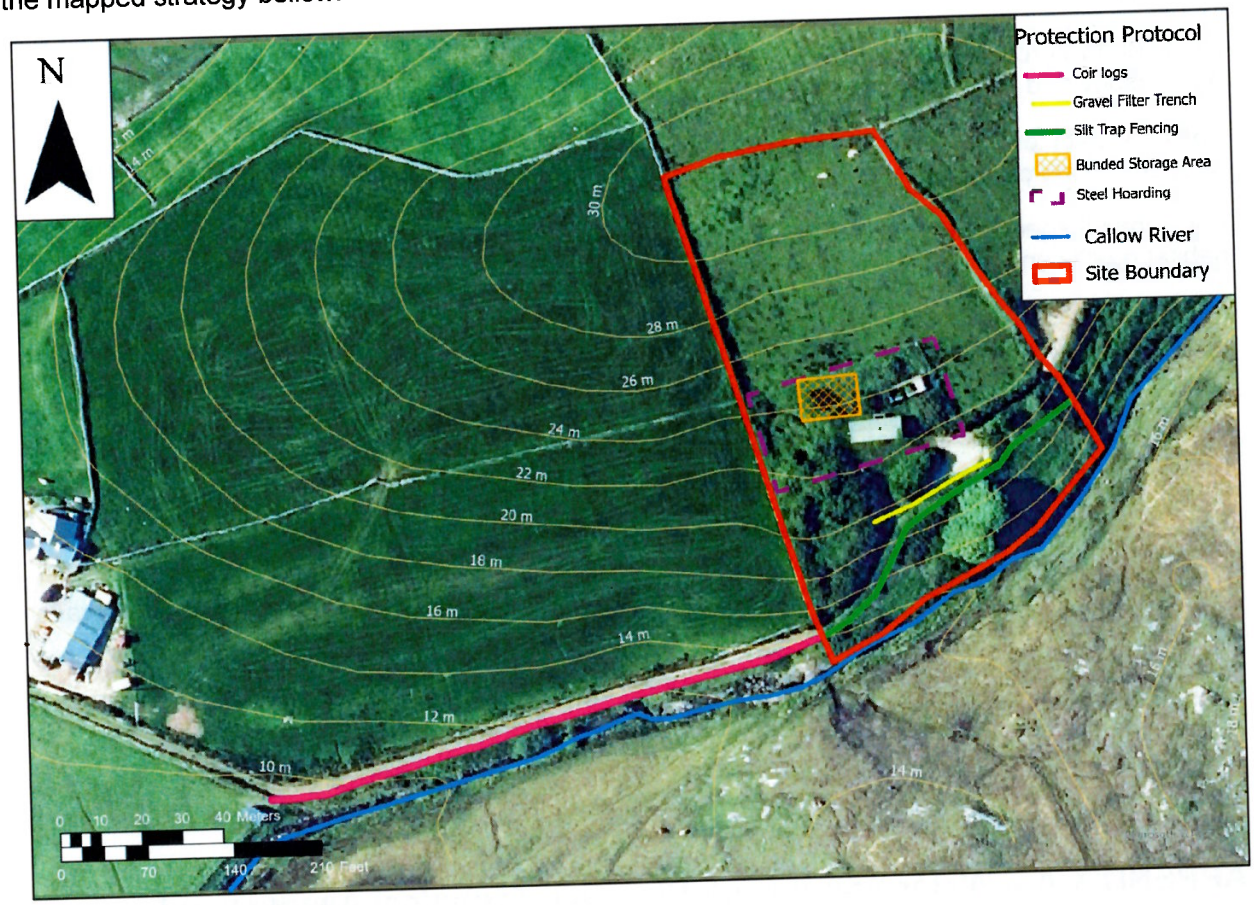
- WFD Objective: Prevent deterioration and achieve at least Good Status.
- Risk Assessment: Construction-phase sediment mobilisation represents the principal potential risk to WFD objectives.
- Control Measures: Installation of sediment barriers, rainfall-trigger inspections, turbidity threshold of 5 NTU above upstream baseline, monthly sampling and post-completion verification sampling.

Conclusion: Subject to implementation of this CEMP, no deterioration in status is likely to occur.

4.0 Construction Sequencing and Method Statements

4.1 Phase 1 – Site Establishment

Install sediment controls prior to any soil disturbance. Follow the mitigation strategy in the NIS and the mapped strategy bellow.



Establish compound away from riparian buffer.

Conduct ecological walkover.

4.2 Phase 2 – Structural Works

Undertake excavation in limited sections to minimise exposed soils. Construction works will involve mostly prefabricated, lightweight materials to be transported to site in smaller vehicles, and no tracked or heavy loads vehicles.

Immediately install silt controls downslope.

Stabilise exposed areas promptly.

4.3 Phase 3 – Wastewater Installation

Excavate percolation trench in dry weather where possible.

Inspect separation distances prior to installation.

Backfill and stabilise immediately upon installation.

4.4 Phase 4 – Demobilisation

Remove temporary sediment controls only once site stabilised.

Undertake final inspection and confirm no sediment discharge.

Complete post-construction water sampling one month after completion.

APPENDIX B – Nis Mitigation Cross-Reference Matrix

NIS Mitigation Commitment	CEMP Section	Implementation Mechanism	Monitoring
Install sediment controls	Section 6	Pre-construction installation	Daily inspection
Monthly water sampling	Section 7	ECoW sampling regime	Sampling reports
Post-construction sampling	Section 7	1 month verification sampling	Verification report
Lighting control	Section 6	Directional shielded lighting	Visual inspection
Retain riparian buffer	Section 6	Permanent buffer retention	Inspection log

5.0 Environmental Audit and Reporting Protocol

Daily inspections shall be undertaken by the Site Environmental Officer.

Monthly compliance review shall be undertaken by the Ecological Clerk of Works.

All monitoring data shall be compiled into a monthly environmental report.

An audit trail shall be maintained including inspection logs, rainfall records, water sampling results and incident reports.

Non-compliances shall be recorded and corrective actions documented prior to recommencement of works.

6.0 Weather Response Plan

Weather forecasts shall be reviewed daily during construction.

If heavy rainfall (>20mm forecast within 24 hours) is predicted, soil disturbance works shall be postponed where practicable.

Additional sediment controls shall be deployed prior to forecast rainfall events.

Inspections shall be undertaken immediately following significant rainfall events.

7.0 Emergency Escalation Protocol

Step 1: Identify incident and cease relevant works.

Step 2: Deploy immediate containment measures (spill kits, sediment barriers).

Step 3: Notify Principal Contractor and Applicant.

Step 4: Notify Planning Authority and/or NPWS where required.

Step 5: Investigate root cause and implement corrective action.

Step 6: Document incident and close out following verification.

8.0 Final Appropriate Assessment Confirmation

Subject to full and proper implementation of all mitigation measures, monitoring commitments, sequencing controls and long-term management measures described within this CEMP, it is concluded beyond reasonable scientific doubt that the proposed development will not adversely affect the integrity of the Connemara Bog Complex SAC or SPA, either alone or in combination with other plans or projects.

5.0 Natura 2000 Conservation Objectives and Mitigation Linkage

This section summarises the site-specific conservation objectives relevant to the Connemara Bog Complex SAC (002034) and Connemara Bog Complex SPA (004181) and links each objective to the project's mitigation controls implemented via this CEMP and the operational controls of the completed development.

5.1 Connemara Bog Complex SAC (002034): Conservation Objectives

Overall objective (SAC): maintain or restore the favourable conservation condition of the habitats and species for which the SAC has been selected, consistent with NPWS conservation objectives for the site.

SAC Qualifying Interest (QI)	Conservation objective (site-level)	Project-relevant impact pathway	Key CEMP / design controls (section refs)
Otter (*Lutra lutra*)	Maintain/restore favourable conservation condition of otter at the site.	Riparian disturbance; pollution; lighting.	Buffers; sediment & pollution prevention; lighting controls; EcoW oversight; emergency response.
Atlantic salmon (*Salmo salar*)	Maintain/restore favourable conservation condition of Atlantic salmon at the site.	Suspended solids; alkaline cement washout; hydrocarbons.	No direct discharge; silt fences/traps; filter trenches; concrete washout & pH control; monitoring & trigger levels; WFD Appendix.
Active blanket bog (priority)	Maintain/restore favourable conservation condition of active blanket bog within the SAC.	Hydrological change; peat disturbance; sediment/nutrient runoff.	No peat cutting; maintain drainage/hydrology; minimise compaction; phased earthworks; wet-weather stop-work; reinstatement.

5.2 Connemara Bog Complex SPA (004181): Conservation Objectives

Overall objective (SPA): maintain or restore the favourable conservation condition of the bird species for which the SPA has been selected. Controls focus on preventing disturbance and protecting supporting habitats through strict pollution prevention and hydrological protection.

SPA Qualifying Interest (QI)	Conservation objective (site-level)	Project-relevant impact pathway	Key CEMP / design controls (section refs)
Merlin (*Falco columbarius*)	Maintain/restore favourable conservation condition of merlin at the site.	Noise/disturbance; lighting.	Daylight working; BS 5228 controls; lighting management; toolbox talks; EcoW oversight as needed.
Golden plover (*Pluvialis apricaria*)	Maintain/restore favourable conservation condition of golden plover at the site.	Disturbance of open bog/heath; noise; access.	Defined working areas; buffer; minimise footprint; controlled access; scheduling; ecological supervision.

6.0 NIS Mitigation Cross-Reference Matrix

This matrix provides an audit trail between NIS mitigation commitments and enforceable site controls. Each measure is assigned a unique ID and mapped to the controlling CEMP procedure, responsible party, monitoring frequency, and evidence records.

NIS ID	NIS commitment (summary)	CEMP control / procedure	Responsible role	Monitoring & frequency	Evidence
NIS-M05	Sediment controls: phased earthworks; silt fences/traps; coir logs; filter trenches; no direct discharge.	Surface Water & Sediment Management Plan; silt fencing specification; settlement/attenuation.	Principal Contractor / Site Manager	Daily in wet weather; weekly otherwise; after rainfall.	Inspection sheets; photos; maintenance log.
NIS-M06	SS in any discharge not to exceed 25 mg/L; no silt deposition (IFI guidance)	Water Quality Monitoring Plan; trigger levels; stop-work & CAPA.	EcoW / Environmental Lead	Baseline; targeted during high-risk works; 1 month post-construction.	Lab certificates; field sheets; results register.
NIS-M08	Concrete washout: dedicated impermeable contained area; pH correction; no hosing to drains.	Concrete & Wet Trades Method Statement; washout design; settlement tanks; pH logs.	Site Manager / Concrete subcontractor	Per pour; daily washout checks.	Pour permits; pH logs; maintenance records.

7.0 Detailed Construction Sequencing and Phase Method Statements

This section provides phase-by-phase sequencing and environmental method statements to minimise exposed ground, prevent runoff mobilisation, and protect the adjacent watercourse and Natura 2000 receptors.

7.1 Phase 1 – Mobilisation and Site Set-Up

Install buffers and perimeter sediment controls (wire-mesh backed silt fence on steel staves; coir logs; stone filter trench with geotextile), establish bunded covered storage and wheel-wash prior to earthworks. EcoW hold-point sign-off required before any ground disturbance.

7.2 Phase 3 – Groundworks and Excavations

Strictly phased earthworks; no excavation in prolonged/heavy rainfall; stockpiles covered; any dewatering routed to settlement with no direct discharge; daily weather log and post-storm inspections. EcoW approval required for any temporary discharge arrangement.

7.3 Phase 4 – Concrete Works

Prefer direct discharge from truck to excavation. Dedicated contained washout area with settlement/pH control; no hosing to drains; immediate containment of spills; off-site disposal of uncured concrete. Concrete deliveries will/should be in smaller trucks such as Esker Readymix who offer a small truck delivery service.

7.4 Phase 7 – Reinstatement and Post-Construction Monitoring

Progressive reinstatement and decompaction; remove temporary controls only after stabilisation. Undertake water quality sampling at 1 month post-construction to verify no residual effects on the receiving watercourse. Lightweight prefabricated materials such as sips panels, metal cladding etc. are specifically specified to minimise risk to the SAC and SPA and will be used on this site.

8.0 Environmental Audit, Reporting and Corrective Action Protocol

A structured audit and reporting protocol will demonstrate compliance with this CEMP, the NIS mitigation commitments, relevant legislation and any planning conditions. It includes routine inspections, formal audits, non-conformance reporting and corrective action tracking.

Activity	Frequency	Led by	Output
Daily environmental walkover	Daily during active works	Site Manager	Daily environmental log + photos
Weekly compliance inspection	Weekly	EcoW / Environmental Lead	Weekly inspection sheet; actions register
Monthly formal audit	Monthly	Environmental Lead	Audit report; NCRs; CAPA tracker
Close-out audit	At practical completion	Environmental Lead	Close-out environmental report + monitoring results

9.0 Weather Response Plan and Emergency Escalation Flowchart

Weather is a primary risk driver for sediment mobilisation. The project will implement forecast monitoring and defined triggers for enhanced controls, stop-work and escalation, particularly for groundworks and wet trades.

9.1 Tri ggers and Actions

Trigger	Actions
Enhanced v ġ lance (persistent rain / saturated ground)	Increase inspections; cover stockpiles; confirm silt controls intact·,check settlement capacity
Stop high-risk earthworks (heavy rainfall warning / intense rainfall)	Stop excavation/earthmoving; secure excavations; divert clean water; deploy extra controls.
High wind dust risk (strong northerly winds; dry)	Suspend high-dust cutting/grinding; use m isting,veri fyscaffold dust sheets.

9.2 Emergency Escalation Flowchart

START → Incident observed → Make safe/contain → Notify Site Manager → Environmental Lead → EcoW (if receptor risk) → Assess severity → Implement CAPA / escalate to competent authority as appropriate → Verify and close-out.

10.0 Appendix: Water Framework Directive Technical Appendix (WFD)

This Water Framework Directive (WFD) Technical Appendix demonstrates how the construction and operational phases of the proposed development will comply with the objectives of Directive 2000/60/EC and its Irish transposition. It identifies the relevant surface water and groundwater receptors, defines the applicable "no deterioration" objective for High Status waters, and sets out the control, monitoring, verification and reporting framework implemented through this CEMP and the long-term operation and maintenance of the proprietary wastewater treatment system. The WFD establishes a framework to protect and enhance the status of surface waters and groundwater, prevent deterioration, and achieve at least "Good Status" (and maintain "High Status" where present) through River Basin Management Plans (RBMPs) and programmes of measures. The project has been developed to align with:

• the WFD "no deterioration" principle and protection of High Status waters;

• Irish WFD implementing regulations and supporting guidance; and

• the River Basin Management Plan 2022–2027 (RBMP) and local authority water protection policies.

The Galway County Development Plan 2022–2028 requires development proposals to protect water quality and avoid deterioration in ecological status of receiving waters; this appendix provides the technical demonstration of that compliance.

The principal WFD receptor is the adjacent surface watercourse identified in the NIS as EPA waterbody Callow_010. The watercourse runs along the southern boundary of the site and provides a direct hydrological pathway to Maumeen Lough within the Connemara Bog Complex SAC (002034). Callow_010 forms part of the Recess_SC_020 catchment. Given the downstream Natura 2000 connectivity and potential salmonid habitat, the CEMP applies precautionary controls suitable for a sensitive receptor. Groundwater beneath the site is within the Spiddal groundwater body (Good Status). Groundwater protection measures are required for excavation and trafficking (fine sediment mobilisation), storage/handling of fuels and chemicals, and the long-term operation of the proprietary wastewater treatment system and polishing filter.The NIS confirms High ecological status for the receiving surface water environment and Good Status for the groundwater body. The overriding WFD objectives for this project are therefore:

• prevent deterioration in surface water status (including High Status protection); and

• prevent deterioration in groundwater chemical or quantitative status.

Accordingly, this CEMP adopts a precautionary approach: controls are designed to avoid any measurable construction-related change, supported by trigger levels, stop-work procedures and corrective action.

Potential WFD-relevant pressures include:

A) Construction phase

• sediment mobilisation from excavation and trafficking (suspended solids/turbidity);

• alkaline contamination from concrete/cementitious materials (pH elevation);

• hydrocarbon contamination from fuels/oils and plant maintenance (sheen/toxicity);

• accidental releases of chemicals (e.g., admixtures, paints) if present; and

• alteration of flow paths due to temporary works or poor surface water management.

B) Operational phase

• wastewater treatment performance risk if not maintained;

• runoff from the developed footprint if not appropriately managed.

Primary pathways are overland runoff to Callow_010, subsurface percolation to groundwater, and inadvertent direct discharge during dewatering or washout activities. Controls are targeted to break these pathways at source and within the pathway. Controls are implemented using a hierarchy of Avoid → Prevent → Contain → Treat → Monitor → Correct.

Avoidance and Minimisation

• minimise the working footprint and exposed soils through phased earthworks and short open-cut durations;

• maintain riparian buffers and prevent vehicle encroachment using temporary barrier fencing and marked exclusion zones; and

• schedule high-risk works for drier periods where practicable and apply the Weather Response Plan triggers.

Sediment and Turbidity Management

• install wire-mesh backed silt fencing keyed into the ground prior to ground disturbance.

• use coir logs / straw bales at point sources and along contour breaks to intercept runoff.

• install geotextile-lined stone filter trenches at identified runoff concentration points.

• cover/contain stockpiles; locate away from drainage pathways; stabilise haul routes; implement wheel-wash/road sweeping as required; and

• no direct discharge of site water to the watercourse. Any dewatering (if required) must be routed through settlement (silt bag/settlement tank) and treated as a hold-point requiring Environmental Lead/ECoW approval.

Concrete, Cement and pH Control

• dedicated impermeable, bunded washout area with settlement capacity.

• no hosing of concrete/cement/grout to drains or ground; capture and remove residues.

• pH testing of any clear water associated with washout/settlement and neutralisation where necessary prior to off-site removal; and

• supervised pours with drip trays and controlled routes.

Hydrocarbon and Chemical Controls

• bunded (110%) storage for fuels/chemicals and lockable containers within the compound;

• refuelling only in a designated impermeable area with drip trays; no refuelling within the buffer;

• plant maintenance off-site where practicable; on-site maintenance only with containment measures; and

• chemical register and Safety Data Sheets (SDS) maintained; only necessary chemicals brought to site.

WFD Compliance Controls – Operational Phase, Wastewater Treatment System (WWTS)

• The proprietary WWTS and polishing filter will be designed, installed and operated in full accordance with the EPA Code of Practice for Domestic Waste Water Treatment Systems (2021).

• Commissioning certification and O&M documentation will be retained.

• Annual servicing (minimum) by a competent service provider, with desludging at manufacturer-recommended intervals.

• Any malfunction triggers immediate servicing and, if needed, temporary containment/alternative arrangements; no bypass discharge is permitted.

Surface Water Runoff Management

• Maintain existing drainage patterns where practicable and avoid creating preferential runoff pathways to Callow_010.

• Keep hard surfaces minimal; direct clean roof water to soakage away from the watercourse and outside buffers where feasible.

• Maintain vegetated buffers as permanent features to intercept diffuse runoff.

Records

• Maintain WWTS service logs, desludging receipts and call-out records and make available to the Planning Authority if requested or required by condition.

Monitoring, Trigger Levels and Response, Locations and Methods

Sampling will be undertaken at upstream and downstream locations relative to the site, using consistent repeat points recorded by GPS. Visual assessments will be completed during each inspection and sampling event.

Frequency (Minimum)

• Pre-commencement baseline confirmation sampling.

• Monthly sampling during active construction works.

• Additional sampling following a pollution incident or if trigger levels are exceeded; and

• Post-construction verification sampling one month after completion (NIS commitment).

Parameters (Minimum)

Parameters must not exceed the parameters measured by Everpure Analysis supplied in the accompanying NIS.

• Visual inspection for hydrocarbon sheen/discolouration/odour; and

• Field observations of silt deposition, bank erosion or habitat smothering.

Trigger Levels and Actions

• Turbidity: downstream >5 NTU above upstream baseline → cease high-risk works; inspect/repair controls; implement CAPA.

· pH: downstream deviates by > ±0.2 from upstream baseline or cement contamination suspected → stop wet trades; isolate source; neutralise as required; CAPA.

· Hydrocarbon sheen/odour → stop work; deploy absorbents; notify Environmental Lead & EcoW; consider authority notification where warranted.

Verification

Corrective measures must be verified by inspection and/or repeat sampling before works recommence. All actions are recorded in the CAPA tracker and audit logs.

Reporting and Planning Compliance Evidence

WFD-related controls and monitoring will be documented in auditable form:

· daily and weekly inspection sheets (sediment controls, buffer integrity, housekeeping).

· weather log and post-storm inspection records.

· sampling field sheets, chain-of-custody forms and laboratory certificates (where applicable).

· incident reports, NCRs and CAPA records; and

· monthly EcoW summaries during construction plus a post-completion verification note following the 1-month sampling.

Where required by planning conditions, the Applicant will compile monitoring outputs into a concise compliance note for the Planning Authority.

Compliance Statement

Subject to full implementation of the prevention, containment, monitoring and corrective action measures set out in this CEMP, and the long-term WWTS maintenance commitments, the project will prevent deterioration of the status of the Callow_010 waterbody and protect groundwater status, consistent with WFD objectives and the RBMP 2022–2027. These measures also support the Appropriate Assessment conclusion of no adverse effect on integrity for the adjacent European Sites. The author recommends that full Badger, Bat and Otter surveys be carried well in advance of any construction and at the earliest possible opportunity should engage with a suitably qualified ecologist. The applicant has agreed to full surveys to ensure that the local flora and fauna have the strictest protections in line with CIEEM/NPWS and TII Guidelines. The applicant has also agreed that any actions or derogations required will be sought through a suitably qualified ecologist.

Dear Colleague,

We act on behalf of Patrick Ridge who has made an application to An Coimisiún Pleanála - Application Ref No. FD 07.323899 – in respect of lands at Emlaghmore, Ballyconneely, County Galway.

An observation lodged in respect of the above application included a Technical Note Response prepared by Bryan Deegan MCIEEM of Altemar Limited. For convenience, I attach a copy of the said report. Such Technical Note Response references "discussions" with IFI concerning the Callow river, as detailed below.

Page 3 - "There is no large buffer between this laneway and the watercourse. Gravel from the works were visible at the edge of the watercourse during the site visit and silt and gravel would have fallen into the watercourse from the works. These works have previously impacted the SAC in an Atlantic Salmon spawning area (as outlined in discussion with IFI)." The laneway referenced comprises the access from the R341 to the applicant lands.

In respect of the above statement and reference to discussions with IFI, please could you:

- provide detail and notes of any discussions/analysis carried out by or for IFI in determining that works to the laneway have previously impacted the SAC in an Atlantic Salmon spawning area;
- provide detail of any discussions/analysis carried out by of for IFI in determining the above; and
- furnish any scientific evidence held by IFI used to form/support the position outlined.

Page 4 – Point 3 - "Based in discussion with Inland Fisheries Ireland this river is a salmon spawning river. Atlantic Salmon are a qualifying interest of the Connemara Box Complex SAC"

In respect of the above statement and reference to discussions with IFI, please could you:

- provide detail of any discussions/analysis carried out by or for IFI in determining that the said river is a salmon spawning river; and
- furnish the scientific evidence used to form/support the opinion that the river is a salmon spawning river.

You might please confirm such information can be provided, or alternatively whether you require our client to submit a Freedom of Information request.

Please do not hesitate to contact me should you have any queries.

Kind regards,

Eoin

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