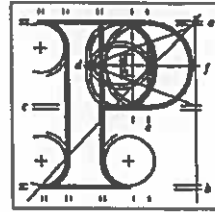


Our Case Number: ABP-307652-20



An
Bord
Pleanála

Date: 19th May 2022

Re: Construction of the Boyne Greenway, pedestrian and cycleway linking Drogheda Town in Co. Louth to Mornington Village in Co. Meath
Townlands at Ship Street in Drogheda, Co. Louth to Mornington Village in Co. Meath

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter, please contact the undersigned officer of the Board.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Kieran Somers
Executive Officer
Direct Line: 01-873 7250

AA02

Tel	Tel	(01) 858 8100
Glaos Áitúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Macílbríde	84 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

LDG-053588-22.

AN BORD PLEANÁLA
LDG- _____
ABP- _____
18 MAY 2022
Fee: € _____ Type: _____
Time: _____ By: Reg post

17th May 2022

Planning Reference Number : ABP-307652-20

Subject of Observation

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

Observation on the report produced by INIS Environmental Consultants

Dear Sirs

On reading the NIS report produced by Inis Environmental Consultants that was submitted on behalf of Meath County Council for the impact of the construction of a greenway within a SPA/SAC we find it totally inaccurate and contradictory in its entirety. The most important part of this survey should be the bird counts and the impact on the wintering and resident protected wildfowl in the area of the proposed greenway.

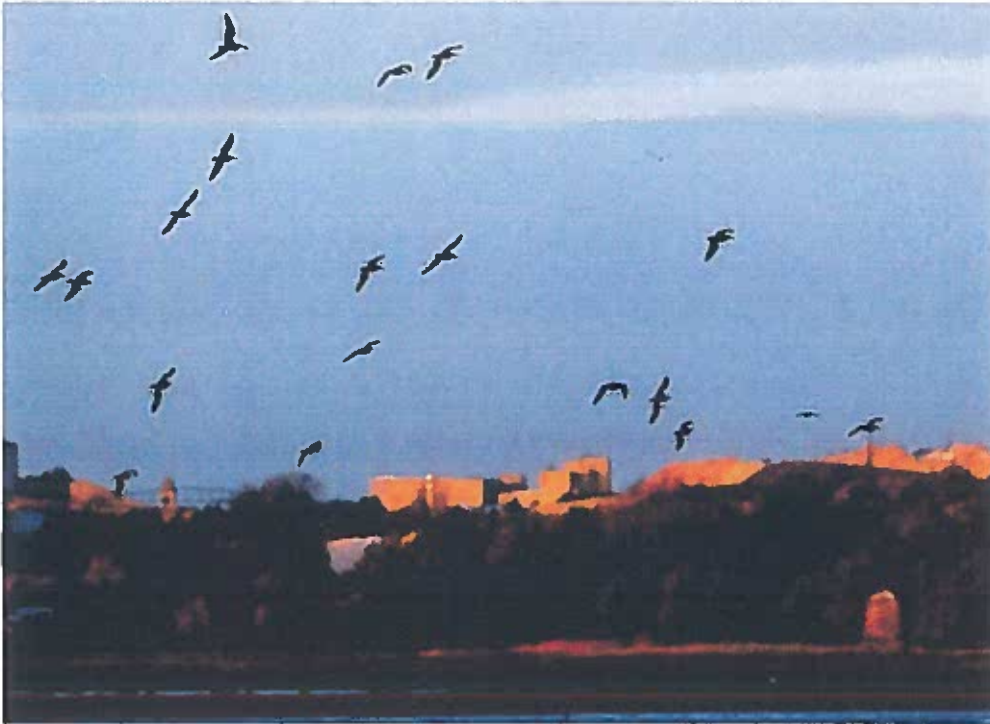
I have been a resident of the High Road, Mornington for 60 years and I have had the privilege and the pleasure of observing the Boyne Estuary SPA/SAC flourish as a wildfowl sanctuary throughout these years. My wife is a keen wildlife photographer who will submit many photographs taken with a 500mm lens of the wildfowl that have been observed on the SPA/SAC contrary to the findings within the NIS report submitted.

1.

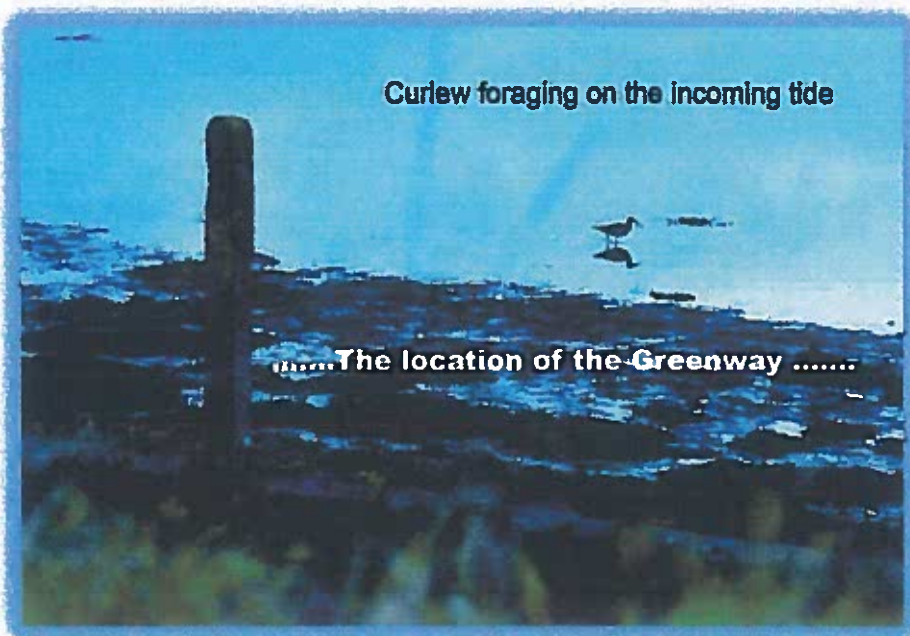
Anybody who has any knowledge of waterfowl would know the first sign of human activity the birds will take flight. I would say the minimum requirement to observe wildfowl without disturbance would be the use of bird hides and camouflage, yet the employees of Inis Environmental Consultants seem to be unaware of the basic nature observation protocol and carried out their survey in full view of all the birdlife contained on the SPA/SAC thus I suggest rendering all bird counts submitted in this NIS report invalid. If An Bord Pleanála are looking for the true bird counts on the Boyne Estuary SPA/SAC, the volunteers that work for Bird watch Ireland would have those true counts to hand.

2.

As an Bord Pleanála is in no doubt well aware, one of our most iconic birds which is on the fringes of extinction is the Curlew. I am providing photographic evidence of high numbers of Curlew on the Boyne Estuary SPA/SAC and photographs of Curlew feeding along the Estuary in the exact locations where the proposed greenway is to be constructed. The construction of this greenway will limit the feeding grounds for these and many more endangered wildfowl as the tide engulfs the Estuary twice daily. Nowhere in the NIS report was the impact of the construction of this greenway reported on the Curlew. I would have to ask the question why the plight of one of Ireland's most endangered species the Curlew was conveniently overlooked in this lengthy report.



Flock of Curlew taken from a hide on the Boyne Estuary OVL02 SPA/SAC 25th October 2022



Contrary to NIS report submitted detailing non breeding Shelduck on the Boyne Estuary last year there were many little families breeding on the Estuary on location OZLO3 and OZLO5 which is a very isolated part of the estuary but also where the proposed new walkway will be constructed no doubt causing severe disturbance to these Shelducks breeding habitat .

I have submitted below photographs of the breeding shelducks at various stages of growth throughout the summer of 2021 all taken from a concealed hide .



4.

I would like to red flag the NIS report section **5.5 Other Reports** which shows 5 planning applications in close proximity to the proposed greenway and granted by Meath Co Co .

5.5.1 Assessment of in combination effects

This appendix states that these projects cause no interference to the SPA/SAC and that going forward these said projects would not cause any direct loss of habitat or disturbance to the European sites highlighted in their report.

Again what it conveniently omits is that the planning application **LB18091 Boyne Camping Ltd** which was granted by Meath County Council was subsequently overturned and refused planning permission by An Bord Pleanála on a number of serious issues .One of which was its immediate proximity to the Boyne Estuary SPA/SAC European protected site and the detrimental effects it would have on the adjacent sanctuary.

I would like to bring to your attention the way paragraph 5.5.1 reads .Would the acceptance of this NIS report from INIS Environmental Consultants call in to question An Bord Pleanála's original decision to refuse planning on this campsite directly adjacent to the Boyne Estuary.

This NIS report still shows blatant support for planning application **LB18091** of which Inis Environmental were heavily involved in . What would the implications of the acceptance of this NIS report have on the decision made previously by An Bord Pleanála ?

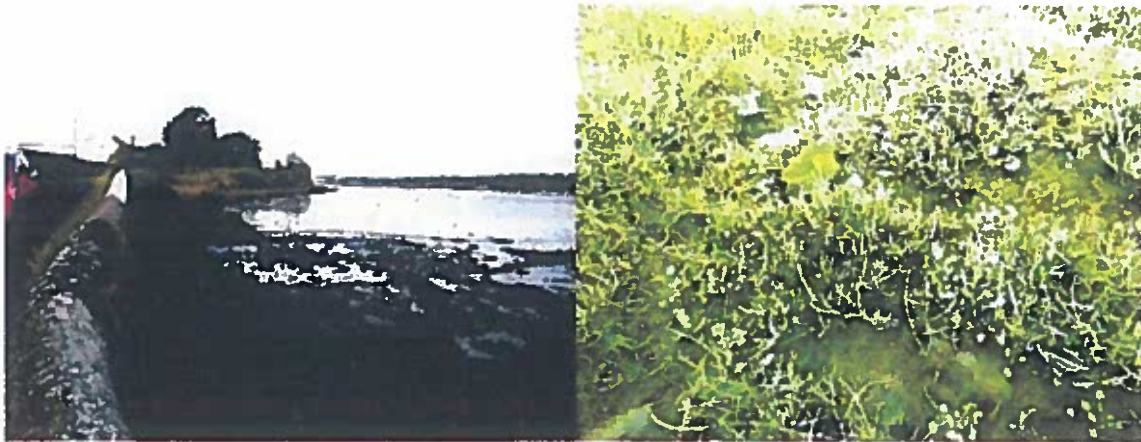
5.

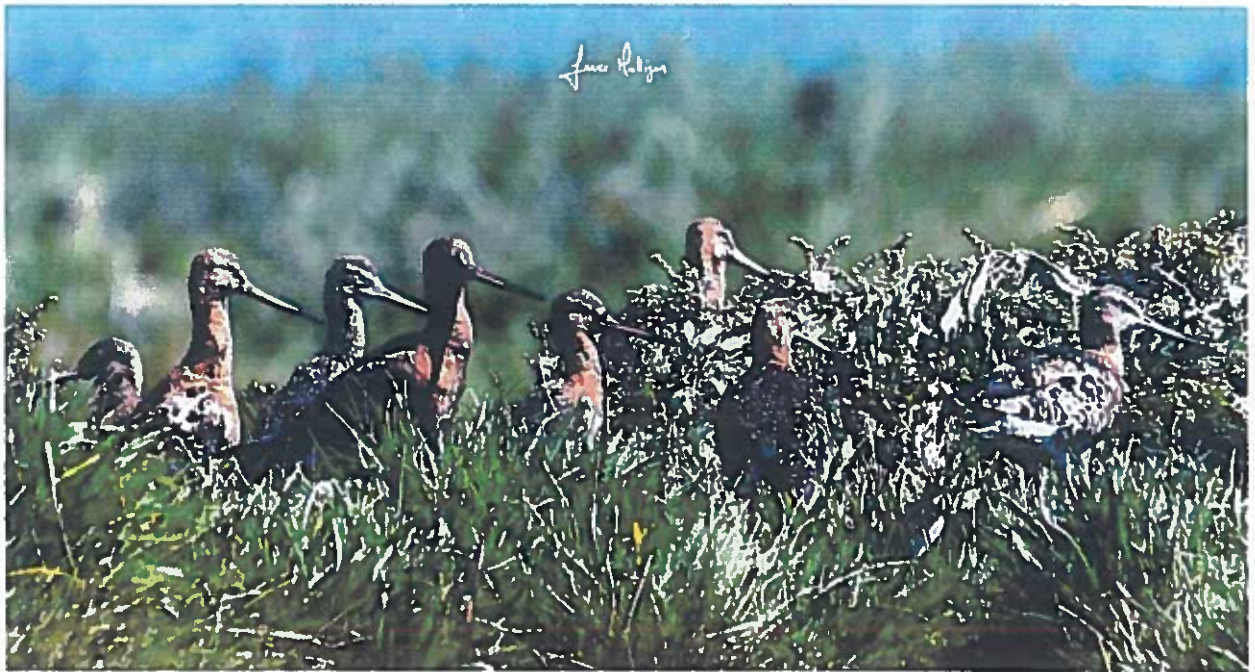
6.1 Inis NIS report

In the quote stated on 6.1 the report states that a walkway will be of great benefit to the wildfowl as people will remain within the confines of the walkway rather than rambling and "*straying*" around the slob lands .

I find this statement absolutely ridiculous as the route of the proposed greenway in the Estuary is devoid of all human activities due to the tidal mud flats .Any walkers that "*stray*" on to the mud flats will have to be rescued by the coast guard !

The photos below were submitted by INIS of the Boyne Estuary at Mornington bridge .The photos clearly show that the terrain is unsuitable for walkers and contradicts the conclusion of the benefits of a walkway to help with the hordes of walkers in this area at present !! Meath County Council propose to build a bridge adjacent to this bridge and I have submitted a photo below of flocks of lapwing as well as many other birds that use the stream flowing under this bridge to wash and drink which will no longer be used on the commencement of construction of a pedestrian bridge on that stream.





Bar Tailed Godwits taken at location OZL03 and below photograph figure 4.5 in Inis NIS report yet there was no mention of any Bar Tailed godwits in any of their counts .



6.1.1 Similar Projects

The report puts a large emphasis on similar projects that it has highlighted with photographic evidence .

Their own photographic evidence clearly show no similarities whatsoever to the Greenway being proposed for the Boyne Estuary .The greenways highlighted in this report all show buffer zones i.e railway lines ,roads ,hedges etc... between the paths and the rivers and at no stage enter or encroach any protected . The greenway proposed for the Boyne Estuary *enters* the SAC/SPA for the majority of the route .

6.

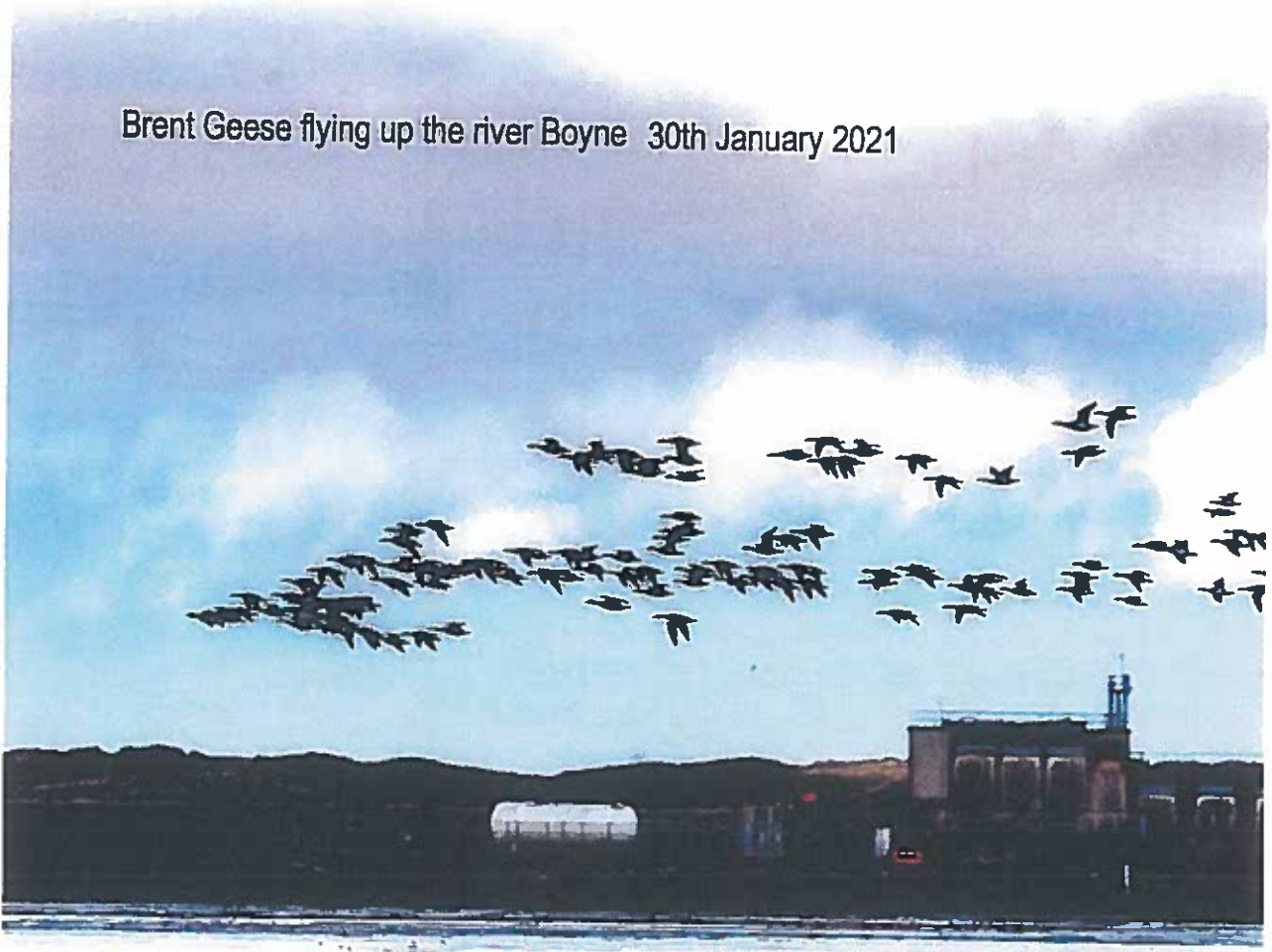
The proposed Greenway is going to exit onto an EU protected SAC at Mornington Dunes .This is area of national importance and sensitivity and is currently being scrutinised by the NPWS who are in talks with Meath County Council as to reverse the damage that has been caused to this area due to the neglect of the said County Council.

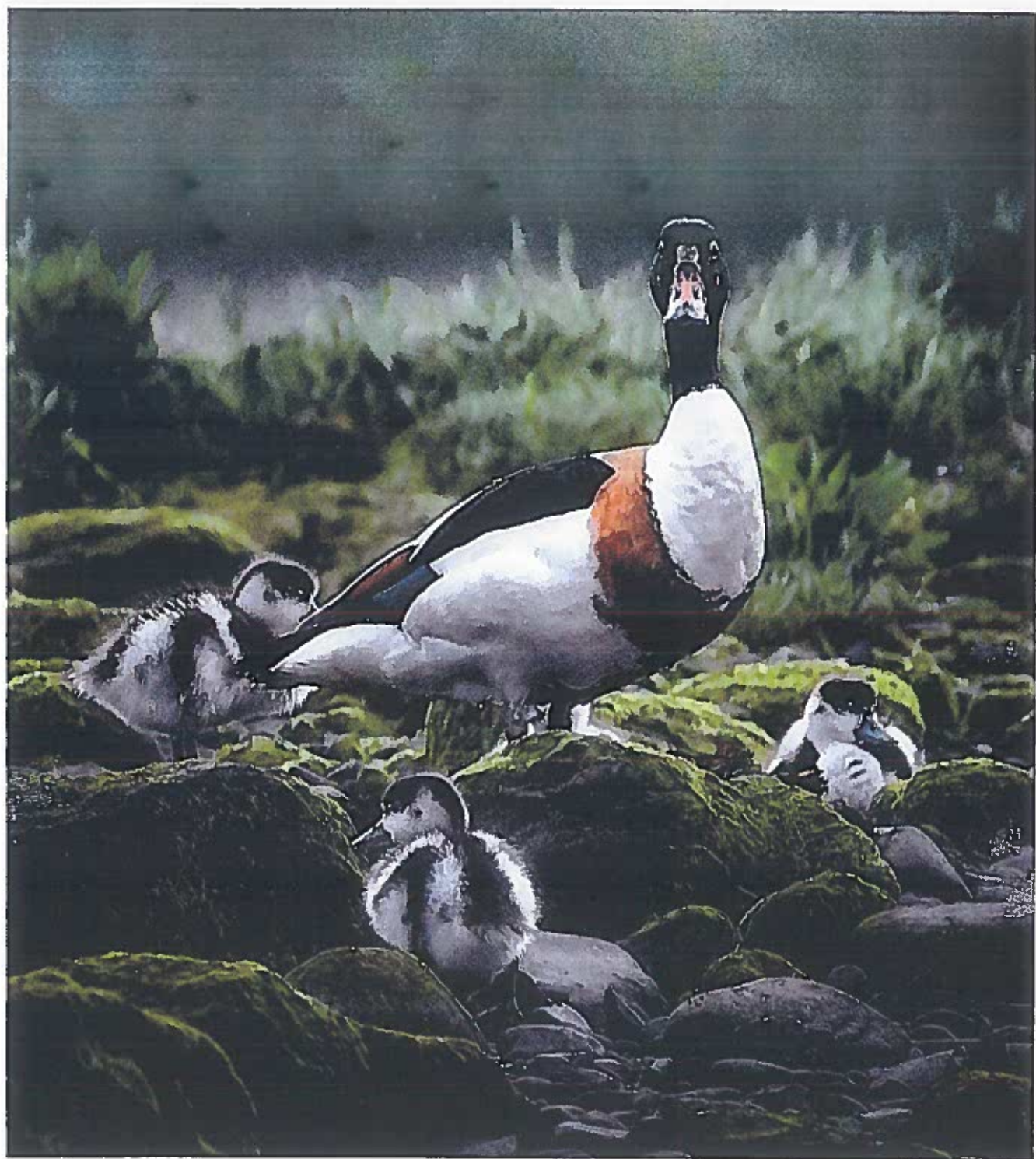
By exiting this walkway onto an E.U protected site there is no way of stopping people straying and causing irrevocable damage to this area of sensitivity , this NIS report has failed to address these issues .

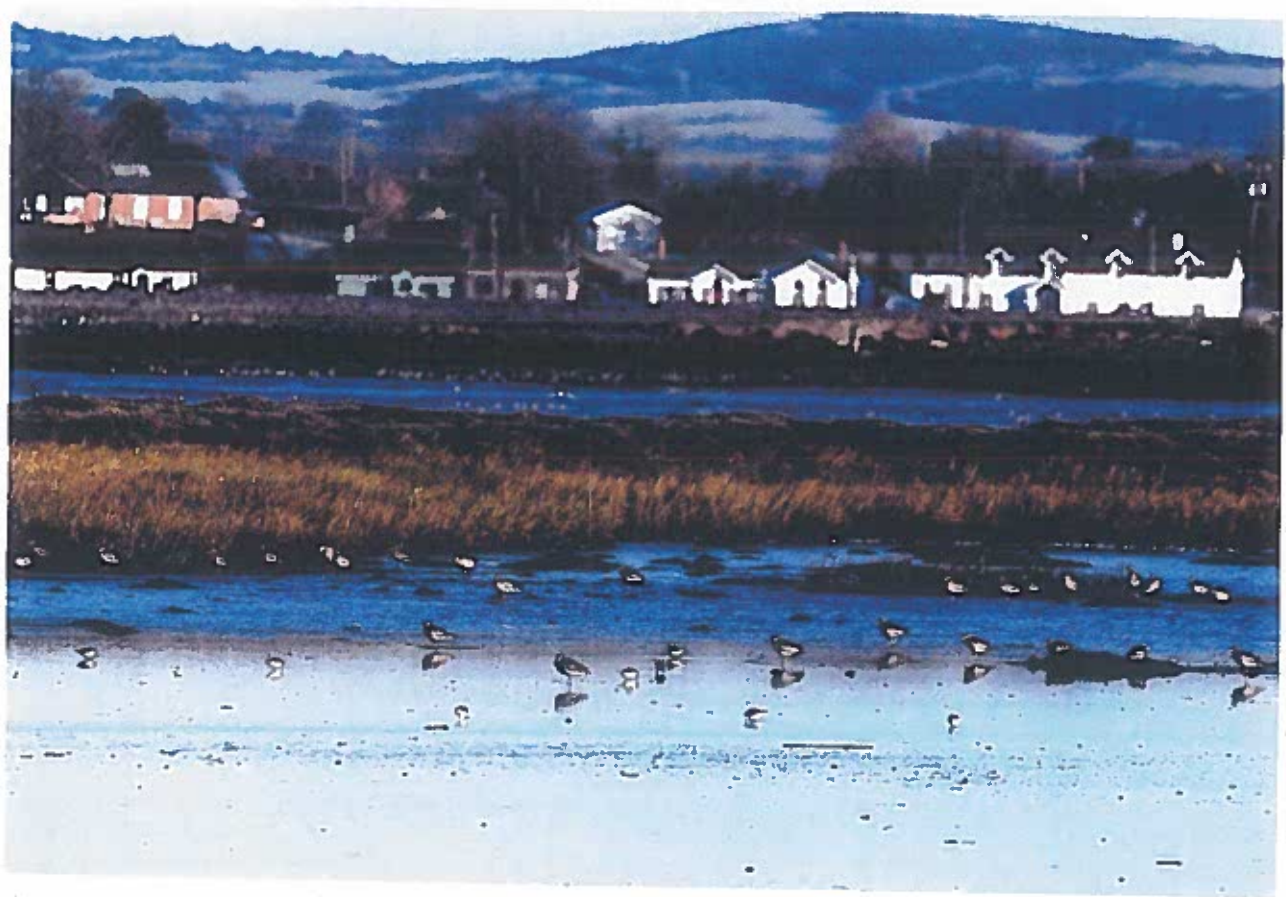


Curlew & Lapwing foraging in the fields adjacent to the Boyne Estuary

Brent Geese flying up the river Boyne 30th January 2021







Summary

Any NIS report is supposed to be an unbiased and independent report on the impact of construction on an area of special protection and conservation however I am sure an Bord Pleannala will come to the same conclusions as we did that this Inis report is totally biased in its support of the proposed Greenway from Drogheda to Mornington .

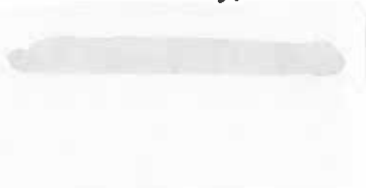
It is well documented that loss of habitat is the largest contributing factor to the extinction of wildlife and it is a fact that this greenway will cause huge loss of habitat to the wildfowl on the Boyne Estuary.

We as humans have a clear choice ,we either try and protect the little wildlife and their habitat that is left or we can destroy their habitat and contribute to the mass extinction that is currently evolving rapidly worldwide .

The Boyne Estuary SAC/SPA will be destroyed forever if the construction of this walkway goes ahead under the false and unprofessional NIS report submitted by INIS Environmental Consultants .

I would also have to call into question the integrity of this company that is responsible for carrying out this NIS survey.This same company hand delivered 180 letters to Clare County Council in support of a planning application for supermacs of which most had forged and fake signatures and is documented in the Irish Times article dated Tue August 18th 2018.Surely a more reputable company is available to carry out such an important report on a EU protected site and give us a true Natura Impact Statement.

Yours Sincerely,

A rectangular area of the document has been redacted with a grey brushstroke, obscuring the signature and any text that might have been present below it.