



REMEDIAL NATURA IMPACT STATEMENT REPORT

October 2025

Prepared for
Anne Conroy

Site Address
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Galway

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APPROPRIATE ASSESSMENT SCREENING REPORT

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Statement of Authority

This report was co-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, EClA, 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, statistical analysis, and the design of mitigation and monitoring strategies to achieve robust, evidence-based outcomes. As a Principal 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 Environmental Consultants has been retained by Ms. Anne Conroy to prepare a Remedial Natura Impact Statement (rNIS) in support of an application for retention planning permission for an existing dwelling house located at Derrynavglau, Recess, Co. Galway. This rNIS has been prepared by Larry Manning, B.Sc. (Hons), in accordance with the requirements of Part XA of the Planning and Development Act 2000 (as amended) and Article 6(3) of the EU Habitats Directive (92/43/EEC).

The purpose of this Remedial Natura Impact Statement is to provide a comprehensive, retrospective assessment of the potential for significant effects arising from the construction and ongoing operation of the existing dwelling on European Sites (Natura 2000 sites) in the vicinity of the subject lands. The assessment evaluates both direct and indirect effects on the qualifying interests and conservation objectives of nearby designated sites and considers whether the project, individually or in combination with other plans or projects, could adversely affect the integrity of these protected areas. The subject site is located approximately 25.15 meters from the Twelve Bens/Garraun Complex Special Area of Conservation (SAC; Site Code: 002031) and approximately 3.65 kilometers from the Connemara Bog Complex SAC (Site Code: 002034). Given the proximity of these designated sites, the competent authority is required to consider whether the existing development, either alone or in combination with other activities, could give rise to significant effects on the ecological integrity of the SACs, in accordance with the precautionary principle set out under Article 6(3) of the Habitats Directive. This rNIS has been prepared to regularise the planning status of the dwelling and to demonstrate compliance with the relevant provisions of EU and national environmental legislation, including the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended. The report identifies, assesses, and evaluates any potential effects on European Sites that may have arisen as a result of the development, sets out remedial and operational mitigation measures, and provides sufficient scientific evidence to enable An Bord Pleanála, as the competent authority, to carry out an Appropriate Assessment of the project. In accordance with best practice and guidance from the Department of Housing, Local Government and Heritage (2021) and the European Commission (2019), this rNIS follows a structured approach that:

- Describes the project and its environmental context
- Identifies relevant Natura 2000 sites and their qualifying interests
- Assesses potential pathways for impact
- Evaluates the significance of any effects that may have occurred; and

- Outlines remedial and ongoing mitigation measures to ensure the continued protection of the conservation objectives of the Twelve Bens/Garraun Complex SAC and Connemara Bog Complex SAC.

The findings of this Remedial Natura Impact Statement confirm that, subject to the prescribed mitigation and monitoring measures, the existing development will not adversely affect the integrity of any European Site, either alone or in combination with other plans or projects.

1.1 Information sources and surveys

The site survey was carried out by Larry Manning on 23/10/2025.

The Remedial NIS is, in part, informed by:

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

1.2 Requirement for Appropriate Assessment

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

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

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

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

The term 'Qualifying Interests' (QI) refers to the specific named habitats and/or non-bird species which require protection and for which an SAC or SPA is designated. The term Special Conservation Interests (SCIs) refers to the named bird species which 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.

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

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

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

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

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

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

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

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

1.3 Methodology

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



Figure 1: Stages of Appropriate Assessment

2.0 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.

- It must be considered whether the project or plan is inherently connected to or necessary to the management of the site.
- 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.
- Identification of the possible ecological effects on the Natura 2000 site.
- An assessment of the significance of the potential effects.

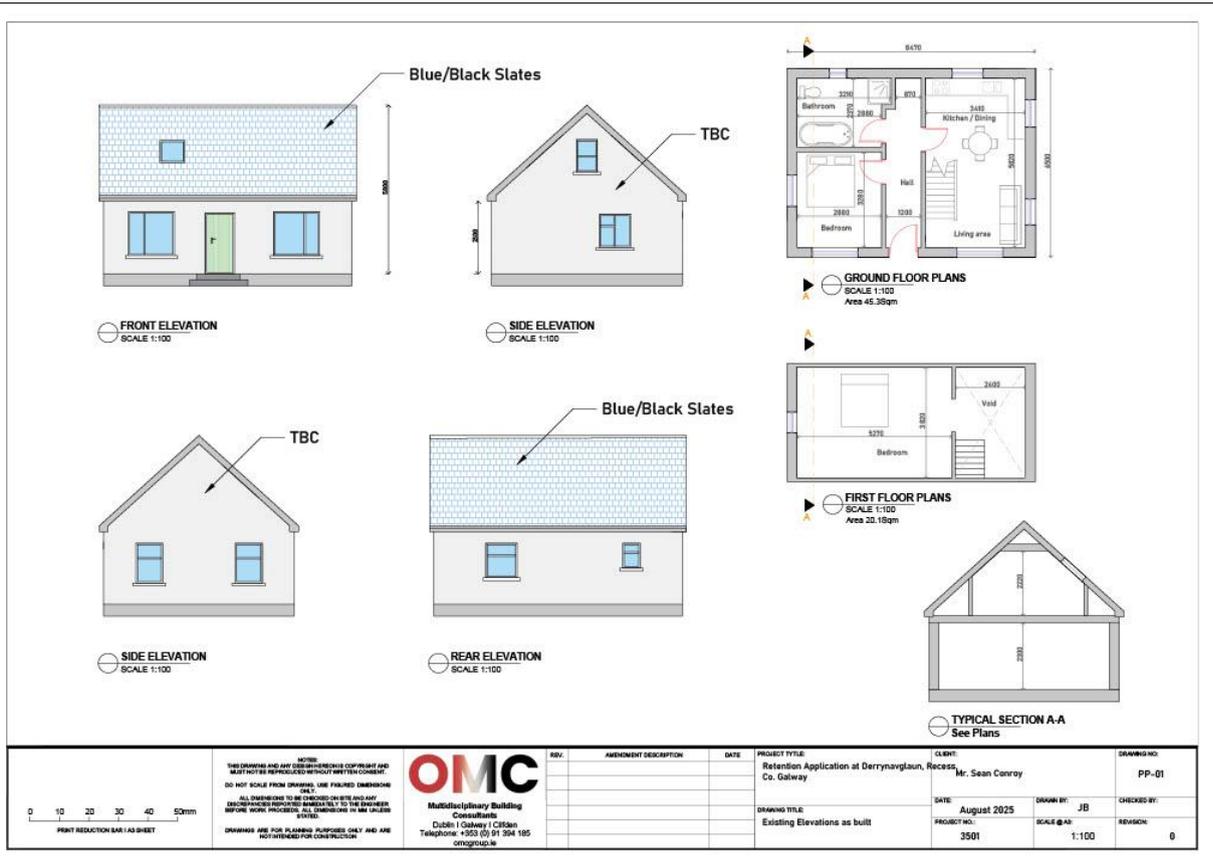
2.1 Scope

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. This report specifically analyses the evidence gathered in relation to Natura 2000 network sites relative to the application site for the production of remedial NIS and will therefore be treating the analysis retrospectively.

2.2 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.



Plans of development.

2.3 Site Location

The proposed development site is located in the town land of Doire na bhFlann, Recess, Co. Galway (53°47'52.87"N -9°81'032.32"W), approximately 14.5km east of Clifden Town in Co. Galway. The site is serviced by an existing private lane connected to a public road (L-51374) which is located to the southwest of the site. The proposed development site consists of an existing dwelling on an area of land which measures approximately 0.25 hectares in area.

2.4 Project description

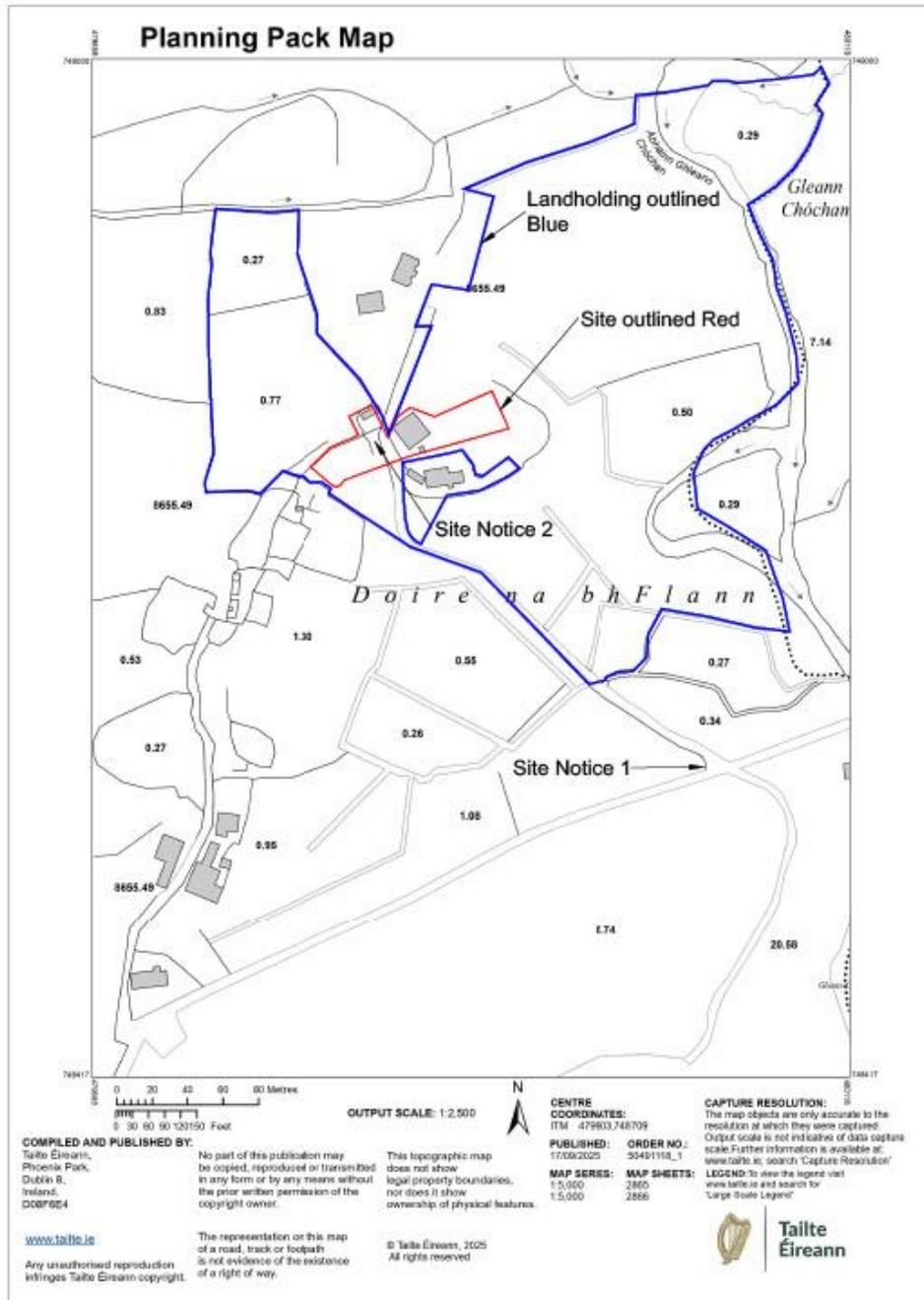
Application for Substitute Consent (as per site notice) for development at the site at Derrynavglau, Recess, Co. Galway. The development consists of (i) permission to retain dwelling house as constructed (65.4 sqm) (ii) permission to install a new wastewater treatment unit and polishing filter bed. The application is accompanied by a remedial Natura Impact Statement (rNIS). The development will include a new wastewater treatment system and new vehicular entrance from the existing private lane, along with associated site works. The new wastewater treatment system is intended to upgrade the current composite toilet. The project is small in terms of size and scale. The primary land use in the area is agricultural, with few other residential developments in the area.

The new wastewater treatment system will be of high quality and meet the standards set out in the EPA guidelines (Code of Practice Domestic Wastewater Treatment Systems (Population Equivalent ≤ 10)). As stated in the site suitability assessment report which accompanies this report, the system is a three-stage wastewater treatment and disposal system, consisting of:

Stage One –
Primary and Secondary Treatment Advanced Mechanical Wastewater Treatment Unit.
Stage Two –

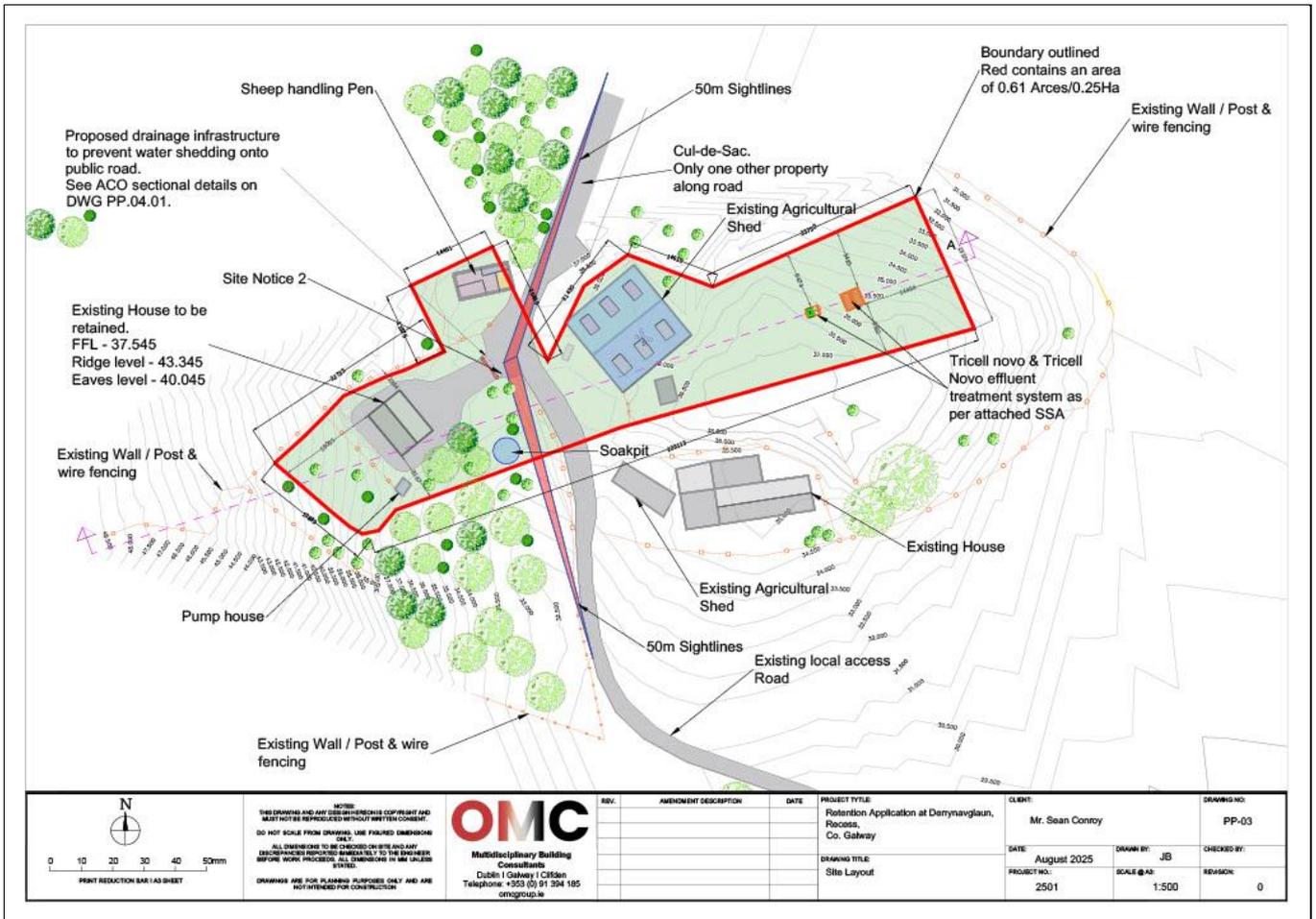
Tertiary Treatment Polishing Filter Bed.
Stage Three –
Tertiary Treatment Dispersal Pad.

The proposed wastewater treatment and disposal system is a comprehensive wastewater solution and satisfies in full what is required for compliance with the regulatory document that is currently in place. All wastewater exiting the proposed dwelling shall be collected and transported via pipe network to the first stage of treatment. It is crucial that this pipe network be installed by an experienced professional at correct falls and gradients, to ensure that all of the wastewater content flows to the septic tank unit. All domestic wastewater treatment systems should be properly installed by a competent person. You should obtain a certificate of installation upon completion. Incorrectly installed pipe work can lead to blockages in the future. The wastewater will flow via gravity to stage one; and into an advanced mechanical wastewater treatment unit, the Tricel Novo System. Under EU regulations, all wastewater treatment plants must be tested in compliance with EN12566-3 CE certification, and the Tricel Novo has achieved this certification. The Tricel Novo treatment system will provide high quality wastewater treatment and ensure compliance with all environmental protection regulations. The Tricel Novo wastewater treatment system has three stages of treatment within the system. In the initial stage of wastewater treatment, anaerobic breakdown takes place in the primary settlement chamber. The wastewater is introduced, and the solids drop to the bottom, becoming detached from the liquid. The second stage of the wastewater treatment involves aerobic breakdown. This takes place in the aeration chamber, where masses of natural occurring bacteria inhabit specially designed filter media. These bacteria are sustained with air, which is continuously supplied from a purpose-built pump in the unit's top section. As the liquid moves slowly through the filter media, the bacteria feed on the waste and eliminate it from the liquid. In the third stage of wastewater treatment, the wastewater flows from the aeration chamber into the final settlement chamber. Suspended sludge containing bacteria is carried with the liquid into the settlement chamber and settles to the bottom of the chamber. From there, a continuous sludge returns system pumps it back to the primary settlement chamber. The remaining treated liquid now meets the required standard to be safely passed out of the Tricel system, and onto the next stage of treatment. The highly treated wastewater effluent will then be delivered via a pumped discharge to a package tertiary treatment plant; this will ensure further treatment and polishing to the effluent and offer a safe and acceptable means of disposal on the proposed site. The Tricel TERO tertiary wastewater system further purifies the treated effluent from a packaged wastewater treatment plant resulting in a reduced area and depth of discharge bed.



<p>NOTES</p> <p>THIS DRAWING AND ANY DESIGNATION IS COPYRIGHT AND MUST NOT BE REPRODUCED WITHOUT WRITTEN CONSENT.</p> <p>DO NOT SCALE FROM DRAWING. USE FIGURED DIMENSIONS ONLY.</p> <p>ALL DIMENSIONS TO BE CHECKED ON SITE AND ANY DISCREPANCIES REPORTED IMMEDIATELY TO THE DRAWERS BEFORE WORK PROCEEDS. ALL DIMENSIONS IN MILLIMETRES UNLESS STATED.</p> <p>DRAWINGS ARE FOR GUIDANCE PURPOSES ONLY AND ARE NOT INTENDED FOR CONSTRUCTION.</p>	<p>OMC</p> <p>Multidisciplinary Building Consultants</p> <p>Dublin Galway Cork</p> <p>Telephone: +353 (0) 91 394 185</p> <p>omcgroup.ie</p>	<p>PROJECT TITLE: Retention Application at Derrynavglau, Recess, Co. Galway</p> <p>DRAWING TITLE: Site Location</p>	<p>CLIENT: Mr. Sean Conroy</p> <p>DATE: Sept 2025</p> <p>PROJECT NO.: 2501</p>	<p>DRAWING NO: PP-02</p> <p>DRAWN BY: JB</p> <p>CHECKED BY:</p> <p>SCALE: AS SHOWN</p> <p>REVISION: 0</p>
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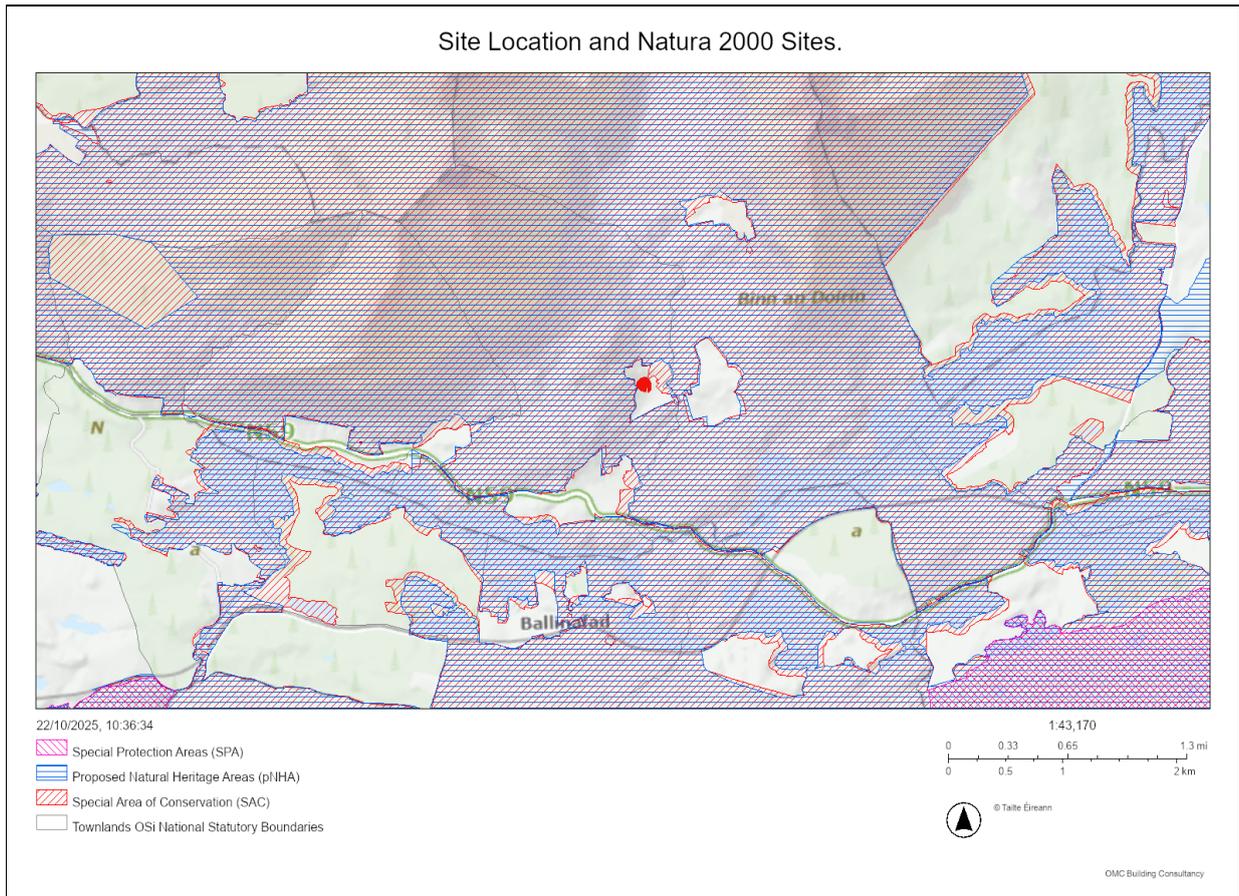
Map 1: Location of site.



Map 2: Site layout

2.5 Relationship with designated sites

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



Map 3: Location of the development site in relation to local Natura 2000 sites. Development site in red border.

2.6 Zone of Influence and Source-Pathway-Receptor Analysis

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.

- Location of Natura 2000 sites
- The area extent to which downstream habitats could be polluted
- To what degree could noise and light impact ecological receptors

Due to the size and scale of the proposed project, in conjunction with its proximity and connectivity to ecological pathways and 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 Twelve Bens/Garraun Complex SAC (002031) in map 4. The Source-Pathway-Receptor (SPR) model is a conceptual framework widely employed in environmental risk assessment, hydrology, hydrogeology, and ecological protection to ensure that developments, plans or projects do not adversely affect protected habitats or species. In the context of Appropriate Assessment (AA) under the EU Habitats Directive (92/43/EEC) and Birds Directive (2009/147/EC), its deployment in Ireland is central to establishing whether a plan or project may have likely significant effects on European Sites (Special Areas of Conservation, Special Protection Areas), taking into account both direct and indirect impacts and hydrological, ecological linkages.

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.

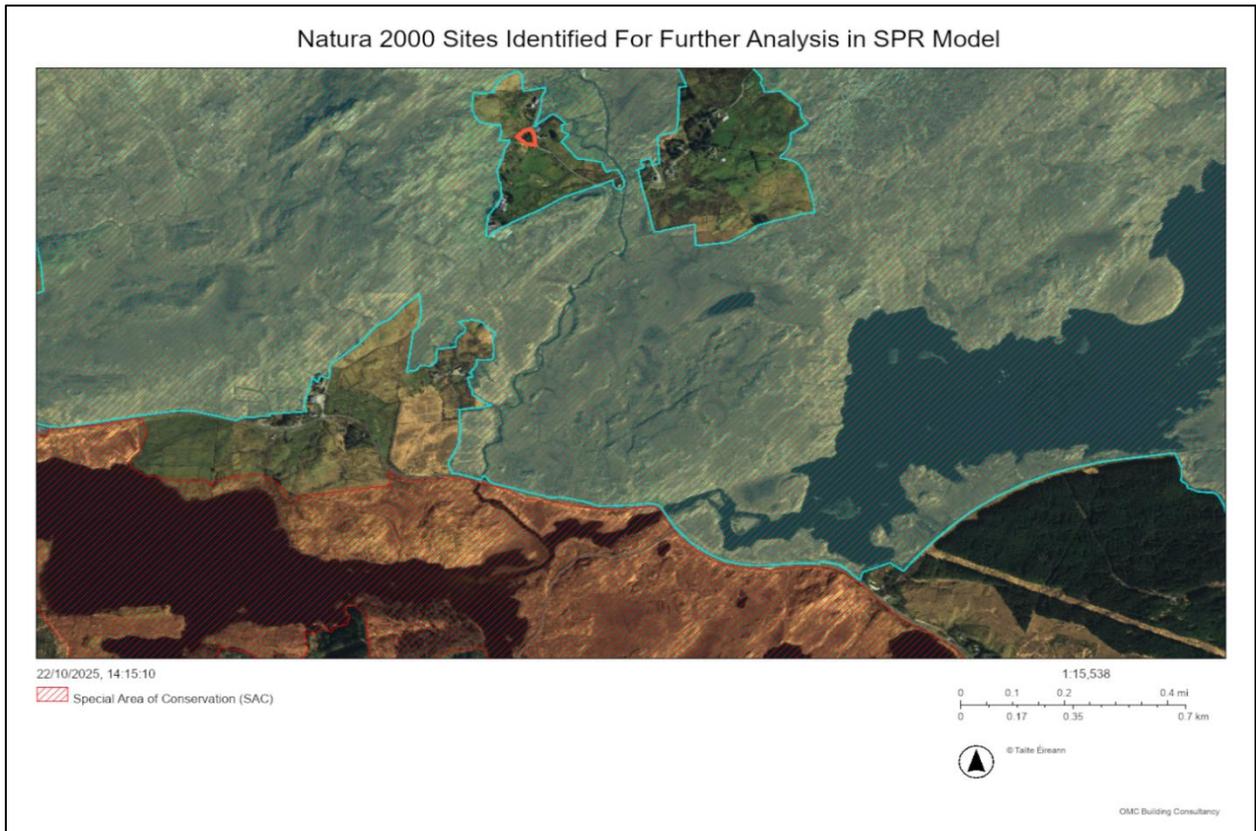
- Pathway

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.

The SPR analysis indicates that the most likely Natura 2000 site to have any direct hydrological linkages and pathways is the Twelve Bens/Garraun Complex SAC (002031) and Connemara Bog Complex SAC [site code: 002034]. Map 4 displays the two SAC's identified in the SPR model for further consideration in this rNIS. Twelve Bens/Garraun Complex SAC is highlighted in turquoise, Connemara Bog Complex SAC is hatched in red.



Map 4: Location of the development site in relation to Natura 2000 sites being considered further. Application site in red border.

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 The Twelve Bens/Garraun Complex SAC

Conservation Objectives for The Twelve Bens/Garraun Complex SAC (Site Code 002031) outlined in table below.

Code	Habitats/Species	Restore/Maintain

3130	Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or of the <i>Isoeto-Nanojuncetea</i>	To maintain the favourable conservation condition
4060	Alpine and Boreal Heaths	To maintain the favourable conservation condition
7130	Blanket Bogs (*if active bog)	To maintain the favourable conservation condition
7150	Depressions on peat substrates of the <i>Rhynchosporion</i>	To maintain the favourable conservation condition
8110	Siliceous scree of the montane to snow levels (<i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i>)	To maintain the favourable conservation condition
8210	Calcareous rocky slopes with chasmophytic vegetation	To maintain the favourable conservation condition
91A0	Old Sessile oak woods with Ilex and Blechnum in the British Isles	To maintain the favourable conservation condition
1029	Freshwater Pearl Mussel (<i>Margaritifera margaritifera</i>)	To maintain the favourable conservation condition
1106	Salmon (<i>Salmo salar</i>)	To maintain the favourable conservation condition
1355	Otter (<i>Lutra lutra</i>)	To maintain the favourable conservation condition
1833	Slender Naiad (<i>Najas flexillis</i>)	To maintain the favourable conservation condition

3.2 Connemara Bog Complex SAC

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 (<i>Littorelletalia uniflorae</i>)	To maintain the favourable conservation condition
3130	Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or <i>Isoeto- Nanojuncetea</i>	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 <i>Ranunculion fluitantis</i> and <i>Callitricho- Batrachion</i> vegetation	To maintain the favourable conservation condition
4010	Northern Atlantic wet heaths with <i>Erica tetralix</i>	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 (<i>Molinion caeruleae</i>)	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 <i>Ilex</i> and <i>Blechnum</i> in the British Isles	To maintain the favourable conservation condition
1065	Marsh Fritillary (<i>Euphydryas aurinia</i>)	To maintain the favourable conservation condition

1106	Salmon (<i>Salmo salar</i>)	To restore the favourable conservation condition
1355	Otter (<i>Lutra lutra</i>)	To maintain the favourable conservation condition
1833	Slender Naiad (<i>Najas flexilis</i>)	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.

5.0 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. Reference to Nelson et. al. (2019) Checklists of protected and threatened species in Ireland was also used to investigate possibility of priority habitats on application site. Using the Polygon Detailed Distribution (by ETC habitat group), the site is located in the area classed as Code and Habitat Name: 7130 Blanket bog (active) see map 6.

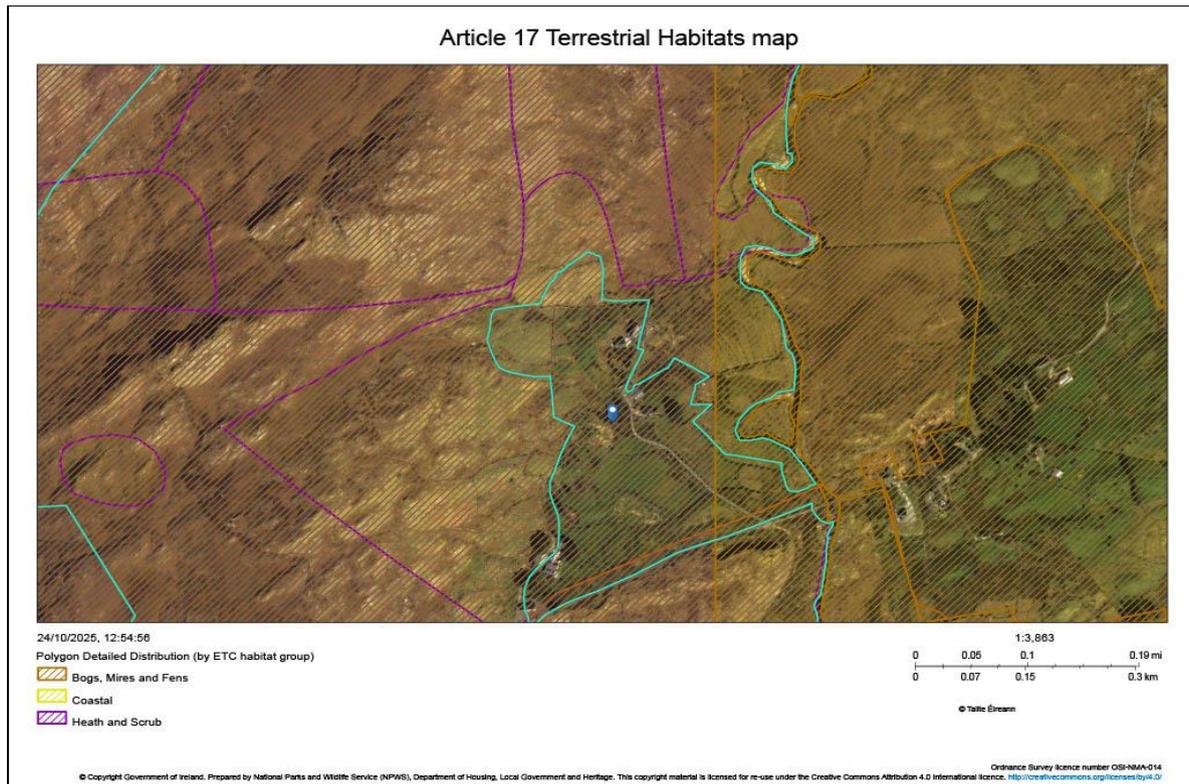
Habitats within the proposed development site include:

- Improved Agricultural Grassland GA1
- Wet Grassland GS4 comprised of soft rush (*Juncus effusus L.*) (more than 90%).
- Buildings and Artificial Surfaces BL3 Stone
Buildings and Other Stonework BL1 Exposed
- Bog woodland WN7 comprised of Holly (*Ilex aquifolium*), Rowan (*Sorbus aucuparia*), willows (*Salix* spp.) and soft (cork screw) rush (*Juncus effusus*) and ferns (Marsh fern (*Thelypteris palustris*)).

No impacts on habitats have occurred as a result of the structure being built. No significant impacts have been identified on habitats in the short term or long term for this very modest residential dwelling site. There are no threatened or critically endangered plant species in the site boundary. The IUCN red list for endangered species was referenced to check for potentially threatened species. The Red Lists are an assessment of the risk of extinction of each species and not just an assessment of their rarity. Threatened species are those species categorised as Critically Endangered, Endangered or Vulnerable (IUCN, 2019) – also commonly referred to as ‘Red Listed’. All Red Listed species are included in each checklist, together with all the species categorised as Regionally Extinct and Near Threatened. Where a species is included in the checklist for other reasons, e.g. protected through European or national legislation, and an assessment has been completed, the IUCN Red List category is given. A blank in the ‘Red List Status’ column means that the species is within a group that has not yet had a Red List assessment. Red Lists in Ireland refer to the whole island, i.e. including Northern Ireland, and so follow the guidelines for regional assessments (IUCN,

2012, 2019). A full list of plant species can be seen in table below. The list includes plants that were observed in the immediate area adjacent to (outside of) the site boundary to account for the possibility of any rare or protected species that require consideration. The plant species observed were recorded outside of the flowering season, but their other vegetative characteristics were used to identify species which follows botanical taxonomic ID guidelines stated in The Irish Vegetation Classification and extensively in appropriate ID keys.

Botanical list for application site
Meadow buttercup (<i>Ranunculus acris</i>)
Saint Anthony's Turnip (<i>Ranunculus tuberosus</i> Lapeyr)
Alder (<i>Alnus glutinosa</i>)
Hybrid dock (<i>Rumex acetosella</i>)
Fuchsia (<i>Fuchsia magellanica</i>)
Herb Robert (<i>Geranium robertianum</i>)
Broad-leaved willowherb (<i>Epilobium montanum</i>)
Water figwort (<i>Scrophularia auriculata</i>)
Self heal (<i>Prunella vulgaris</i>)
Sitka Spruce (<i>Picea sitchensis</i>)
Yorkshire fog (<i>Holcus lanatus</i>)
Marsh Ragwort (<i>Jacobaea aquatica</i>)
Crested buckler fern (<i>Dryopteris cristata</i>)
Early dog violet (<i>Viola reichenbachiana</i>)
Narrow leaf plantain (<i>Plantago lanceolata</i>)
Bog pimpernel (<i>Lysimachia tenella</i>)
Marsh thistle (<i>Cirsium palustre</i>)
Northern fir-moss (<i>Huperzia selago</i>)
White comfrey (<i>Symphytum orientale</i>)
Early forget me not (<i>Myosotis ramosissima</i>)
Foxglove (<i>Digitalis purpurea</i>)
Northern bracken fern (<i>Pteridium aquilinum</i>)
Cork-screw rush (<i>Juncus effusus</i>)
Ash (<i>Fraxinus excelsior</i>)
Sycamore maple (<i>Acer pseudoplatanus</i>)
Goat willow (<i>Salix caprea</i>)
Stinging nettle (<i>Urtica dioica</i>)
Service tree (<i>Cormus domestica</i>)
Marsh fern (<i>Thelypteris palustris</i>)
Rowan (<i>Sorbus aucuparia</i>)
Holly (<i>Ilex aquifolium</i>)



Map 6. Map of application site shows area (highlighted) which is recorded as Bogs, Mires and Fens hatched brown. Taken from NPWS website.

6.0 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 site survey, (E.g. *Rhododendron (Rhododendrum ponticum)*, Japanese knotweed (*Fallopia japonica*)).

7.0 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.

The application site borders mountain drainage channels which join the Glencoaghan River (segment code: 31_277), which drains into Ballynahinch Lake (31_228). The river has been assigned a status of Not at Risk in the Water Framework Directive (WFD). The lake is situated approximately 1.37 km away from the site at its closest point and is also assigned as Not at Risk. The application site is on the WFD River Sub Basins Glencoaghan_010 jurisdiction and part of the WFD Sub-Catchments (Recess_SC_020), Sub-catchment Id 31_4. This fits into the Galway Bay North (31) catchment and hydrometric area. Ground Waterbody WFD Status 2019-2024 IE_WE_G_0011 is assigned as Good overall and chemical status. The bedrock aquifer status is described as Poor Aquifer - Bedrock which is Generally Unproductive except for Local Zones.

The Glencoaghan River (EPA Code: 31G01) is located to the southeast of the site and it is located circa 122m away. No surface water ponding was visible during the dates of the site suitability assessment on the 25th March 2025. Lakes are present within the vicinity of the site, but none are within 100m. There are no beaches/shellfish areas in the immediate vicinity of the site. There are also no wetland areas visible within the vicinity of the site. There are surface water drainage ditches in the immediate vicinity of the site, however none are within 20-30m of the site.

8.0 Soils

The National Soils Hydrology Map was consulted; the application site is situated in an area classed as Poorly Drained Peat. Category Peat type is described as Blanket Peat. Subsoil type till (diamictons) The subsoil is a till type. Till is sediment deposited by or from glacier ice with bedrock at or near the surface.

9.0 Fauna

Based on the findings of the field surveys and desk study, it is concluded that no fauna have been negatively impacted as a result of the construction of the dwelling house.

No loss or fragmentation of habitat occurred as part of the development works. While a range of breeding and foraging habitats exist in proximity to the site, the nature, scale and location of the constructed dwelling do not have the potential to cause additional disturbance to the Special Conservation Interest (SCI) species of the Connemara Bog Complex SPA. Although the SPA lies outside the main analytical focus of this report, consideration has been given to ecological connectivity, potential flight paths, and the local land use patterns that may influence avifauna.

During field surveys, no Cormorant (*Phalacrocorax carbo*), Golden Plover (*Pluvialis apricaria*), Merlin (*Falco columbarius*) or Common Gull (*Larus canus*) were recorded using the habitats within or adjacent to the site. Similarly, no Curlew (*Numenius arquata*) or Snipe (*Gallinago gallinago*) were observed in the rush-dominated habitat to the south of the development. No Annex I bird species were found to be using habitats within the site during any of the site visits.

No mammals or signs of mammal activity were observed within the site boundary, although limited opportunities for small mammals such as mice (*Mus musculus*) and stoats (*Mustela erminea*) exist in the surrounding habitat. No reptiles or amphibians were observed, although the local boggy areas could provide potential breeding opportunities for Common Frog (*Rana temporaria*) and basking sites for Common Lizard (*Zootoca viviparus*). No direct evidence of their presence was recorded during site inspections.

Accordingly, the development has not resulted in any adverse effects on local fauna or on the integrity of any Natura 2000 sites, either alone or in combination with other plans or projects. The existing habitats have retained their ecological functions, and no significant effects on fauna are predicted.

10.0 Birds

No loss or fragmentation of habitat occurred as a result of the construction of the dwelling house. Although a range of breeding and foraging habitats exist in close proximity to the proposed site, due to the nature and scale of the constructed dwelling house as described does not have the potential to generate additional disturbance to the SCI species of the Connemara Bog Complex SPA. Although this SPA is excluded from the main analysis of this report, there must also be consideration to ecological connectivity and flights paths and land use in the area by avifauna.

No Cormorant (*Phalacrocorax carbo*), Golden Plover (*Pluvialis apricaria*), Merlin (*Falco columbarius*) or Common Gull (*Larus canus*) have been observed using the habitats within or adjacent to the site. There were no curlew (*Numenius Arquata*) or snipe (*Gallinago Gallinago*) found in the rush habitat to the south of the site. No Annex I species were observed to be using the habitats within the site during the site visits.

11.0 Mammals

No mammals or signs of mammals were observed at the site. There are some opportunities for small mammals

such as mice and stoats.

12.0 Reptiles and Amphibians

No signs of reptiles or amphibians were observed at the site, although the boggy wet habitat does present an opportunity for breeding common frogs (*Rana temporaria*). There are some opportunities for basking common lizards (*Zootoca viviparius*) on the stones and walls. No sign of them was observed during site visits.

13.0 Assessment of Likely Significant Effects

Following a description of the proposed project and of the nearby Natura 2000 sites, an assessment of possible impacts can be carried out in table 2. This follows 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”.

Table 2. Assessment of Likely Significant Effects

Identify all potential impacts that may result in significant effects on the conservation objectives of a European site (Twelve Bens/Garraun Complex SAC (002031), considering the size and scale of the project
Construction Phase
<p>Size and Scale: The size and scale of the development is relatively small.</p> <p>Land Take/Reduction of Habitat Area: There will likely be no land take resulting from the proposed development</p> <p>Distance from Natura 2000 sites: At its closest point the nearest SAC is approximately 10 meters away from site boundary.</p> <p>Vegetation Clearance: No vegetation clearance is likely to occur on or in very close proximity to the SAC.</p> <p>Habitat Fragmentation: None likely.</p> <p>Loss of habitat: None likely.</p> <p>Disturbance to Qualifying Interests, key ecological receptors or Special Conservation Interests: None likely.</p> <p>Reduction in Species Density: None Likely</p> <p>Changes in key indicators of conservation value (water quality etc.): None likely</p> <p>Demolition: There will be no demolition taking place within the application site or on or in close proximity to the nearest SAC.</p> <p>Surface water runoff from soil excavation/ infill/landscaping (including borrow pits): None is likely due to size and scale.</p> <p>Dust, noise, vibration: None likely</p> <p>Duration of Construction: Construction phase is expected to not exceed 12 months.</p> <p>Lighting disturbance: This will likely not affect any ecological receptors in or near the SAC.</p> <p>Impact on groundwater/dewatering: There will likely be no dewatering taking place and there are no aquifers in the immediate area of the application site. There will be no likely significant effect on any groundwater.</p>

Storage of excavated/construction materials:

Storage of any excavated or construction material will be in adherence to best practice and good housekeeping on site. Further details on this must be advised to mitigate any movement of site material such as soil or dust/sand particles and cement entering the nearby SAC.

Access to Natura 2000 site:

The application development will likely have no effect on access to the SAC for humans and wildlife.

Introduction of Pests:

This proposed development will not likely introduce any pests detrimental to local ecological receptors or any Qualifying Interests of the SAC.

Operational Phase

Disturbance to Qualifying Interests, key ecological receptors or Special Conservation Interests:

None likely

Changes in key indicators of conservation value (water quality etc.):

No changes likely to occur.

Loss of habitat:

No loss of habitat expected.

Habitat Fragmentation:

No habitat fragmentation expected to occur.

Land Take/Reduction of Habitat Area:

No land take is foreseen at the operational phase of the development.

Size and Scale:

The size and scale of the proposed development is small.

Reduction in Species Density:

There will be no likely reduction in species density resulting from the operational phase.

Direct emission to air and water:

There will be no anticipated emissions transported to air and water resulting from the operational phase of the proposed development.

Surface water runoff containing contaminants or sediments:

It is not foreseen that any significant effects from surface water runoff during the operational phase of the proposed development will occur.

Lighting disturbance:

There will be no anticipated lighting disturbance from the application development.

Noise/vibration:

There are no foreseen additional noise or vibration levels expected at the operational phase.

Changes to water/groundwater due to drainage or abstraction:

There will be no changes to groundwaters or nearby waters due to abstraction or drainage.

Presence of people, vehicles and activities:

The area is a working farm. No excess activity expected.

Physical presence of structures (e.g. collision risks):

There will be no likely physical structures likely to cause collisions or related disturbance to the nearby SAC or its QI's.

Potential for accidents or incidents:

It is not foreseen that any likely incidents or accidents will occur from this development.

In combination/cumulative effects from other developments in the area

Planning developments in close proximity to application site within the last five years:

Planning Application Reference :2461620 Description of Proposed Development to construct a

dwelling house, install a waste water treatment unit and polishing filter, and all ancillary site works and services. The application is accompanied by a NIS. Gross floor space of proposed works: 211.28 sqm. Development Address Gleann Chóchan , Recess , Co. Galway – REFUSED

Planning Application Reference: 2561359 Description of Proposed Development: to construct an extension and separate garage to an existing house, plus all associated works Development Address: Gleann Chóchan , Glen House Glencoaghan Ballinafad , Connemara - NEW APPLICATION

Planning Application Reference: 17522: Description of Proposed Development for change of house design, previously granted under Planning Reference Number 13/1223, relocate proposed site entrance and to construct a domestic garage as well as all ancillary site works. Gross floor space of proposed works: 106.10sqm. Development Address: Glencoaghan Td - Application Status WITHDRAWN

Planning Application Reference: 2460348: Description of Proposed Development to construct a new agricultural shed as well as all ancillary site works and site services. This planning application is accompanied by a NIS. Gross floor space of proposed works: 354.09 sqm. Development Address Gleann Chóchan , Recess - Final Decision on Application CONDITIONAL

Planning developments downstream, at a reasonable distance, of application site within the last five years:

Planning Application Reference: 2360512 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. Development Address; Derryadd West – Moyrus , Derryadd West Cuilleen Errisbeg East Canower Derryvickrune and Moyrus in County Galway. – CONDITIONAL

Planning Application Reference: 2461799 Description of Proposed Development: for single storey domestic garage to side and rear of existing dwelling house and all associated site services and landscaping works. Gross floor space of proposed works: 68.00 sqm(garage). Development Address: Doire na Bhflann , Ballinafad , Galway - Final Decision on Application - CONDITIONAL

Planning Application Reference: 25254: Description of Proposed Development to demolish an existing dwelling house and other associated structures and to construct a new dwelling house, domestic garage and sewage treatment system together with all associated site works on same site boundaries granted planning permission under ref 24/307. This application will be accompanied by an updated Natura Impact Statement Development Address Doire na bhFlann , Co na Gaillimhe - Application Status - NEW APPLICATION

There are two planning applications that have been granted permission downstream of the development. There are a small number of applications near to the site that if given permission will not add significant cumulative impacts on the nearby SAC's or their integrity and conservation objectives. This is due to the nature and scale of the developments, which are largely non-commercial private dwellings, and improvements to existing structures. There are no large-scale commercial plans which would require additional analysis.

14.0 Cumulative Impacts on Development Plans

Cumulative impacts are alterations to the environment arising from the combined impact of

past, present and future anthropogenic activities and natural processes. When examining cumulative impacts, it is important to look at activities causing disturbance or pollution to the same Natura 2000 sites.

Pressures on the ecosystem can be listed and evaluated on the basis of pressure positive, negative or neutral on the designated sites that are under consideration for the proposed project.

Plans/Activities in the Area	Relevance/Description
GalwayCounty Development plan 2022-2028	<p>National Heritage/Biodiversity</p> <p>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.</p> <p>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).</p>

	<p>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.</p> <p>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 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.</p> <p>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.*</p> <p>NHB4 - Ecological Appraisal of Biodiversity. Ensure, where appropriate, the protection and conservation of areas, sites, species and ecological/networks of</p>
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	<p>biodiversity values 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</p> <p>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.</p> <p>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</p>
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<p>Northern & Western Regional Assembly Regional Spatial and Economic Strategy 2020 2032 (RSES)</p>	<p>cultural heritage must be adequately assessed in relation to new developments and the upgrading of existing lighting systems.</p> <p>Water Objectives</p> <p>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 dependent species in accordance with the requirements and guidance in the EU Water Framework Directive 2000 (2000/60/EC), the European Union (Water Policy) Regulations 2003 (as amended), the River Basin District Management Plan 2018 – 2021 and other relevant EU Directives, including associated national legislation and policy guidance (including any superseding versions of same) and also have regard to the Freshwater Pearl Mussel Sub-Basin Management Plans.</p> <p>WR 2 - River Basin Management Plans. It is a policy objective of the Planning Authority to implement the program 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.</p> <p>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.</p> <p>RPO 5.5 Ensure efficient and sustainable use of all our natural resources, including inland waterways and peatlands, and forests in a manner which ensures a healthy society a</p>
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	<p>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.</p> <p>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.</p>
<p>Planning applications in the area</p>	<p>A search was conducted on the Galway County Council website of local planning applications in the last 5 years which gave the following results:</p> <p>to (1) Demolish existing rear elevation extension and replace with new single story rear extension (2) Permission to construct single story 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. (Planning Ref.: 20/717)</p> <p>(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. (Planning Ref: 21/1698).</p> <p>Permission for 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. (Planning Ref.: 23/60507).</p>

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 sheep grazing and associated activities.
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	There is no evidence of turf cutting in the immediate area due to the ground consisting of glacial till with only a thin layer of grass and no significant peat deposits.

Table 6: Cumulative assessment

15.0 Cumulative assessment conclusion

Traditional sheep agricultural practices in the area are not excessive and have remained low intensity due to the low-quality agricultural attributes of much of the land. No significant negative impact is anticipated. This development poses no threats to the integrity of the nearby SAC's or their QI's.

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

At the strategic level, the Galway County Development Plan 2022–2028 provides the planning framework for the area. This Plan has undergone SEA and AA, with integrated mitigation to ensure compliance with the Habitats Directive. As the current development and other small-scale projects are consistent with this framework, and no evidence exists of clustered or intensifying development pressures, the risk of significant in-combination effects on the Twelve Bens/Garraun Complex SAC and Connemara Bog Complex SAC is excluded. In line with the precautionary principle, the proposed project is therefore not likely to give rise to significant adverse cumulative impacts on the integrity of the SAC's.

16.0 Mitigations

To ensure continued protection of the integrity of the Twelve Bens/Garraun Complex SAC, the Connemara Bog Complex SAC, and the wider Natura 2000 network, a series of remedial and operational-phase mitigation measures shall be implemented and maintained for the lifetime of the development. These measures are designed to safeguard local hydrology and water quality, prevent nutrient or pollutant migration, and provide verifiable long-term assurance of system performance.

Wastewater Treatment System Maintenance and Monitoring

The proposed on-site wastewater treatment system shall be managed in full compliance with the EPA Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (2021). A biannual inspection and maintenance regime will be implemented by a suitably qualified wastewater professional or service contractor. Each inspection will verify the correct operation of all system components, assess the condition of the treatment unit and polishing filter, and confirm the absence of effluent breakout or odour. Desludging will be undertaken as required, and the frequency of servicing will align with manufacturer specifications or EPA guidance, whichever is more stringent. A detailed Maintenance Log shall be kept on site, recording inspection dates, service results, and any remedial actions undertaken. The homeowner will retain these records for

review by Galway County Council or An Coimisiún Pleanála on request. Where deficiencies are identified, immediate corrective measures such as mechanical repairs, filter media replacement, or desludging shall be completed and recorded within one month of detection.

To verify that the system is not adversely affecting nearby surface or groundwater, performance monitoring will accompany the biannual inspections. This will include a simple visual and olfactory assessment of adjacent drainage features and, where required, spot testing of effluent quality (e.g., pH, ammonia, or nitrate) to confirm effective treatment. Any indication of deterioration will trigger a targeted engineering review and, if necessary, system upgrade in line with EPA and local authority requirements.

Reporting and Compliance

A short Biannual Wastewater and Surface-Water Inspection Report will be prepared by the service engineer following each inspection. This report will summarise system conditions, monitoring outcomes, and confirm compliance with the mitigation measures outlined herein. Copies of the most recent two years' reports will be retained by the applicant and made available for inspection by the competent authority at any time. Where monitoring or inspection indicates that any parameter or condition could give rise to an adverse effect on water quality or qualifying interests in the nearby SACs, an immediate Corrective Action Plan will be implemented and the competent authority notified.

Review and Adaptive Management

This mitigation plan will be reviewed every three years by a qualified environmental professional to ensure ongoing relevance and effectiveness. Should improved technologies or revised EPA standards become available, the applicant commits to updating the wastewater treatment and surface-water management systems accordingly to maintain best environmental practice.

17.0 Conclusion

Following a comprehensive assessment of the potential effects of the completed dwelling at Derrynavglan, Recess, Co. Galway on European sites, and an evaluation of all relevant source–pathway–receptor linkages relating to qualifying interests and habitats, it is concluded with confidence that the development has not resulted in, and is not anticipated to result in, any significant adverse effects on the integrity of the Twelve Bens/Garraun Complex SAC, the Connemara Bog Complex SAC, or on the coherence of the wider Natura 2000 network. This conclusion is supported by the small scale and residential nature of the project, its physical separation from designated sites, and the effective implementation of remedial and operational safeguards outlined in this statement.

The subject site lies entirely outside the boundaries of any Natura 2000 site, thereby eliminating the potential for direct habitat loss or physical disturbance of qualifying interests. Furthermore, the hydrological and hydrogeological assessments confirm that there are no plausible indirect pathways capable of transmitting pollutants or surface water from the development to downstream Natura 2000 receptors, provided that the prescribed management and maintenance measures remain in place.

To ensure continued protection of nearby European sites and the long-term integrity of local surface and groundwater systems, the applicant will implement a biannual inspection and maintenance regime for the on-site wastewater treatment system. These inspections will be carried out by a suitably qualified professional and will include performance verification, desludging and service records, and confirmation that no surface-water contamination or nutrient leakage is occurring. Records of each inspection will be retained and made available to the competent authority upon request.

Subject to adherence to this ongoing monitoring commitment and the remedial mitigation measures set out herein, this Remedial Natura Impact Statement concludes that the development, as constructed and operated, will not adversely affect the integrity of any

European site—either alone or in combination with other plans or projects—and that it fully complies with the requirements of Article 6(3) of the Habitats Directive and Part XA of the Planning and Development Act 2000 (as amended). Accordingly, the project is considered environmentally acceptable and consistent with the conservation objectives of the Twelve Bens/Garraun Complex SAC and the Connemara Bog Complex SAC.

18.0 References

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19.0 Site Synopses

Site Name: The Twelve Bens/Garraun Complex SAC Site

Code: 002031

This is an extensive site situated in the north-west of Connemara in Co. Galway and dominated by mountainous terrain. The site is bounded to the south by the Connemara Bog Complex, to the east by the Maumturk mountains and to the north by Killary harbour. Included within the site are the Twelve Bens mountain range, the mountains to the north of Kylemore (Doughruagh, Garraun and Benchoona), rivers including the Ballynahinch and Owenglin systems and an area of coastal heath and machair near Glassilaun. The site also includes some extensive tracts of lowland blanket bog which are continuous with the mountains. Most of the mountain summits reach a height in excess of 500m, the highest being Ben Baun in the Twelve Bens which reaches 730m. The main soil type within the site is peat. The site includes a large portion of the Connemara National Park and a Statutory Nature Reserve at Derryclare Wood.

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 bogs, 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 are also a lot of Downy Birch (*Betula pubescens*). Other examples of this habitat 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 plants 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 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, totaling 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