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Natura Impact Statement (NIS) Report



***Páirc na hAbhainn,
Athenry,
Co. Galway***



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Natura Impact Statement (NIS) Report – Páirc na hAbhainn, Athenry, Co. Galway

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1.0 Introduction

1.1 Purpose of this Report

This Natura Impact Statement (NIS) has been prepared by Ash Ecology & Environmental Ltd (AEE) on behalf of Galway County Council (GCC) to accompany the Part 10 application to An Bord Pleanála (ABP) for the proposed residential development of 16 no. two-storey houses at Páirc na hAbhainn, Athenry, Co. Galway.

This NIS has been prepared pursuant to Stage 2 Appropriate Assessment (AA) under Article 6(3) of Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Flora and Fauna (the Habitats Directive), as transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477/2011, as amended). It should be read in conjunction with the Screening for Appropriate Assessment (AA) Report prepared by AEE (May 2026), which concludes that a likely significant effect on the Galway Bay Complex SAC (Site Code: 000268) and the Inner Galway Bay SPA (Site Code: 004031) cannot be excluded solely on the basis of the indirect surface water pathway via the Clarinbridge River.

ABP acts as the competent authority for the purposes of Article 6(3) in respect of this Part 10 application. This NIS provides the information required by ABP to carry out the Stage 2 Appropriate Assessment and to determine whether the proposed development will adversely affect the integrity of the screened-in European sites.

An Environmental Impact Assessment (EIA) Screening Report (AEE, May 2026) and an Ecological Impact Assessment (EcIA) (AEE, May 2026) have also been prepared and should be read alongside this report.

1.2 Competency of Assessor

This NIS has been prepared by Aisling Walsh MCIEEM, AMILP, MSc., Managing Director of Ash Ecology & Environmental Ltd (AEE). Aisling is a Full Member of the Chartered Institute of Ecology and Environmental Management (CIEEM), a Licensed Bat Ecologist (NPWS), and an Associate Member of the Institute of Lighting Professionals (ILP). She holds an MSc in Biodiversity and Conservation (TCD), B.Sc. (Hons) Zoology (NUIG), and B.Sc. Applied Aquatic Science (GMIT).

Aisling has over 18 years of experience in environmental consultancy, including extensive experience in preparing Stage 2 Natura Impact Statements, AA Screening Reports, Ecological Impact Assessments, and Environmental Impact Assessment Reports across a wide range of project types and ecological sensitivities. AEE is a CIEEM Registered Practice (Appendix A).

1.3 Project Description

The proposed development comprises the construction of 16 no. two-storey houses on a greenfield site at Páirc na hAbhainn, Athenry, Co. Galway (Figure 1), together with all associated site development works. The site location and context are shown

on Figures 1 and 2. The proposed site layout is shown on Figure 3a and the drainage layout on Figure 3b. The site habitat is shown on Figure 4.

Key project parameters relevant to this NIS are as follows:

- Site area: 0.651 ha
- Site type: Greenfield, previously used as improved agricultural grassland (GA1)
- Proposed development: 16 no. two-storey houses (8 no. 3-bedroom semi-detached and 8 no. 2-bedroom terraced) with associated roadways, paths, parking, landscaping, boundary treatments and all associated infrastructure
- Foul drainage: Connection to Athenry WWTP (D0193). Irish Water pre-connection feasibility confirmed (ref. CDS25006844). No infrastructure upgrade required
- Surface water drainage: Comprehensive SUDS system comprising Graf Eco Bloc attenuation tank with hydrobrake optimum outflow control device, heavy-duty road gullies (D400), silt trap, and Class 1 petrol interceptor, with controlled discharge to the existing municipal surface water network (Figure 3b)
- Distance to nearest watercourse: Approximately 270 m to the Clarinbridge River (west)
- Distance to Galway Bay Complex SAC: Approximately 10.3 km south-west
- Distance to Inner Galway Bay SPA: Approximately 10.3–11 km south-west
- Planning process: Part 10 application to An Bord Pleanála (Local Authority own development)

A Planning Stage Construction Environmental Management Plan (CEMP) will be required as a planning condition and will incorporate best practice construction environmental management measures for site drainage, sediment control, water quality protection, and related matters. These are described in Section 5.4 of this report.

2.0 Methodology

2.1 Regulatory Framework

Article 6(3) of the Habitats Directive provides that any plan or project not directly connected with or necessary to the management of a European site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. The competent authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned.

Article 6(4) provides that where, despite a negative assessment of the implications for the site, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, all compensatory measures necessary to ensure the overall coherence of Natura 2000 are taken. This NIS is prepared at Stage 2 and addresses whether the proposed development will adversely affect the integrity of the relevant European sites. If no adverse effect on site integrity is concluded, Stages 3 and 4 are not engaged.

2.2 Information Sources

The following information sources were used in the preparation of this NIS:

- NPWS (2013) Conservation Objectives: Galway Bay Complex SAC 000268. Version 1
- NPWS (2013) Conservation Objectives: Inner Galway Bay SPA 004031. Version 1
- NPWS (2015) Site Synopsis: Galway Bay Complex SAC 000268. Version date 10.12.2015
- NPWS (2019) Site Synopsis: Inner Galway Bay SPA 004031. Version date 25.10.2019
- Habitat survey and field assessment undertaken by AEE on 29th August 2025
- WFD surface water and groundwater status data (2019–2024) from the EPA (www.epa.ie) and www.catchments.ie
- GSI groundwater vulnerability mapping (www.gsi.ie)
- National Biodiversity Data Centre (NBDC) species records (www.biodiversityireland.ie)
- Proposed drainage design: Site Layout — Services: Wastewater and Surface Water, Figure 3b (November 2025)
- Irish Water Pre-Connection Enquiry confirmation (ref. CDS25006844)
- AEE AA Screening Report, Páirc na hAbhainn, Athenry (May 2026)
- AEE EclA Report, Páirc na hAbhainn, Athenry (May 2026)

2.3 Approach to Impact Assessment

This NIS addresses the Stage 2 Appropriate Assessment by:

- Describing the characteristics of the European sites screened in, including their conservation objectives and qualifying interests
- Identifying the potential effects of the proposed development on the qualifying interests and conservation objectives of the screened-in sites, distinguishing between construction and operational phases
- Assessing whether those effects, in view of the conservation objectives, would adversely affect the integrity of the sites
- Describing the project design features that prevent or reduce potential effects
- Addressing cumulative and in-combination effects with other plans and projects
- Setting out the overall conclusions on adverse effect on site integrity

The assessment has been carried out in accordance with the European Commission Methodological Guidance (EC, 2021) and OPR Practice Note PN01 (2021). The conservation objectives for both European sites — NPWS (2013) — are the most recently published objectives and are used as the basis for this assessment. These objectives remain valid for the purposes of this assessment in accordance with the notes in the NPWS Conservation Objectives documents.

Throughout this assessment, the precautionary principle has been applied. Where uncertainty exists, the benefit of that doubt has been resolved in favour of the European site, not the development.

3.0 Description of European Sites

3.1 Galway Bay Complex SAC (Site Code: 000268)

3.1.1 Site Description

The Galway Bay Complex SAC (000268) is situated on the west coast of Ireland and comprises the inner, shallow part of Galway Bay, which is partially sheltered by the Aran Islands. The SAC encompasses a diverse range of marine, coastal and terrestrial habitats, including intertidal sediment communities, rocky shores, saltmarshes, coastal lagoons, turloughs, calcareous grasslands, and alkaline fens. The site extends along the coastline of Counties Clare and Galway and has a total area of approximately 23,000 ha.

The site is located approximately 10.3 km south-west of the proposed development, as shown on Figure 5. The SAC overlaps spatially with the Inner Galway Bay SPA (004031); their combined designations reflect both the habitat and bird interest of the area. The SAC also adjoins Moneen Mountain SAC (000054) to the west.

The NPWS site synopsis for the Galway Bay Complex SAC (version date 10.12.2015) is attached as Appendix C.

3.1.2 Qualifying Interests

The Galway Bay Complex SAC is designated for the following qualifying interests (QIs) under Annex I and Annex II of the Habitats Directive (NPWS, 2013). Items marked * are priority habitats.

Table 1 sets out the qualifying interests of the Galway Bay Complex SAC (000268) together with a summary of the relevant conservation objectives for each, as published by the National Parks and Wildlife Service (NPWS, 2013).

Table 1 Qualifying Interests and Special Conservation Interests of the Galway Bay Complex SAC (000268)

Code	Qualifying Interest	Conservation Objective (Summary)
Annex I Habitats		
1140	Mudflats and sandflats not covered by seawater at low tide	To maintain favourable conservation condition. Permanent habitat area stable or increasing. Conserve intertidal sandy mud and sand community types in natural condition.
1150*	Coastal lagoons (priority)	To restore favourable conservation condition. Area stable, subject to natural variation. Maintain appropriate salinity, hydrology, water quality and specialist species.
1160	Large shallow inlets and bays	To maintain favourable conservation condition. Permanent habitat area stable or increasing. Conserve Zostera- and maërl-dominated communities.

Code	Qualifying Interest	Conservation Objective (Summary)
1170	Reefs	To maintain favourable conservation condition. Distribution stable or increasing. Conserve Mytilus-dominated, Laminaria-dominated, and shallow sponge-dominated community types.
1220	Perennial vegetation of stony banks	To maintain favourable conservation condition. Area stable or increasing subject to natural processes. Maintain natural sediment circulation.
1310	Salicornia and other annuals colonising mud and sand	To maintain favourable conservation condition. Area stable or increasing. Maintain natural tidal regime, sediment supply, creek and pan structure.
1330	Atlantic salt meadows (Glauco-Puccinellietalia maritima)	To restore favourable conservation condition. Area increasing. Maintain tidal regime, sediment supply and vegetation communities.
1410	Mediterranean salt meadows (Juncetalia maritimi)	To restore favourable conservation condition. Area stable or increasing. Maintain natural tidal regime and vegetation communities.
3180*	Turloughs (priority)	To maintain favourable conservation condition. Area stable at ~59 ha or increasing. Maintain appropriate hydrological regime, soil types, water quality and vegetation.
5130	Juniperus communis formations on heaths or calcareous grasslands	To restore favourable conservation condition. At least 1.4 ha at mapped location. At least 50 plants. Maintain appropriate structure and management.
6210	Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco Brometalia) (*important orchid sites)	To maintain favourable conservation condition. Area stable or increasing. Maintain broadleaf herb component and typical species.
7210*	Calcareous fens with Cladium mariscus and species of the Caricion davallianae (priority)	To maintain favourable conservation condition. Maintain natural hydrological regime, water quality, and vegetation cover.
7230	Alkaline fens	To maintain favourable conservation condition. Maintain natural hydrological regime, water quality, and typical vegetation.
Annex II Species		
1355	Otter (Lutra lutra)	To restore favourable conservation condition. No significant decline in distribution. Conserve extent of terrestrial, marine and freshwater habitat. No significant increase in barriers to connectivity.
1365	Harbour Seal (Phoca vitulina)	To maintain favourable conservation condition. Conserve breeding, moulting and resting haul-out sites. Human activities at levels not adversely affecting harbour seal population.

3.1.3 Conservation Status

The Galway Bay Complex SAC is of immense conservation importance, supporting many habitats listed on Annex I of the EU Habitats Directive, four of which have priority status (coastal lagoons, turloughs, Cladium fens, and orchid-rich calcareous grassland). The site supports an important Common Seal colony (maximum count of 317 in the all-Ireland survey of 2003) and a breeding Otter population. Galway Bay is a very important ornithological site, with Brent Goose having a population of international importance. The site overlaps with the Inner Galway Bay SPA (004031) and this overlap is shown on Map 2 of the NPWS Conservation Objectives document (NPWS, 2013).

The conservation objectives note that eutrophication is a continued threat to the lagoons within the site. Sewage effluent and detritus from the aquaculture industry are identified as concerns in relation to benthic communities. Drainage is identified as a general threat to the turlough and fen habitats. These existing pressures provide important context for the assessment of the proposed development's effects.

3.2 Inner Galway Bay SPA (Site Code: 004031)

3.2.1 Site Description

The Inner Galway Bay SPA (004031) is a very large marine-dominated site situated on the west coast of Ireland. The inner bay is protected from Atlantic swells by the Aran Islands and Black Head. The SPA encompasses intertidal sand and mud flats, saltmarshes, shallow marine waters, rocky shores, shingle beaches and a number of small islands and rocky islets. The total wetland habitat area is estimated at 13,267 ha (NPWS, 2013).

The Inner Galway Bay SPA overlaps spatially with the Galway Bay Complex SAC (000268). This overlap is shown on Map 2 of both NPWS Conservation Objectives documents. The two designations are assessed together in this NIS where appropriate.

The NPWS site synopsis for the Inner Galway Bay SPA (version date 25.10.2019) is also included in Appendix C.

3.2.2 Qualifying Interests

The Inner Galway Bay SPA is designated for the following qualifying interests (bird species and wetland habitat) under the Birds Directive 2009/147/EC (NPWS, 2013), as set out in Table 2.

Table 2 Qualifying Interests of the Inner Galway Bay SPA (004031)

Code	Species / Feature	Conservation Objective (Summary)
A003	Great Northern Diver (<i>Gavia immer</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. No significant decrease in range, timing or intensity of use.
A017	Cormorant (<i>Phalacrocorax carbo</i>)	To maintain favourable conservation condition. No significant decline in breeding population, productivity, distribution or prey biomass. No significant increase in barriers to connectivity.
A028	Grey Heron (<i>Ardea cinerea</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. No significant decrease in range.
A046	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. Internationally important population (676 five-year mean peak).
A050	Wigeon (<i>Anas penelope</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. No significant decrease in range, timing or intensity of use.
A052	Teal (<i>Anas crecca</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. No significant decrease in range.
A056	Shoveler (<i>Anas clypeata</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. No significant decrease in range.
A069	Red-breasted Merganser (<i>Mergus serrator</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. Nationally important population (249 five-year mean peak).
A137	Ringed Plover (<i>Charadrius hiaticula</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. Nationally important population.
A140	Golden Plover (<i>Pluvialis apricaria</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. Nationally important population (2,030 five-year mean peak).
A142	Lapwing (<i>Vanellus vanellus</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing.

Code	Species / Feature	Conservation Objective (Summary)
		Nationally important population (3,969 five-year mean peak).
A149	Dunlin (<i>Calidris alpina alpina</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. Nationally important population (2,155 five-year mean peak).
A157	Bar-tailed Godwit (<i>Limosa lapponica</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. Nationally important population (447 five-year mean peak).
A160	Curlew (<i>Numenius arquata</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. Nationally important population (697 five-year mean peak).
A162	Redshank (<i>Tringa totanus</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. Nationally important population (505 five-year mean peak).
A169	Turnstone (<i>Arenaria interpres</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. No significant decrease in range.
A179	Black-headed Gull (<i>Chroicocephalus ridibundus</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. Nationally important population.
A182	Common Gull (<i>Larus canus</i>)	To maintain favourable conservation condition. Long-term population trend stable or increasing. No significant decrease in range.
A191	Sandwich Tern (<i>Sterna sandvicensis</i>)	To maintain favourable conservation condition. No significant decline in breeding population abundance or productivity. No significant decline in prey biomass available.
A193	Common Tern (<i>Sterna hirundo</i>)	To maintain favourable conservation condition. No significant decline in breeding population abundance or productivity. No significant decline in prey biomass available.
A999	Wetlands	To maintain favourable conservation condition of wetland habitat as a resource for regularly occurring migratory waterbirds. Permanent wetland area stable at not significantly less than 13,267 ha.

3.2.3 Conservation Status

Inner Galway Bay supports two wintering species with populations of international importance: Great Northern Diver and Light-bellied Brent Goose. A further 16 wintering species have populations of national importance. The SPA also supports nationally important breeding colonies of Sandwich Tern, Common Tern, and Cormorant. Six regularly occurring species are listed on Annex I of the EU Birds Directive. Inner Galway Bay is also a Ramsar Convention site.

The permanent wetland habitat area of 13,267 ha provides the foraging and roosting resource for all of the SPA's bird qualifying interests. The integrity of the SPA is fundamentally dependent on the maintenance of wetland habitat quality and extent, particularly the intertidal mudflats, sandflats, and shallow marine waters that support the diversity and abundance of invertebrate and fish prey species on which the bird qualifying interests depend.

4.0 Site Description and Hydrological Context

4.1 Site Characteristics

The development site is located at Páirc na hAbhainn, Athenry, Co. Galway (Figure 1). It comprises a triangular greenfield site of approximately 0.651 ha, situated to the south of the existing Páirc na hAbhainn housing estate at Baunmore, Athenry. The site boundaries are formed by the rear boundary walls and timber fencing of the existing estate to the north, old dry-stone walls to the east, the existing road to the west, and dry-stone walls and intermittent hedging to the south. The topography is steep, sloping approximately 5.5 metres from the lowest to highest point, with the most significant gradient at the north-east corner.

Ecological survey was undertaken on 29th August 2025. The site is dominated by Improved Agricultural Grassland (GA1), a ryegrass-dominated sward of low floristic diversity indicating intensive agricultural management. Boundary habitats include Grassy Meadows (GS2), dry-stone walls with intermittent hedging (BL1/WL1), and block walls and fencing (BL3). The habitat map is shown on Figure 4 and site photographs are in Appendix B.

No standing water, wetland features, drainage ditches, springs, or indicators of groundwater influence at the surface were recorded on site during field survey. No Annex II species or SCI bird species were recorded on site. No other signs (spraints, footprints, couching sites, holts) were recorded.

4.2 Hydrological Context

4.2.1 Surface Water

The WFD catchment context is shown on Figure 8. The site is located within Hydrometric Area 29 (Galway Bay South East), WFD Sub-Catchment Clarinbridge_SC_010, and River Sub-Basin CLARINBRIDGE_030.

The nearest watercourse is the Clarinbridge River, located approximately 270 m to the west of the site boundary (Figure 2). This is an upland river section at this location; it does not exhibit tidal, intertidal, or estuarine characteristics within the vicinity of the site. The Clarinbridge River flows south-westward, discharging to Inner Galway Bay approximately 10.3 km downstream, where it enters the zone of the Galway Bay Complex SAC and Inner Galway Bay SPA.

The WFD River Waterbody Status of CLARINBRIDGE_030 is 'Moderate' for the 2019–2024 cycle, and the waterbody is classified as 'At Risk'. The Moderate status reflects existing pressures in the catchment; the development's drainage design has been prepared with this status in mind.

Ballygarraun South stream is also shown on Figure 2. This stream is located north-east of the site; the proposed development does not drain to this stream.

4.2.2 Groundwater

The GSI groundwater vulnerability mapping indicates that the site overlies an area of High groundwater vulnerability (Figure 8 inset). High vulnerability reflects limited natural attenuation capacity of the unsaturated zone between the surface and the water table, meaning that surface-derived contamination could, in principle, reach groundwater relatively readily.

However, the WFD Groundwater Body Status for the 'Clarinbridge' groundwater body is 'Good' and 'Not at Risk' (2019–2024). This confirms that the High vulnerability has not resulted in deterioration of groundwater quality in the receiving water body. The groundwater body is in good condition.

Critically, the nearest groundwater-dependent European sites — Rahasane Turlough SAC/SPA (6.8–7.6 km) and Kiltiernan Turlough SAC (13.7 km) — lie in a separate groundwater catchment from the proposed development site. There is no hydrological connection between the site's groundwater and those turlough systems. This has been established through analysis of catchment data and WFD groundwater body delineations. The Galway Bay Complex SAC and Inner Galway Bay SPA are marine-dominated sites; their qualifying interest habitats are not groundwater-dependent in the sense relevant to a land-based groundwater contamination pathway. The credible impact pathway to these sites is via the surface water route only, as addressed in this NIS.

4.3 Proposed Drainage Design

The drainage design is shown on Figure 3b. The drainage system has been designed and specified in accordance with Irish Water Codes of Practice for wastewater and surface water infrastructure. It constitutes an integral, committed element of the planning application as submitted.

The following drainage infrastructure is proposed:

- Foul water: Full separate foul water drainage system connecting all 16 units to a dedicated estate connection point, discharging to the existing public foul sewer network and onward to Athenry WWTP (D0193). Irish Water pre-connection feasibility has been confirmed without infrastructure upgrade (ref. CDS25006844). No foul water will be discharged to any surface water body or groundwater under any circumstances.
- Surface water: Surface water from roofs, roads and hard surfaces will be collected via heavy-duty gullies (D400) and directed to a Graf Eco Bloc underground attenuation tank. The attenuation tank is controlled by a hydrobrake optimum flow control device to manage the rate of discharge. Ahead of the attenuation tank, runoff passes through a silt trap and Class 1 petrol interceptor, providing treatment of suspended solids and hydrocarbon contamination before any discharge to the public drainage network.
- Drainage notes: All drainage works are to be constructed in full compliance with Irish Water standards. All pipe work to comply with current TGD Part H.

These design features are permanent engineered elements of the development as submitted. They are not mitigation measures introduced in response to European site considerations; they are inherent design features that intercept, attenuate, and treat surface water before any discharge from the site. As such, they are properly characterised as project design features rather than Article 6 mitigation measures.

5.0 Assessment of Effects on European Sites

5.1 Scope of Assessment

The AA Screening Report (AEE, May 2026) identifies the sole credible impact pathway from the proposed development to the European sites as the indirect surface water route: surface water runoff from the development site → SUDS system → existing municipal surface water network → Clarinbridge River (270 m) → ~10.3 km downstream → Inner Galway Bay (Galway Bay Complex SAC / Inner Galway Bay SPA).

Direct habitat loss, species disturbance, air quality, noise and vibration, and land-based impacts do not constitute credible pathways to any qualifying interest of either European site at the distances involved and are not assessed further in this NIS. They are addressed comprehensively in the AA Screening Report and EclA.

This section assesses the potential effects of the proposed development on each relevant qualifying interest for both the construction and operational phases, and determines whether those effects would adversely affect the integrity of the sites.

5.2 Galway Bay Complex SAC (000268) — Construction Phase

5.2.1 Qualifying Interests with a Potential Pathway

The only conceivable mechanism by which the proposed development could affect the Galway Bay Complex SAC during construction is through surface water carrying suspended sediment, silt, or pollutant contamination (accidental spillage of fuels, concrete, or similar) from the construction site to the Clarinbridge River, and thence downstream to Inner Galway Bay. The qualifying interests of the SAC that are theoretically susceptible to water quality impacts at the bay are those of the marine and intertidal environment, specifically:

- Mudflats and sandflats not covered by seawater at low tide [1140]
- Coastal lagoons [1150]
- Large shallow inlets and bays [1160]
- Reefs [1170]
- Atlantic salt meadows [1330] and Mediterranean salt meadows [1410] (insofar as water quality affects saltmarsh habitat at the bay)
- Otter [1355] (insofar as water quality affects prey availability)
- Harbour Seal [1365] (insofar as water quality affects habitat and prey at the bay)

The remaining qualifying interests — Perennial vegetation of stony banks [1220], *Salicornia* [1310], Turloughs [3180], Juniper scrub [5130], Calcareous grassland [6210], Calcareous fens [7210], and Alkaline fens [7230] — are entirely terrestrial or groundwater-dependent habitats remote from any surface water pathway from the development. They are not susceptible to water quality impacts from a site 10.3 km upstream and are screened out within this NIS without further assessment.

5.2.2 Characteristics of the Pathway

The pathway from the construction site to the qualifying interest habitats at Inner Galway Bay is indirect, multi-stage, and highly attenuated:

- Stage 1 — Site to drainage network: The SUDS system (silt trap + Class 1 petrol interceptor + attenuation tank with hydrobrake) must be bypassed or overloaded before any contamination reaches the public drainage network. The SUDS has been designed and engineered specifically to prevent this.
- Stage 2 — Drainage network to Clarinbridge River: Any contamination entering the drainage network must travel through the existing municipal surface water infrastructure to reach the Clarinbridge River. The public drainage network provides additional dilution and attenuation.
- Stage 3 — Clarinbridge River (270 m → ~10.3 km): The Clarinbridge River provides approximately 10.3 km of watercourse between the point of potential entry and Inner Galway Bay. The river provides substantial dilution, sedimentation, and biological attenuation over this distance. The river is not tidal within the vicinity of the site.
- Stage 4 — Clarinbridge River to Inner Galway Bay: The river discharges to the inner bay. At this point, any residual contamination would be subject to tidal mixing, dilution, and dispersion within a water body of approximately 13,267 ha. The qualifying interest habitats — mudflats, saltmarshes, lagoons, reefs — are distributed across this extensive coastal area.

The pathway is therefore characterised by four stages of attenuation: engineered SUDS treatment, drainage network dilution, river transport and natural attenuation over 10.3 km, and tidal mixing in the bay. A construction site of 0.651 ha with a comprehensive SUDS system, managed under a CEMP, does not represent a credible source of contamination capable of causing measurable effects on water quality at Inner Galway Bay 10.3 km distant, let alone effects of a magnitude sufficient to impair the qualifying interests of the SAC.

5.2.3 Assessment Against Conservation Objectives

Table 3 sets out the assessment of likely effects on each screened-in qualifying interest of the Galway Bay Complex SAC during the construction phase of the proposed development.

Table 3 Assessment of Likely Effects on Qualifying Interests of the Galway Bay Complex SAC (000268) — Construction Phase

QI Code	Qualifying Interest	Assessment	Conclusion
1140	Mudflats and sandflats	The mudflats and sandflats of Galway Bay Complex SAC are located at the coast, approximately 10.3 km downstream of the site. Any silt mobilised from the construction	No adverse effect on site integrity

QI Code	Qualifying Interest	Assessment	Conclusion
		site would be intercepted by the SUDS silt trap and attenuation system, attenuated over 10.3 km of river, and diluted by tidal mixing before reaching intertidal sediment communities. No measurable effect on habitat area, community distribution, or sediment quality is credible at this distance and scale.	
1150	Coastal lagoons (priority)	Coastal lagoons in this SAC are sensitive to water quality changes, particularly elevated nutrients and altered salinity. However, the source (0.651 ha residential development with full SUDS) is of negligible scale relative to the catchment and the 10.3 km attenuation pathway. No credible mechanism exists by which construction-phase runoff from this site could measurably alter water quality in coastal lagoons at Inner Galway Bay.	No adverse effect on site integrity
1160	Large shallow inlets and bays	The large shallow inlets and bays QI encompasses the marine habitat of Inner Galway Bay. The proposed development connects to Athenry WWTP for all foul water, and surface water is treated through SUDS before discharge. The scale of the development and the distance to the bay preclude any measurable effect on the Zostera- or maërl-dominated communities of this habitat at the bay.	No adverse effect on site integrity
1170	Reefs	Reef communities of the SAC are located in the bay and subtidal zone. No mechanism exists by which construction-phase surface water from a 0.651 ha residential site 10.3 km upstream, with a full SUDS system in place, could impair reef community structure, distribution, or species composition.	No adverse effect on site integrity
1330/1410	Saltmarsh habitats	Atlantic and Mediterranean salt meadows are found along the sheltered inlets and bays of Galway Bay. Their conservation	No adverse effect on site integrity

QI Code	Qualifying Interest	Assessment	Conclusion
		objectives require maintenance of natural tidal regime, sediment supply, creek and pan structure, and vegetation communities. No construction-phase impact from this site could affect any of these attributes at a distance of 10.3 km.	
1355	Otter (<i>Lutra lutra</i>)	No otter field signs were recorded on site. The site is 270 m from the Clarinbridge River. No works are proposed within or adjacent to the river bank. The SUDS design prevents any foul water or untreated surface water entering the drainage system. Any indirect effect on otter prey biomass via water quality at the bay is not credible given the pathway attenuation described in Section 5.2.2.	No adverse effect on site integrity
1365	Harbour Seal (<i>Phoca vitulina</i>)	Harbour Seals use haul-out sites distributed around Inner Galway Bay. Their conservation objectives require maintenance of breeding, moulting and resting sites, and human activities at levels not adversely affecting the population. No works are proposed at or near the bay. No disturbance pathway exists. Any indirect effect via water quality is not credible at this distance and scale.	No adverse effect on site integrity

5.3 Galway Bay Complex SAC (000268) — Operational Phase

5.3.1 Foul Water

All foul water from the 16 houses will be discharged to Athenry WWTP (D0193) with confirmed Irish Water pre-connection feasibility. No foul water will be discharged to any surface water body or groundwater. The WWTP operates under EPA licence. There is no operational foul water pathway to any European site.

5.3.2 Surface Water

During the operational phase, surface water from the developed site (roofs, roads, paths, hard standings) will be managed through the permanent SUDS system (attenuation tank, hydrobrake, silt trap, petrol interceptor). The developed site replaces previous improved grassland with impermeable surfaces, but the SUDS system is designed to manage post-development runoff rates and quality. The

residential use of the site generates significantly less surface water contamination risk than the agricultural use it replaces (fertiliser, herbicide, livestock).

Table 4 sets out the assessment of likely effects on each screened-in qualifying interest of the Galway Bay Complex SAC during the operational phase of the proposed development

Table 4 Assessment of Likely Effects on Qualifying Interests of the Galway Bay Complex SAC (000268) — Operational Phase

QI Code	Qualifying Interest	Assessment	Conclusion
1140	Mudflats and sandflats	Operational residential surface water, treated through SUDS, presents no credible mechanism to affect mudflat or sandflat habitat area, community distribution, or sediment quality at Inner Galway Bay 10.3 km downstream.	No adverse effect on site integrity
1150	Coastal lagoons (priority)	Residential surface water nutrient and pollutant loading, treated through SUDS, is negligible relative to catchment-scale inputs and the distance to the lagoons. No operational pathway for adverse effects on lagoon water quality, salinity, or specialist species.	No adverse effect on site integrity
1160	Large shallow inlets and bays	16 residential units with full WWTP connection and SUDS cannot cause measurable change to the water quality of a 10,825 ha estuarine and marine habitat 10.3 km distant.	No adverse effect on site integrity
1170	Reefs	No operational pathway for adverse effects on reef community structure or species composition at the bay.	No adverse effect on site integrity
1330/1410	Saltmarsh habitats	No operational pathway for adverse effects on saltmarsh habitat area, tidal regime, sediment supply, creek structure, or vegetation communities at the bay.	No adverse effect on site integrity
1355	Otter (<i>Lutra lutra</i>)	No operational foul water discharge to any watercourse. SUDS-treated surface water presents no credible mechanism to affect otter prey biomass in the bay.	No adverse effect on site integrity

QI Code	Qualifying Interest	Assessment	Conclusion
1365	Harbour Seal (<i>Phoca vitulina</i>)	No operational pathway for disturbance or habitat degradation at Harbour Seal haul-out sites at Inner Galway Bay. No mechanism for population-level effects via water quality at 10.3 km.	No adverse effect on site integrity

5.4 Construction Environmental Management Plan

A Planning Stage Construction Environmental Management Plan (CEMP) will be required as a planning condition. The CEMP will incorporate the following standard construction best practice measures, which constitute good site management applicable to any competently managed construction site regardless of proximity to a European site:

- Perimeter silt fencing to retain sediment on-site during earthworks and construction
- Wheel wash facilities at site exit points during ground-working phases
- All stockpiles of excavated material to be covered during rainfall events to prevent silt mobilisation
- Designated wash-out area for concrete away from any drainage run-off path; no concrete wash-out to drains or watercourses
- Spill kits to be maintained on site at all times; all contractors to be briefed on spill response procedures
- All refuelling to take place in a designated bunded area with a minimum 200-litre spill capacity
- No storage of fuels, oils, or chemicals within 10 m of any drainage inlet or surface water feature
- Site drainage to be connected to temporary silt traps during construction phase
- No burning of materials on site
- The CEMP to be implemented by a named Environmental Clerk of Works during construction

It is important to note that these measures are standard construction environmental best practice. They are not Article 6 mitigation measures designed to address a specific impact on the qualifying interests of a European site; they are measures that would be implemented on any competently managed construction site. Their implementation provides additional assurance that the already-attenuated surface water pathway cannot give rise to any effect on the SAC or SPA, but the conclusion of no adverse effect on site integrity is not contingent on these measures alone — it is founded primarily on the inherent project design features described in Section 4.3 and the characteristics of the pathway described in Section 5.2.2.

5.5 Inner Galway Bay SPA (004031) — Construction Phase

The Inner Galway Bay SPA overlaps spatially with the Galway Bay Complex SAC. The qualifying interests of the SPA are bird species and the Wetlands habitat [A999] that

supports them. The pathway assessment for construction-phase water quality effects set out in Section 5.2 applies equally to the SPA. The additional question for the SPA is whether construction-phase activities could affect any of the bird qualifying interests through mechanisms other than water quality.

Direct disturbance, noise, or visual impacts on SPA bird species are not credible at distances of 10.3–11 km. The SPA bird species associated with qualifying interests are estuarine and coastal birds that use Inner Galway Bay and its intertidal margins; none of these species are present on or adjacent to the development site at any time, and no nesting, roosting, or foraging habitat for any SCI bird species is present on the site. Light spillage during construction is localised and has no pathway to the bay.

Table 5 sets out the assessment of likely effects on each screened-in qualifying interest of the Inner Galway Bay SPA during the construction phase of the proposed development.

Table 5 Assessment of Likely Effects on Qualifying Interests of the Inner Galway Bay SPA (004031) — Construction Phase

Code	Qualifying Interest	Assessment	Conclusion
A999	Wetlands	Wetland habitat area of 13,267 ha. The permanent area of wetland habitat is dependent on coastal and tidal processes, not on land management 10.3 km upstream. No construction-phase impact from this site could affect the area or quality of the wetland habitat supporting the SPA's bird qualifying interests.	No adverse effect on site integrity
A003	Great Northern Diver	Wintering species using open bay waters. No nesting, roosting or foraging habitat on site. Distance of 10.3 km precludes any disturbance effect. Water quality pathway is not credible at this scale and distance.	No adverse effect on site integrity
A046	Light-bellied Brent Goose	Internationally important wintering population (676). Uses intertidal and saltmarsh areas of Inner Galway Bay. No habitat for this	No adverse effect on site integrity

Code	Qualifying Interest	Assessment	Conclusion
		species on site. No disturbance or water quality pathway credible at 10.3 km.	
A149	Dunlin	Nationally important wintering population (2,155). Uses intertidal mudflats and saltmarsh. No habitat on site. No disturbance or water quality pathway credible at this scale and distance.	No adverse effect on site integrity
A162	Redshank	Nationally important wintering population (505). Uses intertidal habitat at the bay. No habitat on site. No credible pathway for construction impacts.	No adverse effect on site integrity
A191/A193	Sandwich Tern / Common Tern	Breeding colonies on offshore islands and islets in the bay. No nesting habitat on site. Distance of 10.3 km precludes any disturbance effect on breeding colonies. No water quality impact credible at this scale.	No adverse effect on site integrity
A017/A028/A050/A052/A056/A069/A137/A140/A142/A157/A160/A169/A179/A182	Remaining bird qualifying interests	All remaining bird QIs use estuarine, intertidal, or open bay habitats located at Inner Galway Bay 10.3 km from the site. None of these species are present on or adjacent to the site. No credible disturbance, habitatloss, or water quality pathway exists for any of these species.	No adverse effect on site integrity

5.6 Inner Galway Bay SPA (004031) — Operational Phase

Table 6 sets out the assessment of likely effects on each screened-in qualifying interest of the Inner Galway Bay SPA during the operational phase of the proposed development.

Table 6 Assessment of Likely Effects on Qualifying Interests of the Inner Galway Bay SPA (004031) — Operational Phase

Code	Qualifying Interest	Assessment	Conclusion
A999	Wetlands	No operational pathway for adverse effects on wetland habitat area or quality at Inner Galway Bay. Foul water to WWTP. Surface water managed through SUDS. No mechanism for habitat loss or degradation at 10.3 km.	No adverse effect on site integrity
All bird QIs	All bird qualifying interests	All bird QIs depend on the intertidal and estuarine habitat of Inner Galway Bay. The operational residential development does not introduce any disturbance source at or near the bay. Foul water is treated at WWTP. Surface water is managed through SUDS. No operational pathway for adverse effects on population abundance, productivity, distribution, or foraging resources of any bird QI.	No adverse effect on site integrity

6.0 In-Combination Effects

6.1 Plans and Projects Considered

Article 6(3) of the Habitats Directive requires that the assessment considers whether the proposed development, in combination with other plans or projects, could adversely affect the integrity of the European sites. The following plans and projects have been considered:

- Galway County Development Plan 2022–2028
- Athenry Local Area Plan 2024–2030
- Planning application ref. 2461699 (49 no. houses, Farranablake East, Athenry) — NIS submitted by Enviroplan Consulting Limited
- Planning application ref. 2561842 (23 no. residential units, Knockaunglass, Athenry) — NIS submitted by Enviroplan Consulting Limited
- Other permitted and proposed residential developments in the Athenry area
- Existing water quality pressures in the Clarinbridge_030 waterbody (currently at 'Moderate' status)

6.2 In-Combination Assessment

The Clarinbridge River system serves a wider catchment that includes agricultural land, the town of Athenry, and a number of residential developments. The CLARINBRIDGE_030 waterbody is at 'Moderate' WFD status and is 'At Risk', reflecting existing diffuse and point source pressures in the catchment.

The proposed development, comprising 16 no. two-storey houses with full WWTP connection and SUDS treatment of surface water, represents a de minimis addition to the overall catchment loading. The wastewater loading on Athenry WWTP has been confirmed by Irish Water as feasible without infrastructure upgrade. The SUDS system treats surface water before discharge; the residential use the site replaces agricultural grassland which was an unmanaged source of diffuse run-off with no treatment system.

Compared with the two neighbouring developments (refs. 2461699 and 2561842) that have also been assessed for their effects on the Galway Bay Complex SAC and Inner Galway Bay SPA, the proposed development presents a lower-risk profile: the nearest watercourse (Clarinbridge River) is 270 m from the site boundary, significantly further than the Ballygarraun South stream (40 m) adjacent to ref. 2461699; the site is not within a flood zone; and there is no on-site drainage ditch. The addition of this development to the catchment in combination with other residential developments does not alter the fundamental conclusion: the cumulative surface water loading from residential developments with WWTP connections and SUDS systems in this catchment will not adversely affect the integrity of the Galway Bay Complex SAC or Inner Galway Bay SPA.

The conservation objectives for both the SAC and SPA require maintenance or restoration of favourable conservation condition for the relevant qualifying interests. The attributes and targets set for these qualifying interests (NPWS, 2013) are defined in relation to the conditions and pressures at and within the European sites themselves, not in relation to individual small-scale developments 10.3 km upstream

in their shared catchment. In-combination effects from this development and other plans and projects in the Clarinbridge catchment do not constitute an adverse effect on the integrity of either European site.

7.0 Water Framework Directive Non-Deterioration Obligation

Under the Water Framework Directive (2000/60/EC), Member States must implement measures to prevent deterioration of water body status. The relevant surface water body — CLARINBRIDGE_030 — is at 'Moderate' status and 'At Risk'. The WFD non-deterioration obligation requires that the proposed development does not cause further deterioration in this waterbody's status.

The proposed drainage design, incorporating a silt trap, Class 1 petrol interceptor, and attenuation tank with hydrobrake outflow control, ensures that post-development surface water discharge quality will meet the WFD non-deterioration standard. All foul water is discharged to Athenry WWTP under confirmed Irish Water consent. The development replaces a previously unmanaged agricultural grassland with a fully managed drainage system. The WFD non-deterioration obligation is met.

The WFD Groundwater Body Status is 'Good' and 'Not at Risk'. The proposed development does not involve deep excavation, groundwater abstraction, or any activity that could alter groundwater flow or quality. The WFD groundwater non-deterioration obligation is met.

8.0 Adverse Effect on Site Integrity — Overall Assessment

8.1 Definition of Site Integrity

Site integrity is defined by the European Commission as the coherence of a site's ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the level of populations of the species for which it was classified (European Commission, 2000). The assessment of adverse effect on site integrity is made with reference to the conservation objectives for the qualifying interests of each European site.

8.2 Galway Bay Complex SAC (000268)

Having assessed the potential effects of the proposed development on each qualifying interest of the Galway Bay Complex SAC in Sections 5.2 and 5.3, and having considered in-combination effects in Section 6.0, it is concluded that the proposed development will not adversely affect the integrity of the Galway Bay Complex SAC (000268).

The basis for this conclusion is as follows:

- The only credible impact pathway — indirect surface water via the Clarinbridge River — is so highly attenuated by the distance of 10.3 km, the engineered SUDS drainage design, the multi-stage attenuation described in Section 5.2.2, and the tidal mixing and dilution in the bay, that no measurable effect on any qualifying interest at the SAC is possible
- No qualifying interest of the SAC is present at or near the development site
- No Annex II species associated with the SAC were recorded on site
- All foul water is discharged to Athenry WWTP with confirmed Irish Water pre-connection feasibility
- The drainage infrastructure shown on Figure 3b is a Final-status engineered drawing committed to in the planning application
- The conservation objectives for all qualifying interests of the SAC will continue to be met and their achievement will not be impeded by this development

8.3 Inner Galway Bay SPA (004031)

Having assessed the potential effects of the proposed development on each qualifying interest of the Inner Galway Bay SPA in Sections 5.5 and 5.6, and having considered in-combination effects in Section 6.0, it is concluded that the proposed development will not adversely affect the integrity of the Inner Galway Bay SPA (004031).

The basis for this conclusion is as follows:

- No bird qualifying interest of the SPA is present on or adjacent to the development site
- No suitable nesting, roosting, or foraging habitat for any SCI bird species is present on site

- No disturbance pathway exists from the development site to any bird qualifying interest of the SPA
- The sole potential impact pathway — indirect surface water effects on the Wetlands QI [A999] and associated bird foraging habitat — is not credible at a distance of 10.3 km with the engineered drainage system in place
- The permanent wetland habitat area of the SPA (13,267 ha) will not be reduced or degraded by this development
- The conservation objectives for all qualifying interests of the SPA will continue to be met and their achievement will not be impeded by this development

8.4 Summary Table

Table 7 provides an overall summary of the conclusions of this Natura Impact Statement in relation to adverse effect on the integrity of the Galway Bay Complex SAC (000268) and the Inner Galway Bay SPA (004031), individually and in combination with other plans and projects, having regard to the full assessment set out in Sections 5.2 to 5.6 and the in-combination assessment in Section 6.0.

Table 7 Adverse Effect on Site Integrity — Summary of Conclusions

European Site	Adverse Effect on Integrity	Basis
Galway Bay Complex SAC (000268)	NO	Indirect surface water pathway is so highly attenuated by SUDS design, 10.3 km river distance, and tidal mixing that no measurable effect on any qualifying interest is possible. All foul water to WWTP. No Annex II species on site. Conservation objectives will continue to be met.
Inner Galway Bay SPA (004031)	NO	No SCI bird species on site. No disturbance pathway. No credible water quality pathway to Wetlands QI or bird foraging habitat at 10.3 km. Conservation objectives will continue to be met.
In-combination	NO	De minimis addition to catchment loading. WWTP confirmed. SUDS drainage designed to WFD non-deterioration standard. Cumulative effects with neighbouring developments and catchment plans do not adversely affect site integrity of either European site.

9.0 Conclusions

This Natura Impact Statement has been prepared by Ash Ecology & Environmental Ltd on behalf of Galway County Council for the proposed development of 16 no. two-storey houses at Páirc na hAbhainn, Athenry, Co. Galway, pursuant to Article 6(3) of the Habitats Directive and S.I. No. 477/2011.

The NIS has assessed the potential effects of the proposed development on the qualifying interests of the Galway Bay Complex SAC (000268) and the Inner Galway Bay SPA (004031), which were screened in by the AA Screening Report (AEE, May 2026) on the basis of the indirect surface water pathway via the Clarinbridge River.

Having carried out a thorough Stage 2 Appropriate Assessment of all potential impacts, including construction and operational phases and in-combination effects with other plans and projects, AEE concludes as follows:

The proposed development at Páirc na hAbhainn, Athenry, Co. Galway will not adversely affect the integrity of the Galway Bay Complex SAC (000268) or the Inner Galway Bay SPA (004031), alone or in combination with other plans or projects.

This conclusion is reached on the basis of:

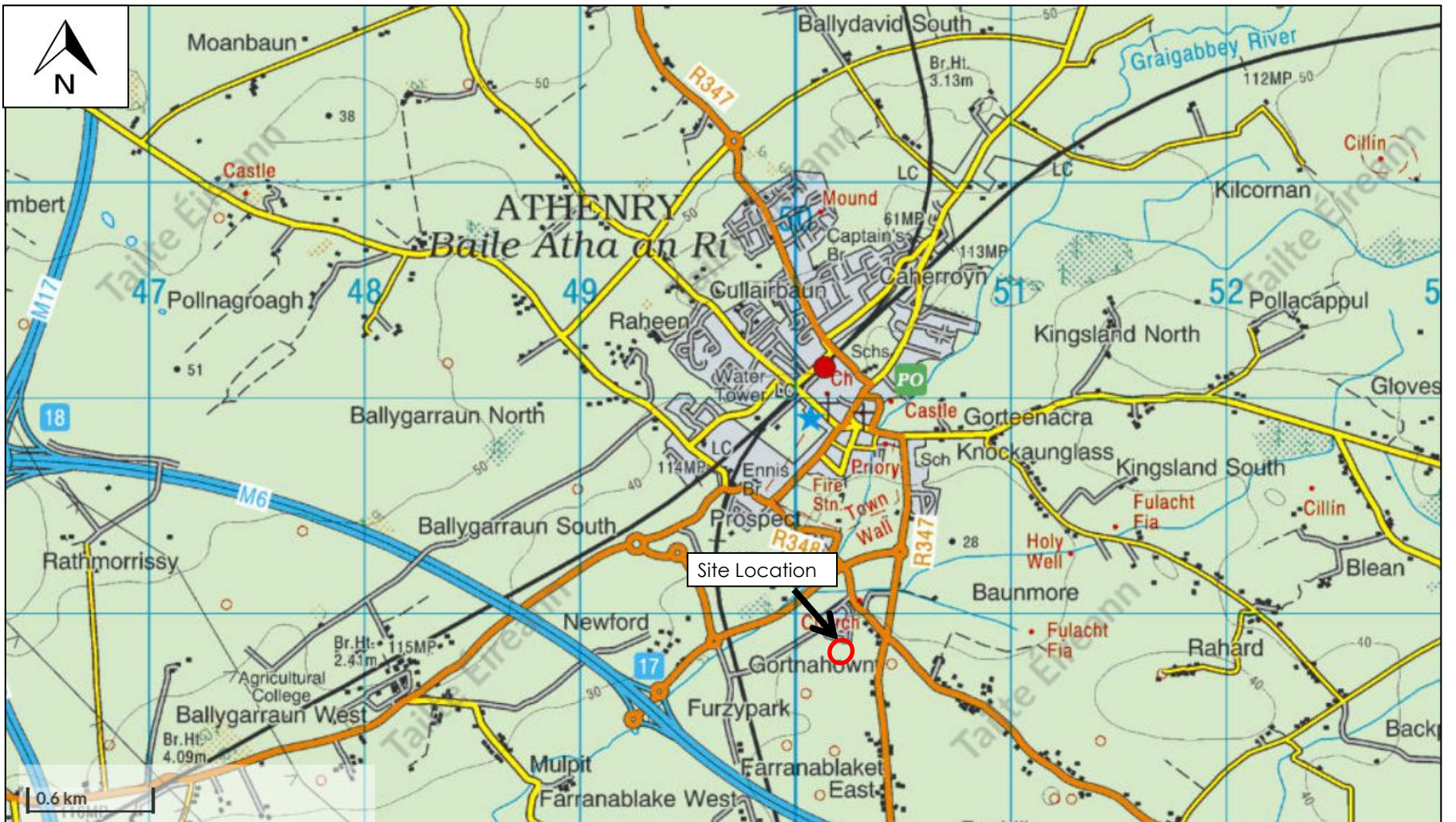
- The indirect and highly attenuated nature of the only credible impact pathway (surface water via the Clarinbridge River over 10.3 km to Inner Galway Bay)
- The engineered drainage design incorporating attenuation, flow control, silt treatment, and Class 1 petrol interception, constituting a Final-status committed design element of the planning application
- The separate connection of all foul water to Athenry WWTP with confirmed Irish Water pre-connection feasibility
- The absence of any qualifying interest habitats or Annex II species on or adjacent to the development site
- The absence of any suitable habitat for SCI bird species of the Inner Galway Bay SPA on or near the development site
- The WFD Groundwater Body Status of 'Good' and 'Not at Risk', and the absence of any groundwater pathway to any European site
- The de minimis contribution of this development to the overall catchment loading, and the absence of in-combination adverse effects with other plans and projects
- The conclusion that all conservation objectives for all qualifying interests of both European sites will continue to be met and their achievement will not be impeded

AEE is a CIEEM Registered Practice. This NIS has been prepared with due skill, diligence, and objectivity, applying the precautionary principle throughout. Where genuine uncertainty existed, it has been resolved in favour of the European site.

10.0 References

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- IFI (2016) *Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Waters*. Inland Fisheries Ireland, Dublin.
- NPWS (2013) *Conservation Objectives: Galway Bay Complex SAC 000268*. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht, Dublin.
- NPWS (2013) *Conservation Objectives: Inner Galway Bay SPA 004031*. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht, Dublin.
- NPWS (2015) *Site Synopsis: Galway Bay Complex SAC 000268*. Version date 10.12.2015. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht, Dublin.
- NPWS (2019) *Site Synopsis: Inner Galway Bay SPA 004031*. Version date 25.10.2019. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht, Dublin.
- Office of the Planning Regulator (2021) *OPR Practice Note PN01: Appropriate Assessment Screening for Development Management*. Office of the Planning Regulator, Dublin.
- Smith, G.F., Delaney, E., Doyle, D., Clinch, R. & Woods, E. (eds.) (2011) *Handbook of Vegetation Survey and Classification*. National Biodiversity Data Centre, Waterford.

FIGURES



Map sourced from National Biodiversity Data Centre Website – www.nbdc.ie



© Tailte Éireann M52

Client Galway County Council		Drawing Site Location Map			
Job NIS Report					
Drawing Number Figure 1	Status Final	Sht. Size A4	Scale As Shown	Date May 26	Drawn AW



- Site Location
- Rivers



Client Galway County Council		Drawing Aerial Photo & Drainage Network			
Job NIS Report					
Drawing Number Figure 2	Status Final	Sht. Size A4	Scale As Shown	Date May 26	Drawn AW



SITE LAYOUT-SERVICES: WASTEWATER & SURFACE WATER
SCALE = 1:250

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Site Boundary

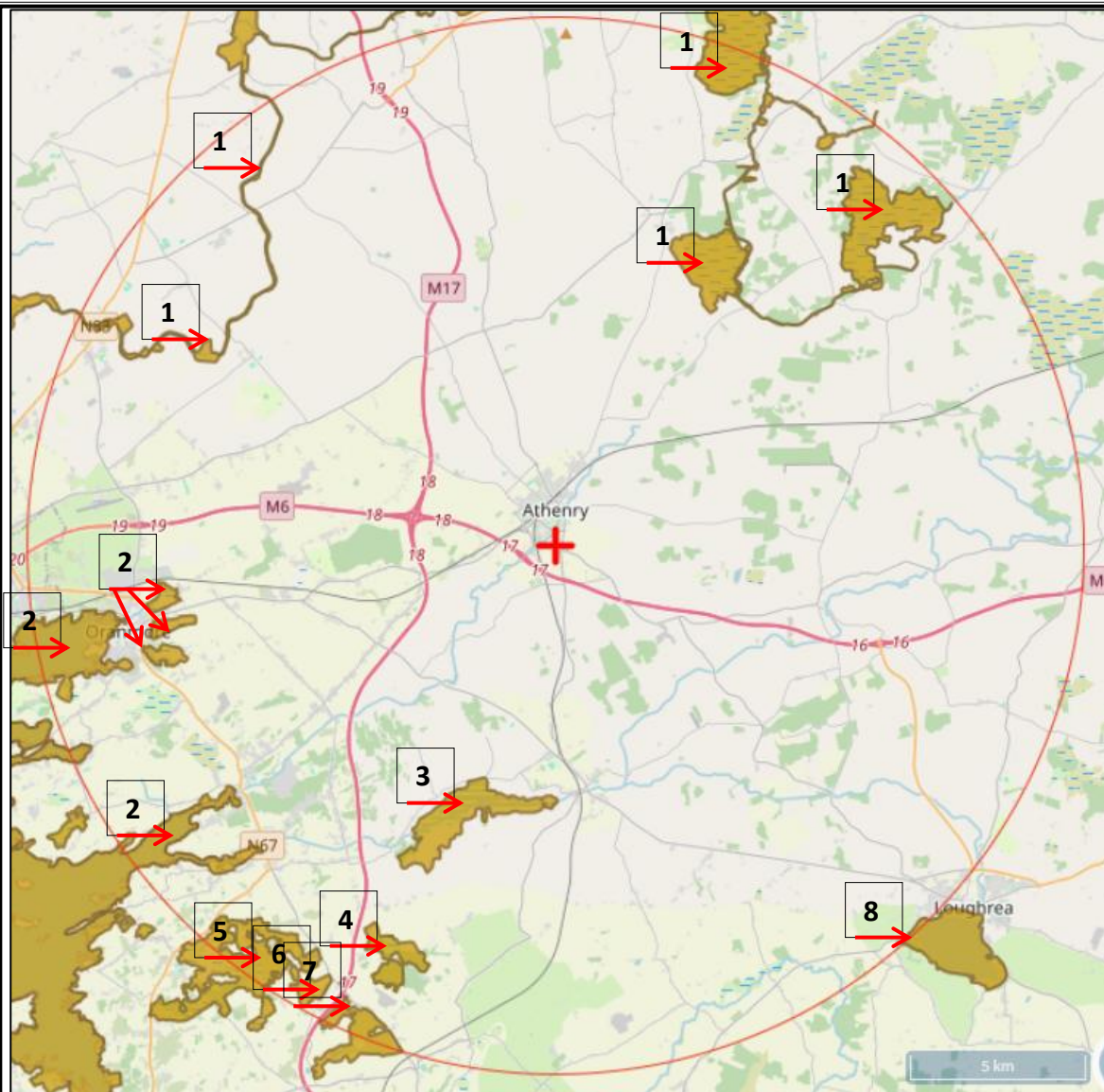
Client Galway County Council		Drawing Proposed Waste Water and Surface Water Drainage Layout	
Job NIS Report			
Drawing Number Figure 3b	Status Final	Sht. Size A4	Scale As Shown
		Date May 26	Drawn AW



- Approx. Site Boundary
- Grassy Meadows (GS2)
- Intermittent Hedging with Old Stone Walls (WL1/BL1)
- Improved Agricultural Grassland (GA1)
- Fencing
- Block Walls - Buildings and Artificial Surfaces (BL3)



Client Galway County Council		Drawing Habitat Map			
Job NIS Report					
Drawing Number Figure 4	Status Final	Sht. Size A4	Scale As Shown	Date May 26	Drawn AW



No.	Site Code	Name	Distance
1	000297	Lough Corrib SAC	7.9km NE, N, NW
2	000268	Galway Bay Complex SAC	10.3km SW
3	000322	Rahasane Turlough SAC	6.8km S, SW
4	000242	Castletaylor Complex SAC	11.8km SW
5	000606	Lough Fingall Complex SAC	13.2km SW
6	001285	Kiltiernan Turlough SAC	13.7km SW
7	002244	Ardrahan Grassland SAC	14.2km SW
8	000304	Lough Rea SAC	14.7km SE



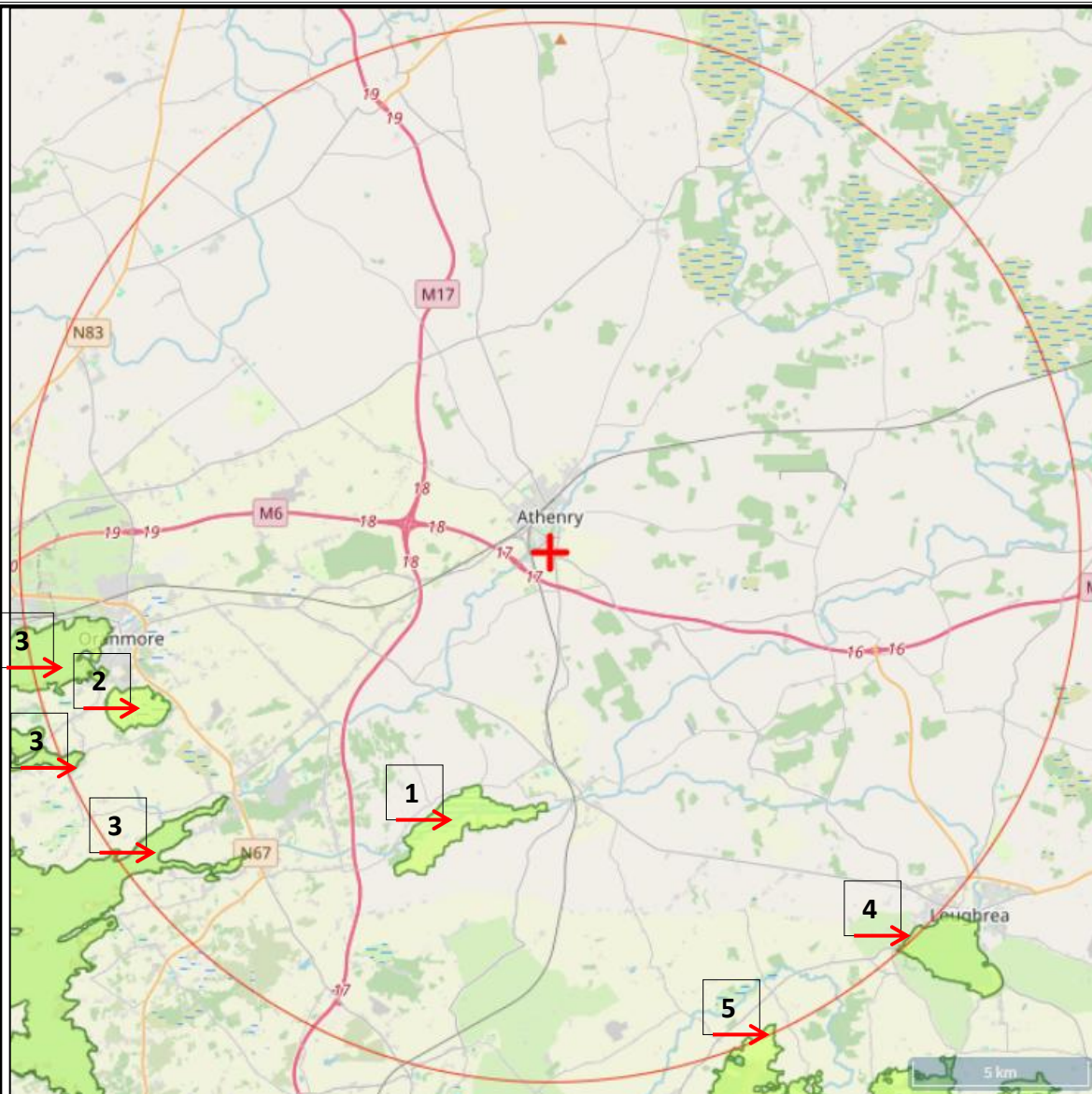
Special Area of Conservation



Site Location



Client Galway County Council		Drawing			
Job NIS Report		Special Areas of Conservation (SACs) within 15km of Site			
Drawing Number Figure 5	Status Final	Sht. Size A4	Scale As Shown	Date May 26	Drawn AW



No.	Site Code	Name	Distance (km)
1	004089	Rahasane Turlough SPA	6.8km S, SW
2	004142	Cregganna Marsh SPA	11.5km SW
3	004042	Lough Corrib SPA	11.4km SW
4	004134	Lough Rea SPA	14.7km SE
5	004168	Slieve Mountains SPA	14.7km SE, S

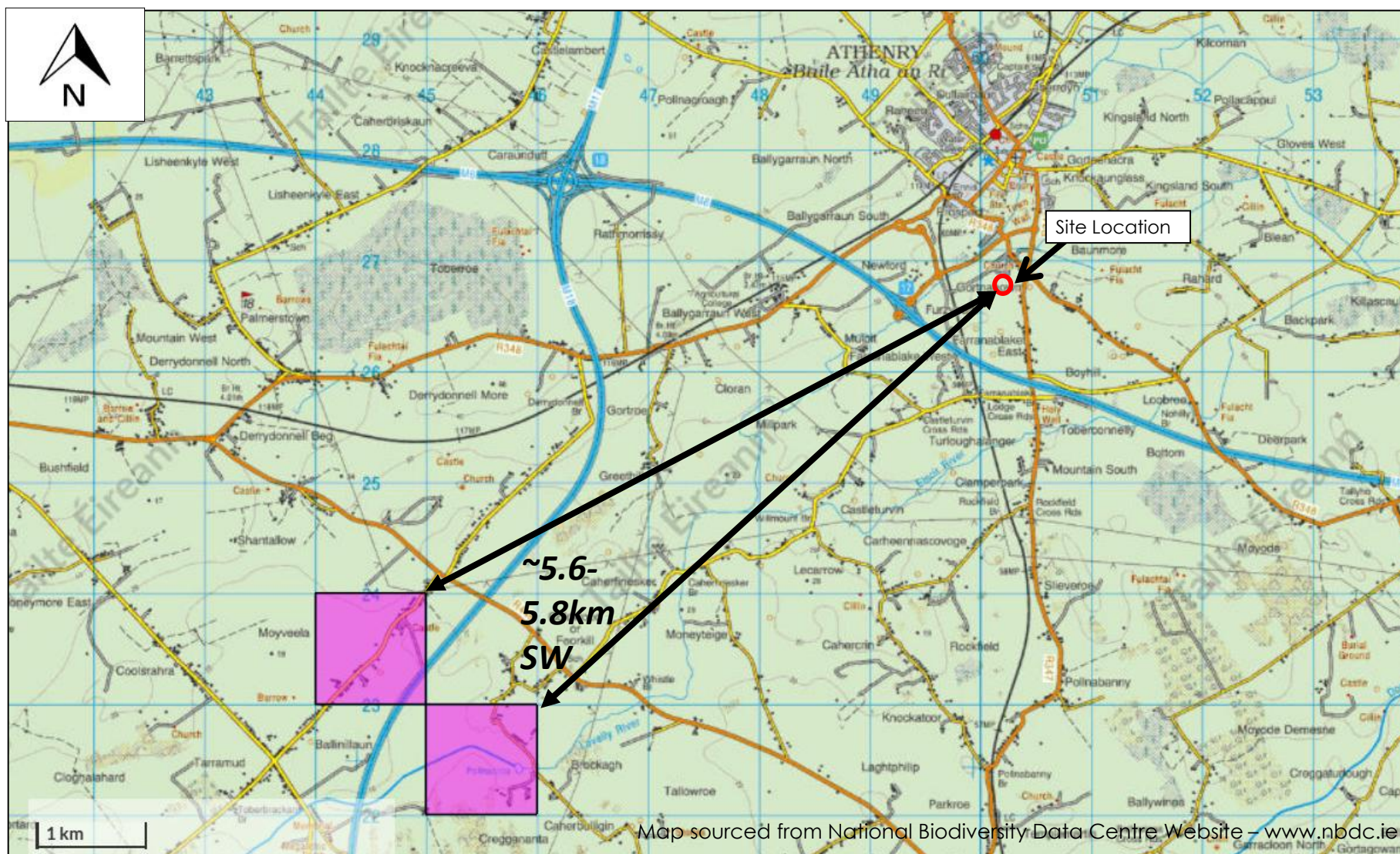


Site Location



N

Client Galway County Council		Drawing Special Protection Areas (SPAs) within 15km of Site				
Job NIS Report						
	Drawing Number Figure 6	Status Final	Sht. Size A4	Scale As Shown	Date May 26	Drawn AW



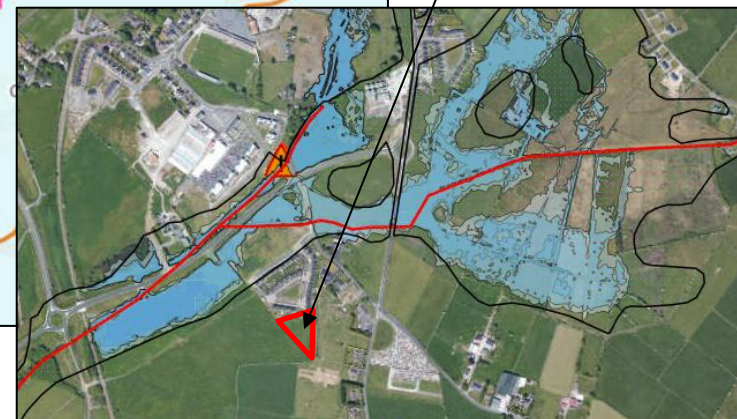
Lesser horseshoe bat records approx. 5.6-5.8km SW of site. Outside the ~2.5km foraging and commuting radius. Unlikely to use site.

Client Galway County Council		Drawing Closest Lesser Horseshoe Bat Records			
Job NIS Report					
Drawing Number Figure 7	Status Final	Sht. Size A4	Scale As Shown	Date May 26	Drawn AW



Site in area of High Vulnerability

Site not in any flood zone



 Approx. Site location – Hydrometric Area 29 – Galway Bay South East

Site within the WFD Sub-Catchment 'Clarinbridge_SC_010' and River Sub-Basin 'CLARINBRIDGE_030'

Water Framework Directive River Waterbody Status 2019-2024

'CLARINBRIDGE_030' is 'Moderate'

River Waterbodies Risk 2019-2024 of 'CLARINBRIDGE_030' is 'At Risk'

WFD Groundwater Body Status 2019-2024 of 'Clarinbridge' is 'Good' and 'Not at Risk'

Client Galway County Council		Drawing 2019-2024 WFD Catchment Drainage Information			
Job NIS Report					
Drawing Number Figure 8	Status Final	Sht. Size A4	Scale As Shown	Date May 26	Drawn AW

APPENDICES

APPENDIX A



Registered Practices Certificate
April 2026—March 2027

Ash Ecology and Environmental Ltd

has been admitted as a Registered Practice
of the

Chartered Institute of Ecology
and Environmental Management

on the 1st day of April 2026

Penny Lewns CEcol CEnv MCIEEM
President

1st April 2026

This certificate remains the property of CIEEM. Membership is subject to annual renewal and may be authenticated by contacting CIEEM at the registered address. Company no. RC000861.

Registered Charity Number (England and Wales): 1189915.

Registered address: Grosvenor Court, Ampfield Hill, Ampfield, Romsey, SO51 9BD United Kingdom.

APPENDIX B



Plate 1: Habitat made up mainly of Improved Agricultural Grassland (GA1) which dominates the site area. View across the Improved Agricultural Grassland (GA1) showing typical ryegrass-dominated sward.



Plate 2: Northern boundary showing transition from Improved Agricultural Grassland (GA1) to Grassy Meadows (GS2) with fence divider. Block walls (BL3) to the rear of existing housing separate the site along the north boundary.



Plate 3: Old stone walls (BL1) forming the eastern site boundary showing typical dry-stone construction.



Plate 4: Intermittent hawthorn and bramble hedging with stone wall features (WL1/BL1) to the south providing limited wildlife corridor connectivity.



Plate 5: Overview of site showing dominance of Improved Agricultural Grassland (GA1) showing evidence of agricultural management and low botanical diversity.

APPENDIX C

Site Name: Galway Bay Complex SAC

Site Code: 000268

Situated on the west coast of Ireland, this site comprises the inner, shallow part of a large bay which is partially sheltered by the Aran Islands. The Burren karstic limestone fringes the southern sides and extends into the sublittoral. West of Galway city the bedrock geology is granite. There are numerous shallow and intertidal inlets on the eastern and southern sides, notably Muckinish, Aughinish and Kinvarra Bays. A number of small islands composed of glacial deposits are located along the eastern side. These include Eddy Island, Deer Island and Tawin Island. A diverse range of marine, coastal and terrestrial habitats, including several listed on Annex I of the E.U. Habitats Directive, occur within the site, making the area of high scientific importance.

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

- [1140] Tidal Mudflats and Sandflats
- [1150] Coastal Lagoons*
- [1160] Large Shallow Inlets and Bays
- [1170] Reefs
- [1220] Perennial Vegetation of Stony Banks
- [1230] Vegetated sea cliffs of the Atlantic and Baltic coasts
- [1310] *Salicornia* Mud
- [1330] Atlantic Salt Meadows
- [1410] Mediterranean Salt Meadows
- [3180] Turloughs*
- [5130] Juniper Scrub
- [6210] Orchid-rich Calcareous Grassland*
- [7210] *Cladium* Fens*
- [7230] Alkaline Fens
- [8240] Limestone Pavement*
- [1355] Otter (*Lutra lutra*)
- [1365] Common (Harbour) Seal (*Phoca vitulina*)

Galway Bay South holds a very high number of littoral communities (12). They range from rocky terraces, to sandy beaches with rock or sand dunes behind. The intertidal sediments of Galway Bay support good examples of communities that are moderately exposed to wave action. A well-defined talitrid amphipod zone in the

upper shore gives way to an intertidal, mid shore zone with sparse epifauna or infauna. On the lower, flat part of the shore, the tubes of the deposit-feeding terebellid worm, *Lanice conchilega*, are common on the surface. Nereid and cirratulid polychaete worms (*Hediste diversicolor*, *Arenicola marina*), small crustaceans and bivalves (*Angulus tenuis*, *Cerastoderma edule* and *Macoma balthica*) are present. The area has the country's only recorded example of the littoral community characterized by *Fucus serratus* with sponges, ascidians and red seaweeds on tide-swept lower eulittoral mixed substrata. This community has very high species richness (85 species), as do the sublittoral fringe communities on the Finavarra reef (88 species). The rare Purple Sea Urchin *Paracentrotus lividus* and the foliose red alga *Phyllophora sicularia* are present at Finavarra, whereas the red alga *Rhodomenia delicatula* and the rare brown alga, *Ascophyllum nodosum* var. *mackii*, occur in Kinvarra and Muckinish Bays. Sublittorally, the area has a number of distinctive and important communities. Of particular note is that Ireland's only reported piddock (bivalve mollusc) bed thrives in the shallows of Aughinish Bay. The rare sponge, *Mycale contarenii*, is also found here. There is further interest in an extensive maerl bed of *Phymatolithon calcareum* which occurs in the strong tidal currents of Muckinish Bay. There is also maerl off Finavarra Point and in Kinvarra Bay (*Lithothamnion corallioides*, *Lithophyllum dentatum* and *Lithophyllum fasciculatum*). An oyster bed in Kinvarra Bay and seagrass (*Zostera* spp.) beds off Finavarra Point are also important features. Other significant habitats which occur include secondary maerl beds and communities strongly influenced by tidal streams.

Saltmarshes are frequent within this extensive coastal site, with both E.U. Habitats Directive types, 'Atlantic Salt Meadow' and 'Mediterranean Salt Meadow' well represented. Most of the saltmarshes are classified as the bay type, with the substrate being mud or mud/sand. There is one lagoon type and one estuary type. Lagoon saltmarshes are the rarest type found in Ireland. The best examples of saltmarsh are located in inner Galway bay, east of a line running between Galway city and Kinvarra. In this area the coastline is highly indented, thus providing the sheltered conditions necessary for extensive saltmarsh development. Common saltmarsh species include Thrift (*Armeria maritima*), Red Fescue (*Festuca rubra*), Common Scurvygrass (*Cochlearia officinalis*), Lax-flowered Sea-lavender (*Limonium humile*), Common Saltmarsh-grass (*Puccinellia maritima*), Saltmarsh Rush (*Juncus gerardi*) and Sea Rush (*Juncus maritimus*). On the lower levels of the saltmarshes and within pans there occurs Glasswort (*Salicornia europaea* agg.). A noteworthy feature of the saltmarsh habitat within this site is the presence of dwarfed brown seaweeds in the vegetation. These are also known as "turf fucoids" and typical species include *Fucus* spp., *Ascophyllum nodosum* and *Pelvetia canaliculata*. A number of locally rare vascular plant species also grow in saltmarsh areas within the site. These include Reflexed Saltmarsh-grass (*Puccinellia distans*) and Sea-purslane (*Halimione portulacoides*), which are both relatively rare in the western half of the country.

Shingle and stony beaches can be found throughout the site, with the best examples along the more exposed shores to the south and west of Galway city and to the north and east of Finavarra, Co. Clare. In general, these shingle shorelines are sparsely vegetated and frequently occur interspersed with areas of sandy beach and/or

bedrock shore. The associated flora is dominated by plant species of frequently disturbed maritime habitats. To the south and west of Galway city, typical plants include Curled Dock (*Rumex crispus*), Common Couch (*Elymus repens*), Sea Sandwort (*Honkenya peploides*), Sea Beet (*Beta vulgaris* subsp. *maritima*), Sea Mayweed (*Matricaria maritima*), Silverweed (*Potentilla anserina*) and Oraches (*Atriplex* spp.). Two rare plant species are associated with the habitat: Henbane (*Hyoscyamus niger*), a threatened species listed in the Irish Red Data Book, grows on shingle beach to the south of Lough Atalia; there are also old records for the threatened plant species Sea-kale (*Crambe maritima*).

Soft coastal cliffs reaching heights in excess of 10m occur at Rusheen. These support coastal grassland with very sparse vegetation cover. Species recorded include Sea Plantain (*Plantago maritima*), Creeping Bent (*Agrostis stolonifera*), False Oat-grass (*Arrhenatherum elatius*), Cock's Foot (*Dactylis glomerata*), Red Fescue, Common Bird's-foot-trefoil (*Lotus corniculatus*), and the lichens *Ramalina* sp. and *Xanthoria parietina*. They are considered highly representative of the rarer soft type of sea cliffs in Ireland.

An excellent range of lagoons of different types, sizes and salinities occurs within the site. This habitat is given priority status on Annex I of the E.U. Habitats Directive. One unusual type of lagoon, karstic rock lagoon, is particularly well represented. This type of lagoon is common on the Aran Islands, but on mainland Ireland, all but one are confined to this site. Additionally, the best example of all karstic lagoons in the country, Lough Murree, is found at this site. The flora of the habitat is rich and diverse, reflecting the range of salinities in the different lagoons. It is typically brackish, with two species of Tasselweed (*Ruppia* spp.), two Red Data charophytes *Chara canescens* and *Lamprothamnion papulosum*, and *Chaetomorpha linum*, an alga (all lagoonal specialists). The fauna of the lagoon is also rich, diverse and lagoonal. At least 10 lagoonal specialist species were recorded in 1996 and 1998 from the combined habitat of all the lagoons, which is one of the highest number for any lagoonal habitat in the country. Many of the species appear to be rare. The lagoons within this site are excellent examples of the habitat type and of high conservation importance.

Other terrestrial habitats within this site which are of conservation importance include Great Fen-sedge (*Cladium mariscus*)-dominated fen and Black Bog-rush (*Schoenus nigricans*)-dominated alkaline fen at Oranmore, a turlough of moderate size at Ballinacourty, limestone pavement at Ballyconry, Gleninagh North and Newquay, dry calcareous grassland with orchids (best examples occurring west of Salthill), Juniper (*Juniperus communis*) scrub formations at Oranmore, wet grassland and an area of deciduous woodland at Barna. The orchid-rich grassland occurs on a series of small drumlin hills found to the west of Galway City, and is largely confined to the sides of the hills. Calcicole species such as Kidney Vetch (*Anthyllis vulneraria*), Harebell (*Campanula rotundifolia*), Spring Gentian (*Gentiana verna*), Common Spotted-orchid (*Dactylorhiza fuchsii*), Lesser Twayblade (*Listera ovata*), Pyramidal Orchid (*Anacamptis pyramidalis*), Yellow-wort (*Blackstonia perfoliata*) and Greater Knapweed (*Centaurea scabiosa*) are found here, among others. Juniper is also found in this area.

Areas of alkaline and *Cladium* fen as best represented near Oranmore, and species such as Great Fen-sedge, Common Reed (*Phragmites australis*), Purple Moor-grass (*Molinia caerulea*), Bogbean (*Menyanthes trifoliata*) and Long-stalked Yellow-sedge (*Carex lepidocarpa*) are found along with the usually dominant, Black Bog-rush. The turlough at Ballinacourty floods to about 25 ha in winter, and has vegetation with a typical zonation. Wetland species such as Amphibious Bistort (*Polygonum amphibium*), Common Marsh-bedstraw (*Galium palustre*) and Marsh Cinquefoil (*Potentilla palustris*) are found near the swallow-hole, with species of wet grassland close to the flood limit (e.g. Silverweed, *Potentilla anserina*, Water Mint, *Mentha aquatica* and Creeping Bent, *Agrostis stolonifera*). Sedges (*Carex* spp.) dominate in between.

Inner Galway Bay provides extensive good quality habitat for Common Seal (maximum count of 317 in the all-Ireland survey of 2003). This species is listed on Annex II of the E.U. Habitats Directive. The seals use a range of haul-out sites distributed through the bay - these include inner Oranmore Bay, Rabbit Island, St. Brendan's Island, Tawin Island, Kinvarra Bay, Aughinish Bay and Ballyvaughan. The site provides optimum habitat for Otter, also an Annex II-listed species.

Galway Bay is a very important ornithological site. The shallow waters provide excellent habitat for Great Northern Divers (35), Black-throated Divers (28), Scaup (39), Long-tailed Duck (27) and Red-breasted Merganser (232). (Figures given are peak average maxima over the 3 winters 1994/95 to 1996/97). All of these populations are of national importance. The intertidal areas and shoreline provides feeding and roosting habitat for wintering waterfowl, with Brent Goose (517) having a population of international importance and a further 11 species having populations of national importance. Four of the regular wintering species are listed on Annex I of the E.U. Birds Directive - Golden Plover, Bar-tailed Godwit and the two diver species. Breeding birds are also of importance, with significant populations of Sandwich Terns (81 pairs in 1995) and Common Terns (99 pairs in 1995), both also being listed on Annex I of the E.U. Birds Directive. A large Cormorant colony (approx. 300 pairs in 1989) occurs on Deer Island.

Fishing and aquaculture are the main commercial activities within the site. A concern is that sewage effluent and detritus of the aquaculture industry could be deleterious to benthic communities. Reef and sediment communities are vulnerable to disturbance or compaction from tractors accessing oyster trestles. The *Paracentrotus lividus* populations have been shown to be vulnerable to over-fishing. Extraction of maerl in Galway Bay is a threat. Owing to the proximity of Galway city, shoreline and terrestrial habitats are under pressure from urban expansion and recreational activities. Eutrophication is probably affecting some of the lagoons and is a continued threat. Drainage is a general threat to the turlough and fen habitats. Bird populations may be disturbed by aquaculture activities.

This large coastal site is of immense conservation importance, with many habitats listed on Annex I of the E.U. Habitats Directive, four of which have priority status

(lagoon, *Cladium* fen, turlough and orchid-rich calcareous grassland). The examples of shallow bays, reefs, lagoons and saltmarshes found within this site are amongst the best in the country. The site supports an important Common Seal colony and a breeding Otter population (Annex II species), and six regular Annex I E.U. Birds Directive species. The site also has four Red Data Book plant species, plus a host of rare or scarce marine and lagoonal animal and plant species.

SITE SYNOPSIS

SITE NAME: INNER GALWAY BAY SPA

SITE CODE: 004031

Inner Galway Bay SPA is a very large, marine-dominated site situated on the west coast of Ireland. The inner bay is protected from exposure to Atlantic swells by the Aran Islands and Black Head. Subsidiary bays and inlets (e.g. Poul-na-clough, Aughinish and Kinvarra Bays) add texture to the patterns of water movement and sediment deposition, which lends variety to the marine habitats and communities. The terraced Carboniferous (Viséan) limestone platform of the Burren sweeps down to the shore and into the sublittoral. The long shoreline is noted for its diversity, and comprises complex mixtures of bedrock shore, shingle beach, sandy beach and fringing salt marshes. Intertidal sand and mud flats occur around much of the shoreline, with the largest areas being found on the sheltered eastern coast between Oranmore Bay and Kinvarra Bay. A number of small islands and rocky islets in the Bay are included within the site.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Black-throated Diver, Great Northern Diver, Cormorant, Grey Heron, Light-bellied Brent Goose, Wigeon, Teal, Red-breasted Merganser, Ringed Plover, Golden Plover, Lapwing, Dunlin, Bar-tailed Godwit, Curlew, Redshank, Turnstone, Black-headed Gull, Common Gull, Sandwich Tern and Common Tern. The E.U. Birds Directive pays particular attention to wetlands and, as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds.

Inner Galway Bay supports an excellent diversity of wintering wetland birds, with divers, grebes, cormorants, dabbling duck, sea duck and waders all well represented. There are internationally important wintering populations of Great Northern Diver (88) and Light-Bellied Brent Goose (676) and nationally important wintering populations of an additional sixteen species i.e. Black-throated Diver (36), Cormorant (266), Grey Heron (102), Wigeon (1,168), Teal (700), Red-breasted Merganser (249), Ringed Plover (335), Golden Plover (2,030), Lapwing (3,969), Dunlin (2,155), Bar-tailed Godwit (447), Curlew (697), Redshank (505), Turnstone (182), Black-headed Gull (1,941) and Common Gull (1,066) - all figures given are five year mean peaks for the seasons 1995/96 to 1999/2000. Of note is that the populations of Red-breasted Merganser and Ringed Plover represent 6.8% and 2.3% of the respective all-Ireland totals. Other species which occur in notable numbers include Little Grebe (35), Long-tailed Duck (21), Scaup (44) and Herring Gull (216). In addition, the following species also use the site: Great Crested Grebe (16), Mallard (200), Common Scoter (87), Oystercatcher (576), Grey Plover (60), Black-tailed Godwit (46), Mute Swan (150) and Great Black-backed Gull (129). The site provides both feeding and roost sites for most of the species. Little Egret, a species which has recently colonised Ireland, also occurs at this site.

The site has several important populations of breeding birds, most notably colonies of Sandwich Tern (81 pairs in 1995) and Common Tern (98 pairs in 1995 on Green Island and 46 pairs in 2001 on Mutton Island). A large Cormorant colony occurs on Deer Island - this had 200 pairs in 1985 and 300 pairs in 1989.

Inner Galway Bay SPA is of high ornithological importance with two wintering species having populations of international importance and a further sixteen wintering species having populations of national importance. The breeding colonies of Sandwich Tern, Common Tern and Cormorant are also of national importance. Also of note is that six of the regularly occurring species are listed on Annex I of the E.U. Birds Directive, i.e. Black-throated Diver, Great Northern Diver, Golden Plover, Bar-tailed Godwit, Sandwich Tern and Common Tern. Inner Galway Bay is a Ramsar Convention site and part of the Inner Galway Bay SPA is a Wildfowl Sanctuary.