

Wicklow to Greystones Greenway Non-Statutory Public Consultation

From: [redacted] >
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To Wicklow Greenway <wicklowgreenway@wicklowcoco.ie>

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To whom it may concern

Please find attached submission [redacted] Newcastle, Co. Wicklow, [redacted] in respect of the Emerging Preferred Route (EPR) of the Wicklow to Greystones Greenway.

We would be grateful if you would confirm receipt of this submission by return.

Many thanks in advance.

Kind Regards

[redacted]
Principal – [redacted]

[redacted]
[redacted]
[redacted]

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[Redacted]

Senior Executive Officer,
Transportation and Infrastructure Delivery Department,
Wicklow County Council,
County Buildings,
Whitegates,
Wicklow Town,
A67 FW96.

12th February 2026

Our Ref.: 26009

Re: Wicklow to Greystones Greenway

Non-Statutory Public Consultation - Emerging Preferred Route

Dear Sir / Madam

We, [Redacted] are instructed by our clients, [Redacted] Newcastle, Co. Wicklow, [Redacted] (Property Folio Ref. [Redacted]), to make this submission in respect of the Emerging Preferred Route (EPR) of the Wicklow to Greystones Greenway.

This submission is accompanied by a bird survey by Birds Ireland to provide Wicklow County Council with the strongest possible understanding of our client's lands and their environmental sensitivity. This forms Appendix A of this submission.

In summary this submission does not consent to the proposed development, as currently proposed, and requires the complete re-think of the southern part of the greenway from the Kilcoole railway station to the south that are:

- the amendment of the route of the greenway to an alternative alignment away from the most sensitive environmental designations along the coastline that will enable a more positive implementation of the greenway; and
- to recognise that the EPR will not be achievable along this southern stretch (from Kilcoole railway station), including through our clients lands, as currently proposed, due to costings, privacy and environmental constraints.

The reasons for this submission as is detailed in the following is:

- the profound negative impact the proposed Greystones to Wicklow Greenway will have on the economic viability, amenity, privacy and security of our client farm that their family have managed for four generations; and
- the significant negative impact the proposal will have on the protected flora and fauna of the Natura 2000 site adjacent to which it will be constructed.

We request the Council to review a number of key issues in terms of the proposed development that are set out in this submission. Our clients strongly oppose the current alignment, and its impact on their farm and the integrity of the Murrough SPA.

Who are our clients?

Our clients live and run a farm of 31 hectares that is located within the townland of [Redacted]. Their home is located at the western periphery of their farm. Their farm is located some 850m to the east of, and accessed from the R761. This single lane private access road also provides access to a number of other family homes and farms. Our clients farm has been in the [Redacted] for four generations, and was

[Redacted]

[Redacted]

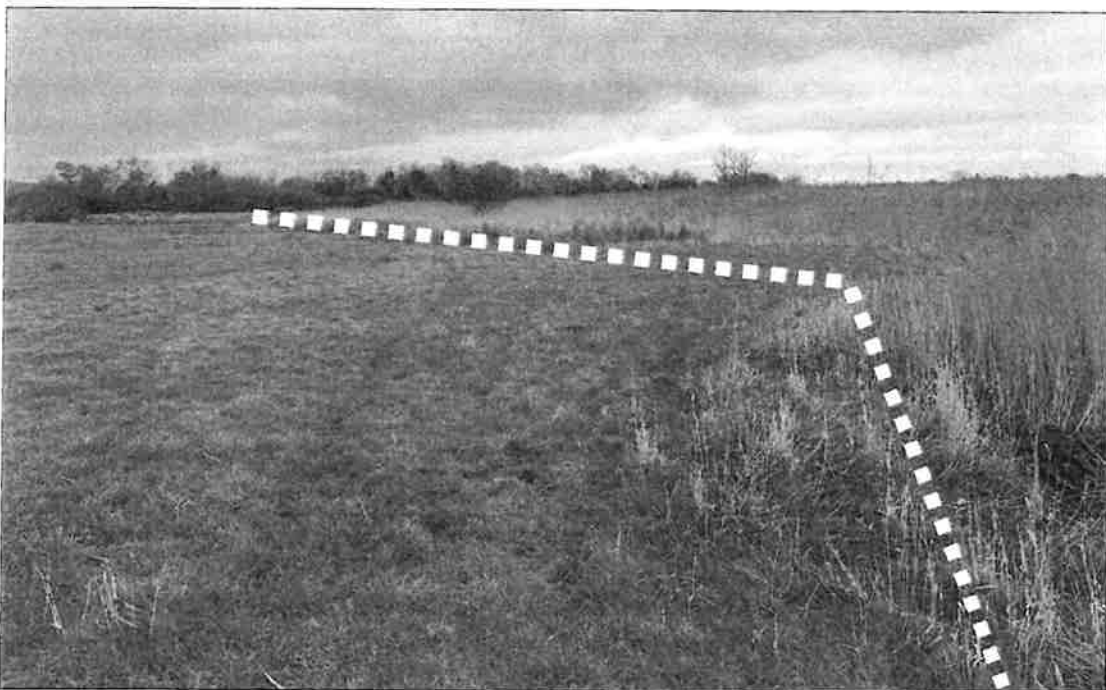
handed over to our clients in 2022. Our clients operate an organic sheep farm on their lands, which is registered as such by the Organic Trust.

The environment of our client's farm

The ecological and environmental sensitivity of the farm, and farming practices of our clients, is reflected in it being included within two Natura 2000 sites, as listed below. The character of our client's lands are notable in that they border and include the Murrough Special Protection Areas (SPA) (SPA:004186) and the Murrough pNHA (pNHA:000730). Their farm also includes the Murrough Wetlands Special Area of Conservation (SAC) that runs in a narrow strip parallel and along the coast before widening to the immediate south-east of our client's lands.

Our clients operate a National Park and Wildlife Service (NPWS) Farm Plan Scheme on their lands over which the Emerging Preferred Route (EPR) passes through. This Scheme's sole purpose is to seek to encourage rich grassland habitat creation for breeding waders, geese and swans; and includes actions also for encouraging lapwing, redshank and other waders. Our clients, as part of this scheme, are required to implement a management plan to maintain and improve the habitat on their lands to encourage specific wildlife and their preferred habitats. The area subject of this NPWS Farm Plan Scheme, and the EPR across their lands is included within Appendix B of this submission.

A notable characteristic of our client's farm is its low lying nature, and that its eastern half, as well as forming a Natura 2000 site, is prone to flooding. The success of the Farm Plan Scheme is clearly evident on the lands, particularly to the north, where the reeds and rich habitat has extended to the west, and over which the Council seek to run the proposed greenway through it.



Photograph of north-east field our client's farm and proposed greenway (white dashed line) indicated

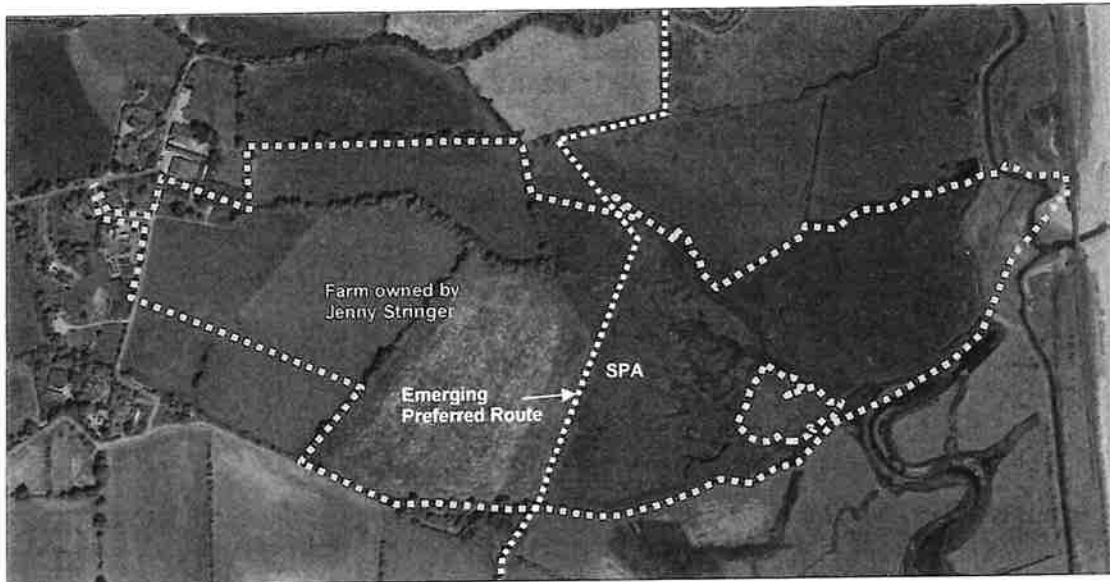
We wish to place on record that as well as the river network that flows from west to east to the immediate north and south of their farm, there are also drainage ditches over which the proposed development will be required to pass. These hydrological connections are an important aspect of the conservation designation of the sites to the east, as well as draining our client's and other adjacent lands. Irrespective of other points made in this submission, it would be imperative that the most appropriate and biodiversity led solutions are used for any water course crossing. There are, for example, two parallel fields drains that run centrally within their farm that are hydrologically connected and ultimately drain into the SPA to the east.

The Proposed Development – Emerging Preferred Route

The Emerging Preferred Route of the Wicklow to Greystones Greenway takes two forms. The northern section that extends primarily along the coastline to just beyond the Kilcoole railway station; and the rest of the route that appears to be routed on an ill-considered alignment that is based primarily on seeking to avoid the SAC and SPA designations that are located along the coast. A key aspect of any greenway should be its attractiveness as a route, and the potential social and economic benefits it may bring to the local population and businesses along the route. The current EPR completely fails to achieve this.

We note that the publication of the EPR forms Phase 2 of a seven phase of a proposed Greenway development process. We note that as yet no detailed environmental assessment, surveys etc. have been undertaken of the route, and therefore this EPR must be considered in that light.

The indicated EPR passes almost half way across our client's farm splitting it into two, and clearly has had inadequate regard to the SPA designation of lands immediately adjacent to it; or the fact that the route is passing directly through a pNHA (see page 5 of this submission). This not only happens within, and to the immediate north of our client's farm, but also to its immediate south. Irrespective of the profound negative impact on the farm, there can be no justification of the potential environmental impact of the proposed greenway in this instance.



Aerial photograph of our client's farm (outlined in yellow) and proposed greenway (white dashed line) (source: Google Earth)

We submit that the proposed EPR across our clients lands is contrary to the policies and objectives of the County Development Plan (CDP). The policies and objectives of the Plan all promote the development of an integrated greenway network, but in seeking to establish them, it identifies that there is a need for high value assets and amenities should be protected and enhanced (section 4.1). This is reflected in Policy CPO 19.21 of the CDP, which appears to be significantly out of date, as no reference is made to the SPA, despite it being established in 2009; and refers to the SAC as a candidate SAC, despite it being designated as a full SAC in 2017. Point 7 of CPO 19.21 outlines that it is an objective to facilitate the development of a coastal walk (having due regard to environmental designations and compliance with the EU Habitats Directive) and to restrict development that interferes with the achievement of this objective. Putting aside the fact the current proposal is a Greenway, and is not on the coast along this length, there can be no basis to claim that this somehow supports the EPR in this instance. It reflects the opposite, and indicates the ill-considered EPR in this instance.

National Policy Objective NPO22 seeks that these greenways should achieve the maximum impact and connectivity. The current proposal fails to achieve this, and fails to support rural areas, as it runs for long length through areas where there will only be farmland on both sides, and no connection to the coast or inland to the wider population. The EPR is therefore contrary to the core principles of the Department of

Transport's document entitled 'Strategy for the Future Development of National and Regional Greenways (2018)'. This document emphasises the use of State land as a preference to the need for the acquisition of private lands.

Section 11.2.3 of the CDP specifically deals with Greenways, and recognises the tourism asset that they can provide. However, this can only be realised if the route is deeply connected to the environment in which it is passing through, as opposed to a largely linear route in this instance. Such an alignment must be considered as a poor route design that should not be supported in this instance, and against which our clients have the strongest possible opposition.

We respectfully request the Council to question the viability and validity of the EPR, given the impact on the environment, amenity and farming businesses that would result, as well as the constraints that are clearly evident in trying to implement it in this instance.

Loss of land and inconvenience in farm operations

The extent of the loss of land under the EPR is unclear at present, but would comprise a substantive part of their farm, as well as subdividing it in two. Whilst the documents refer to a 6m corridor, the propensity of the land to flood, may require a wider corridor though our clients lands to artificially raise the proposed greenway, creating a highly incongruous feature within the landscape; as well as creating a hard edge to a Natura 2000, site, and subdividing one part of the pNHA that is ecologically linked to the SPA from the other.

The loss in income for our client's organic farm, would be significant, as it would reduce its size by c. 0.24-0.4ha. and potentially further allowing for any required landscaping or mitigation, which we would be of the considered opinion is not achievable in this instance, in seeking to maintain the integrity of the nature conservation sites. This significant loss in farm income will be compounded by reduced production, and lower CAP Pillar1 and Pillar2 payments.

There would remain a need for our client's to be able to move machinery and livestock from one side of the greenway to the other in the unlikely event that the greenway moved forward. Our client's operate a rotational grazing system that involves the sub-division of fields into smaller paddocks, allowing livestock to graze them out for 5-7 days before moving on to the next one in rotation. It is unquestionable that the EPR would have a profound negative impact on the income and workings of the farm.

There are also real concerns that the use of the proposed greenway will result in a negative impact on the safety and welfare of their stock caused by straying dogs onto their lands. This will be compounded by the need to have at least three crossings across the proposed greenway. Our client's would also be rightly concerned that the fencing along the route would be inappropriate to control trespass onto and across their lands, and the obvious welfare issues that this would create. Our client's are also concerned given the access to the farm and its access lane to the R761, so close to the EPR, that the level of trespass has the potential to be significant and create real bio-security and potential disease transmission concerns. There is potential that the degree of potential trespass, due to the above, could also lead to anti-social behaviour.

The organic nature of the farm requires our clients to follow very strict organic farm guidelines. This includes a general presumption against greater compaction of soils and disturbance to their flock. Our clients are concerned that the greenway will not just impact them once the greenway is in operation, but would also lead to disturbance prior to the making of the application, in terms of any site investigative works required, and then during construction. These would be unacceptable in such an environmentally sensitive location and would have serious implications of their status as an organic farm. The only reasonable conclusion is that the EPR would have an unacceptable impact on the income and operation of our client's organic farm.

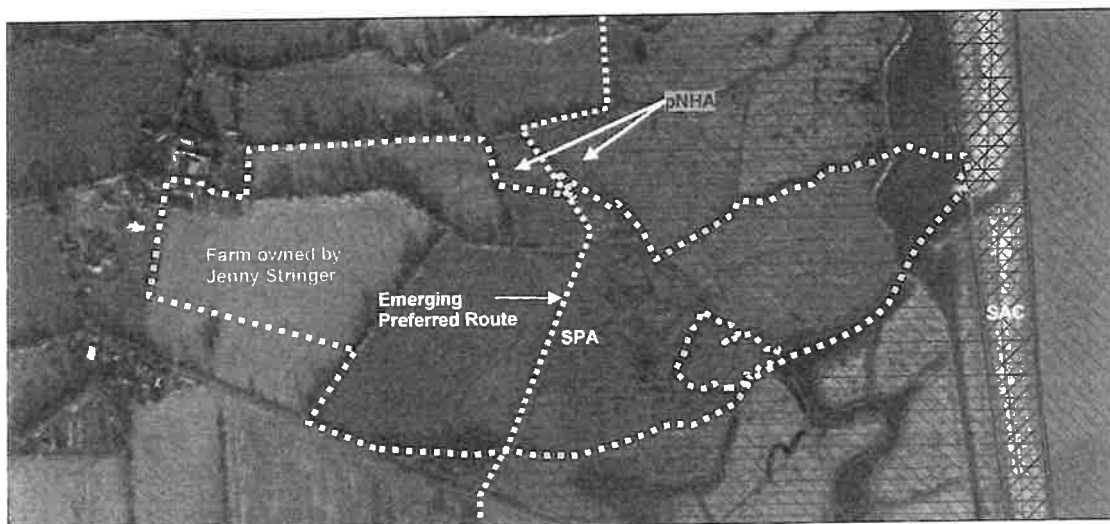
Negative impact on Protected Sites

We also refer the Council to the potential impact that the proposal will have on the statutory designations along this part of the coastline that are reflected in the pNHA, SAC and SPA designations, and on which the EPR is indicated to be required to be built on, or be adjacent to. The creation of a publicly accessible corridor and pathway of 5-6m wide would be detrimental to the protected habitat of the natural environment used by wading and other birds. This habitat is recognised as of international importance and which the Council are statutorily required to protect.

The proposed alignment of the EPR is indicated as directly abutting the Murrough SPA designated site within our clients lands, and also abutting and partly passing through the Murrough pNHA (see below). The Murrough SPA comprises a coastal wetland complex that stretches for 13 km from Kilcoole Station, east of Kilcoole village in the north, to Wicklow town in the south, and extends inland for up to 1 km in places. The site includes an area of marine water to a distance of 200m from the low water mark.

The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Red-throated Diver, Greylag Goose, Light-bellied Brent Goose, Wigeon, Teal, Black-headed Gull, Herring Gull and Little Tern. The E.U. Birds Directive pays particular attention to wetlands, and as these form part of this SPA, the site and its associated waterbirds are of special conservation interest for Wetland & Waterbirds.

The Murrough SPA is an important site for wintering waterbirds, being internationally important for Light-bellied Brent Goose and nationally important for Red-throated Diver, Greylag Goose, Wigeon, Teal, Black-headed Gull and Herring Gull. It is probably the most important site in the country for nesting Little Tern. The regular occurrence of Red-throated Diver, Little Egret, Whooper Swan, Greenland White-fronted Goose, Golden Plover, Little Tern, Sandwich Tern, Short-eared Owl and Kingfisher is of note as these species are listed on Annex I of the E.U. Birds Directive. Part of the Murrough SPA is also a Wildfowl Sanctuary.



Aerial view of main farm holding (outlined in yellow) with NPWS nature conservation designations shown relative to the EPR (SPA shown in pink hatch, and pNHA in blue) (Source: NPWS)

The EPR is completely incompatible with the conservation of the SPA. The method employed by the Council's consultants of seeking to avoid routes directly through the SPA within our client's lands along the majority of the preferred route, fails to grasp the importance of the SPA and its Conservation Objectives, and the potential for the boundary of an SPA to be extended. For example, the boundary of this SPA was extended in 2023 to include a large amount of marine waters. Given that the EPR runs through the Murrough pNHA, which would form an obvious potential extension to the SPA in the future, there is a complete disregard to such matters within the EPR.

The Conservation Objectives for the Red Throated Divers, for example, within the Murrough SPA note the potential negative impact of barriers, which if constructed, the proposed Greenway in its current alignment would create. The objectives state:

"Barriers limiting the population's access to this SPA or ecologically important sites outside the SPA will ultimately affect the achievement of targets for population trend and/or spatial distribution. Factors such as the number, location, shape and area of potential barriers must be taken into account to determine their potential impact."

Similar objectives are cited for the Greylag Goose, Light Bellied Goose, Wigeon, Teal, Black Headed Gull and other species within the SPA.

We submit that the EPR along the boundary of the SPA is wholly unsuitable for achieving conservation objectives. The designation recognises that factors such as intensity, frequency, timing and duration of a (direct or indirect) disturbance source must be taken into account to determine the potential impact upon the targets for population trend and spatial distribution. The greenway will have, in our considered opinion, a direct and negative impact on the conservation objectives of the SPA.

It is also recognised that the wintering population of birds within the SPA can make extensive use of suitable habitats in important areas outside the SPA for foraging and roosting. The extent, availability and quality of these supporting habitats will be of importance for the resilience of the SPA population. The EPR would negatively impact upon this connectivity.

We request the Council to reconsider the EPR in this instance, as the current alignment has clear conflicts with the conservation objectives of the Murrough SPA, pNHA and SAC that is in place under the Habitats Directive.

We have grave concerns that the project, either individually or in combination with other plans and projects, which clearly the Greenway has the potential to generate, will have an adverse effect on the integrity of the Murrough SPA, pNHA and SAC in view of its conservation objectives and best scientific knowledge.

The Zone of Influence (Zol) of the EPR will certainly include large areas of the Murrough SPA, pNHA and SAC. It is, in our considered opinion, highly unlikely that adverse effects to the integrity of the European sites within the Zol of the proposed scheme and the potential for in-combination effects with other projects and activities can be excluded. Furthermore, we submit that the potential for adverse effects cannot be effectively and sufficiently ameliorated by both design-based and applied mitigation measures related to surface water quality and disturbance/ displacement impacts. It must be concluded therefore that the EPR would lead to adverse impacts on the Qualifying Interests/ Special Conservation Interest species of the European sites within the Zol of the proposed scheme.

The EPR will lead to disturbance and displacement impacts on foraging and roosting Special Conservation Interest bird species. This cannot be adequately mitigated in this instance given the length of the EPR and how closely it aligns with the nature conservation designations. We submit that such a potential negative impact should preclude the Council from moving forward with the project in this or similar form.

We submit that the Council have a statutory requirement to ensure that such habitats and species are protected. In essence any development such as this that would materially alter the coastline environment as a result of the detailed construction work required, and the noise disturbance once in operation, should be avoided. We submit that the current EPR is a material contravention of the Council's own objectives under CPO 17.4, 17.5, 17.6 and 17.7 of the Wicklow County Development Plan 2022-2028; and should not progress further. In addition, it must also be noted that the EPR cuts across biodiversity corridors that provide an ecological connection to these protected sites contrary to Objective CPO 17.14 of the CDP.

This project completely fails to protect the integrity of European sites, and would fail in any way towards the protection and where possible enhancement of the ecological coherence of the European Site network and should not be considered further under the Council's own objectives.

CONCLUSION

The purpose of this submission is to request Wicklow County Council to our client's opposition to the EPR, and we request that they do not move forward with the Wicklow to Greystones Greenway. It will have a profound negative impact on the integrity and our client's ability to work their organic farm; and lead to adverse impacts on the Qualifying Interests / Special Conservation Interest species of the European sites within the Zol of the proposed EPR.

It is our respectful contention that this route does not offer:

- Results in conflict with environmental statutory designated areas identified and protected under EU law; and
- Will negatively impact the integrity and workings of our clients organic farm.

It is essential that the Emerging Preferred Study Area and Preferred Route are re-examined. This alignment fails to achieve the potential for greater economic and social cohesion; and would have a negative impact on the Natura 2000 sites along its boundary. The route from Greystones to Kilcoole station, which is a route of 6.1km, where it is aligned with the railway would appear to be achievable and offer an excellent greenway that utilises existing infrastructure, where possible. The route to the south, which crosses our clients organic farm, unfortunately, does not, and our client's strongly oppose it.

This project completely fails to protect the integrity of European sites, and would fail in any way towards the protection and where possible enhancement of the ecological coherence of the European Site network and should not be considered further under the Council's own objectives.

We request that the Council do not move forward with the project in this or similar form.

Yours faithfully,

A horizontal redacted signature, appearing as a dark blue/black scribble.A horizontal redacted name, appearing as a dark blue/black scribble.

Encl./

[REDACTED] Newcastle, Co. Wicklow – Bird Survey January 2026

Site Description

The proposed development site is located off the R761 between the villages of Kilcoole and Newcastle, Co. Wicklow. Leabeg Farm is an active agricultural farm with crops, grassland and native woodland all surrounding several farmhouse and dwellings.

Most importantly, the whole farm is bordered to the east by the Murrough Wetlands complex. This wetlands complex stretches for 13 kilometres along the coastal strip from Kilcoole Station (east of Kilcoole village) to the north, to Wicklow town in the south, and extends inland for up to one kilometre in places. This extensive area is designated as a Special Protection Area (004186) under the EU Birds Directive due to its special conservation interest for several bird species.

Proposed Development

The proposed development consists of a 'Greenway' from Greystones to Wicklow town. The proposed route from Greystones travels along coastal areas and across sections of farmland inland from the coast.



Fig. [REDACTED] Layout and Habitat Map showing proposed route of the Greenway (in red)

Regarding [REDACTED] the proposed route of the Greenway transects the farmland along the eastern section.

The route dissects areas of croplands, grasslands and woodlands as well as small streams that run east to the coast through the farm. More importantly, the proposed route of the Greenway runs directly along the western boundary of the Murrough Wetlands SPA (see Fig 1 above).



Fig 2 – Grassland on central section of farm bordering reedbeds of the Murrough Wetlands



Fig 3 – Flooded grassland on southern section of farm bordering the Murrough Wetlands



Fig 4 – Grassland on northern section of farm bordering reedbeds of the Murrough Wetlands

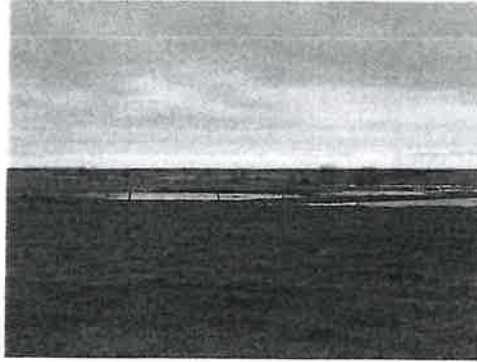


Fig 5 – Flooded grassland on southern section of farm bordering the Murrough Wetlands

Background

Birds Ireland (BINS Ltd established 1990) was commissioned by [REDACTED] to undertake a preliminary Winter Bird Survey of the proposed route of the Greenway.

This survey was to assess the potential effects of the proposed Greenway route on species; particularly those protected by national and international legislation, or considered to be of particular nature conservation importance.

Bird Survey – 25th Jan 2026

[REDACTED], undertook the bird survey of the site on 25th January 2026.

It should be noted that, as water levels were very high on the survey day, many wetland species were feeding on Leabeg Farm land bordering the Murrough Wetland.

[REDACTED] is an Environmental Consultant and Ornithologist who has worked on a wide range of conservation, research and ecological monitoring projects across Ireland. He is also very experienced in coordinating and undertaking surveys and is very experienced with all survey methodologies. Eric has inputted to many Environmental Impact Assessment Reports, Environmental Assessments and Appropriate Assessments for numerous projects.

[REDACTED] has almost 50 years field experience and is a highly sought-after public speaker, a wildlife photographer and a well-known broadcaster on RTE Radio1. He is also the author of many best-selling books including *'The Complete Field Guide to Ireland's Birds'* and *'Finding Birds in Ireland'* as well as *'Birdwatching in Ireland with Eric Dempsey'* (all published by Gill Books). He has also published work on Ireland's birds in European, North American and Australian journals.

Bird Survey Results

The following species were recorded during the bird survey on 25th January 2026.

| SPECIES | NOTES |
|--------------------------|--|
| Mute Swan | 5 present on flooded southern sections of the farm |
| Whooper Swan | 12 feeding on the northern area of the farm |
| Greylag Goose | 24 feeding (with Whooper Swans) on the northern area of the farm |
| Mallard | Min. 30 birds at various sites along the proposed Greenway route |
| Wigeon | Min. 280 birds at southern and central areas along the proposed Greenway route |
| Teal | Min. 140 birds at southern and central areas along the proposed Greenway route |
| Little Grebe | 6 feeding on channels on northern section of farm |
| Little Egret | 4 feeding in flooded fields on northern section of farm with 7 on flooded areas on the southern section |
| Grey Heron | Min. 8 birds at various sites along the proposed Greenway route |
| Red Kite | 4 birds circling over the farm. This species is now breeding in the area. |
| Buzzard | 2 present - a regular breeding species on the farm. |
| Peregrine Falcon | A single bird was perched in trees on the northern section of the farm |
| Water Rail | Several calling at various sites along the proposed Greenway route |
| Moorhen | Several at various wetland sites along the proposed Greenway route |
| Lapwing | Min. 300 birds feeding on the flooded areas on the southern areas along the proposed Greenway route |
| Black-tailed Godwit | Min. 135 birds feeding on the flooded areas on the southern areas along the proposed Greenway route |
| Curlew | Min. 50 birds along the northern section of the site with min. 30 birds feeding on the flooded areas on the southern areas |
| Snipe | Min. 14 birds were flushed from the flooded fields on the northern section |
| Black-headed Gull | Up to 30 feeding in the flooded fields at various sections |
| Great BB Gull | 7 roosting in fields on the northern section of the site |
| Woodpigeon | Common |
| Stock Dove | 8 birds recorded in fields in the southern section |
| Collared Dove | Common |
| Great Spotted Woodpecker | A single bird recorded from mature trees along the southern section. |
| Skylark | Minimum of 20 birds feeding in fields on southern section |
| Meadow Pipit | Up to 80 birds recorded from the fields in the northern section of the farm with a further 45(+) along other sections. |
| Pied Wagtail | Common |
| Wren | Common |
| Duncock | Common |
| Redwing | Up to 20 birds feeding widely over the farm |
| Song Thrush | Common |

| | |
|---------------|--|
| Fieldfare | Up to 100 birds feeding widely over the farm |
| Mistle Thrush | Common |
| Blackbird | Common |
| Robin | Common |
| Stonechat | Up to 4 birds recorded along proposed route of Greenway |
| Goldcrest | Common |
| Great Tit | Common |
| Blue Tit | Common |
| Maggpie | Common |
| Jackdaw | Common |
| Rook | Common |
| Hooded Crow | Common |
| Raven | 2 over the area |
| Starling | Min. 200 feeding in fields across the area |
| Chaffinch | Min. 60 within a mixed flock of finches along the central section |
| Goldfinch | Up to 30 within a mixed flock of finches along the central section |
| Greenfinch | Up to 15 within a mixed flock of finches along the central section |
| Linnet | Up to 80 within a mixed flock of finches along the central section |
| Reed Bunting | Min. 10 recorded along proposed route of Greenway |
| Yellowhammer | Up to 80 within a mixed flock of finches along the central section |

A total of 51 species was recorded during the Winter Bird Survey on 25th January 2026.

In addition, it should be noted that Barn Owl nest boxes are present on the farm with prospecting birds examining the boxes in late summer/early autumn 2025.

Red-listed Bird Species

There were nine (9) species on the Red List of the Birds of Conservation Concern in Ireland (2020-2026) recorded on the Winter Bird Survey on 25th January 2026 as follows:

- Lapwing
- Black-tailed Godwit
- Curlew
- Snipe
- Stock Dove
- Red Kite
- Meadow Pipit
- Redwing
- Yellowhammer

Amber-listed Bird Species

There were eleven (11) species on the Amber List of the Birds of Conservation Concern in Ireland (2020-2026) recorded on the Winter Bird Survey on 25th January 2026 as follows:

- Mute Swan
- Whooper Swan
- Greylag Goose

- Wigeon
- Teal
- Black-headed Gull
- Skylark
- Starling
- Goldcrest
- Greenfinch
- Linnet

Additional Observations

In addition to the birds recorded during the survey of 25th January 2026, further observations included an Otter swimming and feeding in the channels along the northern section of the farm, and a Hare in the fields along the southern section.

Recommendation

Before any development of the proposed Greenway route, a full EIA should be completed by Wicklow Co. Co. with an emphasis on the presence of both wintering and breeding Red-listed and Amber-listed bird species.

Conclusion

It is the considered opinion of [REDACTED] is of national and local ecological importance for birds with nine (9) Red-listed and eleven (11) Amber-listed species of Conservation Concern recorded along the proposed Greenway route.

Further to this, the proposed Greenway route development on [REDACTED] runs next to the Murrough Wetlands, a Special Protection Area and will result in unprecedented disturbance due to cycling traffic/footfall.

If permitted, the proposed Greenway route will cause irreparable damage to this fragile, important environment and the natural beauty of this region.

APPENDIX B – NPWS FARM PLAN SCHEME AT LEABEG MIDDLE (Plan Reference no. 2021_WK_008)

