

Environmental Constraints Report.

For the proposed *Cuan na Loinge* road coastal flooding mitigation project

Cuan Na Luinge

Carrowroe West

Co. Galway



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1.0 Introduction

Fitzsimons Walsh Environmental Limited has been engaged to review the scope of works for the proposed Cuan Na Loinge road coastal flooding mitigation project and provide a synoptic report detailing the Environmental consideration and constraints facing the project.

The report identifies the potential environmental factors that could impact a proposed project in order to better understand environmental risks and compliance requirements.

1.1 The proposed works

The proposed flood mitigation works are to take place on a section of the L-52214 local road at Cuan Na Luinge, Carrowroe West, Co. Galway. See figure 1.



Figure 1 Site Location

It is recognised¹ that a significant length of the L-52214, it's junctions with two side roads and a residential entrance in Cuan na Loinge, Ceantar na nOileán becomes inundated with seawater at very high tides and following storm surge events on an ever-increasing basis. This results in the road being impassable affecting up to seventeen local residences. The objective of the proposed project is to raise the level of the road so that inundation events and inundation periods are significantly reduced.

¹ OPW, 2005.

2.0 Environmental Considerations

The site of the proposed works is in an environmental sensitive area. The site itself lies within the *Kilkieran Bay and Islands SAC* and is proximal to the *Connemara Bog Complex* which is designated a Special Protection Area and a Special Area of Conservation.

2.1 Natura Impact Statement (NIS) to enable Appropriate Assessment

The Appropriate Assessment process is a four-stage process with issues and tests at each stage. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required.

A NIS identifies and characterises any possible implications the project may have (either individually or in combination with other plans and projects) on the conservation objectives of any 'screened-in' European Site(s), taking into account the full scope of these objectives, whether generic or site specific.

The following Natura 200 sites lie within a 15km radius of the proposed development site (see table 1 and figure 2)

Table 1 Natura 2000 sites within 15km radius of proposal site

Site Name	Site Code	Designation	Proximity to the Natura 2000 site.
Connemara Bog Complex SPA	004181	SPA	Surrounds the site to the east, north and north west. Closest point to site is 6 km east.
Kilkieran Bay and Islands SAC	002111	SAC	The site lies within the SAC which extends to the North, South , East and West of the site.
Connemara Bog Complex SAC	002034	SAC	Surrounds the site to the east, north and northwest. The closest point to the site is 6 km east.

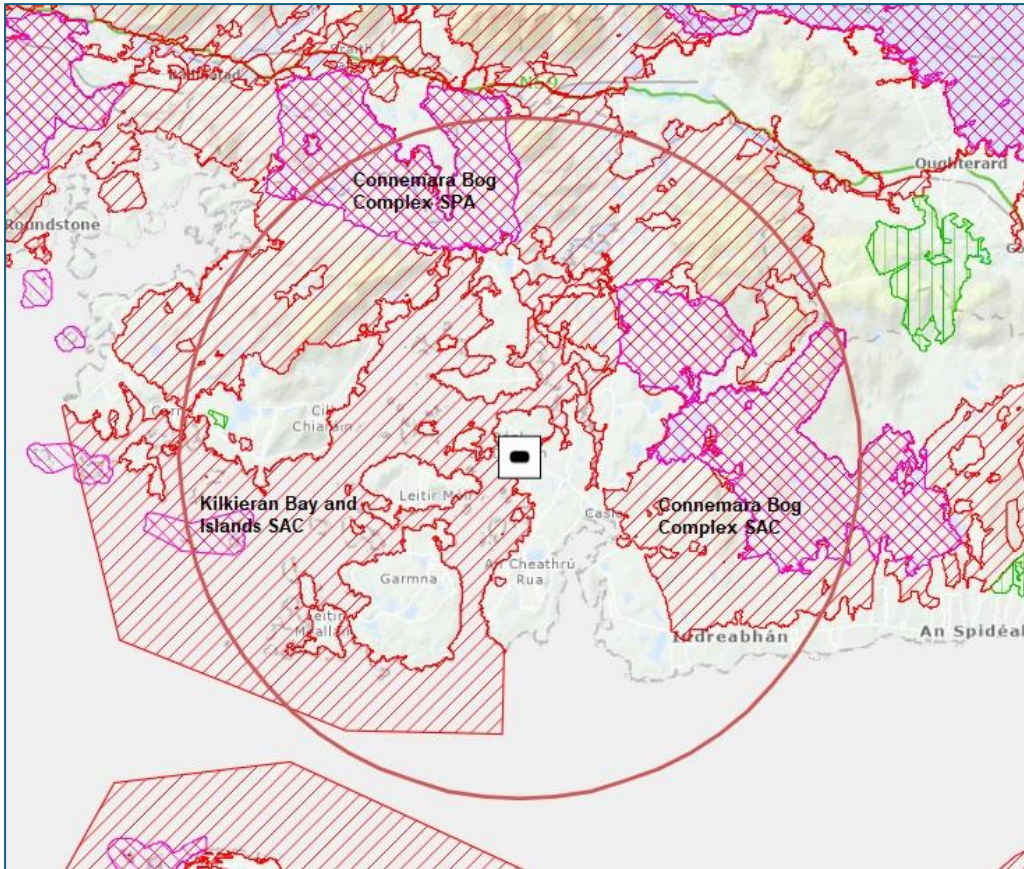


Figure 2 Natura 2000 sites proximal the project site

2.1.1 Stage (1) Appropriate Assessment (AA) Screening

An AA screening report has been undertaken² for the proposed development.

The screening process identifies the likely impacts of a proposed project or plan upon a Natura 2000 site, either alone, or in combination with other projects or plans and considers whether these impacts are likely to be significant.

2.1.2 AA Screening Conclusion

Based on the findings of the AA screening report it is concluded that the proposed development:

- (1) Is not directly connected with or necessary to the management of a Natura 2000 site and
- (2) May have significant impacts on one or more Natura 2000 sites.

² Fitzsimons Walsh environmental, 2025. Appropriate Assessment Screening Report for the Proposed Cuan na Loinge Road Coastal Flooding Mitigation Project

Following an examination, analysis and evaluation of the relevant information and the potential for significant effects on the conservation objectives of Natura 2000 sites, and applying the Precautionary Principle, it is not possible to exclude (on the basis of objective information and in the absence of specific prescribed precautionary/mitigation measures) that the proposed plan individually or in combination with other plans or projects, has the potential to have significant negative impacts on the following Natura 2000 site:

- **Kilkieran Bay and Islands SAC**

Screening having identified potential impacts of the proposed plan upon this Natura 2000 site, and in accordance with Article 6(3) of the Habitats Directive, a Stage 2 Appropriate Assessment is deemed necessary.

- **A Stage 2 Appropriate Assessment will be prepared for submission to the appropriate authorities.**

2.2 Environmental Impact Assessment Report (EIAR)

An EIAR screening determination in respect of the need for an Environmental Impact Assessment Report (EIAR') for the proposed development has been undertaken³.

The objective of the screening exercise is to provide the information required under Schedule 7A, having regard to the criteria set out in Schedule 7 of the Planning and Development Regulations 2001, as amended.

There is a mandatory requirement for an EIAR to accompany a planning application for some types of development that meet or exceed the “thresholds” specified in Schedule 5 to the Planning and Development Regulations. In addition to the mandatory requirement, there is a case-by-case assessment necessary for sub-threshold developments as they may be likely to have significant effects on the environment. If a sub-threshold development is determined to be likely to have significant effect on the environment, then an EIAR will be required.

³ Fitzsimons Walsh environmental, 2025. Environmental Impact Assessment Screening Report for the Proposed Cuan na Loinge Road Coastal Flooding Mitigation Project

The EIA screening report has looked at the likely significant effects on the environment of proposed development in relation to:

- the magnitude and spatial extent of the impact
 - Site Description & Context – Overview of the location, land use, and environmental setting.
 - Protected Areas & Species – Identification of Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and other designated sites.
 - Habitats & Biodiversity – Assessment of existing habitats, including potential impacts on flora and fauna.
 - Water & Drainage – Consideration of flood risks, water quality, and hydrology.
- the nature of the impact
- the transboundary nature of the impact
- the intensity and complexity of the impact
- the probability of the impact
- the expected onset, duration, frequency, and reversibility of the impact
- the in-combination impact of the proposed project along with the impact of other existing and/or proposed development in the area
- the possibility of effectively reducing/mitigating the impact.

2.2.1 EIA Screening Conclusion

The proposed development is outside the mandatory requirements for EIA and is considered to be sub-threshold for the relevant project type.

It has been concluded, having regard to the nature and scale of the proposed works that there is no likelihood of significant effects on the environment (direct, indirect, or cumulatively with other development) and therefore it is considered that an Environmental Impact Assessment Report (EIAR) is not required in this instance.

- **The EIA screening report will be submitted to the appropriate authorities.**

2.3 Ecological Impact assessment (EclA)

It is recommended that an ecological impact assessment be undertaken for the proposed development.

The EclA would.

- Establish baseline ecological data at the proposed development site;
- Determine the ecological value of the identified ecological receptors;
- Assess the potential impacts, including direct, indirect and secondary impacts which may result from the proposed works during construction and operation
- To recommend mitigation measures as appropriate to avoid and / or reduce impacts to the identified ecological features
- Identify any residual impacts post mitigation and recommend appropriate enhancement / restoration measures where feasible.

The EclA would be prepared in accordance with the following legislation and guidelines:

- European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011), as amended. With particular reference to the Third Schedule of the European Communities Regulations 2011 (S.I. No. 477 of 2011) which deals with invasive species.
- The EIA Directive 2011/92/EU, as amended by Directive 2014/52/EU.
- European Union (EU) (Environmental Impact Assessment and Habitats) (No. 2) Regulations 2015 (S.I. No. 320/2015).
- Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, herein referred to as the Habitats Directive.
- Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds, herein referred to as the Birds Directive.
- The EU Water Framework Directive (2000/60/EC).
- The Wildlife Acts 1976 to 2020 (as amended), herein referred to as the Wildlife Acts.
- The Flora (Protection) Order 2015 (S.I. No. 356 of 2015).

The potential for effects on nature conservation interests would be assessed, taking into consideration the habitats and species that are likely to be affected by the proposed development. This approach included consideration (as appropriate) of the following guidance documents:

- Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (DoEHLG 2009, February 2010) and the European Communities (Birds and Natural Habitats) Regulations 2011 (DoEHLG 2011)

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- CIEEM (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine
 - Fossitt (2000). A Guide to Habitats in Ireland. The Heritage Council.

In order to adequately establish the existing, baseline ecology, and determine its value, it is recommended that at least two site surveys be undertaken. These surveys would be undertaken in late spring/early summer and again in late summer.

3.0 Environmental Impact Mitigation

The NIS and the EclA will identify and detail the mitigation measures necessary to eliminate , or reduce to the minimum, any potential negative impact associated with the works.

- A Preliminary Construction Environmental Management Plan (CEMP) will be prepared for submission to the authorities.
- The CEMP will take account of the mitigation measures identified in the Natura Impact Statement and the Ecological Impact Assessment.
- The CEMP can be amended to take account of any conditions the competent authorities may wish to impose.

4.0 Conclusion

This Environmental Constraints Report has examined the scope of the proposed project and has identified the potential environmental factors that could be impacted.

It has been determined that:

- Significant effects on a Natura 2000 site cannot be ruled out therefore a Stage 2 Appropriate Assessment is required.
- An Environmental Impact Assessment Report (EIAR) is not required having considered the nature, scale, and location of the proposed works.
- A full Ecological Impact Assessment (EclA) is required due to the potential impact on the sensitive aquatic habitats surrounding the proposed works

The AA Screening report, the EIA screening report and the EclA will be submitted with the planning application for the project for consideration by the appropriate authorities.