



**Comhairle Cathrach  
na Gaillimhe**

Galway City Council

Galway City Climate Action Plan  
2024 -2029

Natura Impact Statement

February 2024

## **Galway City Climate Action Plan**

### **Natura Impact Statement**

Document Stage	Document Version	Prepared by
Final	1	Pat Doherty MSc, MCIEEM

This report has been prepared by DEC Ltd. with all reasonable skill, care and diligence. Information report herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is prepared for Galway City Council and we accept no responsibility to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

## Table of Contents

<b><u>1.0</u></b>	<b><u>INTRODUCTION</u></b>	<b><u>1</u></b>
1.1	STATEMENT OF AUTHORITY	1
1.2	EU HABITATS DIRECTIVE ARTICLE 6(3) ASSESSMENT	2
1.2.1	REQUIREMENT FOR AN ASSESSMENT UNDER ARTICLE 6 OF THE HABITATS DIRECTIVE	3
<b><u>2.0</u></b>	<b><u>SUMMARY OF THE SCREENING FOR APPROPRIATE ASSESSMENT</u></b>	<b><u>4</u></b>
<b><u>3.0</u></b>	<b><u>METHODOLOGY</u></b>	<b><u>5</u></b>
3.1	GUIDANCE	5
3.2	BACKGROUND TO HABITATS DIRECTIVE ARTICLE 6 ASSESSMENTS	5
3.3	STAGE 2: APPROPRIATE ASSESSMENT STEPS	6
3.4	INFLUENCE OF THE APPROPRIATE ASSESSMENT PROCESS ON THE PLAN	6
3.5	SOURCES OF INFORMATION	7
3.6	OVERLAP WITH THE STRATEGIC ENVIRONMENTAL ASSESSMENT OF THE DRAFT CAP	7
3.7	ASSESSMENT CRITERIA	8
<b><u>4.0</u></b>	<b><u>DESCRIPTION OF THE GALWAY CITY CAP</u></b>	<b><u>9</u></b>
4.1	BACKGROUND TO GALWAY CITY CAP	9
4.1.1	LOCAL AUTHORITY CLIMATE ACTION PLANS	9
4.1.2	DEVELOPMENT OF THE LA-CAP	10
4.2	SCALE, NATURE AND LOCATION OF THE GALWAY CITY CAP	11
<b><u>5.0</u></b>	<b><u>EUROPEAN SITES</u></b>	<b><u>13</u></b>
5.1	OVERVIEW OF EUROPEAN SITES	13
5.2	ZONE OF INFLUENCE OF THE PLAN	14
5.3	IDENTIFICATION OF EUROPEAN SITES	14
5.4	CONSERVATION OBJECTIVES	15
<b><u>6.0</u></b>	<b><u>ASSESSMENT OF THE DRAFT CAP</u></b>	<b><u>17</u></b>
6.1	ELEMENTS OF THE DRAFT CAP WITH POTENTIAL TO RESULT IN ADVERSE EFFECTS	17
6.2	IDENTIFICATION OF THE NATURE OF ADVERSE EFFECTS	19
6.3	IN-COMBINATION EFFECTS	26
<b><u>7.0</u></b>	<b><u>MITIGATION MEASURES</u></b>	<b><u>28</u></b>

<b>7.1</b>	<b>MITIGATION MEASURES FROM GALWAY CITY DEVELOPMENT PLAN (CDP) 2023 -2029</b>	<b>29</b>
<b>7.2</b>	<b>SEA &amp; APPROPRIATE ASSESSMENT MITIGATION MEASURES INCORPORATED IN THE DRAFT CAP 40</b>	
<b>7.3</b>	<b>RESPONSIBILITY FOR IMPLEMENTING MITIGATION MEASURES</b>	<b>42</b>
<b>8.0</b>	<b><u>CONCLUSION</u></b>	<b><u>42</u></b>
	<b>REFERENCES</b>	<b>43</b>
	<b><u>APPENDIX 1: EUROPEAN SITES SCREENED IN</u></b>	<b><u>44</u></b>
	<b>Appendix 2: AA Screening of modifications to the Galway City CAP</b>	<b>45</b>

## **1.0 INTRODUCTION**

Doherty Environmental Consultants (DEC) Ltd have been appointed by Galway City Council to prepare a Natura Impact Statement of the draft Galway City Council Climate Action Plan (CAP). This NIR has been completed with respect to the requirements outlined in Article 6(3) of the EU Habitats Directive and Section 177U of the Planning and Development Act and has been prepared in order to facilitate Galway City Council's requirement for completing an Appropriate Assessment of the Plan.

The proposed CAP is not directly connected with or necessary for the management of any European Site and hence the requirements of Article 6(3) of the Habitats Directive and Part XAB of the Planning and Development Act 2000, apply. Section 177U(1) of the Planning and Development Act 2000 requires that a screening for appropriate assessment of, inter alia, a land use plan be carried out by a competent authority to assess, in light of best scientific knowledge, whether the proposed Plan, individually or in combination with another plan or project is likely to have a significant effect on a European site. A Screening Report for Appropriate Assessment has been completed and assessed the potential for the CAP to result in likely significant effects to European Sites. A summary of the screening is provided in the Section 2 below.

## **1.1 STATEMENT OF AUTHORITY**

This Appropriate Assessment Screening Report has been prepared by Mr. Pat Doherty BSc., MSc, MCIEEM, of DEC Ltd. Mr. Doherty is a consultant ecologist with over 20 years' experience in completing ecological impact assessments and environmental impact assessments. Pat has been involved in the completion of assessment reports for proposed developments and land use activities under the EIA Directive and Article 6 of the Habitats Directive since 2003 and 2006 respectively. He has extensive experience completing such reporting for projects located in a variety of environments and has a thorough understanding of the biodiversity issues that may arise from proposed land use activities. Pat was responsible for completing one of the first Appropriate Assessment reports for large scale infrastructure developments in Ireland when he prepared the Appropriate Assessment for the N25 New Ross Bypass in 2006/07. Since then Pat has completed multiple examinations of both plans and projects in Ireland. He has completed Natura Impact Statements for national scale plans such as Ireland's CAP Strategic Plan and National Seafood Development Plan and regional and county scale plans including County Development Plans, Local Area Plans, Tourism Strategies

and Climate Action Plans. Pat has completed multiple Natura Impact Statements for a range of development types that include large scale infrastructure developments in sectors such as transport and energy as well as industrial, commercial and residential developments.

Pat has completed focused certified professional development training in Appropriate Assessment as well as in a range of ecological survey techniques and assessment processes. Training has been completed for National Vegetation Classification (NVC) and Irish Vegetation Classification (IVC) surveying, bryophyte survey for habitat assessment and identification, professional bat survey and assessment training, mammal surveying and specific training for bird and bat survey techniques. Ongoing training has been completed by approved training providers such as CIEEM, British Trust for Ornithology, the Botanic Gardens and the Field Studies Council.

## **1.2 EU HABITATS DIRECTIVE ARTICLE 6 (3) ASSESSMENT**

Legislative protection for habitats and species is provided within the European Union by the Habitats Directive. The Habitats Directive has been implemented in Ireland and throughout Europe through the establishment of a network of designated conservation areas known as the Natura 2000 (N2K) network. The N2K network includes sites designated as Special Areas of Conservation (SACs), under the EU Habitats Directive and Special Protection Areas (SPAs) designated under the EU Birds Directive 2009/147/EC (as amended). SACs are designated in areas that support habitats listed on Annex I and/or species listed on Annex II of the Habitats Directive. SPAs are designated in areas that support: 1% or more of the all-Ireland population of bird species listed on Annex I of the EU Birds Directive; 1% or more of the population of a migratory species; and more than 20,000 waterfowl.

This Screening Report for Appropriate Assessment is being prepared in order to enable the competent authority to comply with Article 6(3) of Council Directive 92/43/EEC (The Habitats Directive). It is prepared to assess whether or not the project alone or in combination with other plans and projects is likely to have a significant effect on any European Site in view of best scientific knowledge and in view of the conservation objectives of the European Sites and specifically on the habitats and species for which the sites have been designated. Measures intended to avoid or reduce the harmful effects of the proposed project on European sites (i.e. “mitigation measures”) or best practice measures have not been considered in this screening stage appraisal.

### **1.2.1 Requirement for an Assessment under Article 6 of the Habitats Directive**

According to section 177U(1) of the Planning and Development Act 2000 (as amended) the competent authority has a duty to:

- Determine whether the proposed Project is directly connected to or necessary for the management of one of more European Sites; and, if not,
- Determine if the Project, either individually or in combination with other plans or projects, would be likely to have a significant effect on the European Site(s) in view of best scientific knowledge and the Conservation Objectives of the site(s).

This report contains information to support a Screening for Appropriate Assessment and is intended to provide information that assists the competent authority when assessing and addressing all issues regarding the construction, operation and decommissioning of the Project and to allow the competent authority to comply with the Habitats Directive. Article 6(3) of the Habitats Directive defines the requirements for assessment of projects and plans for which likely significant effects on European Sites may arise. The Birds Directive and the Habitats Directive together list habitats and species that are of international importance for conservation and require protection. The Habitats Directive requires competent authorities, to carry out a Screening for Appropriate Assessment of plans and projects that are not directly connected to or necessary for the management of a European Site, to assess whether the plan or project alone or in combination with other plans or projects, would be likely to have significant effects on European Sites in view of best scientific knowledge and the Site's conservation objectives. This requirement is transposed into Irish Law by, inter alia, Part XAB of the Planning and Development Act, 2000 (as amended). Section 177U (4) of Part XAB of the Planning and Development Act states:

*"The competent authority shall determine that an appropriate assessment of a draft Land use plan or a proposed development, as the case may be, is required if it cannot be excluded, on the basis of objective information, that the draft Land use plan or proposed development, individually or in combination with other plans or projects, will have a significant effect on a European site. "*

## 2.0 SUMMARY OF THE SCREENING FOR APPROPRIATE ASSESSMENT

A Screening Report for Appropriate Assessment has been completed for the draft CAP. This Screening was completed in line with the requirements of Article 6 (3) of the EU Habitats Directive, as transposed into Irish law in Part XAB of the Planning and Development Act 2000 (as amended) in relation to land use planning.

The Screening represents the first stage of the Article 6(3) Habitats Directive assessment process and was undertaken to identify whether the plan has the potential to result in likely significant effects to European Sites. The first step of the Screening was to assess all actions proposed by the CAP for their potential to result in likely significant effects to European Sites. A total of 7 no. actions were identified as having the potential to result in likely significant effects to European Sites. These actions are listed in full in Table 6.1 of this NIR. During the screening a clear relationship was identified between land use activities, that may arise as a result of the implementation of these actions and European Sites.

For instance, actions that aim to promote/facilitate adaptation measures for existing key infrastructure such as roads and flood defences; the provision of infrastructure to enable modal shifts in transport from private vehicle to active travel and public transport; the implementation of nature-based actions with local authority lands; and the facilitation of community decarbonisation and future proofing initiatives could, in the absence of appropriate design and consideration, contribute to land use effects with potential to result in adverse effects to European Sites.

Given elements of the draft CAP will facilitate land use activities that will have the potential to result in impacts to European Sites, further consideration of the CAP, alone and in-combination with other land use plans is required as part of a Natura Impact Statement.

Accordingly, this NIS has been prepared to inform the Appropriate Assessment of the draft CAP's potential to result in likely significant effects to European Sites and their qualifying features of interest occurring within the zone of influence of the plan.



### **3.0 METHODOLOGY**

#### **3.1 GUIDANCE**

This NIS has been undertaken in accordance with National and European guidance documents: Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (DEHLG 2010) and *Assessment of Plans and Projects Significantly Affecting Natura 2000 sites – Methodological Guidance of the Provisions of Article 6(3) and (4) of the Habitats directive 92/43/EEC*. The following guidance documents were also of relevance during this the preparation of this NIS:

- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites – Methodological Guidance of the Provisions of Article 6 (3) and (4) of the Habitats Directive 92/42/EED. European Commission (2021).
- Managing Natura 2000 Sites – The provisions of Article 6 of the Habitats directive 92/43/EEC. European commission (2018).

#### **3.2 BACKGROUND TO HABITATS DIRECTIVE ARTICLE 6 ASSESSMENTS**

The EC (2021) guidelines outline the stages involved in undertaking an assessment of a project under Article 6 (3) and 6 (4) of the Habitats Directive. The assessment process comprises the four stages outlined below. Stage 1 to 3 form part of the Article 6 (3) process, while Stage 4 forms part of the Article 6 (4) process. This NIR presents the findings of an assessment for Stage 2 of this assessment process.

- Stage 1 – Screening: This stage defines the proposed plan, establishes whether the proposed plan is necessary for the conservation management of the Natura 2000 site and assesses the likelihood of the plan to have a significant effect, alone or in combination with other plans or projects, upon a Natura 2000 site.
- Stage 2 – Appropriate Assessment: If a plan or project is likely to have a significant affect an Appropriate Assessment must be undertaken. In this stage the impact of the plan or project to the Conservation Objectives of the Natura 2000 site is assessed. The

outcome of this assessment will establish whether the plan will have an adverse effect upon the integrity of the Natura 2000 site.

- Stage 3 – Assessment of Alternative Solutions: If it is concluded that, subsequent to the implementation of mitigation measures, a plan has an adverse impact upon the integrity of a Natura 2000 site it must be objectively concluded that no alternative solutions exist before the plan can proceed.
- Stage 4 – Where no alternative solutions exist and where adverse impacts remain but imperative reasons of overriding public interest (IROPI) exist for the implementation of a plan or project an assessment of compensatory measures that will effectively offset the damage to the Natura site 2000 will be necessary.

### **3.3 STAGE 2: APPROPRIATE ASSESSMENT STEPS**

The EC Guidance Assessment Criteria for Appropriate Assessment seeks the following information:

1. A description of the elements of the project that are likely to give rise to significant effects to European Sites;
2. The Setting out the Conservation Objectives of the Site;
3. A description of how the project will affect key species and key habitats;
4. A description of how the integrity of the site (determined by structure and function and conservation objectives) is likely to be affected by the project (e.g. loss of habitat, disturbance, disruption, chemical changes, hydrological changes etc.);
5. A description of the mitigation measures that are to be introduced to avoid, reduce or remedy the adverse effects on the integrity of European Sites.

### **3.4 INFLUENCE OF THE APPROPRIATE ASSESSMENT PROCESS ON THE PLAN**

The purpose of the Appropriate Assessment of the Plan is not only to assess the implications of this Plan on European Sites and their qualifying features of interest occurring within its zone of influence, but also to provide safeguards that aim to minimise the ecological implications of

the Plan and avoid likely significant effects to European Sites. This was completed by identifying any elements of the Plan and the current Galway CDP 2023-2029 that aim to protect the natural environment.

### **3.5 SOURCES OF INFORMATION**

Information relied upon included the following information sources, which included maps, ecological and water quality data:

- Online data available on European sites as held by the National Parks and Wildlife Service (NPWS) from [www.npws.ie](http://www.npws.ie);
- GIS based ecological datasets held by the NPWS;
- GIS based ecological datasets held by Galway City Council;
- Galway City Development Plan 2023 – 2029 Natura Impact Statement

### **3.6 OVERLAP WITH THE STRATEGIC ENVIRONMENTAL ASSESSMENT OF THE DRAFT CAP**

The Strategic Environmental Assessment (SEA) of the draft CAP was carried out concurrently with the NIS. There were several areas of overlap and in accordance with good practice in terms of the following stages:

- Sharing of baseline data gathering and sharing, data on European sites and potential sensitivities and threats.
- Objectives that will result in land use activities were examined by the NIS team for potential adverse effects on integrity of the European Sites in terms of their Conservation Objectives but also any other ecological impacts outside of the European site scale were highlighted to the SEA team for them to address in the SEA process.
- SEA team was able to highlight potential interactions between other environmental issues such as water quality and infrastructure and the sensitivities of European sites to the NIS team.

### 3.7 ASSESSMENT CRITERIA

The purpose of an Appropriate Assessment is to examine the potential for a land use plan to result in land use activities that could compromise the conservation objectives of a European Site. For many conservation objectives that have been given site-specificity, they are themselves broken down into a series of attributes and targets for each Qualifying Interest.

To make the assessment process efficient and manageable without losing quality of analysis, the Conservation Objectives were distilled to four common themes that could then be used as assessment criteria to examine each Objective that has been identified as having the potential to result in likely significant effects to European Sites. Each of the four criteria was quite general in nature which allows an easier assessment but also resulted in a very light “trigger” for the potential for adverse effects on integrity of European Sites to be identified.

The common themes which have become the four assessment criteria for the analysis of zoning parcels are described below:

- **Are there hydrological/hydrogeological linkages between Objectives and European sites and potential for impacts arising to and from surface, ground and coastal water quality?** European sites in County Galway (including Galway City) host a range of freshwater (surface and ground) and marine-dependent QIs and SCIs. These QI’s and special conservation interests are reliant on freshwater, groundwater and/or coastal water quality. Therefore any Objectives that could directly or indirectly affect water quality or supply could potentially affect the European site.
- **Will there be a risk of direct habitat loss or loss of ecological networks supporting European sites?** For example, walking trails and other new development occurring on undeveloped lands within the European sites etc.
- **Will there be a risk of direct or indirect disturbance to European site habitats and/or species?** Even though many of the land use activities that arise from the draft CAP actions may not be directly within European sites, they could affect European Site and their Qualifying Interest (Qis) via indirect disturbance, e.g. recreation at coastal sites, river walkways, noise disturbance due to construction.

- **Will there be a risk of direct or indirect threats to European sites by invasive species?** Many freshwater and terrestrial European sites are vulnerable to the adverse effects of invasive species introductions and land use activities associated with certain Actions will have the potential to result in the spread of such species.

## **4.0 DESCRIPTION OF THE GALWAY CITY CAP**

### **4.1 BACKGROUND TO GALWAY CITY CAP**

Through the Climate Action and Low Carbon Development (Amendment) Act 2021, Ireland is now on a legally binding path to net-Zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade. The Act provides the framework for Ireland to meet its international and EU climate commitments and to become a leader in addressing climate change.

As required by the 2021 Act, Galway City Council is preparing their first Local Authority Climate Action Plan (LA-CAP) which must be adopted by the Elected Members before 23rd February 2024. This will continue the work undertaken over the first Climate Adaptation Strategy 2019-2024 which was non statutory.

#### **4.1.1 Local Authority Climate Action Plans**

Local Authorities will have a particularly important role in the delivery of both climate mitigation and adaptation. This is reflected in the provisions of the Climate Action and Low Carbon Development (Amendment) Act, 2021, which requires each Local Authority to prepare a CAP specifying the mitigation and the adaptation measures to be adopted by the Local Authority.

Local authorities are key drivers in advancing climate policy at the local level and the Galway CAP aims to strengthen the alignment between national climate policy and local circumstances with the prioritisation and acceleration of evidence-based measures, to assist in the delivery of the climate neutrality objective for Galway City Council.

Galway City Council will use its CAP in planning how it will reduce greenhouse gas emissions and increase climate resilience from across its own assets and infrastructure, whilst also taking

on a broader role to influence, facilitate and co-ordinate the climate actions of communities and other stakeholders and what it will do to advocate for climate action in Galway. In order to ensure that the CAP is centred around a strong understanding of the role and remit of Galway City Council on climate action, the Plan is being developed through the following framework.

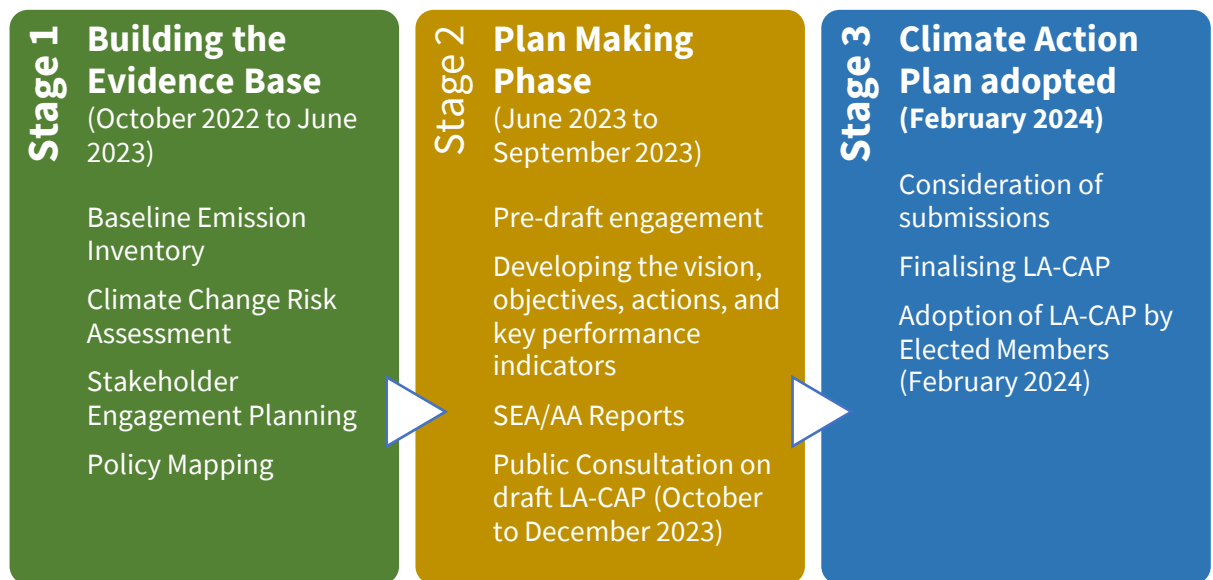
- Fully accountable: Targeted actions for areas where Galway City Council has full accountability for climate action within their own operations.
- Influence: Actions for where Galway City Council can influence businesses, communities, and individuals in the delivery of local climate action through the functions and services they provide.
- Coordination: Actions for where Galway City Council can coordinate and facilitate local and community action bringing together stakeholders in partnership to achieve climate action related projects.
- Advocate: Actions aligned to Galway City Council's role as advocate on climate action through raising awareness, communicating, informing, and engaging in open dialogue on the topic.

While the Climate Action Plan will be ambitious to reflect the leadership role of Galway City Council on climate action, the Plan will not include actions whereby their implementation and achievement fall outside their role, remit, and governance.

#### **4.1.2 Development of the LA-CAP**

The development of the Climate Action Plan will follow a number of stages as explained in the Figure 4.1. below.

**Figure 4.1 Stages in the development of the Climate Action Plan**



## 4.2 SCALE, NATURE AND LOCATION OF THE GALWAY CITY CAP

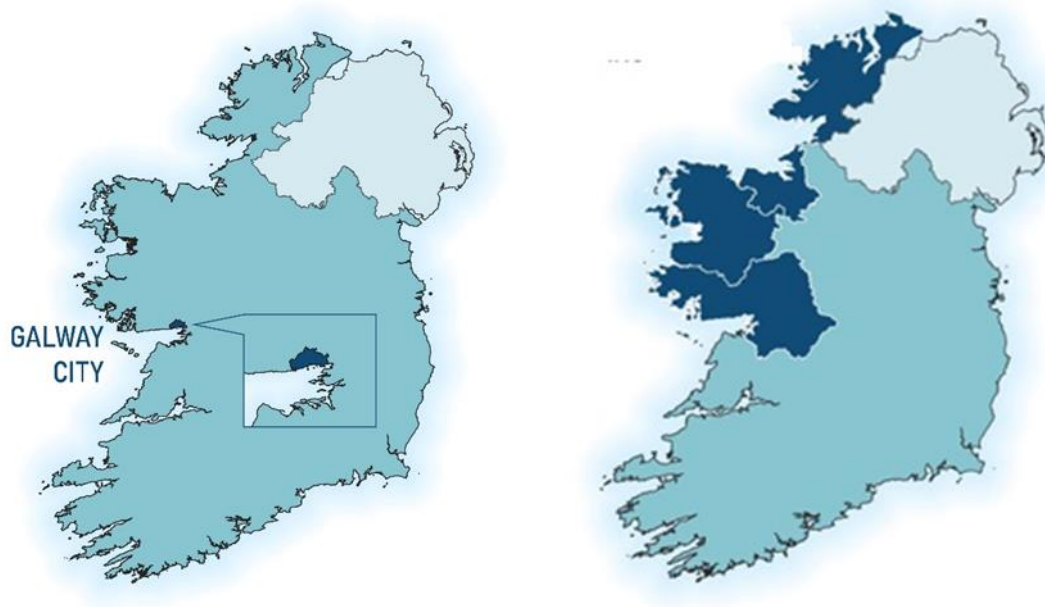
The plan will cover all of the functional area of Galway City. **Figure 4.2** shows the location of Galway City and the Atlantic Seaboard North Climate Action Regional office extents. These include:

- Governance and Leadership
- Energy and Built Environment
- Communities Resiliency and Transition
- Environment and Biodiversity
- Transport and Mobility
- Sustainability and Resource Management

The Plan will have to comply, as relevant, with various legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment, Ecological Impact Assessment and requirements as appropriate) that form the statutory decision-making and consent granting. Actions arising from the plan will demonstrate compliance with the environmental protection measures in the current Galway City-2023 -2029, and SEA Environmental Reports and Natura Impact Reports that accompanies same.



**Figure 4.2: Galway City and the Atlantic Seaboard North CARO**



## **5.0 EUROPEAN SITES**

### **5.1 OVERVIEW OF EUROPEAN SITES**

Galway City is situated in the west coast of Ireland, bordered by the County of Galway and the Atlantic Ocean to the north and west, County Mayo to the north, Galway Bay and County Clare to the south and the County Roscommon to the east.

The Plan area is rich in biodiversity, with many significant protected habitats and species including coastal habitats and terrestrial habitats supporting a range of species and flora including otters, bats, wildfowl, salmon, lamprey and otter amongst others. Other habitats, although not protected are important for providing links between the protected habitats, allow migration, dispersal and genetic exchange of wild plants and mammals. Examples include scrub, hedgerows, tree lines, roadside verges, housing estate open spaces and gardens. Natural heritage in the plan area includes a wide range of natural features that make an essential

contribution to the environmental quality, ecological biodiversity, climate resilience through nature-based solutions landscape character, visual amenity and recreational activities of the city

Four European Sites are within Galway City, namely, Lough Corrib SAC, Galway Bay Complex SAC, Inner Galway Bay SPA and Lough Corrib SPA. Collectively referred to as the Natura 2000 network, SACs and SPAs are designated in consideration of Habitats Directive Annex I habitats and Annex II species and classified in consideration of Birds Directive Annex I bird species. Few Natura 2000 sites are exclusively designated or classified in consideration of terrestrial or aquatic qualifying interests; many consist of a combination of terrestrial, freshwater and marine habitats and species. In the natural environment also there is considerable overlap between terrestrial and aquatic fauna and flora, with each co-existing and co-reliant in many cases.

As well as within Galway City there are a high number of European Sites within and bordering the plan area. In order to identify these sites the spatial boundary data for the European site network, as published by the NPWS in July 2023 was used. All European Sites which were deemed to be within the zone of influence of the potential implications of the draft CAP are considered further in Section 3.2 below and are listed in Table A1.1 in Appendix 1.

## **5.2 ZONE OF INFLUENCE OF THE PLAN**

The approach to defining the zone of influence of the Galway City CAP follows the approach used during for the Galway CDP 2023-2029. The land use effects of the CAP, be they direct or indirect effects, will be primarily restricted to Galway City only. However a wider zone of influence is used for impacts relating to surface waters that are hydrologically connected to the Plan area and that support freshwater-dependent habitats; habitats for SACs or SPAs; habitats for Annex 2 qualifying species; and habitat for SPA special conservation interest bird species.

## **5.3 IDENTIFICATION OF EUROPEAN SITES**

The approach to defining the zone of influence of the Galway City CAP follows the approach used during for the Galway CDP 2023-2029. The land use effects of the CAP, be they direct or indirect effects, will be primarily restricted to Galway City only. However a wider zone of influence is used for impacts relating to surface waters that are hydrologically connected to the

Plan area and that support freshwater-dependent habitats; habitats for SACs or SPAs; habitats for Annex 2 qualifying species; and habitat for SPA special conservation interest bird species.

In line with the approach to defining the zone of influence as set out in the Galway CDP 2023-2029, the screening of the draft CAP identified 71 European Sites that are either located within Galway City, within a 15km buffer of the City boundary or within a 35km buffer of the city boundary where an SAC designated for freshwater pearl mussel is hydrologically connected to the Plan Area of Galway City. As noted above 4 of these European Sites are located within Galway City. Of the remaining 67, 11 are SPAs and 56 are SACs.

Each of these 71 sites are considered to fall within the zone of influence of the draft CAP. These 71 European Sites are listed in Appendix 1.

Using this approach, the following European Sites have been identified as being at potential risk of land use effects, at the plan level. These are as follows:

268	Galway Bay Complex SAC
297	Lough Corrib SAC
4042	Lough Corrib SPA
4031	Inner Galway Bay SPA
322	Rahasane Turlough SAC
606	Lough Fingall Complex SAC
1285	Kiltiernan Turlough SAC
2244	Ardrahan Grassland SAC
4089	Rahasane Turlough SPA
4142	Cregganna Marsh SPA

## 5.4 CONSERVATION OBJECTIVES

The function of this NIS is to examine the potential adverse effects of the draft CAP on European Sites and the conservation objectives set out for the features of interest for which these sites are designated as SACs and SPAs. Generic Conservation Objectives have been published for all European Sites occurring in Ireland. The generic Conservation Objectives for SACs and their qualifying habitats and qualifying species are:

- To maintain the Annex I habitats for which the SAC has been selected at favourable conservation status;

- To maintain the Annex II species for which the SAC has been selected at favourable conservation status;
- To maintain the extent, species richness and biodiversity of the entire site; and
- To establish effective liaison and co-operation with landowners, legal users and relevant authorities.

The generic Conservation Objectives for SPAs and their special conservation interests are:

To maintain the bird species of special conservation interest, for which the SPA has been designated, at favourable conservation status.

Favourable Conservation status of a habitat is achieved when:

- Its natural range, and area it covers within that range, are stable or increasing;
- The specific structure and functions which are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future; and

The conservation status of its typical species is “favourable”. Favourable Conservation status of a species is achieved when:

- Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats;
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future; and
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

In addition to the published generic Conservation Objectives for all European Sites, Site Specific Conservation Objectives (SSCOs) have been published for individual European Sites. These SSCOs identify the attributes that underpin the conservation status of qualifying features of interest/special conservation interests and provide targets for ensuring that their favourable status is maintained and/or restored. As outlined in Section 3.7 above four assessment criteria have been used during this NIS that aim to capture the attributes and targets that underpin the site-specific conservation objectives for European Site. These four criteria are used to examine

the potential for land use activities associated with Objectives to result in adverse effects to European Sites.

## 6.0 ASSESSMENT OF THE DRAFT CAP

### 6.1 ELEMENTS OF THE DRAFT CAP WITH POTENTIAL TO RESULT IN ADVERSE EFFECTS

The actions of the draft CAP have been examined for their potential to result in land use effects, which in turn could contribute, in the absence appropriate safeguards and consideration, to adverse effects to European Sites. A total of 7 no. actions have been identified as having the potential to support future land use activities that could in turn result in adverse effects to European Sites.

It is noted that actions of the draft CAP are strategic in nature and lack specificity with regard to the nature and location of future land use activities that may be supported by the 7 no. action listed in Table 6.1 below. As such the identification of potential adverse effects is based on a consideration of conceivable land use activities that could arise as a result of the supporting policy framework established by the draft CAP. The consideration of such adverse effects is set out in Table 6.1 below.

**Table 6.1: Draft CAP Actions Identified as Having Potential to Contribute to Adverse Effects to European Sites**

Action No.	Action	Adverse Effects
23	Support the upgrade of stormwater pipe capacity in collaboration with Uisce Éireann, arising from the completion of the Greater Galway Strategic Drainage Study (GGSDS).	The upgrade of stormwater infrastructure across the city could result in direct impacts to European Sites if such infrastructure requires works within or bounding Lough Corrib or Galway Bay. Indirect effects could arise where works for water infrastructure are connected to the Galway Bay and Lough Corrib European Sites via hydrological pathway or any of the other 6 no. European Sites occurring within the zone of influence of the plan by such pathways.

Action No.	Action	Adverse Effects
30	Development and implementation of infrastructure and technology across the city to reduce water wastage, such as water fountains, and increase rainwater harvesting, in collaboration with Uisce Éireann where necessary.	The installation of such water infrastructure across the city could result in direct impacts to European Sites in the event that such infrastructure requires works within or bounding Lough Corrib or Galway Bay. Indirect effects could arise where works for water infrastructure are connected to the Galway Bay and Lough Corrib European Sites via hydrological pathway or any of the other 6 no. European Sites occurring within the zone of influence of the plan by such pathways.
33	Continue to support implementation of the Galway City Climate Adaptation Plan and the Corrib go Cósta - Galway City Flood Relief Scheme .	The Corrib go Cósta - Galway City Flood Relief Scheme is currently at Stage 1 Options Assessment. Preparation and submission of planning application documentation is scheduled of Q1 2025. Given the nature of this scheme and the presence of European Sites within, to the north and south of the scheme area, it is considered likely at this stage that potential direct and/or indirect impacts to European Sites could arise as a result of the implementation of this scheme.
41	Develop a City Blueway Strategy for rivers and canals in collaboration with Office of Public Works (OPW), Inland Fisheries Ireland (IFI) and Lough Corrib Navigational Trustees (LCNT).	The support of blueway initiatives and projects could conceivably result in the support of new infrastructure and use of the Corrib and associated waterways that in turn could have potential to result in direct impacts such as habitat loss or habitat degradation such as areas of lake fringe of Lough Corrib or indirect impacts such as habitat and species disturbance and changes in key indicators of conservation status such as water quality.
47	Support the development of greater accessibility, modal shift and active travel throughout Galway City through implementation of work programmes and Galway Transport Strategy (GTS)	The support of active travel and greenway initiatives and projects could conceivably result in the support of new infrastructure that in turn could have potential to result in direct impacts such as habitat loss or habitat degradation or indirect impacts such as habitat and species disturbance and changes in key indicators of conservation status such as water quality.

Action No.	Action	Adverse Effects
DZ 14	Implement walking, cycling, and public transport infrastructure projects in line with the GTS	The support of active travel and greenway initiatives and projects could conceivably result in the support of new infrastructure that in turn could have potential to result in direct impacts such as habitat loss or habitat degradation or indirect impacts such as habitat and species disturbance and changes in key indicators of conservation status such as water quality.
DZ 34	Public lighting upgrades	In the absence of the inclusion of measures that aim to safeguard crepuscular and nocturnal fauna that are sensitive to night time lighting from negative disturbance effects of lighting, the conversion of lighting at any sensitive locations at or adjacent to the Lough Corrib European Sites and the Galway Bay Complex SAC/Inner Galway Bay SPA, will have the potential to result in adverse disturbance effects.

## 6.2 IDENTIFICATION OF THE NATURE OF ADVERSE EFFECTS

The potential impacts of the implementation of the draft CAP Actions listed in Table 6.1 to European Site is examined in Table 6.2 below by evaluating the potential for each of these Action to result in adverse effects to the 4 assessment criteria.

**Table 6.2: Identification of adverse effects to the Qualifying Features/Special Conservation Interests of European Sites**

<b>Actions</b>	<b>Hydrological pathway to European Site whose conservation objectives are reliant on surface, ground and coastal water quality</b>	<b>Direct habitat loss of European Site</b>	<b>Direct or indirect disturbance to European Site habitat and/or species</b>	<b>Direct or indirect impacts to European Site from invasive species</b>
23	Yes. Works to upgrade the stormwater infrastructure across the city is likely to be connected to the Lough Corrib European Sites and the Galway Bay European Sites both of which support freshwater and coastal dependent qualifying habitat and species. There is also potential for a hydrological connection to exist between areas subject to this action and the other 6 no. European Sites occurring within the zone of influence of the plan. These qualifying habitat and species are reliant on good water quality and the provision of new/upgraded stormwater infrastructure could, in the absence of suitable safeguards, have the potential to result in perturbations to water quality with downstream impacts to qualifying habitats and species.	The provision of upgraded/new stormwater infrastructure supported by this action could overlap with Lough Corrib European Sites or the Galway Bay European Sites. In the event of such overlap the potential could arise for the loss of qualifying habitat under circumstances where due consideration and safeguards do not inform such developments.	Yes. The provision of upgraded/new stormwater infrastructure supported by this action could have the potential to result in direct and indirect disturbance to qualifying habitat or species where the development site is connected to such habitats or the habitats relied upon by such species via impact pathways such as watercourse etc.	Yes. In the event that upgraded/new stormwater infrastructure supported by the action are located in areas that are already infested by non-native invasive species, the potential will exist for their spread.



Actions	Hydrological pathway to European Site whose conservation objectives are reliant on surface, ground and coastal water quality	Direct habitat loss of European Site	Direct or indirect disturbance to European Site habitat and/or species	Direct or indirect impacts to European Site from invasive species
30	Yes. The provision of infrastructure across the city to reduce water wastage is likely to be connected to the Lough Corrib European Sites and the Galway Bay European Sites both of which support freshwater and coastal dependent qualifying habitat and species. here is also potential for a hydrological connection to exist between areas subject to this action and the other 6 no. European Sites occurring within the zone of influence of the plan. These qualifying habitat and species are reliant on good water quality and the provision of new/upgraded stormwater infrastructure could, in the absence of suitable safeguards, have the potential to result in perturbations to water quality with downstream impacts to qualifying habitats and species.	The provision of infrastructure across the city to reduce water wastage could overlap with the Lough Corrib European Sites or the Galway Bay European Sites. In the event of such overlap the potential could arise for the loss of qualifying habitat under circumstances where due consideration and safeguards do not inform such developments.	Yes. The provision of infrastructure across the city to reduce water wastage have the potential to result in direct and indirect disturbance to qualifying habitat or species where the development site is connected to such habitats or the habitats relied upon by such species via impact pathways such watercourse etc.	Yes. In the event that area selected for the provision of infrastructure to reduce water wastage are located in areas that are already infested by non-native invasive species, the potential will exist for their spread.
33	Yes. The provision of flood relief infrastructure across the city to reduce water wastage is likely to be connected to the Lough Corrib European Sites and the Galway Bay European Sites both of which	The provision of flood relief infrastructure could overlap with the Lough Corrib European Sites or the Galway Bay European Sites. In the event of such overlap the potential could	Yes. The provision of flood relief infrastructure will have the potential to result in direct and indirect disturbance to qualifying habitat or species where the development site is connected to	Yes. In the event that areas selected for the provision of flood relief infrastructure are located in areas that are already infested by non-native invasive species, the

Actions	Hydrological pathway to European Site whose conservation objectives are reliant on surface, ground and coastal water quality	Direct habitat loss of European Site	Direct or indirect disturbance to European Site habitat and/or species	Direct or indirect impacts to European Site from invasive species
	support freshwater and coastal dependent qualifying habitat and species. here is also potential for a hydrological connection to exist between areas subject to this action and the other 6 no. European Sites occurring within the zone of influence of the plan. These qualifying habitat and species are reliant on good water quality and the provision of flood relief infrastructure could, in the absence of suitable safeguards, have the potential to result in perturbations to water quality with downstream impacts to qualifying habitats and species.	arise for the loss of qualifying habitat under circumstances where due consideration and safeguards do not inform such developments.	such habitats or the habitats relied upon by such species via impact pathways such watercourse etc.	potential will exist for their spread.
41	Yes. All surface water bodies occurring within the Galway City area either form part of or are hydrologically connected to the Lough Corrib European Sites and/or the Galway Bay European Sites. These European Sites support freshwater and coastal dependent qualifying habitat and species. here is also potential for a hydrological connection to exist between areas subject to this action and the other	The provision of blueway infrastructure and the use of of waterbodies within the city as blueways could overlap with European Sites. In the event of such overlap the potential could arise for the loss of qualifying habitat under circumstances where due consideration and safeguards do not inform future blueway initiatives.	Yes. The provision of blueway initiatives supported by this action could have the potential to result in direct and indirect disturbance to qualifying habitat or species where the infrastructure and associated blueway operation phase activity is connected to such habitats or the habitats relied upon by such species via impact pathways such watercourse etc.	Yes. In the event that future blueway infrastructure supported by the action are located in areas that are already infested by non-native invasive species, the potential will exist for their spread. Furthermore the use of waterbodies as blueways could, in the absence of appropriate safeguards result in the spread of non-native invasive species during its operation phase.

Actions	Hydrological pathway to European Site whose conservation objectives are reliant on surface, ground and coastal water quality	Direct habitat loss of European Site	Direct or indirect disturbance to European Site habitat and/or species	Direct or indirect impacts to European Site from invasive species
	6 no. European Sites occurring within the zone of influence of the plan. These qualifying habitat and species are reliant on good water quality and the provision of new blueway infrastructure or the use of these waterbodies as blueways could, in the absence of suitable safeguards, have the potential to result in perturbations to water quality and disturbance with downstream impacts to qualifying habitats and species.			
47	Yes. All surface water bodies occurring within the Galway City area either form part of or are hydrologically connected to the Lough Corrib European Sites and/or the Galway Bay European Sites. These European Sites support freshwater and coastal dependent qualifying habitat and species. here is also potential for a hydrological connection to exist between areas subject to this action and the other 6 no. European Sites occurring within the zone of influence of the plan. These qualifying habitat and species are reliant on good water	The provision of new infrastructure development supported by this action could overlap with European Sites. In the event of such overlap the potential could arise for the loss of qualifying habitat under circumstances where due consideration and safeguards do not inform such developments.	Yes. The provision of developments supported by this action could have the potential to result in direct and indirect disturbance to qualifying habitat or species where the development site is connected to such habitats or the habitats relied upon by such species via impact pathways such watercourse etc.	Yes. In the event that developments supported by the action result are located in areas that are already infested by non-native invasive species, the potential will exist for their spread.

Actions	Hydrological pathway to European Site whose conservation objectives are reliant on surface, ground and coastal water quality	Direct habitat loss of European Site	Direct or indirect disturbance to European Site habitat and/or species	Direct or indirect impacts to European Site from invasive species
	quality and the provision of active travel infrastructure development supported by this action could, in the absence of suitable safeguards, have the potential to result in perturbations to water quality with downstream impacts to qualifying habitats and species.			
DZ 14	Yes. All surface water bodies occurring within the Galway City area either form part of or are hydrologically connected to the Lough Corrib European Sites and/or the Galway Bay European Sites. These European Sites support freshwater and coastal dependent qualifying habitat and species. here is also potential for a hydrological connection to exist between areas subject to this action and the other 6 no. European Sites occurring within the zone of influence of the plan. These qualifying habitat and species are reliant on good water quality and the provision of active travel infrastructure development supported by this action could, in the absence of suitable safeguards, have the potential to result in	The provision of new infrastructure development supported by this action could overlap with European Sites. In the event of such overlap the potential could arise for the loss of qualifying habitat under circumstances where due consideration and safeguards do not inform such developments.	Yes. The provision of developments supported by this action could have the potential to result in direct and indirect disturbance to qualifying habitat or species where the development site is connected to such habitats or the habitats relied upon by such species via impact pathways such watercourse etc.	Yes. In the event that developments supported by the action result are located in areas that are already infested by non-native invasive species, the potential will exist for their spread.

Actions	Hydrological pathway to European Site whose conservation objectives are reliant on surface, ground and coastal water quality	Direct habitat loss of European Site	Direct or indirect disturbance to European Site habitat and/or species	Direct or indirect impacts to European Site from invasive species
	perturbations to water quality with downstream impacts to qualifying habitats and species.			
DZ 34	The implementation of this action will not result in perturbations to surface waters.	The implementation of this action will not result in direct habitat loss.	The implementation of this action, could in the absence of appropriate design safeguards, result in indirect habitat loss for sensitive species such as special conservation interest bird species of the Lough Corrib SPA or the Inner Galway Bay SPA in the event that lighting is inappropriately sited or designed with respect to important bird areas within these SPAs.	The implementation of this action will not result in the spread of invasive species.

### 6.3 IN-COMBINATION EFFECTS

This Section provides an outline of the potential cumulative effects on the European Sites within the zone of influence of the Plan. There is potential for a wide range of plans and project to combine with the draft CAP and documented threats and pressures to these European Sites. Table 6.3 below provides a non-exhaustive list of the Plans that represent those most likely to combine with the draft CAP to result in potential cumulative effects. An assessment for potential cumulative effects to arise is provided for each of the Plans listed in Table 6.3.

**Table 6.3: In-Combination Assessment with Other Plans**

Principal Plans	Comment	Statement
<b>National Planning Framework (under revision)</b>	This plan was subject to full SEA and AA and concluded that subject to full adherence and implementation of measures likely significant effects were not identified	No in-combination impacts were predicted as a result of implementation of the Plan, the revised NPF will be subject to full SEA and AA.
<b>Northern and Western Regional Economic and Spatial Strategy 2020-2032;</b>	These plans were subject to full SEA and AA and concluded that subject to full adherence and implementation of measures likely significant effects were not identified.	No in-combination impacts were predicted as a result of implementation of the Plans.
<b>Third Cycle River Basin Management Plan for Ireland 2022-2027 draft</b>	The third and current cycle aims to build particularly on the initiatives of the second cycle, particularly the governance and implementation structures, and to improve the establishment of Irish Water, An Forum Uisce, the Local Authority Waters Programme and the Agricultural Sustainability	No in-combination impacts were predicted as a result of implementation of the Plans

Principal Plans	Comment	Statement
	<p>Support and Advisory Programme.</p> <p>These actions support the policies in the LAP. However, any developments that may arise as a result of this plan will be required to have a project level AA and EIA which will assess these in detail and provide suitable mitigation measures where appropriate.</p> <p>The Third Cycle RMP is subject to full SEA And AA.</p>	
<b>Galway City Development Plan 2023-2029</b>	<p>Galway City Development Plans have been prepared in accordance with the Planning and Development Act 2000, and have been subject to full SEA, AA and SFRA.</p> <p>The plan sets out the overall strategy for planning and sustainable development for the city. Chapter 5 of the plan outlines the aims of Galway City Council to protect and enhance the natural heritage and biodiversity of designated and non-designated ecological sites and sets out the policies and objectives for this.</p>	No in-combination impacts were predicted as a result of implementation of the Plans.

Principal Plans	Comment	Statement
<b>Galway City Local Economic and Community Plan (LECP) 2017 -2022; new LECP in prep.</b>	These plans were subject to SEA and AA screening and concluded that subject to full adherence and implementation of measures likely significant effects were not identified.	No in-combination impacts were predicted as a result of implementation of the Plans.
<b>Galway City Climate Change Adaptation Strategy 2019-2024</b>	Galway Council Climate Change Adaptation Strategy (2019-2024 and any subsequent versions).  This Plan has been subject to SEA/AA screening and is being replaced by the CAP 2024 - 2029	No in-combination impacts were predicted as a result of implementation of the Plans.

## 7.0 MITIGATION MEASURES

Given that the draft CAP is required to align with and sit alongside the Galway CDP 2023-2029 in terms of planning hierarchy applicable to the city it follows that all environmental safeguards set out in the Galway CDP 2023-2029 will be applicable to the safeguarding European Sites from potential adverse effects identified for the draft CAP.

The following subsections below sets out the suite of mitigation measures to ensure the draft CAP does not give rise to significant environmental effects.

All mitigation measures included in the following section are relevant to the protection of European Sites and their qualifying features of interest/special conservation interests. All general mitigation measures that provide safeguards to biodiversity in general are also included in the list of mitigation measures outlined in the following section.

Section 7.1 sets out the relevant policies and objectives of the Galway CDP 2023-2029 that aim to protect the environment. These policies and objectives will act as safeguards to the potential adverse effects associated with the 7 no. actions of the draft CAP listed in Section 6.1 above.



Section 7.2 set out the results of the SEA and AA process review of the draft CAP actions that has culminated with the provision of additional wording to selected actions. The additional wording provides clarity and focus with respect to environment protection as well as providing for the opportunity for positive environmental effects across a variety of actions set out in the draft CAP.

## 7.1 MITIGATION MEASURES FROM GALWAY CITY DEVELOPMENT PLAN 2023 - 2029

The policies and objectives set out in the current Galway CDP 2023-2029 that will provide safeguards for the potential adverse impacts that could arise out of land use activities supported by the draft CAP are outlined in Table 7.1 below. These measures will provide the necessary safeguards that will protect against the potential impacts that could arise out of the implementation of the 7 no. actions identified in Section 6.

**Table 7.1: Galway City Development Plan 2023 -2029 Policies & Objectives that provide Environmental Safeguards & Protection for European Sites**

Policy 5.1. Green Network and Biodiversity	
1	Support sustainable use and management of areas of ecological importance, parks and recreation amenity areas and facilities through an integrated green network policy approach in line with the Galway Recreation and Amenity Needs Study and where superseded by the Greenspace Strategy, where it can be demonstrated that there will be no adverse impacts on the integrity of European sites.
2	Support the actions of the Galway Recreation and Amenity Needs Study and the upcoming Greenspace Strategy with particular emphasis on the progression and completion of both the existing South Park and Kingston Land Masterplans.

3	Support the retention and enrichment of biodiversity throughout the city in recognition of the need to protect and restore biodiversity to increase the resilience of natural and human systems to climate change.
4	Support the implementation of the National Biodiversity Action Plan (2017-2021) and the All-Ireland Pollinator Plan (2021-2025) and support the actions of the City Council's Heritage Plan 2016-2021 and Biodiversity Action Plan 2014-2024 relating to the promotion of ecological awareness and biodiversity.
5	Support climate action through implementation of nature-based solutions that enhance biodiversity in the green network, including measures such as tree planting, SUDS, use of green infrastructure. Such measures will be informed by the Greenspace strategy.
6	Promote the integration of nature-based solutions in all new developments as appropriate to contribute to the city's climate resilience and require large scale development proposals to include a green infrastructure and biodiversity plan.
8	Achieve a sustainable balance between meeting future recreational needs (both passive and active) and the preservation of the city's biodiversity and ecological and cultural heritage.
10	Support the outcomes of the Greenspace Strategy and any objectives to progress delivery of new urban parks including an additional urban park close to the city centre.
11	Support the Healthy Green Spaces initiative which seeks to improve the quality of green spaces in the city, to enhance climate change resilience, aesthetic value, biodiversity and improve public health and wellbeing.

12	Improve accessibility to the City Parks, recreation and amenity areas and facilities and include for sustainable modes of transport, where appropriate.
15	Co-operate with the NPWS, landowners and stakeholders in the preparation and implementation of management plans for designated European sites.
17	Enhance linkages and connectivity within the green network identified in Table 4.1.
19	Ensure that all passive and active recreational proposals are considered in the context of potential impact on the environment, sites of ecological and biodiversity importance and general amenity.
20	Ensure that notwithstanding land use zoning objectives, significant change of use from existing recreational facilities will only be considered if it is clearly demonstrated that either the loss of such a facility would not have an unacceptable impact on recreation and amenity provision in the city, or if an alternative facility is provided of equal or preferably superior benefit to the local community or the city's hierarchy of facilities and amenities.
23	Continue to implement measures to increase and restore biodiversity in open spaces and road verges through the no mow grass management initiative, and ornamental pollinator projects such as the perennial bulb planting scheme.
<b>Policy 5.2. Protected Spaces: Sites of European, National and Local Ecological Importance</b>	
1	Protect European sites that form part of the Natura 2000 network (including Special Protection Areas and Special Areas of Conservation) in accordance

	with the requirements in the EU Habitats Directive (92/43/EEC), EU Birds Directive (2009/147/EC) and associated national legislation.
2	<p>Ensure that all plans or projects within the Plan area will only be authorised and /or supported after the competent authority has ascertained based on scientific evidence, screening for appropriate assessment and /or a Habitats Directive Assessment that :</p> <ul style="list-style-type: none"> <li>i. The plan or project will not give rise to an adverse direct, indirect or secondary effect on the integrity of any European site (either individually or in combination with other plans or projects); or</li> <li>ii. The plan or project will have an adverse effect on the integrity of any European site (that does not host a priority natural habitat type/and or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000; or</li> <li>iii. The plan or project will have an adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons for overriding public interest, restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out</li> </ul>

	in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000.
3	Protect, conserve and promote the nationally designated sites of ecological importance, including existing and proposed Natural Heritage Areas (NHA and pNHAs) in the city.
4	Protect, conserve and support the development of an ecological network throughout the city which will improve the ecological coherence of the Natura 2000 network in accordance with Article 10 of the Habitats Directive.
5	Continue to recognise sites of County Geological Interest in the city identified by the Geological Survey of Ireland (GSI) and protect such sites from inappropriate development and protect geological NHAs should they become designated and notified to the Local Authority, during the lifetime of the Plan.
6	Protect Local Biodiversity Areas, wildlife corridors and stepping stones based on the Galway Biodiversity Action Plan 2012-2024 and support the biodiversity of the city in the Council's role/responsibilities, works and operations, where appropriate.
7	Encourage, in liaison with the NPWS, the sustainable management of features which are important for the ecological coherence of the network of European sites and essential, by their linear or continuous nature or as stepping stones for the migration, dispersal and genetic exchange of wild species.
8	Support the actions of the Galway City Council Heritage Plan 2016-2021 and any update and Biodiversity Action Plan 2014-2024 relating to the promotion

	of ecological awareness and biodiversity, the protection of wildlife corridors and the prevention of wildlife habitat fragmentation.
9	Co-operate with the NPWS, landowners and stakeholders in the preparation and implementation of management plans for designated sites.
10	Protect and conserve rare and threatened habitats and their key habitats, (wherever they occur) listed on Annex I and Annex IV of the EU Habitats Directive (92/43EEC) and listed for protection under the Wildlife Acts 1976-2000.
11	Ensure that plans and projects with the potential to have a significant impact on European sites (SAC or SPA) whether directly, indirectly or in combination with other plans or projects are subject to Appropriate Assessment, under Article 6 of the Habitats Directive (92/43EEC) and associated legislation and guidelines, to inform decision making.
12	Achieve a sustainable balance between meeting future recreational needs (both passive and active) and the protection of the city's ecological heritage.
13	Support the inclusion of natural features, such as trees, hedgerows, stone walls, ponds and the use of green design features and the incorporation of biodiversity measures in developments layouts.
14	Support and implement measures to control and manage alien/invasive species.
15	Protect the ecological integrity of statutory Nature Reserves, refuges for fauna and Annex 1 Habitats.

<b>Policy 5.3 Blue Spaces: Coast, Canals and Waterways</b>	
1	Protect and maintain the integrity of the coastal environment and waterways by avoiding significant impacts and meeting the requirements of statutory bodies, national and European legislation and standards.
2	Conserve and protect natural conservation areas within the coastal area and along waterways and ensure that the range and quality of associated habitats and the range and populations of species are maintained.
3	Develop and enhance the recreational and amenity potential of the city's waterways and coastal area, while not compromising the ecological importance of these areas.
4	Investigate the extensive water resource in the city with a view to exploring where public access and enjoyment can be improved and where potential sustainable uses and water-based recreation can be developed to the benefit of the city, and have regard to ecological conservation and safety considerations.
5	Support the implementation of the recommendations of the River Basin Management Plan in relation to the protection of water quality of surface waters, groundwater and coastal waters.
6	Ensure development and uses adhere to the principles of sustainable development and restrict any development or use which negatively impact on water quality.

7	Have regard to European and national best practice when assessing development in or near coastal areas which is likely to have significant effects on the integrity, defined by the structure and function, of any designated European sites, protected coastal and marine fauna and flora.
8	Ensure the conservation of the canal corridor and require that developments abutting the canal relate to the context of the adjacent environment and contribute to the overall amenity, and explore the possibility of opportunities for public access.
9	Work with stakeholders, including IW, OPW, EPA, Inland Fisheries and Corrib Navigation Trust in the management of the river and canal systems.
10	Encourage uses which will facilitate conservation of the industrial archaeology legacy of mill buildings, warehouses and associated features.
12	Ensure the protection of the River Corrib as a Salmonid River, where appropriate.
13	Restrict the location of structures other than structures with essential links to the waterway and public utilities within 10 metres of the River Corrib in G agricultural zoned lands.
14	Facilitate sustainable flood defence and coastal protection works in order to prevent flooding and coastal erosion, subject to environmental and visual considerations as guided by the Corrib go Cósta, Galway Flood Relief Scheme project



15	Maintain and extend the achievement of the Blue Flag Beach Status in co-operation with IW.
16	Ensure any development within the aquatic environment shall be carried out in consultation with prescribed bodies and with adherence to their guidelines.
17	Protect and maintain, where feasible, undeveloped riparian zones and natural floodplains along the River Corrib and its tributaries.
18	Ensure that development does not have a significant adverse impact, incapable of satisfactory mitigation, on protected species.
20	Implement the outcomes of the emerging strategy for the marine environment set out in the forthcoming Marine Planning and Development Management legislation.
21	Ensure the conservation of the special recreational value of the riverside walk from Wolfe Tone Bridge to Salmon Weir Bridge and require that developments abutting the walkway incorporate measures to minimise noise levels in their design and reduce the emission and intrusion of any noise which might have potential to adversely impact on amenities and quiet space attributes
<b>Policy 5.4. Green Spaces: Urban Woodlands and Trees</b>	
1	Manage and develop woodlands in the ownership of Galway City Council for natural heritage, recreation and amenity use, including Terryland Forest Park, Merlin Park Woods and Barna Woods/Lough Rusheen City Park.

2	Make Tree Preservation Orders for individual trees or groups of trees within the city, where appropriate.
3	Integrate existing trees and hedgerows on development sites where appropriate and require tree planting, as part of landscaping schemes for new developments.
4	Continue to promote partnerships with the community for the management and improvement of biodiversity in local open spaces, through schemes such as the Green Flag Awards.
<b>Policy 9.2 Water Quality</b>	
1	Support the actions of the River Basin Management Plan 2018-2021 and future River Basin Management Plan in order to promote and achieve a restoration of good status, reduce chemical pollution and prevent deterioration of surface, coastal and groundwater quality, where appropriate.
2	Continue to pursue the maintenance of good bathing water quality at the city beaches through monitoring and management actions in accordance with the Bathing Water Quality Regulations 2008.
3	Ensure development adheres to prevailing environmental standards and guidelines and accords with emerging legislation and strategy on the marine environment.
4	Maintain and extend the Blue Flag Beaches status in regard to water quality, infrastructure and amenity provision for beaches in the city.
5	Protect the city's groundwater resource in accordance with the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (Groundwater) Regulations, 2010 (SI No. 9 of 2010) or any updated legislation and limit any development which has potential to impact the objectives for protection, enhancement and/or restoration.

6	Minimise and control discharges to inland surface water bodies, in particular Terryland/Sandy River, groundwater and coastal waters to prevent water pollution and protect the environment.
<b>Policy 9.4 Sustainable Urban Drainage Systems</b>	
1	Ensure the use of Sustainable Urban Drainage Systems (SuDS) and sustainable surface water drainage management, wherever practical in the design of development to enable surface water run-off to be managed as near to its source as possible and achieve wider benefits such as sustainable development, water quality, biodiversity local amenity and climate adaptation.
2	Promote the use of green infrastructure e.g. green roofs, green walls, bioswales, planting and green spaces for surface water retention purposes as an integrated part of SUDS and to deliver all the ancillary benefits.
<b>Policy 9.6 Air Quality and Noise</b>	
1	Maintain air quality to a satisfactory standard by regulating and monitoring atmospheric emissions in accordance with EU policy directives on air quality and Ambient Air Quality and Cleaner Air for Europe (CAFÉ) Directive (2008/50/EC) by promoting and supporting initiatives to reduce air pollution and by increasing the use of sustainable transport modes and developing urban woodlands, encouraging tree planting, conserving and creating green open space.
2	Ensure the design of development incorporates measures to minimise noise levels in their design and reduce the emission and intrusion of any noise or vibration which might adversely impact on amenities, in particular residential amenities where appropriate.
3	Consider the details of Galway City Council Noise Action Plan 2019-2023 in the assessment and design of relevant development applications in the interests of protecting future amenity.
4	Implement environmental noise mitigation measures as outlined in Galway City Council Noise Action Plan 2019-2023.
5	Promote best practice in the implementation of radon prevention and mitigation measures in partnership with relevant agencies.

<b>Policy 9.7 Light Pollution</b>	
1	Ensure the design of external lighting minimises the incidence of light pollution, glare and spillage into the surrounding environment and has due regard to the visual and residential amenities of surrounding areas and is so designed to mitigate adverse impacts on wildlife and ecosystems.
2	Require all new developments to be designed with the inclusion of energy efficient lighting schemes.
<b>Policy 10.2 Strategic Regeneration and Brownfield Sites</b>	
1	Facilitate and enable the redevelopment of strategic Regeneration and Opportunity sites in the city to support the sustainable and compact growth of the city which will add value and create more attractive places in which people can live and work and achieve alignment with the National Strategic Outcomes of the NPF and the Regional Policy Objectives of the RSES and implementation of the Core Strategy.
11.2	An Ecological Impact Assessment (EcIA) will be required to be undertaken for proposed developments likely to impact on locally important natural habitats and wildlife corridors, developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals where the requirements of section 11.32 do not apply.

## 7.2 SEA & APPROPRIATE ASSESSMENT MITIGATION MEASURES INCORPORATED IN THE DRAFT CAP

Table 7.2 set out the additional wording for listed actions that aims to clarify and focus environment protection as well as providing for the opportunity for positive environmental effects across the actions listed in the table. It is noted that not all actions listed in Table 7.2 have been identified as having the potential to result in adverse effects to European Sites but have been amended in light of the above mentioned aims of clarity, environment focus and

enhancement. The additional wording provided for the actions listed in Table 7.2 below is shown as bold blue text.

**Table 7.2: Mitigation Measures to Galway City Climate Action Plan**

Action No.	Action Description	Included in Draft CAP? Yes/no
<b>new action</b>	<b>In implementing this Galway City Climate Action Plan, ensure compliance with Galway Plan 2023-2029 and local area plan objectives and policies relating to environmental management, the protection of statutory Conservation Areas and ensure compliance with specific environmental management measures relating to this plan. Landuse plans and projects arising from this Climate Action Plan will be underpinned by Strategic Environmental Assessment, Environmental Impact Assessment, Appropriate Assessment, and Ecological Impact Assessments as relevant.</b>	Yes Action 21
<b>new action</b>	<b>Galway City Council will take account of any relevant recommendations in the EPA State of Our Environment Report 2024, once published, in implementing the Plan over its lifetime.</b>	Included in Section 3.2 thematic focus of the CAP
<b>new action</b>	<b>Galway City Council will consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan over the lifetime of the Plan.</b>	Included as a Key Performance indicator under Action 21 above
15	Establish climate ambassador program and forum to facilitate knowledge sharing, capacity building and just transition on climate and energy initiatives <b>and nature-based solutions</b> and actions across the city. Program to include climate/ energy/ <b>NBS</b> leaders and pioneers from throughout the city including businesses and community groups.	Yes
32	Deliver the community climate action fund and work to identify further funding streams for local climate action projects and support communities and voluntary sector in developing and implementing climate adaptation and mitigation projects at local level <b>supporting nature-based solutions that can provide co benefits to people and nature.</b>	Yes
34	Develop and implement green space strategy (GSS) for Galway City Council owned green spaces that <b>supports space for nature</b>	Yes
37	Develop tree strategy for the Galway City area, including detail to increase tree canopy cover throughout the city through management of existing stock and new planting <b>in appropriate places with appropriate planting mixes.</b>	Yes
41	Develop a City Blueway Strategy for rivers and canals <b>informed by ecological assessment and provision of appropriate buffers and wildlife corridors</b> in collaboration with Office of Public Works (OPW), Inland Fisheries Ireland (IFI) and Lough Corrib Navigational Trustees (LCNT).	Yes
<b>New action</b>	<b>With respect to DZ actions, ensure that they are aligned with the conservation objectives for the Lough Corrib Special Area of</b>	To be included in final CAP

**Conservation (SAC) (Site Code: 000297), Galway Bay Complex (SAC) (Site Code: 000268) and Inner Galway Bay Special Protected Area (SPA) (Site Code: 004031).**

### **7.3 RESPONSIBILITY FOR IMPLEMENTING MITIGATION MEASURES**

The responsibility for implementing land use actions proposed by the draft CAP lies with the relevant departments of Galway City Council. Departments seeking to carry out land use activities, under the aegis of the support provided by the draft CAP action are obliged to ensure that the implementation of these objectives are consistent with the environmental safeguards as listed in Section 7.1 and Section 7.2 above. It is a statutory requirement for a competent authority (e.g. Galway City Council) to carry out screening for appropriate assessment for all land use projects and all land use activities implemented under/facilitated by the draft CAP will be assessed for their potential to result in likely significant effects to European Sites.

### **8.0 CONCLUSION**

This NIS has reviewed the potential impacts arising from the draft CAP and found that, without the implementation of mitigation measures, the Plan will have the potential to impact upon the Conservation Objectives of European Sites and their relevant qualifying features that occur within the zone of influence of the Plan. Given the undefined spatial nature of the Actions and conceivable land use activities arising from the draft CAP actions it has not been possible to identify the specific European Site and associated features of interest that may be at risk of adverse impacts from the Plan. For such actions with potential to generate land use activities a precautionary approach has been taken and it has been found in this NIS that in the absence of appropriate safeguards adverse impacts to European Site could arise. These adverse impacts are detailed in Table 6.1 and Table 6.2 of this NIS.

The mitigation measures outlined in Section 7 of this NIS will protect European Sites from potential adverse impacts. These measures have been implemented for previously adopted plans in Galway City and are known to provide effective safeguards at the Plan level for the protection of European Site from potentially adverse land use activities.

With the proper implementation of all mitigation measures detailed in this NIS the draft CAP is not considered to have the potential to result in adverse impacts to European Sites occurring within Galway City or the surrounding area.

## **REFERENCES**

DEHLG (2010) Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities. Rev Feb 2010. Department of Environment, Heritage and Local Government, Dublin.

European Commission (2021) 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 (European Commission Environment Directorate-General)

European Commission (2019) Managing Natura 2000 Sites: the provisions of Article 6 of the ‘Habitats’ Directive 2/43/EEC. Office for Official Publications of the European Communities, Luxembourg.

## **APPENDIX 1: EUROPEAN SITES SCREENED IN**

Table A1.1 below provides a list of the European Sites occurring within the zone of influence of the draft CAP and screened in for further examination as part of an Natura Impact Statement of the draft Plan. The list of European Sites screened in follows that identified for the Galway CDP 2023-2029



Site Code	European Sites	Within City	Distance (km) from Galway City
000020	Black Head-Poulsallagh Complex SAC		12.39
000054	Moneen Mountain SAC		12.41
000238	Caherglassaun Turlough SAC		17.96
000242	Castletaylor Complex SAC		12.23
000252	Coole-Garryland Complex SAC		17.63
000268	Galway Bay Complex SAC	x	0.00
000286	Kiltartan Cave (Coole) SAC		20.74
000295	Levally Lough SAC		29.98
000296	Lisnageeragh Bog and Ballinastack Turlough SAC		44.79
000297	Lough Corrib SAC	x	0.00
000299	Lough Cutra SAC		26.99
000301	Lough Lurgen Bog/Glenamaddy Turlough SAC		41.31
000304	Lough Rea SAC		25.33
000318	Peterswell Turlough SAC		20.60
000322	Rahasane Turlough SAC		11.53
000324	Rosroe Bog SAC		49.65
000461	Ardkill Turlough SAC		31.78
000474	Ballymaglancy Cave, Cong SAC		30.18
000475	Carrowkeel Turlough SAC		38.03
000479	Cloughmoyne SAC		19.96
000480	Clyard Kettle-Holes SAC		28.77
000503	Greaghans Turlough SAC		31.92
000504	Kilglassan/Caheravoostia Turlough Complex SAC		32.73
000525	Shrule Turlough SAC		23.36
000527	Moore Hall (Lough Carra) SAC		45.15
000541	Skealaghan Turlough SAC		32.26

Site Code	European Sites	Within City	Distance (km) from Galway City
000606	Lough Fingall Complex SAC		9.16
000994	Ballyteige (Clare) SAC		26.54
000996	Ballyvaughan Turlough SAC		15.45
001251	Cregduff Lough SAC		53.03
001257	Dog's Bay SAC		54.67
001271	Gortnandarragh Limestone Pavement SAC		12.64
001285	Kiltiernan Turlough SAC		11.91
001312	Ross Lake And Woods SAC		9.89
001321	Termon Lough SAC		25.31
001536	Mocorha Lough SAC		24.63
001774	Lough Carra/Mask Complex SAC		30.15
001913	Sonnagh Bog SAC		24.75
001926	East Burren Complex SAC		11.63
001932	Mweelrea/Sheeffry/Erriff Complex SAC		46.85
002008	Maumturk Mountains SAC		31.61
002034	Connemara Bog Complex SAC		6.95
002074	Slyne Head Peninsula SAC		62.62
002111	Kilkieran Bay And Islands SAC		27.53
002117	Lough Coy SAC		21.02
002119	Lough Nageeron SAC		48.87
002129	Murvey Machair SAC		58.37
002179	Towerhill House SAC		45.06
002180	Gortacarnaun Wood SAC		29.74
002181	Drummin Wood SAC		28.79
002197	Derrinlough (Cloonkeenleananode) Bog SAC		33.58
002244	Ardrahan Grassland SAC		13.20

Site Code	European Sites	Within City	Distance (km) from Galway City
002293	Carrowbaun, Newhall and Ballylee Turloughs SAC		20.74
002294	Cahermore Turlough SAC		16.82
002295	Ballinduff Turlough SAC		18.94
002296	Williamstown Turloughs SAC		43.89
002320	Kildun Souterrain SAC		28.37
002352	Monivea Bog SAC		18.84
004005	Cliffs of Moher SPA		33.05
004031	Inner Galway Bay SPA	x	0.00
004042	Lough Corrib SPA	x	0.00
004051	Lough Carra SPA		39.40
004056	Lough Cutra SPA		27.01
004062	Lough Mask SPA		32.45
004089	Rahasane Turlough SPA		11.46
004107	Coole-Garryland SPA		19.50
004134	Lough Rea SPA		25.38
004142	Cregganna Marsh SPA		2.41
004159	Slyne Head To Ardmore Point Islands SPA		42.55
004168	Slieve Aughty Mountains SPA		22.19
004181	Connemara Bog Complex SPA		11.41

## **Appendix 2: AA Screening of proposed modifications to the CAP**