

28th August 2020

Planning Reference Number : **PL17.307652**

Subject of Observation

AN BORD PLEANÁLA	
LDC	<u>030713-20</u>
ABP-	_____
10 SEP 2020	
Fee: €	_____ Type: _____
Time: _____	By: <u>Reg Feek</u>

Construction of Boyne Greenway pedestrian and cycle way from Drogheda to Mornington

Grounds of Observation :

1. The negative impact the construction and increased levels of usage by walkers/cyclists associated with his greenway will have on the sensitive and isolated area of the Boyne Estuary which is an SPA/SAC. These areas are protected under Irish and European Law.
2. The Impact and Detrimental effect this Greenway will have on the wildfowl species that inhabit these areas through noise ,light and human/canine pollution .
3. The minimum requirements for any proposed Greenway in an area of such sensitivity should have an impact study carried out over a number of years to determine what impact the effect a walkway would have on an SPA and SAC which is devoid of human activity of present .Such a study should be carried out by Birdwatch Ireland or The National Parks and Wildlife Services as the true impact should be sought for the welfare of our visiting and resident wildfowl.
4. The negative impacts on the Dunes and Rare Vegetation within the Dunes at Mornington by human recreational pressures associated with the construction of this walkway .

The Boyne Estuary is one of the most important Estuaries for wintering birds on the Irish coastline . The Boyne Estuary is a special protection area of conservation under the EU Birds Directive .Supporting document NPWS Version 1 December 2012(site code 4080)

To support our objections to the construction of this Greenway in the Boyne Estuary I would like to present a conservation objectives supporting document on the Boyne Estuary SPA site code 4080 compiled by the National Parks and Wildlife Service in 2012.I will also submit photographic evidence of the many species of endangered birds which need to feed along the Estuary on the incoming tides where the proposed Greenway will be constructed . All photos submitted have been taken by me over the last number of months with a 500mm lens so as not to create disturbance to the wildfowl .

The Selection Species and Additional Special Conservation Interests for Boyne Estuary SPA are listed below

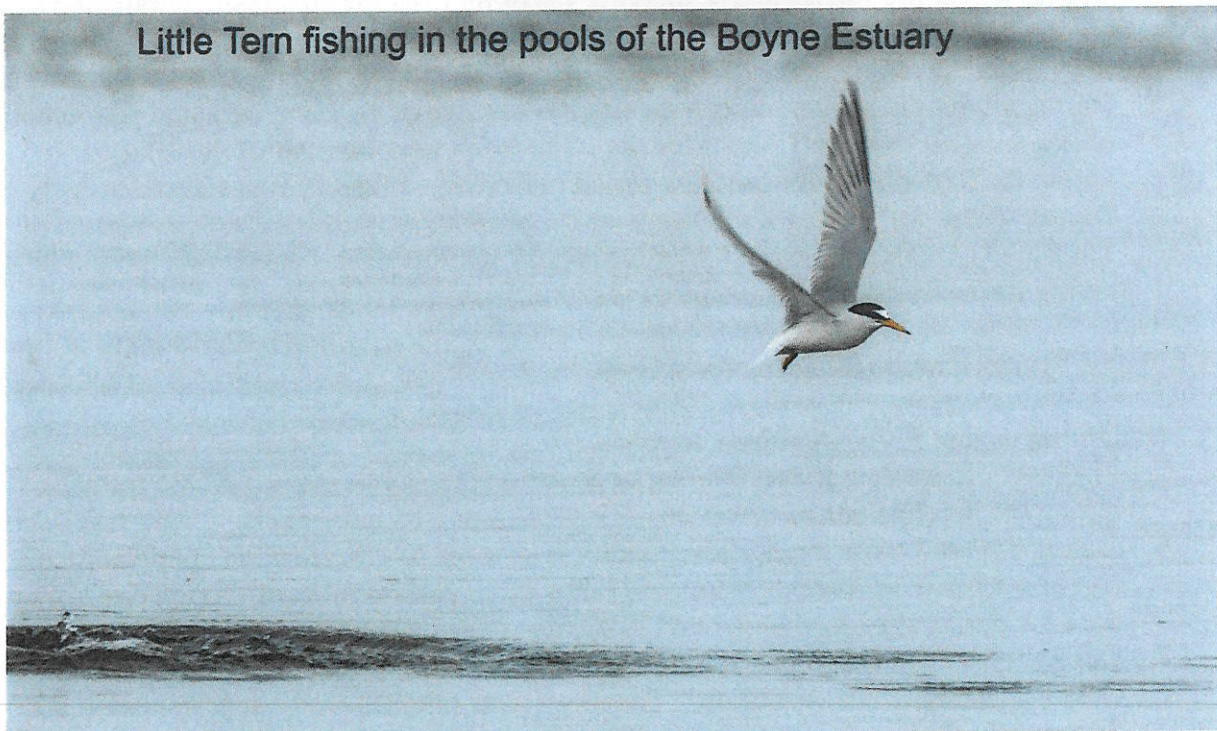
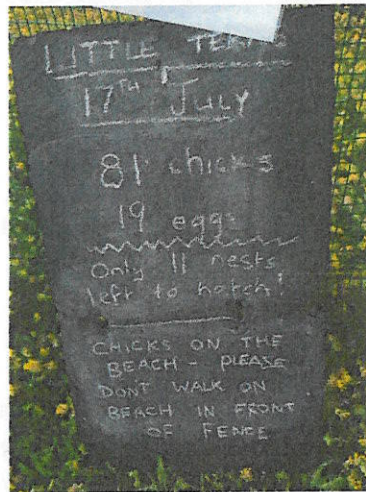
The Selection Species listed for Boyne Estuary SPA are as follows:-

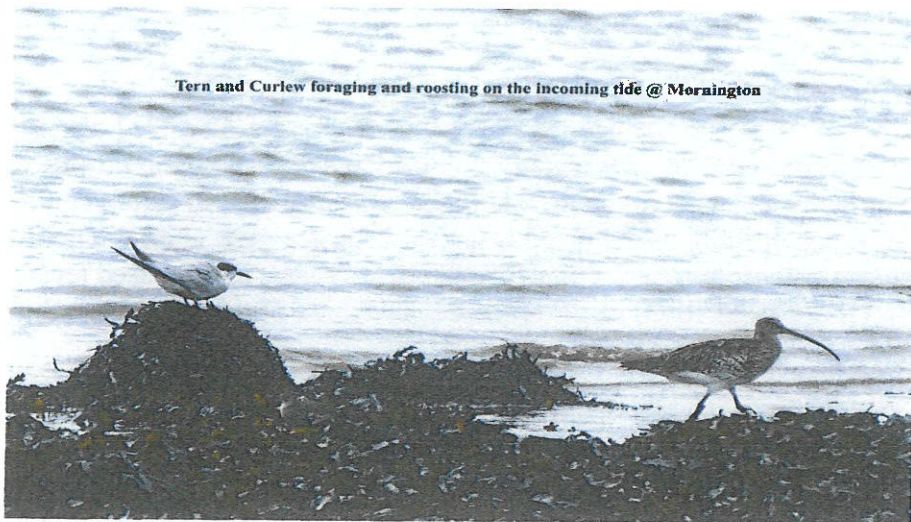
1. During winter the site regularly supports 1% or more of the all-Ireland population of Golden Plover (*Pluvialis apricaria*). The mean peak number of this Annex I species within the SPA during the baseline period (1995/96 – 1999/00) was 6,070 individuals.
2. During winter the site regularly supports 1% or more of the all-Ireland population of Knot (*Calidris canutua*). The mean peak number of this species within the SPA during the baseline period (1995/96 – 1999/00) was 1,771 individuals.
3. During winter the site regularly supports 1% or more of the biogeographic population of Black-tailed Godwit (*Limosa limosa*). The mean peak number of this species within the SPA during the baseline period (1995/96 – 1999/00) was 471 individuals.
4. During winter the site regularly supports 1% or more of the all-Ireland population of Turnstone (*Arenaria interpres*). The mean peak number of this species within the SPA during the baseline period (1995/96 – 1999/00) was 175 individuals.

Additional Special Conservation Interests for Boyne Estuary SPA are as follows:

5. During winter the site regularly supports 1% or more of the all-Ireland population of Shelduck (*Tadorna tadorna*). The mean peak number of this species within the SPA during the baseline period (1995/96 – 1999/00) was 218 individuals.
6. During winter the site regularly supports 1% or more of the all-Ireland population of Oystercatcher (*Haematopus ostralegus*). The mean peak number of this species within the SPA during the baseline period (1995/96 – 1999/00) was 1,090 individuals.
7. During winter the site regularly supports 1% or more of the all-Ireland population of Grey Plover (*Pluvialis squatarola*). The mean peak number of this species within the SPA during the baseline period (1995/96 – 1999/00) was 98 individuals.

8. During winter the site regularly supports 1% or more of the all-Ireland population of Lapwing (*Vanellus vanellus*). The mean peak number of this species within the SPA during the baseline period (1995/96 – 1999/00) was 4,657 individuals.
9. During winter the site regularly supports 1% or more of the all-Ireland population of Sanderling (*Calidris alba*). The mean peak number of this species within the SPA during the baseline period (1995/96 – 1999/00) was 69 individual.
10. During winter the site regularly supports 1% or more of the all-Ireland population of Redshank (*Tringa totanus*). The mean peak number of this species within the SPA during the baseline period (1995/96 – 1999/00) was 583 individuals.
11. The Boyne Estuary SPA supports a breeding population of the Annex I species Little Tern (*Sterna albifrons*). In 1995, the All-Ireland Tern Survey recorded a total of 14 pairs. This exceeds the all-Ireland 1% threshold making this site of national importance. This year 2020 has seen 81 chicks hatched on the Boyne Estuary.
12. The wetland habitats contained within Boyne Estuary SPA are identified of conservation importance for non-breeding (wintering) migratory waterbirds. Therefore the wetland habitats are considered to be an additional Special Conservation Interest.





Tern and Curlew foraging and roosting on the incoming tide @ Mornington

The wetland Habitats contained within the Boyne Estuary SPA are identified of conservational importance for non-breeding wintering migratory wading birds and ducks ,therefor the wetlands habitat are considered to be an additional special conservation interest .

On Saturday the 15th of August 2020 I photographed a Curlew on the Boyne Estuary which was ringed and has since been identified by [REDACTED] in Wales ,this is part of her email :

"Yes, that is one of our birds up here in Wales - thank you for letting us know. A male who was originally ringed in April 2019 on our study site in the Conwy uplands (Ysbyty Ifan), he made one attempt at breeding before being seen on the Boyne Estuary in Co. Meath on the 19th August 2019. This is obviously his preferred location so great to have another report of him."

This photograph shows that we are extremely fortunate to have some resident Curlews on the Estuary which are in danger of extinction and have decreased by 96% in Ireland due to habitat loss. It also sustains hundreds of visiting Curlew which Ireland has a duty to protect under EU law .

Curlew residing on the Estuary identified by tags on 15/8/20



The National Parks and Wildlife Services Survey of the Boyne Estuary 2012 clearly outlines the conservation objectives one of which states the need to avoid significant disturbance of the habitats. Disturbance that occurs in either singular or cumulative in nature could result in the displacement of one or more of the listed water bird species from areas within the SPA and a huge reduction in their numbers. Significant habitat change or increased levels of disturbance within these areas could result in the displacement of the listed water bird species.

It also states that in areas subject to heavy or ongoing disturbance birds may be disturbed so frequently that their displacement is equivalent to habitat loss. It states clearly in the survey that walking with dogs and human activity is the biggest treat to wildfowl populations and where the purposed Greenway is to be built there is currently very little human activity or dog walking. A 3.5km stretch from Flo Gas to Mornington Bridge is near totally devoid of human contact. The planned insertion of this walkway within the SPA /SAC will cause serious noise, light, human and dog walking pollution. These areas contain ten birds of National importance as stated in the NPWS survey site code 4080.

Where Meath County Council intend to construct a bridge in Mornington as part of the Greenway is a very significant site and of great importance to all the wildfowl on the Estuary. This is where a freshwater stream enters the Estuary and is where all the wintering wildfowl use the fresh water to wash and preen, which they will no longer be able to do so due to human disturbance.

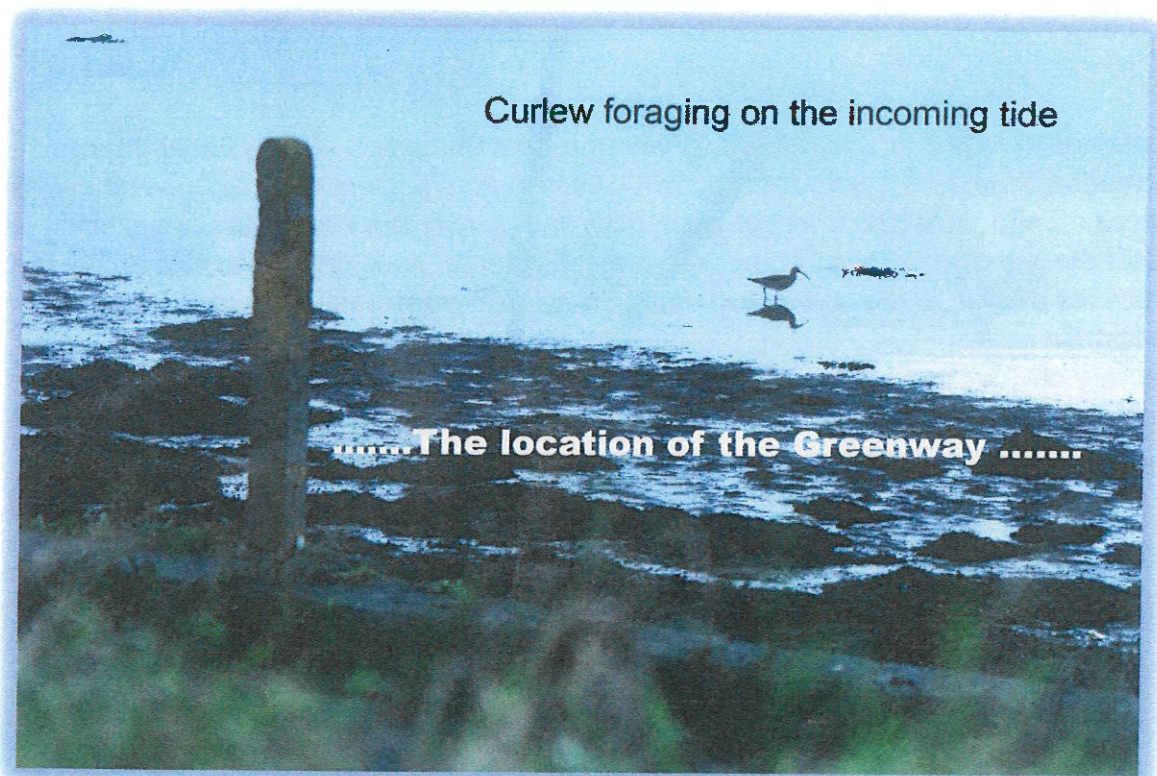


As Stated in Birdwatch Ireland Magazine Autumn 2020 :

Wintering water birds have declined by 40% in less than 20 years ,Ireland has already lost species including the Corn Bunting .If efforts fail the Curlew could be extinct as a breeding species here within the next 10 years .On May 9th 2019 the Dail declared a National Biodiversity and Climate Emergency .

This proposed Greenway will cause untold damage to this area of SAC and SPA that has been in existence as a sanctuary for over 50 years. When are we as a Nation going to get serious on protecting our last few remaining Conservation areas ? You and I have a clear choice, to try and protect the Habitat that sustains and supports our ever declining wild fowl species that inhabit and visit our shores ,or lose them forever.

All of these wildfowl as mentioned previously, forage in the areas where the proposed Greenway will be constructed as the tide forces them to retreat to the edges of the Sanctuary. It is not good enough that as humans we must take the last remaining piece of their land on which they need to survive .



As stated by the accompanying NPWS survey page 4 , 3.1:

The overarching conservation objective for Boyne Estuary SPA is to ensure that water bird populations and their wetland habitats are maintained at ,or restored to, favourable conservation condition .This includes ,as an integral part ,the need to avoid deterioration of habitats and significant disturbance , thereby ensuring the persistence of site integrity .

The building of a Greenway/Cycleway through this habitat go against the overarching Conservation objectives for the Boyne Estuary SPA /SAC

SAND DUNES MORNINGTON accompanied by appendix 6 Mornington site report and Habitat Map from the Boyne Coast and Estuary SAC site code 1957

The proposed Cycleway/Greenway finishes at the Maiden Tower in Mornington which is an area of SAC .This is in the middle of the Mornington Sand Dunes which are part of the Boyne Coast and Estuary SAC ,also present are Salt Marshes at the edge of the Boyne .At no time has MCC said they have plans to fence of this very sensitive area which contains the very rare *Echium vulgare* (Vipers bugloss) ,*Equisetum variegatum* (Variegated Horsetail) and *Ophioglossum vulgatum* (Adders tongue) .These are locally rare plants in Ireland and are considered *Indicators of local distinctiveness* at this site .

Contained in Appendix 6 the NPWS survey state that this area is already under intense recreational pressure from human activity .It states as of present that the Dunes should be fenced off and protected from human activity and protect this vulnerable eco system .It also states the use of many parts of the Dunes as informal car parking areas to gain access to the beach are a result of the lack of appropriate management strategies for car parking and pedestrian access.

It is very obvious that a Greenway and Cycleway entering this sensitive area will cause untold damage to the Dunes as there is no way of stopping people accessing the Dunes and no way of stopping Cyclists and the inherent lack of any car parking facilities .

Summary

A Similar Greenway was proposed in Wexford where it was to be built within an SAC and SPA and it was to end in a Dune system which was an SAC . An Bord Pleannala rightly refused permission for such a Greenway due the sensitivity of the area .The proposed Greenway in Wexford is mirror image to the proposed Greenway in the Boyne Estuary and I would hope that An Bord Pleannala in its wisdom will refuse the planning for the construction of this Greenway as they did in Wexford, as it is well publicised the biggest threat to our water birds is the loss of habitat .**If this habitat is lost on the Boyne Estuary it will be lost forever.**

In the NIS report submitted with the application for planning permission from Meath County Council ,it states that screens along the Estuary will prevent disturbance ,as this is a walkway/cycleway the screens would have to be at least eight feet and still it would not prevent noise and light pollution from walkers and dogs .This NIS goes against all previous studies by NPWS on the Boyne Estuary and EU Habitats Directive that have stated that the overriding conservation objective is the maintenance (or restoration) of 'favourable conservation status ' of habitats and species .How putting a walkway in or immediately adjacent to a wildfowl sanctuary can contribute to the conservation objective of restoring favourable conservation status of habitat and species beggars believe .Disturbance ..anthropogeinc disturbance that occurs in or near a site and is either singular or cumulative in nature could result in **displacement** of one or more of the listed waterbird species from areas within the SPA,and /or a reduction in their numbers .To lose even one bird as a result of the construction of this greenway in their habitat is in my opinion criminal .

Unfortunately as live in a world of extinction we would implore the Bord to preserve the little remaining habitat that is available to an ever -shrinking population of wildlife so that it can be observed and enjoyed for generations to come .

Yours Sincerely

