



An
Bord
Pleanála

Inspector's Report

ABP-315460-23

Development	Development which involves the construction of the Boyne Greenway - North Bank
Location	in the townlands of Mell and Moneymore, Drogheda, Co. Louth
Local Authority	Louth County Council
Type of Application	Application for approval made under Section 177(AE) of the Planning and Development Act, 2000 (local authority development requiring appropriate assessment)
Prescribed Bodies	Department of Housing, Local Government and Heritage
Observers	None
Date of Site Inspection	27 th October 2023
Inspector	Susan Clarke

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1.0 Introduction

- 1.1. Louth County Council is seeking approval from An Bord Pleanála to undertake the construction of the Boyne Greenway – North Bank in Drogheda, Co. Louth. Sections (550m) of the proposed greenway (total length proposed 1.6km) are located within the River Boyne and River Blackwater Special Area of Conservation (SAC) (site code: 002299). A Natura Impact Statement (NIS) and application under Section 177AE was lodged by the Local Authority based on the proposed development's likely significant effect on European sites.
- 1.2. Section 177AE of the Planning and Development Act 2000 (as amended) requires that where an appropriate assessment is required in respect of development by a local authority, the authority shall prepare a NIS and the development shall not be carried out unless the Board has approved the development with or without modifications. Furthermore, Section 177V of the Planning and Development Act 2000 (as amended) requires that the appropriate assessment shall include a determination by the Board as to whether or not the proposed development would adversely affect the integrity of a European site and the appropriate assessment shall be carried out by the Board before consent is given for the proposed development.

2.0 Proposed Development

- 2.1. The proposed development comprises the construction of the Boyne Greenway – North Bank in Drogheda, County Louth. The proposed development includes provision of a path with a total length of c1.6km. Of this approx. 650m is a completely new path that will run through mainly scrub habitat. The remainder of the proposed works consists of the enhancement of an existing 950m pathway, including widening the path from 2m to 3m with a bitmac surface, resurfacing of poor-quality surfaces and the provision of lighting. Benches, bins and bicycle racks will be installed at several locations along the path. Access control gates will be installed on the pathway. Vegetation currently encroaching onto the existing path will be removed/trimmed. Areas of fencing which are damaged will be removed/replaced. Road signs and markings will be put in place.

2.2. **Accompanying documents:**

2.2.1. The application is accompanied by the following documents:

- Section 177AE Application Report (dated November 2022) including a Natura Impact Statement, Plates, Lighting Preliminary Design Report, and a Louth County Council Memo in relation to flooding;
- EIAR Screening Assessment (dated November 2022) including an Archaeological Impact Assessment;
- Outline Construction and Environmental Management Plan (dated November 2022);
- Planning drawings;
- A list of Prescribed Bodies and copies of public notices.

Subsequent a Request for Further Information, the following documentation was submitted:

- Natura Impact Statement – NIS (22 November 2023);
- EIA Screening Assessment (22 November 2023);
- Bat Survey Report (22 November 2023);
- Otter Survey Report (22 November 2023);
- Lighting Application Specialists Preliminary Design;
- Planning drawings.

3.0 **Site and Location**

3.1. The site is located on the northern banks of the River Boyne, to the west of Drogheda town centre and St. Domini's Bridge. The greenway would travel along a linear site extending from Boyne Hill estate to an existing footpath perpendicular to Lower Mell Street, running through the footpath up to Horse Lane, before connecting back to Lower Mell Street, on the northern banks of the River Boyne. The immediate surrounding area is comprised of commercial, residential, public amenity, undeveloped greenspace some of which is used for agricultural purposes, and the River Boyne.

- 3.2. The site is partially located within the River Boyne and River Blackwater Special Area of Conservation (SAC) (site code: 002299). The Boyne River Islands proposed Natural Heritage Area is located further west of the subject site.

4.0 Planning History

There are several planning cases in the vicinity, none of which are relevant to the project. I highlight that the Board refused permission for the construction of the Boyne Greenway Drogheda to Mornington (ABP Ref. 307652), located to the south of the River Boyne, east of the town centre, in August 2023 due to that development's potential impact on the integrity of the Boyne Coast and Estuary SAC and Boyne Estuary SPA.

5.0 Legislative and Policy Context

5.1. The EU Habitats Directive (92/43/EEC)

- 5.1.1. This Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) and 6(4) require an appropriate assessment of the likely significant effects of a proposed development on its own and in combination with other plans and projects which may have an effect on a European Site (SAC or SPA).

5.2. European Communities (Birds and Natural Habitats) Regulations 2011

- 5.2.1. These Regulations consolidate the European Communities (Natural Habitats) Regulations 1997 to 2005 and the European Communities (Birds and Natural Habitats) (Control of Recreational Activities) Regulations 2010, as well as addressing transposition failures identified in CJEU judgements. The Regulations in particular require in Reg 42(21) that where an appropriate assessment has already been carried out by a 'first' public authority for the same project (under a separate code of legislation) then a 'second' public authority considering that project for appropriate assessment under its own code of legislation is required to take account of the appropriate assessment of the first authority.

5.3. National Nature Conservation Designations

- 5.3.1. The Department of Housing, Local Government and Heritage and the National Parks and Wildlife Service are responsible for the designation of conservation sites throughout the country. The three main types of designation are Natural Heritage Areas (NHA), Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) and the latter two form part of the European Natura 2000 Network.
- 5.3.2. The proposal is within the following designated site: River Boyne and River Blackwater Special Area of Conservation (SAC) (site code: 002299).
- 5.3.3. The following European sites are located in proximity to the subject site: Boyne River Islands pNHA (site code:001862), Boyne Coast and Estuary pNHA (site code:001957) and Boyne Estuary SPA (site code: 004080), Boyne Coast and Estuary SAC (Site Code 001957), River Boyne and River Blackwater SPA (Site Code 004232) and North-West Irish Sea SPA (Site code 004236).

5.4. Planning and Development Act 2000 (as amended)

- 5.4.1. Part XAB of the Planning and Development Act 2000, as amended, sets out the requirements for the appropriate assessment of developments which could have an effect on a European site or its conservation objectives.
- 177(AE) sets out the requirements for the appropriate assessment of developments carried out by or on behalf of local authorities.
 - Section 177(AE) (1) requires a local authority to prepare, or cause to be prepared, a Natura impact statement in respect of the proposed development.
 - Section 177(AE) (2) states that a proposed development in respect of which an appropriate assessment is required shall not be carried out unless the Board has approved it with or without modifications.
 - Section 177(AE) (3) states that where a Natura Impact Statement has been prepared pursuant to subsection (1), the local authority shall apply to the Board for approval and the provisions of Part XAB shall apply to the carrying out of the appropriate assessment.

- Section 177(V) (3) states that a competent authority shall give consent for a proposed development only after having determined that the proposed development shall not adversely affect the integrity of a European site.
- Section 177AE (6) (a) states that before making a decision in respect of a proposed development the Board shall consider the NIS, any submissions or observations received and any other information relating to:
 - The likely effects on the environment.
 - The likely consequences for the proper planning and sustainable development of the area.
 - The likely significant effects on a European site.

5.5. **Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities**

- 5.5.1. Guidance is provided for the competent authority to assess any plan or project. The impact of any plan or project alone or in combination with other projects on the integrity of the Natura 2000 site is considered with respect to the conservation objectives of the site and the structure and function.

6.0 **Policy Context**

6.1. **Introduction**

- 6.1.1. The following sets out a list of applicable national, regional and local policy relevant to the assessment of the application.

6.2. **National Policy**

6.2.1. **National Planning Framework (NPF)**

The National Planning Framework (NPF) sets out a number of national strategic outcomes which includes enhanced amenities and heritage. It notes that this will ensure that our cities, towns and villages are attractive and can offer a good quality of life. It includes amenities in rural areas such as activity based tourism and trails including greenways, blueways and peatways. The NPF states that the development of such greenways offers a unique alternative means for tourists and visitors to access and enjoy rural Ireland. It states:

“The development of a strategic national network of these trails is a priority and will support the development of rural communities and job creation in the rural economy, as well as the protection and promotion of natural assets and biodiversity.”

The NPF sets out a number of national policy objectives focused on sustainable transportation, greater accessibility and improved air quality arising from increased use of alternatives to the car, including:

- NPO 22 - Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.
- NPO 27 - Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility...
- NPO 28 - Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.
- NPO 64 - Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car...

6.3. Strategy for the Development of National & Regional Greenways, 2018

This Strategy seeks to assist in the strategic development of nationally and regionally significant Greenways in appropriate locations constructed to an appropriate standard in order to deliver a quality experience for all Greenways users. It also aims to increase the number and geographical spread of Greenways of scale and quality around the country over the next 10 years with a consequent significant increase in the number of people using Greenways as a visitor experience and as a recreational amenity.

6.3.1. **Design Manual for Urban Roads and Streets, 2019 ('DMURS')**

DMURS states that:

- 'Better street design in urban areas will facilitate the implementation of policy on sustainable living by achieving a better balance between all modes of transport and road users. It will encourage more people to choose to walk, cycle or use public transport by making the experience safer and more pleasant.'
- 'Designing for cyclists must also be given a high priority. Trips by bicycle have the potential to replace motor vehicles as an alternative means of transport for short to medium range trips (and in some cases longer range trips). Cycling also promotes a healthy lifestyle.'

6.3.2. **Cycle Design Manual, September 2023**

The 2011 National Cycle Manual is now replaced by this new Cycle Design Manual, which draws on the experience of cycle infrastructure development over the past decade and international best practice to help deliver safe cycle facilities for people of all ages and abilities. The Manual is intended as a live document that will be updated to reflect emerging best practice.

Chapter 2 of the Manual sets out the five main requirements (safety, coherence, directness, comfort and attractiveness), that designs should fulfil to cater for existing cyclists and to attract new cyclists to the network. Key design principles include a network approach, segregation and inclusive mobility. It is advised that promoters of cycle facilities should cycle. Information is also provided on the types of cycle vehicles, cycle links, appropriate facilities and width calculations.

Chapter 3 of the Manual addresses cycle network planning, as well as the planning of cycling in private developments and public infrastructure projects. Designing for cycling is covered in Chapter 4, with guidance provided on the following:

- Geometric requirements (design speed, sight distance, visibility splays, horizontal and vertical alignments, surface crossfall, clearance and headroom),

- Cycle links (segregated cycle facilities, standard and stepped cycle tracks, protected cycle lanes, two-way cycle tracks, greenways and shared active travel facilities, cycle lanes, cycling in mixed traffic, contraflow cycling, parking and loading on links, bus stops, transitions, pedestrian crossings at cycle tracks),
- Priority junctions,
- Signal-controlled junctions (including protected junctions),
- Crossings,
- Roundabouts.

Details relating to implementation and maintenance, including public lighting and signage/ wayfinding, are provided in Chapter 5, and Chapter 6 sets out the various design principles on cycle parking. Finally, typical layouts for cycle infrastructure are included in the appendix.

6.3.3. **Get Ireland Walking Strategy and Action Plan 2017-2020**

The ‘Get Ireland Walking’ initiative was established in 2013 and its vision is to “empower and support people to choose to walk more often for recreation, transport and health as part of their daily life”. A number of actions are set out including the creation of opportunities for improved access to lands for recreational walking and to develop and market recreational walking infrastructure.

Other relevant national policy and guidance:

- National Development Plan 2018-2027
- Climate Action Plan 2023
- National Cycle Policy Framework 2009-2020
- Smarter Travel: A Sustainable Transport Future, 2009-2020
- The Planning System and Flood Risk Management Guidelines for Planning Authorities (including the associated Technical Appendices) (2009).

6.4. Regional Policy

Regional and Economic Spatial Strategy for Eastern and Midland Region, 2019 ('RSES')

Regional Policy Objectives include reference to Drogheda as a Regional Growth Centre. RPO 4.15 refers to the Amenity potential of the River Boyne and the Boyne Greenway. Enabling Infrastructure includes:

“Drogheda is strategically located on the Dublin-Belfast Economic Corridor and the existing high capacity road and national rail links play a critical role in supporting economic growth and competitiveness for the region. The RSES supports the improvement and protection of walking and cycling routes such as the Boyne Greenway and public transport provision including accessibility by rail in order to support sustainable productivity growth while protecting the intraregional capacity of the existing motorway network. The planning and delivery of the Drogheda Flood Relief Scheme will protect existing development and future growth.”

6.5. Louth County Development Plan 2021 – 2027

Zoning

The subject site extends approximately 1.6km, the majority of which is subject to the following land use zoning objective H1 – Open Space: *To preserve, provide and improve recreational amenity and open space. Cycleway/Walkway trails are generally a permitted use under this zoning. A smaller section of the site (c.0.13km is located on lands zoned A2-new Residential – Phase 1: To provide for new residential neighbourhoods and supporting community facilities.*

Chapter 6 – Tourism

TOU 8: To promote and facilitate the development of walkways and cycleways at appropriate locations throughout the County utilising disused transport links where feasible.¹

¹ The above policies TOU 8 - 10 shall all be subject to compliance with all relevant EU policies such as the Water Framework, Birds, Habitats SEA &EIA Directives.

TOU 9: To protect the integrity and scenic quality of existing and future walking and cycling routes and their setting.

TOU 10: To work in conjunction with adjoining authorities including Newry, Mourne and Down District Council and Meath County Council to extend and design new walking and cycling routes, including the Great Eastern Greenway and the Boyne Greenway. Ensure all proposals include appraisal of environmental impacts and take full account of the potential for negative impacts on European Sites through the process of Appropriate Assessment.

TOU 11: To continue the development of a network of greenways in County Louth in accordance with the 'Strategy for Future Development of National and Regional Greenways'

Chapter 7 – Movement

MOV 7: To support a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking and the attainment of any national targets relating to modal change published during the life of this Plan.

MOV 9: To support investment in sustainable transport infrastructure that will make walking, cycling or public transport more attractive and appealing, and facilitates accessibility for all, regardless of age, physical mobility, or social disadvantage.

MOV 25: To support the retrospective provision of walking and cycling infrastructure in existing settlements, where feasible, to achieve growth in sustainable mobility and strengthen and improve the walking and cycling network.

Chapter 9 – Built Heritage

There are no Protected Structures or structures listed on the NIAH located within the subject site, however there are a number of such structures in the surrounding area including *inter alia*:

- LH0234-012005: Ritual Site, Holy Well
- LH024-012001: Souterrain
- LH024-012002: Souterrain
- LH024-012005: Enclosure

- 13618005: Westgate Mill: store/warehouse.

BHC 1: To protect and enhance archaeological sites and monuments, underwater archaeology, and archaeological objects listed in the Record of Monuments and Places (RMP), and/or the Register of Historic Monuments and seek their preservation (i.e. presumption in favour of preservation in situ or in exceptional cases, at a minimum, preservation by record) through the planning process and having regard to the advice and recommendations of the National Monuments Service of the Department of Housing, Local Government and Heritage and the principles as set out in the 'Framework and Principles for the Protection of the Archaeological Heritage' (Department of Arts, Heritage, Gaeltacht and the Islands 1999).

BHC 5: To protect all sites and features of archaeological interest discovered subsequent to the publication of the Record of Monuments and Places (i.e. preservation in situ or in exceptional circumstances, at a minimum preservation by record) having regard to the advice and recommendations of the National Monuments Section of the Department of Housing, Local Government and Heritage.

BHC 10: To require, as part of the development management process, archaeological impact assessments, geophysical surveys, test excavations and monitoring, as appropriate, where development proposals involve ground clearance of more than half a hectare or for linear developments over one kilometre in length or for developments in proximity to areas with a density of known archaeological monuments and history of discovery, as identified by a licensed archaeologist.

Chapter 10 – Infrastructure and Public Utilities

The site traverses an area designated in the Development Plan as being in flood zone A (The probability of flooding is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding) and where a wide range of receptors would be vulnerable) and flood zone B (The probability of flooding is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding)).

IU 26: To reduce the risk of new development being affected by possible future flooding by:

- Avoiding development in areas at risk of flooding and

- Where development in floodplains cannot be avoided, taking a sequential approach to flood risk management based on avoidance, reduction and adaptation to the risk.

IU 27: To ensure all proposals for development falling within Flood Zones A or B are consistent with the “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” 2009. Proposals for development identified as being vulnerable to flooding must be supported by a site specific Flood Risk Assessment and demonstrate to the satisfaction of the Planning Authority that the development and its infrastructure will avoid significant risks of flooding and not exacerbate flooding elsewhere.

IU 33: Where a portion of a site is at risk of flooding, the lands at risk will be subject to the sequential approach to ensure first and foremost that new development is directed towards lands at low risk of flooding; and to restrict the type of development to that ‘appropriate’ to each flood zone in accordance with Tables 3.1 and 3.2 of the Flood Risk Management Guidelines.

Chapter 12 – Climate Action

Section 12.7.3.3 makes reference to the subject project: *Most recently, Louth County Council has secured €200,000 worth of funding to improve the Northside Greenway at Mell in Drogheda. The funding has been allocated under the Outdoor Recreation Infrastructure Scheme, a joint initiative between the Department of Rural and Community Development and Fáilte Ireland.*

MOV 28: To promote walking and cycling as a safe, convenient, healthy, efficient, and environmentally friendly mode of transport for all age groups.

MOV 30: To provide, where possible traffic free pedestrian and cyclist routes particularly where such routes would provide a more direct, safer, and more attractive alternative to the car.

MOV 33: To continue the development of a network of Greenways in the County in accordance with the Strategy for the Future Development of National and Regional Greenways.

6.6. Drogheda Joint Local Area Plan

- 6.6.1. Louth County Council and Meath County Council have commenced the preparation of a joint Local Area Plan (LAP) for Drogheda and its environs. The Plan will set out a

land use strategy for the future growth and sustainable development of Drogheda, focusing on issues including population and economic growth, delivery of housing and community facilities, regeneration of vacant and under-utilised lands, the potential impacts of climate change, environmental protection, and investment in transportation and water services infrastructure. At the time of writing this Report, submissions were being accepted in respect of the Pre-Draft Issue Paper.

7.0 The Natura Impact Statement

- 7.1. Louth County Council's application for the proposed development was accompanied by a Natura Impact Statement (NIS), which scientifically examined the proposed development and the European sites. The NIS identified and characterised the possible implications of the proposed development on the European sites, in view of the sites' conservation objectives, and provided information to enable the Board to carry out an appropriate assessment of the proposed works.
- 7.2. The NIS describes the elements of the project (along or in combination with other projects and plans) that are likely to give rise to significant effects on the European sites. Potential impacts are set out as well as an assessment of their possible adverse effects on the conservation objectives of qualifying interest features and the mitigation measures that are to be introduced to avoid, reduce or remedy any adverse effects on the integrity of the European site.
- 7.3. The assessment of impacts presented in the NIS found that there is potential for significant effects from the proposed development to significantly impact the River Boyne and River Blackwater SAC, the Boyne Coast and Estuary SAC, and the Boyne Estuary SPA, via surface water runoff during construction and operation. However, with implementation of mitigation measures in full, it is considered, beyond reasonable scientific doubt, that no adverse effects on the integrity of the European site would occur in light of the conservation objectives of that site.

8.0 Consultations

- 8.1. The application was circulated to the following bodies:
 - Fáilte Ireland

- An Chomhairle Ealíon
- An Taisce
- Heritage Council
- Irish Water
- Inland Fisheries
- Department of Housing, Local Government & Heritage
- Department of Environment, Climate and Communications
- Transport Infrastructure Ireland
- Bord Gais

8.1.1. Responses were received from the Department of Housing, Local Government & Heritage:

Archaeology

- The potential does exist that previously unknown archaeological feature or deposits may be exposed or identified, especially in the area adjacent to the known archaeological monuments (LH024-012001-012005) at Toberboice Lane, where the potential is particularly high, within the greenfield. Recommends the following conditions:

1. All ground works associated with the proposed development shall be monitored under licence by a suitably qualified archaeologist.
2. As part of the assessment a programme of test excavation shall be carried out at locations chosen by the archaeologist (licenced under the National Monuments Acts 1930-2004), having consulted the site drawings and the National Monuments Service.
3. A detailed building survey of any structures of architectural/cultural heritage interest.
4. Should archaeological material be found during the course of works, the work on the site shall be stopped pending a decision as to how best to deal with the archaeology. The developer shall be prepared to be advised by the Department with regard to any necessary mitigating

action (e.g. preservation in situ, or excavation) and should facilitate the archaeologist in recording any material found.

Reason: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.

Nature Conservation

- Whilst no sightings of otters were recorded during a site walkover, otters are known to occur along the adjacent section of the Boyne and it is most likely that no evidence of their presence along the proposed greenway route was found during the October walkover visit because the ecologist carrying out the walkover was not an otter specialist.
- An additional otter survey of the areas along the greenway by an otter specialist is required in order to establish more securely whether or not the scheme might adversely affect an otter breeding or resting place.
- Recommends that an amended NIS is prepared to incorporate an assessment of the results of an otter survey by an otter specialist.
- No bat surveys appear to have been carried out in relation to the proposed development.
- It is not clear that the preliminary lighting design for the greenway project has been prepared in accordance with the various guidelines on lighting and bats.
- Propose that a movement activated light regime be adopted for the proposed project.
- No habitat survey of the proposed greenway route was carried out in connection with the application, nor a bird survey of scrub proposed to be cleared as part of the development.
- Recommends that a bat survey of the proposed greenway to be carried out during the period of the year when bats are fully active i.e. from May to August.
- Recommends an amended EIA Screening Report to incorporate a classification of habitats according to the Fossitt scheme occurring along the greenway route and a breeding bird survey of this route.

8.2. Public Submissions

There are no public submissions on file.

9.0 EIA Screening

- 9.1.1. An EIA Screening Report (dated 22nd November 2023) states that EIA is not mandatory as the project is not specified under Annex I of the EIA Directive. In addition, it is stated that the project is not listed under Annex II. Nonetheless, the Applicant screened the development in terms of Schedule 7 criteria and concluded that the proposed development will not result in any significant environmental impacts.
- 9.1.2. Screening for EIA is only required either if the proposed development (a) constitutes a sub threshold development being of a class of development as set out in Part 1 or Part 2, Schedule 5 of the Planning and Development Regulations or (b) having regard to the definition of a road (Part 1 Section 2 Roads Act 1993 as amended), falls within a class of development set out in Section 50 (1) (a) of the Roads Act, 1993, as substituted by S. 9 (1) (d) (i) of the Roads Act 2007. Having regard to the Planning and Development Regulations, the only class relevant is 10 (dd). All private roads which would exceed 2000 metres in length. The subject greenway is not a private road. Under the Roads Act it is stated that a road authority or the Authority shall prepare a statement of the likely effects on the environment ('environmental impact statement') of any proposed road development it proposes consisting of —
- (i) the construction of a motorway,
 - (ii) the construction of a busway,
 - (iii) the construction of a service area, or
 - (iv) any prescribed type of proposed road development consisting of the construction of a proposed public road or the improvement of an existing public road.
- 9.1.3. The greenway does not constitute any of these types of development. In conclusion, as the proposed development does not meet the criteria either under the Planning and Development Regulations or the Roads Act, an EIA or screening for EIA is in my opinion not required.

- 9.1.4. The application is made under section 177AE and this assessment, therefore, is not a formal screening assessment. If the applicant requires a formal view as to whether EIA is required, there are other statutory mechanisms for them to do so.

10.0 Assessment

10.1. The Likely Consequences for the Proper Planning and Sustainable Development of the Area:

- 10.1.1. The proposed development comprises the construction of the Boyne Greenway – North Bank in Drogheda, County Louth. The proposed development includes provision of a path with a total length of c1.6km and will form an extension to the current Boyne Greenway². In addition, to providing improved recreational facilities for the Town, it will also improve general connectivity and accessibility in a sustainable manner from existing and future residential areas to the town centre. It will help provide a segregated off-road experience.
- 10.1.2. The development of greenways is strongly advocated at a national, regional and local policy level, in particular Policy Objective TOU10 of the CDP which aims to extend and design new walking and cycling routes including the Boyne Greenway. A summary of the relevant policies and objectives relevant to the development of such greenways is provided in Section 6 above. In short, I am satisfied that the proposed development would be consistent with strategic policy objectives to encourage and promote designated cycle and walking trails and provide enhanced recreational and tourism amenities.
- 10.1.3. Approximately 650m of the proposed c.1.6km will consist of a new path which will run through mainly scrub habitat. The remainder of the proposed works consist of enhancement of an existing 920m pathway. The proposed works go from Boyne Hall estate in the west to Horse Lane in the east and will encompass an existing footpath with two connections to Lower Mell Street between Fountain Hill and Riverview Street and another at Horse Lane. The majority of the site is zoned Objective H1 – Open Space: *To preserve, provide and improve recreational amenity and open space.*

² The Boyne Greeway runs from Dominic's Park on the south bank of the River Boyne near the Bridge of Peace in Drogheda, along the river close to the Mary McAleese Cable Bridge and then along the Boyne Canal to the Battle of the Boyne Visitor Centre at Oldbridge.

Cycleway/Walkway trails are generally a permitted use under this zoning. A smaller section of the site (c.0.13km is located on lands zoned A2-new Residential – Phase 1: *To provide for new residential neighbourhoods and supporting community facilities.* Having regard to the zoning on the site, the location beside the town centre and the policies and objectives of the CDP, the proposed development complies with the proper planning and sustainable development of the area, subject to an assessment of the effects on the environment and integrity of the Natura 2000 network.

10.2. **The Likely Effects on the Environment**

10.3. **Population and Human Health**

10.3.1. The delivery of the greenway will provide a safe walking route for locals and tourists, in addition to improving connectivity and accessibility in the town. It will form an extension of the Boyne Greenway thereby improving the area's recreational facilities. During the construction phase there will be some minor short term and temporary impacts due to the operations required to construct the greenway. An Outline Construction Method Statement is submitted with the application which includes a number of mitigation measures to minimise construction impacts. Given the distance to nearby dwellings and the low intensity of the proposed construction works, it is envisaged that there will be no material adverse impacts to human beings arising from the development. During the operational phase, the greenway would provide many benefits in terms of its recreational and amenity value and potential positive impacts on human health. Having regard to the nature and scale of the proposed works, there will not be significant visual impacts from the proposal that would negatively impact the area's visual amenity.

10.4. **Biodiversity**

Habitats

10.4.1. The Department requested that the Applicant provide a classification of habitats according to the Fossitt scheme occurring along the greenway route. Section 5.1 of the EIA Report (and Section 1.2 of the EIA Screening Assessment) outline the habitats present. During a site walkover on 19th July 2023, three invasive species were identified: Butterfly-bush, Sycamore, and Cherry Laurel. The Applicant states in the Cover Letter (dated 22nd November 2023) that as none of the 3 invasive species found on site are listed on the Third Schedule Invasive Species, an Invasive Species

Management Plan is not required. Section 7.2 of the EIA Report states that if the pre-construction surveys identify any invasive species specifically Giant Hogweed, Indian Balsam or Japanese Knotweed, a management plan must be prepared and implemented. I note the use of a Project Ecologist who can oversee the construction works. Also, I highlight that there are no instream works proposed and as such, the spread of invasive species by water would be limited. Having regard to the foregoing, I am satisfied that the threat of spreading of invasive species can be managed appropriately during the construction phase.

Otter

10.4.2. On foot of the Department's concerns in relation to potential impacts on otter from the proposed development, the RFI Response includes an 'Otter Survey Report' dated 22nd November 2023, which was prepared by Luis Lemma, BSc, MSc, PhD, CEcol, MCIEEM, Principal Ecologist. The Report states that Mr Lemma has extensive expertise in Biological Control, Taxonomy, Aquatic Macroinvertebrates, Bat, Otter and Badger Surveys in addition to undertaking environmental assessments for a range of activities. The Report states that according to the National Otter Survey Ireland 2010/2012, a total of five surveys have been conducted in the Boyne Catchment from 1980/81 and to 2010/11 with sample sizes varying from 12 to 84 sites. The survey indicated that otter incidents within the catchment declined significantly by 37.3% from 1980/81 to 2004/2005 and subsequently increased by an estimated 42.8% by 2010/2011. A site walkover was undertaken on the 4th of August and the 9th of November 2023 by the Principal Ecologist and otter specialist Mr. Lemma. The proposed track and its surroundings up to 150m from the path were investigated where possible (See Figure 3.1 of the Report). No holts, couches, spraints, prints, natal dens, or food remains were recorded. Whilst suitable habitat for otter is present in the area, the Applicant contends that due to the presence of people and pets crossing the area on a regular basis, it is unlikely that otters are using the site area. Nonetheless, the following mitigation measures are proposed:

- In the event an otter holt or couch is located during construction works, a protection zone extending 30 metres is required.

- In the event a natal den is located during construction works, a protection zone extending 150 metres is required.
- These protection zones must be visibly demarcated prior to the initiation of any construction works. It is strictly prohibited to conduct any form of works within these zones including vegetation clearance and material storage unless an official license that permits such activities has been issued.
- Any machinery with the potential to harm otters should be secured or enclosed within temporary fencing at the conclusion of each work day. Construction activities should be limited to daytime hours to minimize disruption to these primarily nocturnal animals.
- No permanent fencing is proposed at the greenway to ensure unrestricted access to otters at all times. In the event that utters are identified in a pre-construction survey then mammal resistant fencing should be incorporated on either side of all water courses at which utter presence is known and should stretch to at least 25 metres and preferably to 50 metres or more either side of the crossing.
- No permanent fencing is proposed in the new greenway with only minor repairs to existing fencing which would be post and rail. Therefore, there will be no barrier to movement.

10.4.3. In addition, I note that the NIS (see Section 5.9) (22nd November 2023) and OCEMP (see Section 9) (dated November 2022) outline a series of mitigation measures to protect water quality. These include *inter alia*: appointment of a suitably qualified ecologist, minimum construction area, no direct discharges to water, provision of silt fencing, spill kits, positioning of the construction compound away from the riverbank, etc. Mitigation measures to protect water quality during both the construction and operational phases are critical to ensuring there would be no indirect impacts on otter food supplies.

10.4.4. Having regard to the foregoing, I am satisfied that subject to the implementation of proposed mitigation measures, no adverse direct or indirect impacts on otters would likely occur as a result of the proposed development.

Badger

10.4.5. The Ecological Impact Assessment Report (22nd November 2023) submitted as part of the RFI Response highlights that a potential badger run was identified emerging from an area of scrubland which backs onto Toberboice Lane. No setts or prints hairs or faeces were identified. Section 7.2 of the Report outlines the construction phase mitigation measures, which include *inter alia* that no construction should be carried out during dawn and dusk as this is when badgers are most active. If a badger set is identified during the works no heavy machinery should be used within 30m of setts and within 20m for light machinery. No works should be carried out within 50m of active sets during the breeding season (December to June inclusive). An experienced ecologist should be on site when required during construction works and site clearance to provide ecological advice to avoid and slash or minimize the ecological impacts. Having regard to the nature and extent of the proposed development, I am satisfied that the proposed development would not significantly impact badgers subject to the implementation of the mitigation measures outlined in the EIA Report.

Bat

10.4.6. The RFI Response includes a Bat Survey Report (dated 22 November 2023) which states that the landscape in which the site is located has a high suitability for bats in general. Five bat species were recorded foraging in the environs of the site including: Common pipistrelle, lesser noctule, soprano pipistrelle, brown long-eared bat and the Daubenton's bat (each of these species are Annex IV species under the EU Habitats Directive and all have a Favourable Status in Ireland). No evidence of current or historic bat roosting was observed, however the survey results suggest that bats commute and forage through the site area. No significant impacts resulting from the proposed development were identified, however the provision of artificial lighting is stated to have a Moderate Negative Impact on bats. Section 4.1 of the Report outlines the various mitigation measures including: should bats be identified the local NPWS conservation ranger will be contacted, presence of an experienced ecologist during site clearance works, only directional lighting will be utilised during the construction phase if required, and motion activated with sensors in operation from dusk to dawn will be provided for the operational period of the project. The Report states that the motion sensed lighting will be slightly angled so that the areas with potential for bat presence remain shaded. In addition, it is stated that the installation of shorter lamp

posts would be beneficial. I concur with this suggestion, and recommend that should the Board approve the proposed development, that shorter lamp posts be conditioned. The Applicant states that the lighting will be provided in accordance with Bats and Lighting Guidance Notes for: Planners, Engineers Architects, and Developers, Bat Conservation Ireland, 2010. Having regard to the nature and extent of the proposed development, I am satisfied that the proposed development would not significantly impact bats subject to the implementation of the mitigation measures outlined in the Bat Survey Report.

Birds

- 10.4.7. The RFI Response includes a Bird Survey Report (dated 22 November 2023) outlining the analysis of field surveys undertaken over a 4-week period from 19th July to 16th August 2023 (75 survey hours). The following target species were identified: Black Headed Gull, Swallow, Common House Martin, Common Swift, Cormorant, European Starling, Goldcrest, Grey Wagtail, European Herring Gull, House Sparrow, Lesser Black Backed Gull, Little Egret, Mallard and Mute Swan (see Table 3.1 of the Report). No QI species of the River Boyne/Blackwater SPA or Boyne Estuary SPA were identified. The Report states that the most active area for birds was the grassland/scrub areas in which no pathway is present. A series of mitigation measures are proposed including: retention of trees and hedgerows were possible, felling of any tree or hedgerow to be undertaken outside the breeding season, retention of grassland, scrubs and other vegetation surrounding the proposed pathway, and the provision of bird boxes. Having regard to the nature and extent of the proposed development, I concur with the findings of the Report that the proposed development does not pose a threat to local bird populations.

Biodiversity – Conclusion

- 10.4.8. Having regard to the documentation submitted with the original application and as part of the RFI Response, conducted a site visit, and the nature and extent of the proposed development, I am satisfied that the proposed development will not have a significant impact on the area's local biodiversity.

10.5. Cultural Heritage

- 10.5.1. Archaeological Impact Assessment entitled 'An Archaeological Impact Assessment Boyne Greenway North Bank Drogheda, Co. Louth', dated 20th October 2022 was

included with the application. The Report outlines that the subject site does not contain any Protected Structures or structures listed on the NIAH, nor is it located in an Architectural Conservation Area. However, it highlights that there are four monuments located in the vicinity of the proposed greenway: Souterrains LH024-012001-012002, Enclosure LH024-12004 and a Burial Ground LH024-012003. The Report states that *“as the area presently occupied by an existing footpath along the riverbank was previously monitored by Donald Murphy under works associated with the Drogeha Main Drainage Project in the late 1990s, it is not expected that any archaeological features or deposits would be present within the proposed Greenway along this route. However, the potential does exist that previously unknown archaeological features or deposits may be exposed or identified, especially in the area adjacent to the known archaeological monuments (LH024-012001-012005) at Toberboice Lane, where the potential is particularly high within the greenfields”*. Accordingly, it is recommended that archaeological monitoring of all groundworks, by a licensed eligible archaeologist working under license from the Department of Housing Local Government and Heritage in consultation with the National Museum of Ireland, within the greenfield areas should be conducted and conditioned within any grant of permission for the site. It is also recommended that any ruinous stone structure which would be partially impacted upon should be subject to a detailed measured and photograph photographic architectural survey.

- 10.5.2. A submission received from the DAU in relation to archaeology concurs with the Applicant’s recommendation and accordingly suggests a condition be attached to an approval for the proposed development. Having regard to the findings of the AIA, which I consider to have been robustly prepared, and to the nature and location of the proposed works, I am satisfied that the proposed development will not have any significant negative impacts on the area’s cultural heritage subject to condition.

10.6. **Water Quality**

- 10.6.1. The EPA’s catchment mapping (IE_EA_010_0100) highlights that the Boyne Estuary is ‘At risk’. Its Ecological Status or Potential is ‘Moderate’, while its Chemical Surface Water Status is ‘Failing to achieve good’. The river supports many protected and non-protected aquatic and terrestrial habitats and species. Any impact on the water quality could have a negative impact on these habitats and species. I highlight that there are no in-stream works proposed as part of the proposed development. Mitigation

measures in the outline CEMP and NIS include the protection of the water quality. I have assessed these in detail below in the NIS and I am satisfied that mitigation measures can be successfully implemented to protect the water quality of the Estuary.

10.7. **Flooding**

10.7.1. The Applicant highlights that a significant portion of the site is vulnerable to Fluvial Flooding with predicted Extreme Water Levels of between 3.877m-4.167m for a 1% AEP (1 in 100 year return period) while a small portion is also vulnerable to Coastal Flooding with a predicted Extreme Water Level of 3.57m for a 0.5% AEP (1 in 200 year return period).

10.7.2. Table 3.2 of the Planning System Flood Risk Management Guidelines considers the use on water-compatible development appropriate on lands within Flood Zone A or application of the justification test for proposals for less vulnerable development. Water-compatible development, such as amenity open space and outdoor sports and recreation is considered appropriate. I consider the proposal can be defined as amenity open space and is considered water compatible. The ancillary facilities such as benches, bins, bicycle racks, and gates can also be considered within the scope of this vulnerability class. There would not be any significant increase in surface water runoff having regard to the open undeveloped environment.

10.7.3. In summary, having regard to the nature and extent of the proposed development, I do not consider the works will cause any flood displacement or exacerbate flooding occurrence or consequences.

10.8. **Conclusion**

10.8.1. Having regard to the nature, scale and layout of the proposed development, I consider that the proposed greenway will have a long-term positive impact on the environment.

10.9. **The likely significant effects on a European site:**

The areas addressed in this section are as follows:

- Compliance with Articles 6(3) of the EU Habitats Directive
- The Natura Impact Statement
- Appropriate Assessment.

10.10. **Compliance with Articles 6(3) of the EU Habitats Directive**

10.10.1. The Habitats Directive deals with the Conservation of Natural Habitats and of Wild Fauna and Flora throughout the European Union. Article 6(3) of this Directive requires that any plan or project not directly connected with or necessary to the management of the 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 must be satisfied that the proposal will not adversely affect the integrity of the European site.

10.11. **Natura Impact Statement**

10.11.1. The application was accompanied by an NIS which described the proposed development, the project site, and the surrounding area. An updated NIS was submitted at RFI Stage and this report forms the basis of my assessment. The project description, legislative context, and methodology are outlined in Section 1 of the Report, while the site description is detailed in Section 2.

10.11.2. No standalone Stage 1 Screening Assessment has been submitted with the application or at RFI Stage, however Section 3.1 (Zone of Influence) of the NIS lists all European Sites within a 15km radius of the site. This section concludes that of the six European Sites within a 15km radius of the subject site, three require Stage 2 Appropriate Assessment.

10.11.3. The Report predicts the potential (direct and indirect) impacts for these sites and their conservation objectives, it suggested mitigation measures, and concludes that "*no significant negative impacts on the conservation status of the Natura 2000 network and its associated habitats and species are anticipated as a result of this development.*"

10.11.4. Whilst an AA Screening Report has been provided, having reviewed the NIS and the supporting documentation submitted with the original application and at RFI stage, I am satisfied that it provides adequate information in respect of the baseline conditions, does clearly identify the potential impacts, and does use best scientific information and knowledge. Details of mitigation measures are provided, and they are summarised in Section 5 of the NIS. I am satisfied that the information is sufficient to allow for

appropriate assessment of the proposed development (see further analysis below).
Set out below is my own independent assessment.

10.12. Screening for Appropriate Assessment

10.12.1. The proposed development is not directly connected with or necessary to the management of any European site.

10.12.2. Having regard to the information and submissions available, nature, size and location of the proposed development and its likely direct, indirect and cumulative effects, the source pathway receptor principle and sensitivities of the ecological receptors the following European Sites are considered relevant to include for the purposes of initial screening for the requirement for Stage 2 appropriate assessment on the basis of likely significant effects.

Table 1: European sites considered for Stage 1 screening:			
European site (SAC/SPA)	Qualifying Interests	Connections (Source, pathway, receptor)	Considered further in screening. Y/N
River Boyne and River Blackwater SAC (Site Code 002299) River Boyne and River Blackwater SAC National Parks & Wildlife Service (npws.ie)	Alkaline fens [7230] Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae) [91E0] Lampetra fluviatilis (River Lamprey) [1099] Salmo salar (Salmon) [1106] Lutra lutra (Otter) [1355]	Yes, the subject site is partially located within the SAC.	Yes.
Boyne Estuary SPA (Site Code 004080) Boyne Estuary SPA National Parks & Wildlife Service (npws.ie)	Shelduck (<i>Tadorna tadorna</i>) [A048] Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Grey Plover (<i>Pluvialis squatarola</i>) [A141] Lapwing (<i>Vanellus vanellus</i>) [A142] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144] Black-tailed Godwit (<i>Limosa limosa</i>) [A156] Redshank (<i>Tringa totanus</i>) [A162] Turnstone (<i>Arenaria interpres</i>) [A169]	Yes, Hydrological Connection, SPA is c3.3km downriver of the site.	Yes, due to the hydrological connectivity and potential ex-situ connectivity.

	Little Tern (<i>Sterna albifrons</i>) [A195] Wetland and Waterbirds [A999]		
Boyne Coast and Estuary SAC (Site Code 001957) Boyne Coast and Estuary SAC National Parks & Wildlife Service (npws.ie)	Estuaries [1130] Mudflats and sandflats not covered by seawater at low tide [1140] Annual vegetation of drift lines [1210] Salicornia and other annuals colonising mud and sand [1310] Atlantic salt meadows (<i>Glauco-Puccinellietalia maritima</i>) [1330] Embryonic shifting dunes [2110] Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) [2120] Fixed coastal dunes with herbaceous vegetation (grey dunes) [2130]	Yes, Hydrological Connection, SAC is c3.5km downriver of the site.	Yes, due to the hydrological connectivity.
River Boyne and River Blackwater SPA (Site Code 004232) River Boyne and River Blackwater SPA National Parks & Wildlife Service (npws.ie)	Kingfisher (<i>Alcedo atthis</i>) [A229]	Yes, Hydrological Connection, SPA is c1.2km upriver of the site. Note that the River Boyne at this location is tidal in nature.	Yes, due to the hydrological connectivity and potential ex-situ connectivity.
North-West Irish Sea SPA (Site code 004236) North-west Irish Sea SPA National Parks & Wildlife Service (npws.ie)	Red-throated Diver (<i>Gavia stellata</i>) [A001] Great Northern Diver (<i>Gavia immer</i>) [A003] Fulmar (<i>Fulmarus glacialis</i>) [A009] Manx Shearwater (<i>Puffinus puffinus</i>) [A013] Cormorant (<i>Phalacrocorax carbo</i>) [A017] Shag (<i>Phalacrocorax aristotelis</i>) [A018] Common Scoter (<i>Melanitta nigra</i>) [A065] Little Gull (<i>Larus minutus</i>) [A177] Black-headed Gull (<i>Chroicocephalus ridibundus</i>) [A179] Common Gull (<i>Larus canus</i>) [A182]	Yes, Hydrological Connection, SPA is c.7.7km downriver of the site.	Yes, due to the hydrological connectivity and potential ex-situ connectivity.

	<p>Lesser Black-backed Gull (<i>Larus fuscus</i>) [A183] Herring Gull (<i>Larus argentatus</i>) [A184] Great Black-backed Gull (<i>Larus marinus</i>) [A187] Kittiwake (<i>Rissa tridactyla</i>) [A188] Roseate Tern (<i>Sterna dougallii</i>) [A192] Common Tern (<i>Sterna hirundo</i>) [A193] Arctic Tern (<i>Sterna paradisaea</i>) [A194] Little Tern (<i>Sterna albifrons</i>) [A195] Guillemot (<i>Uria aalge</i>) [A199] Razorbill (<i>Alca torda</i>) [A200] Puffin (<i>Fratercula arctica</i>) [A204]</p>		
<p>Clogher Head SAC (Site Code 001459) Clogher Head SAC National Parks & Wildlife Service (npws.ie)</p>	<p>Vegetated sea cliffs of the Atlantic and Baltic coasts [1230] European dry heaths [4030]</p>	<p>No - no connection between the proposed development and the SAC. SAC is located 12km northeast of the subject site.</p>	<p>No, having regard to the separation distance, the nature of the qualifying interests, the nature and extent of the proposed, it is concluded therefore that significant effects on the conservation objectives of the SAC are unlikely and therefore the site can be screened out from further consideration.</p>
<p>River Nanny Estuary and Shore SPA (Site Code 004158) River Nanny Estuary and Shore SPA National Parks & Wildlife Service (npws.ie)</p>	<p>Oystercatcher (<i>Haematopus ostralegus</i>) [A130] Ringed Plover (<i>Charadrius hiaticula</i>) [A137] Golden Plover (<i>Pluvialis apricaria</i>) [A140] Knot (<i>Calidris canutus</i>) [A143] Sanderling (<i>Calidris alba</i>) [A144] Herring Gull (<i>Larus argentatus</i>) [A184] Wetland and Waterbirds [A999]</p>	<p>Possible (ex-situ) SPA is located 7.7km southeast of the subject site.</p>	<p>No, having regard to the separation distance, and the nature and extent of the proposed, it is concluded therefore that significant effects on the conservation objectives of the SPA are unlikely and therefore the site can be screened out from further consideration.</p>

- 10.12.3. Based on my examination of the NIS report and supporting information (including Section 177AE Application Report, Otter Survey Report, Bird Survey Report, and OCEMP), the NPWS website, aerial and satellite imagery, the scale of the proposed development and likely effects, separation distance and functional relationship between the proposed works and the European sites, their conservation objectives and taken in conjunction with my assessment of the subject site and the surrounding area, I would conclude that a Stage 2 Appropriate Assessment is required for five of the seven European sites referred to above.
- 10.12.4. The remaining two sites can be screened out from further assessment due to the scale of the proposed works, the nature of the Conservation Objectives, Qualifying and Special Conservation Interests, the separation distances and the lack of a substantive linkage between the proposed works and the European sites. It is therefore reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European Sites River Nanny Estuary and Shore SPA (site code 004158) and Clogher Head SAC (site code 001459) in view of the sites conservation objectives and a Stage 2 Appropriate Assessment is not therefore required for these sites.
- 10.12.5. **Appropriate Assessment of implications of the proposed development**
- 10.12.6. The following is an objective scientific assessment of the implications of the project on the qualifying interest features of the European sites using the best scientific knowledge in the field. All aspects of the project which could result in significant effects are assessed and mitigation measures designed to avoid or reduce any adverse effects are considered and assessed.
- 10.12.7. The following Guidance has been adhered to in my assessment:
- DoEHLG (2009). Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government, National Parks and Wildlife Service, Dublin

- EC (2021) Assessment of plans and projects significantly affecting Natura 2000 sites. Revised Methodological guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive 92/43/EC
- EC (2018) Managing Natura 2000 sites. The provisions of Article 6 of the Habitats Directive 92/43/EEC

10.13. Relevant European Sites

10.13.1. The following is a summary of the objective scientific assessment of the implications of the proposed development on the qualifying interest features of the River Boyne and River Blackwater SAC (Site Code 002299); Boyne Estuary SPA (Site Code 004080); Boyne Coast and Estuary SAC (Site Code 001957); River Boyne and River Blackwater SPA (Site Code 004232) and North-West Irish Sea SPA (Site code 004236) using the best scientific knowledge in the field. All aspects of the proposed development which could result in significant effects are assessed and mitigation measures designed to avoid or reduce any adverse effects are considered and assessed.

10.13.2. In-Combination Effects

10.13.3. The NIS does not include an assessment of potential in combination effects with other plans or projects. However, the EIA Screening Assessment (Section 4.2) lists a number of projects in the vicinity of the subject site which could result in significant environmental impacts when considered with the proposed development. I have reviewed this list, in addition to reviewing the National Planning Application Database (NPAD) to identify any applications with the potential to have an in-combination effect in terms of Appropriate Assessment. Having regard to the scale, nature and location of the proposed development, I have not identified any planning permissions which, in combination with the project, would be likely to have a potential in-combination effect. In addition, I note that the Louth County Development Plan 2021-2027 has safeguards to protect the natural environment and European sites (see for example Policy Objective TOU 10 outlined in Section 6.5 above). I am satisfied that potential in-combination effects can be ruled out.

Table 2: River Boyne and Blackwater SAC (site code:002299)

Summary of Key issues that could give rise to adverse effects:

- Impacts to water quality through construction related pollution events (e.g. chemicals, oil/fuel, cementitious materials etc.) or sediments/silt run-off.
- Disturbance and or displacement of species listed as qualifying interests due to potential water quality impacts during construction or disturbance of foraging/commuting routes or breeding habitats.
- Habitat loss, fragmentation or alteration.
- Introduction of invasive species or biosecurity issues during construction.

Conservation Objectives: [CO002299.pdf \(npws.ie\)](#)

Summary of Appropriate Assessment

Qualifying Interest feature	Conservation Objectives Targets and attributes	Potential adverse effects	In-combination effects	Mitigation measures	Can adverse effects on integrity be excluded?
7230 Alkaline fens	<p>To maintain the favourable conservation condition of Alkaline fens in River Boyne and River Blackwater SAC, which is defined by the following list of attributes and targets:</p> <ul style="list-style-type: none"> - Habitat area stable or increasing, subject to natural processes - No decline to habitat distribution, subject to natural processes - Ecosystem function: soil nutrients: Maintain soil pH and nutrient status within natural ranges 	<p>No</p> <p>QI not recorded by Applicant in Habitat Survey submitted with RFI. SCCO states that the main areas of alkaline fen in the SAC are documented to occur in the vicinity of Lough Shesk, Freekan Lough, Newtown Lough in the upper reaches of the Stonyford River. Having regard to the</p>	None	No mitigation required.	<p>Yes</p> <p>No potential for adverse direct or indirect effects.</p>

	<ul style="list-style-type: none"> - Ecosystem function: peat formation: Maintain active peat formation, where appropriate - Ecosystem function: hydrology - groundwater levels: Maintain, or where necessary restore, appropriate natural hydrological regimes necessary to support the natural structure and functioning of the habitat - Ecosystem function: hydrology - surface water flow: Maintain, or where necessary restore, as close as possible to natural or semi-natural, drainage conditions - Ecosystem function: water quality: Maintain appropriate water quality, particularly pH and nutrient levels, to support the natural structure and functioning of the habitat - Vegetation composition: community diversity: Maintain variety of vegetation communities, subject to natural processes - Vegetation composition: typical brown mosses: Maintain adequate cover of typical brown moss species - Vegetation composition: typical vascular plants: Maintain adequate cover of typical vascular plant species 	<p>separation distances between these locations and the subject site, and scale and nature of the proposed development, no potential indirect impacts during construction or operational phases are anticipated on this QI.</p>			
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	<ul style="list-style-type: none"> - Vegetation composition: native negative indicator species: Cover of native negative indicator species at insignificant levels - Vegetation composition: non-native species: Cover of non-native species less than 1% - Vegetation composition: native trees and shrubs: Cover of scattered native trees and shrubs less than 10% - Vegetation composition: algal cover: Cover of algae less than 2% - Vegetation structure: vegetation height: At least 50% of the live leaves/flowering shoots are more than either 5cm or 15cm above ground surface depending on community type - Physical structure: disturbed bare ground: Cover of disturbed bare ground not more than 10% - Physical structure: tufa formations: Disturbed proportion of vegetation cover where tufa is present is less than 1% - Indicators of local distinctiveness: No decline in distribution or population sizes of rare, threatened or scarce species associated with the habitat; maintain features of local 				
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	<p>distinctiveness, subject to natural processes</p> <ul style="list-style-type: none"> - Transitional areas between fen and adjacent habitats : Maintain adequate transitional areas to support/protect the alkaline fen ecosystem and the services it provides 				
<p>91E0 Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae)*</p>	<p>To restore the favourable conservation condition of Alluvial forests with <i>Alnus glutinosa</i> and <i>Fraxinus excelsior</i> (Alno-Padion, Alnion incanae, Salicion albae)* in River Boyne and River Blackwater SAC, which is defined by the following list of attributes and targets:</p> <ul style="list-style-type: none"> - Habitat area stable or increasing, subject to natural processes. - No decline in habitat distribution, subject to natural processes. - Woodland size area stable or increasing. Where topographically possible, "large" woods at least 25ha in size and "small" woods at least 3ha in size - Woodland structure: cover and height :Total canopy cover at least 30%; median canopy height at least 7m; native shrub layer cover 10-75%; native herb/dwarf shrub layer cover at 	<p>Yes</p> <p>QI not recorded by Applicant in Habitat Survey submitted with RFI. However, SCCO highlights an area (Map 3) approx. 2km upstream of the subject site where alluvial forest woodland is present.</p> <p>Siltation or pollution, invasive species could decrease water quality negatively impacting on the habitat area during the construction phase.</p>	<p>None</p>	<p>See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/biohazards. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.</p>	<p>Yes</p> <p>No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity</p>

	<p>least 20% and height at least 20cm; bryophyte cover at least 4%</p> <ul style="list-style-type: none"> - Woodland structure: community diversity and extent: Maintain diversity and extent of community types - Woodland structure: natural regeneration: Seedlings, saplings and pole age-classes of target species for 91E0* woodlands and other native tree species occur in adequate proportions to ensure survival of woodland canopy - Hydrological regime: flooding depth/height of water table: Appropriate hydrological regime necessary for maintenance of alluvial vegetation - Woodland structure: dead wood: At least 19 stems/ha of dead wood of at least 20cm diameter - Woodland structure: veteran trees: No decline in woodland structure - Woodland structure: indicators of local distinctiveness: No decline in distribution and, in the case of red listed and other rare or localised species, population size - Woodland structure: indicators of overgrazing: All five indicators of overgrazing absent 				
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	<ul style="list-style-type: none"> - Vegetation composition: native tree cover: No decline. Native tree cover at least 90% of canopy; target species cover at least 50% of canopy - Vegetation composition: typical species: At least 1 target species for 91E0* woodlands present; at least 6 positive indicator species for 91E0* woodlands present - Vegetation composition: negative indicator species: Negative indicator species cover not greater than 10%; regeneration of negative indicator species absent - Vegetation composition: problematic native species: Cover of common nettle (<i>Urtica dioica</i>) less than 75% 				
1099 River Lamprey <i>Lampetra fluviatili</i>	<p>To restore the favourable conservation condition of River Lamprey (<i>Lampetra fluviatilis</i>) in River Boyne and River Blackwater SAC, which is defined by the following list of attributes and targets:</p> <ul style="list-style-type: none"> - Distribution: Restore access to all water courses down to first order streams - Distribution of larvae: Not less than 50% of sample sites with suitable habitat positive for larval brook/river lamprey 	<p>Yes</p> <p>SCCO states that Lamprey are present in River Boyne, including the lower reaches of the River Boyne.</p> <p>Siltation or pollution could decrease water quality resulting in a potential negative effect on population and habitat for the QI</p>	None	See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction	<p>Yes</p> <p>No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity</p>

	<ul style="list-style-type: none"> - Population structure of larvae: At least three age/size classes of larval brook/river lamprey present - Larval lamprey density in fine sediment: Mean density of brook/river larval lamprey in sites with suitable habitat more than 5/m² - Extent and distribution of spawning nursery habitat: No decline in extent and distribution of spawning and nursery beds 	<p>during the construction phase.</p> <p>Introduction of invasive species could also decrease water quality during the construction phase.</p>		<p>of invasive species/ biohazards.</p> <p>Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.</p>	
1106 Salmon <i>Salmo salar</i>	<p>To restore the favourable conservation condition of Atlantic Salmon (<i>Salmo salar</i>) in River Boyne and River Blackwater SAC, which is defined by the following list of attributes and targets:</p> <ul style="list-style-type: none"> - Distribution: extent of anadromy: 100% of river channels down to second order accessible from estuary, - Adult spawning fish: Conservation limit (CL) for Adult spawning fish for each system consistently exceeded - Salmon fry abundance: Maintain or exceed 0+ fry mean catchment-wide abundance threshold value. Currently set at 17 salmon fry/5 minutes sampling - Out-migrating smolt abundance: No significant decline 	<p>Yes</p> <p>The Site Synopsis states that Atlantic Salmon run the Boyne almost every month of the year.</p> <p>Siltation or pollution could decrease water quality during the construction phase.</p> <p>Introduction of invasive species could also decrease water quality during the construction phase.</p>	None	<p>See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality.</p> <p>Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/ biohazards.</p> <p>Ecological Clerk of Works to be appointed to monitor compliance with</p>	<p>Yes</p> <p>No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity</p>

	<ul style="list-style-type: none"> - Number and distribution of redds: No decline in number and distribution of spawning redds due to anthropogenic causes - Water quality: At least Q4 at all sites sampled by EPA 			mitigation measures and conditions.	
1355 Otter <i>Lutra lutra</i>	<p>To maintain the favourable conservation condition of Otter (<i>Lutra lutra</i>) in River Boyne and River Blackwater SAC, which is defined by the following list of attributes and targets:</p> <ul style="list-style-type: none"> - Distribution: No significant decline in distribution - Extent of terrestrial habitat: No significant decline. Area mapped and calculated as 447.6ha along river banks/ lake shoreline/around ponds - Extent of freshwater (river) habitat: No significant decline. Length mapped and calculated as 263.3km - Extent of freshwater (lake) habitat: No significant decline. Area mapped and calculated as 31.6ha - Couching sites and holts: No significant decline in couching sites and holts - Fish biomass available: No significant decline in fish biomass 	<p>Yes</p> <p>No holts, couches, spraints, prints, natal dens, or food remains were recorded by the Applicant in the Otter Survey Report. The Applicant contends that whilst suitable habitat for otter is present in the area, due to the presence of people and pets crossing the area on a regular basis, it is unlikely that otters are using the site area.</p> <p>During the construction phase the project could act as a barrier between the river and scrub area north of the site, which could provide a suitable otter resting</p>	None	<p>See Section 10.14 below.</p> <p>A pre-construction survey to be repeated if more than 10-12 months have passed prior to the commencement of any works. If otters are identified mammal-resistant fencing will be provided during the construction phase.</p> <p>Protection zones to be established if holts, couches (30m) or natal dens (150m) are identified.</p> <p>Construction work limited to daytime hours only.</p>	<p>Yes</p> <p>No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity</p>

	<p>- Barriers to connectivity: No significant increase in barriers to connectivity</p>	<p>place. In addition, siltation or pollution, could decrease water quality during the construction phase which may impact on the availability of fish biomass</p> <p>No fencing is proposed along the greenway and so it will not act as a barrier in the operational phase.</p> <p>.</p>		<p>Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.</p> <p>No permanent fencing proposed along the greenway that could act as a barrier in the operational phase.</p>	
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Overall conclusion:

Integrity test: Following the implementation of mitigation, the construction, operation and decommissioning of the proposed development will not adversely affect the integrity of the River Boyne and River Blackwater SAC in light of the site's Conservation Objectives. No reasonable scientific doubt remains as to the absence of such effects.

Table 3: Boyne Estuary SPA (Site Code 004080)

Summary of Key issues that could give rise to adverse effects:

- Impacts to water quality through construction related pollution events (e.g. chemicals, oil/fuel, cementitious materials etc.) or sediments/silt run-off.

Conservation Objectives: [Boyne Estuary SPA | National Parks & Wildlife Service \(npws.ie\)](#)

Summary of Appropriate Assessment

Qualifying Interest feature	Conservation Objectives Targets and attributes	Potential adverse effects	In-combination effects	Mitigation measures	Can adverse effects on integrity be excluded?
A048 Shelduck Tadorna tadorna A130 Oystercatcher Haematopus ostralegus A140 Golden Plover Pluvialis apricaria A141 Grey Plover Pluvialis squatarola A142 Lapwing Vanellus vanellus A143 Knot Calidris canutus A144 Sanderling Calidris alba A156 Black-tailed Godwit Limosa limos A162 Redshank Tringa totanus	To maintain the favourable conservation condition of the QI in Boyne Estuary SPA, which is defined by the following list of attributes and targets: - Population trend: Long term population trend stable or increasing - Distribution: No significant decrease in the range, timing or intensity of use of areas by the QI, other than that occurring from natural patterns of variation	Yes None of the QIs were identified by the Applicant during the bird survey (see Appendix A). Having regard to the nature, scale and location of the proposed development, habitats to be directly impacted by the works and the duration of the works, it is unlikely that the proposal would significantly disturb the QI. However, siltation or pollution could decrease water quality during the construction phase.	None	See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/ biohazards. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.	Yes No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity

A169 Turnstone Arenaria interpres					
A195 Little Tern Sterna albifrons	<p>To maintain the favourable conservation condition of Little Tern in Boyne Estuary SPA, which is defined by the following list of attributes and targets:</p> <ul style="list-style-type: none"> - Breeding population abundance: apparently occupied nests (AONs): No significant decline - Productivity rate: fledged young per breeding pair: No significant decline - Distribution: breeding colonies: No significant decline - Prey biomass available: No significant decline - Barriers to connectivity: No significant increase - Disturbance at the breeding site: Human activities should occur at levels that do not adversely affect the breeding little tern population 	<p>Yes</p> <p>QI not identified by the Applicant during the bird survey (see Appendix A). Having regard to the nature, scale and location of the proposed development, habitats to be directly impacted by the works and the duration of the works, it is unlikely that the proposal would significantly disturb the QI. However, siltation or pollution could decrease water quality during the construction phase.</p>	None	<p>See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/ biohazards. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.</p>	<p>Yes</p> <p>No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity</p>
A999 Wetlands	<p>To maintain the favourable conservation condition of the wetland habitat in Boyne Estuary SPA as a resource for the regularly-occurring migratory waterbirds that utilise it. This is defined by the following attribute and target:</p>	<p>Yes</p> <p>Siltation or pollution could decrease water quality during the construction phase negatively impacting on habitat area.</p>	None	<p>See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to</p>	Yes

	- Habitat area: The permanent area occupied by the wetland habitat should be stable and not significantly less than the area of 594ha, other than that occurring from natural patterns of variation			mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/ biohazards. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.	
<p>Overall conclusion:</p> <p>Integrity test:</p> <p>Following the implementation of mitigation, the construction, operation and decommissioning of the proposed development will not adversely affect the integrity of the Boyne Estuary SPA in light of the site's Conservation Objectives. No reasonable scientific doubt remains as to the absence of such effects.</p>					

Table 4: Boyne Coast and Estuary SAC (Site Code 001957)					
Summary of Key issues that could give rise to adverse effects:					
<ul style="list-style-type: none"> • Impacts to water quality through construction related pollution events (e.g. chemicals, oil/fuel, cementitious materials etc.) or sediments/silt run-off. • Introduction of invasive species or biosecurity issues during construction. 					
Conservation Objectives: Boyne Coast and Estuary SAC National Parks & Wildlife Service (npws.ie)					
Summary of Appropriate Assessment					
Qualifying Interest feature	Conservation Objectives Targets and attributes	Potential adverse effects	In-combination effects	Mitigation measures	Can adverse effects on integrity be excluded?

1130 Estuaries	<p>To maintain the favourable conservation condition of Estuaries in Boyne Coast and Estuary SAC, which is defined by the following list of attributes and targets:</p> <ul style="list-style-type: none"> - Habitat area: The permanent habitat area is stable or increasing, subject to natural processes. See map 3 - Community distribution: Conserve the following community types in a natural condition: Intertidal estuarine mud and fine sand with Hediste diversicolor and Corophium volutator community; and Subtidal fine sand dominated by polychaetes community. See map 5 	<p>Yes, strong hydrological connection from subject site to the SAC via Boyne River.</p> <p>Siltation or pollution could decrease water quality during the construction phase negatively impacting on habitat area.</p>	None	<p>See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/ biohazards. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.</p>	<p>Yes</p> <p>No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity</p>
1140 Mudflats and sandflats not covered by seawater at low tide	<p>To maintain the favourable conservation condition of Mudflats and sandflats not covered by seawater at low tide in Boyne Coast and Estuary SAC, which is defined by the following list of attributes and targets:</p> <ul style="list-style-type: none"> - Habitat area: The permanent habitat area is stable or increasing, subject to natural processes. See map 4 	<p>Yes, strong hydrological connection from subject site to the SAC via Boyne River.</p> <p>Siltation or pollution could decrease water quality during the construction phase</p>	None	<p>See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity</p>	<p>Yes</p> <p>No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity</p>

	<ul style="list-style-type: none"> - Community distribution: Conserve the following community types in a natural condition: Intertidal estuarine mud and fine sand with Hediste diversicolor and Corophium volutator community; and Fine sand dominated by bivalves community complex. See map 5 	negatively impacting on habitat area.		measures are also set out in the NIS to prevent introduction of invasive species/ biohazards. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.	
1310 Salicornia and other annuals colonizing mud and sand	<p>To restore the favourable conservation condition of Salicornia and other annuals colonizing mud and sand in Boyne Coast and Estuary SAC, which is defined by the following list of attributes and targets:</p> <ul style="list-style-type: none"> - Habitat area: Area stable or increasing, subject to natural processes, including erosion and succession. For sub-sites mapped: Baltray- 2.91ha, Mornington- 1.14ha. See map 6 - Habitat distribution: No decline or change in habitat distribution, subject to natural processes. See map 6 for known distribution - Physical structure: sediment supply: Maintain/restore natural circulation of sediments and organic matter, without any physical obstructions 	<p>Yes, strong hydrological connection from subject site to the SAC via Boyne River.</p> <p>Siltation or pollution could decrease water quality during the construction phase negatively impacting on habitat area.</p>	None	<p>See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/ biohazards. Ecological Clerk of Works to be appointed to monitor compliance with</p>	<p>Yes</p> <p>No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity</p>

	<ul style="list-style-type: none"> - Physical structure: creeks and pans: Maintain creek and pan structure, subject to natural processes, including erosion and succession - Physical structure: flooding regime: Maintain natural tidal regime - Vegetation structure: zonation: Maintain the range of coastal habitats including transitional zones, subject to natural processes including erosion and succession - Vegetation structure: vegetation height: Maintain structural variation within sward - Vegetation structure: vegetation cover: Maintain more than 90% of area outside creeks vegetated - Vegetation composition: typical species and sub-communities: Maintain the presence of species-poor communities with typical species listed in the Saltmarsh Monitoring Project (McCorry and Ryle, 2009) - Vegetation structure: negative indicator species- <i>Spartina anglica</i>: No significant expansion of common cordgrass (<i>Spartina anglica</i>), with an annual spread of less than 1% 			mitigation measures and conditions.	
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<p>1330 Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>)</p>	<p>To maintain the favourable conservation condition of Atlantic salt meadows (<i>Glauco- Puccinellietalia</i>) in Boyne Coast and Estuary SAC, which is defined by the following list of attributes and targets:</p> <ul style="list-style-type: none"> - Habitat area: Area stable or increasing, subject to natural processes, including erosion and succession. For sub-sites mapped: Baltray- 17.67ha, Mornington- 8.76ha. See map 6 - Habitat distribution: No decline or change in habitat distribution, subject to natural processes. See map 6 for known distribution - Physical structure: sediment supply: Maintain natural circulation of sediments and organic matter, without any physical obstructions - Physical structure: creeks and pans: Maintain creek and pan structure, subject to natural processes, including erosion and succession - Physical structure: flooding regime: Maintain natural tidal regime - Vegetation structure: zonation: Maintain the range of coastal habitats including transitional zones, 	<p>Yes, strong hydrological connection from subject site to the SAC via Boyne River.</p> <p>Siltation or pollution could decrease water quality during the construction phase negatively impacting on habitat area.</p>	<p>None</p>	<p>See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/ biohazards. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.</p>	<p>Yes</p> <p>No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity</p>
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	<p>subject to natural processes including erosion and succession</p> <ul style="list-style-type: none"> - Vegetation structure: vegetation height: Maintain structural variation within sward - Vegetation structure: vegetation cover: Maintain more than 90% of area outside creeks vegetated - Vegetation composition: typical species and sub-communities: Maintain range of sub- communities with typical species listed in Saltmarsh Monitoring Project (McCorry and Ryle, 2009) - Vegetation structure: negative indicator species - <i>Spartina anglica</i>: No significant expansion of common cordgrass (<i>Spartina anglica</i>), with an annual spread of less than 1% 				
1410 Mediterranean salt meadows (<i>Juncetalia maritimi</i>)	<p>The status of Mediterranean salt meadows (<i>Juncetalia maritimi</i>) as a qualifying Annex I habitat for Boyne Coast and Estuary SAC is currently under review. The outcome of this review will determine whether a site-specific conservation objective is set for this habitat.</p> <p>No specific attributes or targets identified for the QI.</p>	<p>Yes</p> <p>Siltation or pollution could decrease water quality during the construction phase negatively impacting on QI.</p>	None	See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity	<p>Yes</p> <p>No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity</p>

				measures are also set out in the NIS to prevent introduction of invasive species/ biohazards. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.	
2110 Embryonic shifting dunes	<p>To restore the favourable conservation condition of Embryonic shifting dunes in Boyne Coast and Estuary SAC, which is defined by the following list of attributes and targets:</p> <ul style="list-style-type: none"> - Habitat area: Area stable or increasing, subject to natural processes, including erosion and succession. For sub-sites mapped: Baltray- 2.52ha, Mornington- 0.67ha. See map 7 - Habitat distribution: No decline or change in habitat distribution, subject to natural processes. See map 7 for known distribution - Physical structure: functionality and sediment supply: Maintain the natural circulation of sediment and organic matter, without any physical obstructions 	<p>Yes, hydrological connection from subject site to the SAC via Boyne River.</p> <p>Siltation or pollution could decrease water quality during the construction phase negatively impacting on habitat area.</p>	None	<p>See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/ biohazards. Ecological Clerk of Works to be appointed to monitor compliance with</p>	<p>Yes</p> <p>No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity</p>

	<ul style="list-style-type: none"> - Vegetation structure: zonation: Maintain the range of coastal habitats including transitional zones, subject to natural processes including erosion and succession - Vegetation composition: plant health of foredune grasses: More than 95% of sand couch (<i>Elytrigia juncea</i>) and/or lyme- grass (<i>Leymus arenarius</i>) should be healthy (i.e. green plant parts above ground and flowering heads present) - Vegetation composition: typical species and sub-communities: Maintain the presence of species-poor communities with typical species: sand couch - Vegetation composition: negative indicator species: Negative indicator species (including non-natives) to represent less than 5% cover (<i>Elytrigia juncea</i>) and/or lyme-grass (<i>Leymus arenarius</i>) 			mitigation measures and conditions.	
2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ('white dunes')	To restore the favourable conservation condition of Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) in Boyne Coast and Estuary SAC, which is defined by the following list of attributes and targets:	Yes, hydrological connection from subject site to the SAC via Boyne River. Siltation or pollution could decrease water	None	See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to	Yes No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct

	<ul style="list-style-type: none"> - Habitat area: Area stable or increasing, subject to natural processes including erosion and succession. For sub-sites mapped: Baltray- 2.97ha, Mornington- 1.99ha. See map 7 - Habitat distribution: No decline or change in habitat distribution, subject to natural processes. See map 7 for known distribution - Physical structure: functionality and sediment supply: Maintain the natural circulation of sediment and organic matter, without any physical obstructions - Vegetation structure: zonation: Maintain the range of coastal habitats including transitional zones, subject to natural processes including erosion and succession - Vegetation composition: plant health of dune grasses: More than 95% of marram (<i>Ammophila arenaria</i>) and/or lyme-grass (<i>Leymus arenarius</i>) should be healthy (i.e. green plant parts above ground and flowering heads present) - Vegetation composition: typical species and sub-communities: 	<p>quality during the construction phase negatively impacting on habitat area.</p>		<p>mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/ biohazards. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.</p>	<p>or indirect effects on integrity</p>
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	<p>Maintain the presence of species-poor communities dominated by marram</p> <ul style="list-style-type: none"> - Vegetation composition: negative indicator species: Negative indicator species (including non-natives) to represent less than 5% cover (Ammophila arenaria) and/or lyme-grass (Leymus arenarius) 				
2130 *Fixed coastal dunes with herbaceous vegetation ('grey dunes')	<p>To restore the favourable conservation condition of Fixed coastal dunes with herbaceous vegetation (grey dunes) in Boyne Coast and Estuary SAC, which is defined by the following list of attributes and targets:</p> <ul style="list-style-type: none"> - Habitat area: Area increasing, subject to natural processes including erosion and succession. For sub-sites mapped: Baltray- 26.41ha; Mornington- 20.46ha. See map 7 - Habitat distribution: No decline or change in habitat distribution, subject to natural processes. See map 7 for known distribution - Physical structure: functionality and sediment supply: Maintain the natural circulation of sediment and organic matter, without any physical obstructions 	<p>Yes, strong hydrological connection from subject site to the SAC via Boyne River.</p> <p>Siltation or pollution could decrease water quality during the construction phase negatively impacting on habitat area.</p>	None	<p>See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/ biohazards. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.</p>	<p>Yes</p> <p>No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity</p>

	<ul style="list-style-type: none"> - Vegetation structure: zonation: Maintain the range of coastal habitats including transitional zones, subject to natural processes including erosion and succession - Vegetation structure: bare ground: Bare ground should not exceed 10% of fixed dune habitat, subject to natural processes - Vegetation composition: sward height: Maintain structural variation within sward - Vegetation composition: typical species and sub-communities: Maintain range of sub- communities with typical species listed in Ryle et al. (2009) - Vegetation composition: negative indicator species: Negative indicator species (including non-natives) to represent less than 5% cover - Vegetation composition: scrub/trees: No more than 5% cover or under control 				
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Overall conclusion:

Integrity test:

Following the implementation of mitigation, the construction, operation and decommissioning of the proposed development will not adversely affect the integrity of the Boyne Coast and Estuary SAC in light of the site's Conservation Objectives. No reasonable scientific doubt remains as to the absence of such effects.

Table 5: River Boyne and River Blackwater SPA (Site Code 004232)					
Summary of Key issues that could give rise to adverse effects:					
<ul style="list-style-type: none"> • Impacts to water quality through construction related pollution events (e.g. chemicals, oil/fuel, cementitious materials etc.) or sediments/silt run-off. • Introduction of invasive species or biosecurity issues during construction. 					
Conservation Objectives: River Boyne and River Blackwater SPA National Parks & Wildlife Service (npws.ie)					
Summary of Appropriate Assessment					
Qualifying Interest feature	Conservation Objectives Targets and attributes	Potential adverse effects	In-combination effects	Mitigation measures	Can adverse effects on integrity be excluded?
A229 Kingfisher Alcedo atthis	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA	QI not identified in the Applicant's Bird Survey (see Appendix A). Having regard to the nature, scale and location of the proposed development, habitats to be directly impacted by the works and the duration of the works, it is unlikely that the proposal would significantly disturb the QI. However, siltation or pollution could decrease water quality during the construction phase.	None	See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/ biohazards. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.	Yes No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity

Overall conclusion:

Integrity test:

Following the implementation of mitigation, the construction, operation and decommissioning of the proposed development will not adversely affect the integrity of the River Boyne and River Blackwater SPA in light of the site's Conservation Objectives. No reasonable scientific doubt remains as to the absence of such effects.

Table 6: North-West Irish Sea SPA (Site code 004236)

Summary of Key issues that could give rise to adverse effects:

- Impacts to water quality through construction related pollution events (e.g. chemicals, oil/fuel, cementitious materials etc.) or sediments/silt run-off.
- Introduction of invasive species or biosecurity issues during construction.

Conservation Objectives: [North-west Irish Sea SPA | National Parks & Wildlife Service \(npws.ie\)](http://www.npws.ie)

Summary of Appropriate Assessment

Qualifying Interest feature	Conservation Objectives Targets and attributes	Potential adverse effects	In-combination effects	Mitigation measures	Can adverse effects on integrity be excluded?
A001 Red-throated Diver <i>Gavia stellat</i> A003 Great Northern Diver <i>Gavia immer</i> A065 Common Scoter <i>Melanitta nigr</i>	To maintain/restore the favourable conservation condition of the QIs at North-west Irish Sea SPA, which is defined by the following list of attributes and targets: - Non-breeding population size: No significant decline	A183 Lesser Black-backed Gull, A017 Cormorant, A184 Herring Gull, A187 Great Black-backed Gull, and A179 Black-headed Gull identified in the Applicant's Bird Survey (see Appendix A). Having regard to the nature, scale and location of the proposed development, habitats to be directly impacted by the works and the duration of the works, it is unlikely that the	None	See Section 10.14 below. Best practice drainage and pollution prevention methods are set out in the NIS and include detailed measures to mitigate impacts to water quality. Biosecurity measures are also set out in the NIS to prevent introduction of invasive species/	Yes No doubt as to the effectiveness or implementation of mitigation measures proposed to prevent direct or indirect effects on integrity

<p>A179 Black-headed Gull <i>Chroicocephalus ridibundu</i></p> <p>A182 Common Gull <i>Larus canus</i></p> <p>A187 Great Black-backed Gull <i>Larus marinus</i></p> <p>A862 Little Gull <i>Hydrocoloeus minutus</i></p> <p>A009 Fulmar <i>Fulmarus glacialis*</i></p> <p>A184 Herring Gull <i>Larus argentatus</i></p> <p>A188 Kittiwake <i>Rissa tridactyla</i></p> <p>A013 Manx Shearwater <i>Puffinus puffinus</i></p> <p>A192 Roseate Tern <i>Sterna dougalli</i></p> <p>A193 Common Tern <i>Sterna hirundo</i></p>	<ul style="list-style-type: none"> - Population Size: Long term SPA population trend is stable or increasing - Breeding population size: No significant decline 	<p>proposal would significantly disturb the QI. However, siltation or pollution could decrease water quality during the construction phase.</p>		<p>biohazards. Ecological Clerk of Works to be appointed to monitor compliance with mitigation measures and conditions.</p>	
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<p>A183 Lesser Black-backed Gull <i>Larus fuscus</i></p> <p>A194 Arctic Tern <i>Sterna paradisae</i></p> <p>A195 Little Tern <i>Sterna albifrons</i></p> <p>A017 Cormorant <i>Phalacrocorax carb</i></p> <p>A018 Shag <i>Phalacrocorax aristotelis</i></p> <p>A204 Puffin <i>Fratercula arctica</i></p> <p>A199 Guillemot <i>Uria aalge</i></p> <p>A200 Razorbill <i>Alca torda</i></p> <p>All QI of the SPA</p>	<ul style="list-style-type: none"> - Breeding Population Size: Long term population trend within the SPA is stable or increasing - Population size: No significant decline - Spatial distribution: Sufficient number of locations, area, and availability (in terms of timing and intensity of use) of suitable habitat to support the population - Forage spatial distribution, extent and abundance: Sufficient number of locations, area of suitable habitat and 				
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	<p>available forage biomass to support the population target</p> <ul style="list-style-type: none"> - Disturbance across the site: The intensity, frequency, timing and duration of disturbance occurs at levels that do not significantly impact the achievement of targets for population size and spatial distribution - Barriers to connectivity and site use: The number, location, shape and area of barriers do not significantly impact the site population's access to the SPA or other ecologically important sites outside the SPA 				
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Overall conclusion:

Integrity test:

Following the implementation of mitigation, the construction, operation and decommissioning of the proposed development will not adversely affect the integrity of the North-West Irish Sea SPA in light of the site's Conservation Objectives. No reasonable scientific doubt remains as to the absence of such effects.

10.14. Mitigation

10.14.1. Section 5 of the NIS details all the mitigation measures which are proposed during the construction and operational phases of the proposal. The measures are summarised below:

- Preparation of final CEMP
- Positioning the site compound in the Trinity Street car park
- Refuelling and storage of hydrocarbons restricted to site compound
- Regular checks of machinery
- Provision of spill kits
- Removal and disposal of wastewater from temporary welfare facilities by licenced waste collector
- Pre-construction otter survey
- If otters are recorded, mammal-resistant fencing will be provided
- Permanent fencing is not proposed along the greenway
- Protection zones to be established around any holts, couches or natal dens identified
- Construction hours limited to daytime
- Use of an Ecological Clerk of Works
- Good construction site hygiene should be employed to prevent the introduction and spread of problematic invasive plant species. All plant and equipment to be cleaned down prior to arrival on site. Any soil/topsoil required to be sourced from a stock that has been screened for invasive species.
- Minimum area necessary for an active work area to be identified and fenced off. Minimise areas to be stripped of vegetation.
- Any excavations to be undertaken during clement weather to minimise run-off.
- Avoid stockpiles of excavated material.
- Silt fencing to be erected along the boundaries of the watercourses during construction works. A double layer of geotextile membrane is recommended.

- No direct discharge to water.
- Natural vegetation on verges of the proposed development must be preserved.
- Regular monitoring for signs of run-off.
- French drains to manage drainage runoff during the operational phase.
- Minimise temporary artificial lighting in the construction phase. Directional lighting to be used.
- Permanent lighting to be motion activated with sensors in operation from dusk to dawn, similar to the Dodder Greenway.
- Lighting to be slightly angled.
- Where possible, loud equipment should be substituted with a quieter alternative.
- Water bowsers should be used to dampen down areas during time of dry weather.
- Stockpiles to kept to a minimum.
- Avoid dry sweeping of large areas
- Ensure sand and other aggregates are stored in bunded areas.
- Surfacing equipment only to be operated with any manufactures dust abatement measures in place.

10.15. Residual Effects

10.15.1. On foot of the employment of mitigation measures no adverse effects on the qualifying interests of River Boyne and River Blackwater SAC (Site Code 002299); Boyne Estuary SPA (Site Code 004080); Boyne Coast and Estuary SAC (Site Code 001957); River Boyne and River Blackwater SPA (Site Code 004232) and North-West Irish Sea SPA (Site code 004236) are anticipated.

10.16. NIS Omissions

10.16.1. The North-West Irish Sea SPA (Site code 004236) was not included in the Applicant's NIS. However, as outlined above I consider that there is sufficient information on file for the Board to undertake AA having regard to the nature of the site's QI.

10.16.2. In addition, no assessment of in-combination impacts was undertaken by the Applicant. However, as stated above, having reviewed National Planning Application Database, I do not consider that any planning permissions which, in combination with the project, would be likely to have a potential in-combination effect.

10.17. Suggested Related Conditions

10.17.1. A number of measures are proposed which can be implemented by way of condition, should the Board decide to grant permission, and are set out in full in section 5 of the NIS, some of which are set out in section 10.14 above. I consider it appropriate, in the event of a grant of permission, and having regard to the nature of the works in a SAC to require the appointment of a project ecologist to oversee the construction works. Application of mitigation measures are expressly provided for in the schedule of conditions below.

10.18. Conclusion

10.18.1. I am satisfied that the proposed development individually or in combination with other plans or projects would not adversely affect the integrity of the European sites in light of their conservation objectives (subject to the implementation of mitigation measures outlined above).

10.19. Appropriate Assessment Conclusions

10.19.1. Having regard to the nature, scale and location of the proposed works which are partially located in the River Boyne and River Blackwater SAC (Site Code 002299) and in close proximity to Boyne Estuary SPA (Site Code 004080); Boyne Coast and Estuary SAC (Site Code 001957); River Boyne and River Blackwater SPA (Site Code 004232) and North-West Irish Sea SPA (Site code 004236), I consider that it is reasonable to conclude on the basis of the information on the file, which I consider adequate in order to carry out a Stage 2 Appropriate Assessment, that the proposed development, individually or in combination with other plans and projects would not adversely affect the integrity of the aforementioned European sites, or any other European site, in view of the sites' Conservation Objectives.

10.20. Recommendation

10.21. On the basis of the above assessment, I recommend that the Board approve the proposed development subject to the reasons and considerations below and subject

to conditions including requiring compliance with the submitted details and with the mitigation measures as set out in the NIS.

11.0 Reasons and Considerations

In coming to its decision, the Board had regard to the following:

- (a) the EU Habitats Directive (92/43/EEC),
- (b) the European Union (Birds and Natural Habitats) Regulations 2011-2015,
- (c) the likely consequences for the environment and the proper planning and sustainable development of the area in which it is proposed to carry out the proposed development and the likely significant effects of the proposed development on a European Site,
- (d) the conservation objectives, qualifying interests and special conservation interests for the River Boyne and River Blackwater SAC (Site Code 002299); Boyne Estuary SPA (Site Code 004080); Boyne Coast and Estuary SAC (Site Code 001957); River Boyne and River Blackwater SPA (Site Code 004232) and North-West Irish Sea SPA (Site code 004236);
- (e) the policies and objectives of the Louth County Development Plan 2021- 2027
- (f) the nature and extent of the proposed works as set out in the application for approval,
- (g) the information submitted in relation to the potential impacts on habitats, flora and fauna, including the Natura Impact Statement,
- (h) and, the report and recommendation of the Inspector.

Appropriate Assessment:

The Board agreed with and adopted the screening assessment and conclusion carried out in the Inspector's report that the River Boyne and River Blackwater SAC (Site Code 002299); Boyne Estuary SPA (Site Code 004080); Boyne Coast and Estuary SAC (Site Code 001957); River Boyne and River Blackwater SPA (Site Code 004232) and North-West Irish Sea SPA (Site code 004236) are the only European Sites in respect of which the proposed development has the potential to have a significant effect.

The Board considered the Natura Impact Statement and associated documentation submitted with the application for approval, the mitigation measures contained therein, the additional information submitted to the Board, the submissions and observations on file, and the Inspector's assessment. The Board completed an appropriate assessment of the implications of the proposed development for the affected European Sites, namely the River Boyne and River Blackwater SAC (Site Code 002299); Boyne Estuary SPA (Site Code 004080); Boyne Coast and Estuary SAC (Site Code 001957); River Boyne and River Blackwater SPA (Site Code 004232) and North-West Irish Sea SPA (Site code 004236) in view of the sites' conservation objectives. The Board considered that the information before it was adequate to allow the carrying out of an appropriate assessment. In completing the appropriate assessment, the Board considered, in particular, the following:

- i. the likely direct and indirect impacts arising from the proposed development both individually or in combination with other plans or projects,
- ii. the mitigation measures which are included as part of the current proposal, and
- iii. the conservation objectives for the European Sites.

In completing the appropriate assessment, the Board accepted and adopted the appropriate assessment carried out in the Inspector's report in respect of the potential effects of the proposed development on the integrity of the aforementioned European Sites, having regard to the sites' conservation objectives.

Proper Planning and Sustainable Development/Likely effects on the environment:

It is considered that, subject to compliance with the conditions set out below, the proposed development would not have significant negative effects on the environment or the community in the vicinity, would not give rise to a risk of pollution, would not adversely impact on the cultural, archaeological and built heritage of the area and would not interfere with the existing land uses in the area. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

12.0 Conditions

1.	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, and additional plans and particulars submitted on 22nd November 2023, except as may otherwise be required in order to comply with the following conditions. Where any mitigation measures set out in the Natura Impact Statement or any conditions of approval require further details to be prepared by or on behalf of the local authority, these details shall be placed on the file and retained as part of the public record.</p> <p>Reason: In the interest of clarity and the proper planning and sustainable development of the area and to ensure the protection of the environment.</p>
2.	<p>The mitigation and monitoring measures identified in the Natura Impact Statement dated 22nd November 2023 shall be implemented in full except as may otherwise be required in order to comply with other conditions. Prior to the commencement of development, details of a time schedule for implementation of mitigation measures and associated monitoring shall be prepared by the local authority and placed on file and retained as part of the public record.</p> <p>Reason: In the interest of protecting the environment, the protection of European Sites and in the interest of public health.</p>
3.	<p>The scheme shall be modified as follows:</p> <p>a) motion sensored lighting shall be provided on shorter lamp posts along the greenway. The details of same shall be agreed with a suitably qualified ecologist to be retained by the local authority.</p> <p>Reason: To protect the local bat population.</p>
4.	<p>Prior to the commencement of development, the local authority, or any agent acting on its behalf, shall prepare in consultation with the relevant statutory agencies, a Construction Environmental Management Plan (CEMP), incorporating all mitigation measures indicated in the Natura Impact Statement, Ecological Impact Assessment, Otter Survey Report, Bat Survey Report, Bird</p>

	<p>Survey Report and demonstration of proposals to adhere to best practice and protocols. The CEMP shall include:</p> <ul style="list-style-type: none"> a) all mitigation measures indicated in the Natura Impact Statement; b) Specific proposals as to how the measures outlined in the CEMP will be measured and monitored for effectiveness. c) methods to avoid pollution of the Boyne River / Estuary. <p>Reason: In the interest of protecting the environment and the European Sites.</p>
5.	<p>Prior to the commencement of development, details of measures to protect fisheries and water quality of the river systems shall be outlined and placed on file. Full regard shall be had to Inland Fisheries Ireland's published guidelines for construction works near waterways (Guidelines on Protection of Fisheries during Construction Works in and Adjacent to Waters, 2016). A programme of water quality monitoring shall be prepared in consultation with the contractor, the local authority and relevant statutory agencies and the programme shall be implemented thereafter.</p> <p>Reason: In the interest of the protecting of receiving water quality, fisheries and aquatic habitats.</p>
6.	<p>The County Council and any agent acting on its behalf shall ensure that all plant and machinery used during the works should be thoroughly cleaned and washed before delivery to the site to prevent the spread of hazardous invasive species and pathogens.</p> <p>Reason: In the interest of the proper planning and sustainable development of the area and to ensure the protection of the European sites.</p>
7.	<p>A suitably qualified ecologist shall be retained by the local authority to oversee the site set up and construction of the proposed development and implementation of mitigation measures relating to ecology set out in outline CEMP and the Natura Impact Statement, Ecological Impact Assessment, Otter Survey Report, Bat Survey Report and Bird Survey Report. The ecologist shall be present during site construction works. Upon completion of works, an</p>

	<p>ecological report of the site works shall be prepared by the appointed ecologist to be kept on file as part of the public record.</p> <p>Reason: In the interest of nature conservation and the protection of terrestrial and aquatic biodiversity.</p>
8.	<p>a. All ground works associated with the proposed development shall be monitored under licence by a suitably qualified archaeologist.</p> <p>b. As part of the assessment a programme of test excavation shall be carried out at locations chosen by the archaeologist (licenced under the National Monuments Acts 1930-2004), having consulted the site drawings and the National Monuments Service.</p> <p>c. A detailed building survey of any structures of architectural/cultural heritage interest.</p> <p>d. Should archaeological material be found during the course of works, the work on the site shall be stopped pending a decision as to how best to deal with the archaeology. The developer shall be prepared to be advised by the Department with regard to any necessary mitigating action (e.g. preservation in situ, or excavation) and should facilitate the archaeologist in recording any material found.</p> <p>Reason: In order to conserve the archaeological heritage of the site and to secure the preservation and protection of any remains that may exist within the site.</p>

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Ms Susan Clarke
Senior Planning Inspector

14th February 2024