



An Bord Pleanála
64 Marlborough St
Dublin 1
D01 V902

8 September 2020

RE: CONSTRUCTION OF THE BOYNE GREENWAY DROGHEDA TO MORNINGTON, CO MEATH & CO LOUTH

To whom it concerns,

We are a small voluntary group established in 2011, with the objective of campaigning for a 17km cycleway from the Maiden Tower at Mornington, Co Meath to the Bru na Boinne, Interpretation Centre at Newgrange, Co Meath.

Our group was established as part of the Local Heroes movement in Drogheda, when almost 7,000 people were out of work. We looked to develop regeneration projects, one of which was to develop ways in which we could get more amenity from the river Boyne.

We have been actively engaged on this project and assisted in achieving many of the key milestones as follows:

- Worked with the National Trails Office in completing an assessment of the route in February 2013.
- Campaigned for the Drogheda Ramparts to Oldbridge Estate route which was opened in February 2014.
- Completed a feasibility study with Roughan O'Donovan looking at a number of routes from Drogheda to the Maiden Tower at Mornington.
- Feasibility study completed in August 2014, with a review of 4 proposed routes and determination of best option (Copy attached).
- Conducted 4 public meetings to review the proposed routes. Some local opposition, in particular, the Crook Road.
- Boyne Greenway included in Greater Dublin Cycle Network Plan 2013 published by the National Transport Authority.
- Included in Laytown and Bettystown Walking and Cycling Study Jan 2014 completed on behalf of Meath County Council.
- Included in the Meath County Development Plan 2013 – 2019 and Draft Meath County Development Plan 2020 – 2026.
- Included in Louth County Development Plan 2015 – 2021.

- In 2015 met with National Transport Authority to discuss linkages with Bus and Rail services.
- In June 2016 East Meath Municipal Members voted in favour to proceed with a planning application for the route from the Maiden Tower, Mornington to Drogheda.
- DBFL appointed consultants in February 2017 to complete both the Drogheda link and the Mornington to Drogheda route.
- Non statutory Public Consultation commenced September 2019.
- 2,700 submissions made as part of the Public Consultation - 98% of which supported the development.
- Upgrade to Dominic's Park – Drogheda Ramparts section commenced August 2019 and completed December 2019.
- July 2020 - €750k awarded to Meath County Council for design and planning of Oldbridge Estate to Navan, Co Meath Route

We welcome Meath County Council's application. Meath County Council have been working on this project since 2013. Throughout this time, they have actively engaged with local communities and their representatives. They have consulted with representative bodies such as ourselves in a very fair and balanced way. The non statutory public consultation period allowed all interest groups to make representations, with over 2,700 submissions being made. Many of these representations were taken on board and assisted in making a number of key improvements to the project.

There is very strong support, significant local interest and community engagement in this development. This development is necessary for the proper and sustainable development of the East Meath and Drogheda region.

European, National and Local Policy

National Policy

The proposal is consistent and aligned with the following policies:

- Climate Action and Low Carbon Development Act, 2015
- Climate Action Plan 2019
- The programme for Government 2020
- 2040 Project Ireland
- Strategy for the Future Development of National and Regional Greenways (2018) (Dept of Transport, Tourism and Sport).
- Our Sustainable Future – A framework for Sustainable Development for Ireland 2012 (Govt of Ireland 2012 and 2015 progress report.
- People, Place and Policy – Growing Tourism to 2025
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban areas 2009 – Dept of Heritage and Local Govt
- Smarter Travel – A sustainable Transport future: A new Transport Strategy for Ireland 2009 – 2020
- National Cycle Policy Framework 2009 – 2020 (Dept of Transport)
- A Strategy for the Development of Irish Cycle Tourism 2007 (Failte Ireland)
- Irish Trails Strategy (2007)
- Get Ireland Walking Strategy and Action Plan 2017 – 2020 (Sport Ireland)
- Get Ireland Active (The National Physical Activity Plan for Ireland) 2016
- Healthy Ireland Framework 2013-2015 (Govt of Ireland)
- National Cycle Manual (2011) NTA

- The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009

Regional Policy

The proposal is consistent and aligned with the following policies:

- Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region
- Greater Dublin Area Cycle Network Plan 2013 (NTA)
- Failte Ireland's Ancient Development Plan 2020 – 2024 (Boyne Valley Region) (Failte Ireland June 2020)

Local Policy

The proposal is consistent and aligned with the following policies:

- Draft Meath County Development Plan 2020 – 2026
- Louth County Development Plan 2015 – 2021
- East Meath Local Area Plan 2014 – 2020
 - HER POL3
 - GI POL 9
 - GI OBJ 3
- ARUP Cycling and Pedestrian Report East Meath 2014 – Meath County Council
- LOVEDROGHEDA Business Improvement District Proposal Document 2020 – 2025

Traffic and Road Safety

The R150/R151 road is the main commute road between Laytown, Mornington, Bettystown (LMB) (pop 11,872) and Drogheda (pop 40,956). In the Constraints and Preliminary Design Report, sets out a number of existing safety issues:

- No or poor pedestrian footpaths and crossing facilities
- No dedicated cycle facilities
- High volume of vehicles and HGVs (low bridge heights on other routes)
- High Vehicular speeds and
- Narrow carriageways unsuitable for newly commissioned public transport vehicles
- Poor pedestrian and cyclist environment, which discourages pedestrian and cycling transport modal change.

While some of these issues can be mitigated through better road design; slowing traffic and installing calming measures. Given the current road structure, it is a physical impossibility to amend the existing road structure to insure and facilitate pedestrian and cyclist safety.

It is not safe for an experienced pedestrian or cyclist to use this road and it is highly dangerous with extreme risk of serious injury if inexperienced, children walk or cycle this route.

The report outlines the very high rate of accidents (21 in total) with 1 fatality, and 3 serious collisions as per data from the Road Safety Authority's collision statistics, 2005 to 2016, with 34 causalities.

ABP should give consideration to the interim population growth of the area since 2016 and the forecasted growth up to 2025, when it is likely the population of LMB will be close to 19,000 citizens – similar to Sligo town. This population growth will increase traffic movements on this road and will increase the risk of further vehicle, pedestrian and cyclist accidents.

Section	Minor Incidents	Serious Incidents	Fatal Incidents	No of Casualties
Section 1	5	1	0	8
Section 2	7	0	1	17
Section 3	4	1	0	7
Section 4	1	1	0	2
Total	17	3	1	34

Data from RSA 2005 – 2016

On the R150, the report states that Annual Average Daily Traffic (AADT) movements were between 5,500 and 6,000. On the R151 – Mornington Road the AADT range was between 4,500 and 5,000 vehicles.

Given the ongoing housing development in East Meath and Drogheda these AADT movements are likely to increase further in the coming years.

There are many sections of the R150 and R151 that are not suitable for both vehicular and pedestrian / cyclist movements. We attach some examples in appendix 1.

The current risk of a serious accident on this road is a key deterrent for cyclists, walkers and runners in using this road. It is viewed as dangerous and the risk of serious injury is very high. Local people, in general, chose not to cycle or walk, and use their cars more often than they would like. It is key to the development of a local sustainable transport policy that safe cycleways are actively promoted, and citizens are afforded the opportunity to walk or cycle safely in their community.

For the proper planning of the East Meath / Drogheda region it is not safe or practical to have pedestrians and cyclists share the R150 and R151 road with vehicular traffic. Inspectors when assessing this application should position themselves as a pedestrian and walk east along the road from the Grammar School to the Riverside gift shop (presently no footpath). There are numerous locations where it is not safe for pedestrians. Given current road design requirements, it would require significant mitigating measures in terms of speed control and possible right of way requirements to make this road functional for use by both pedestrians/cyclists and vehicular traffic. Given the existing and future projected vehicular movements on this road, this is a physical impossibility. Please refer appendix 1, where we posed as a pedestrian walking into on coming traffic at a number of locations along the route.

The development of East Meath since the late 1990's has left cycle and pedestrian infrastructure as an after thought. ABP inspectors should travel around the hinterland to assess for themselves in areas such as Donacorney and Bettystown, and witness first hand, the lack of pedestrian and cycleway infrastructure. This is despite an ARUP cycling and pedestrian report produced in 2014 recommending infrastructure, which has not been forthcoming due to lack of funding.

Demographic Changes

Population Projections

It is critical that ABP consider the demographic changes in the Drogheda and East Meath areas.

From 1991 to 2016, the population of Drogheda grew from 23,848 to 40,956 – 71% increase. From 1991 to 2016 the population of Laytown-Bettystown-Mornington grew from 3,360 to 11,872 – 353% increase - (Source CSO). From 2011 to 2016, the population of Laytown-Bettystown-Mornington grew by 9.0%.

The table below identifies some (not all) of the large scale residential housing projects currently under construction:

Laytown-Bettystown-Mornington

Scheme Name	Scheme Address	Developer	No of Houses	Expected Population Increase
Donacarney Wood	Donacarney, Mornington, Co Meath	Wonderglade & Carroll Estates	319	880
Whitefield Hall	Donacarney, Mornington, Co Meath	Granbrind	205	570
Seoid na Tra	Donacarney, Mornington, Co Meath	Carroll Estates	65	180
Dun Eimear	Donacarney, Mornington, Co Meath	Urban Life	115	320
Total			704	1,950

Source: Existing planning files with Meath Co Co – Search Donacarney

The population increase associated with the above 4 developments only, is equivalent to a 16.4% increase in the population of LBM, based on 2016 CSO figures. Given that 24,500 houses are predicted to be constructed in the State in 2020 – this is 2.9% of the annual National house construction plan. Please be aware that this is not the full scale of housing construction in the LBM region, at the present time.

There are also significant housing developments in construction in South Drogheda / Drogheda, Co Meath.

School Construction and Student Population

Allowing for the completion of the Educate Together Secondary School on the Mill Rd, Mornington, there will be a minimum of 3,000 students attending primary and secondary school in the immediate vicinity of the proposed Greenway. Currently school populations are as follows:

School	Level	No of Pupils	Established / In Construction
An Bhradain Fheasa, Mill Road, Mornington	Primary	437	Recently completed 2018
Drogheda Grammar School	Secondary	437	Established
Educate Together	Secondary	120 (700)	In Construction – will rise to 700
Le Cheile	Primary	434	Established
Realt Na Mara	Primary	913	Established
Total		2,341	This will increase to a minimum of 2,921

Given the amount of house building in the East Meath / Drogheda South region, this is expected to increase further.

Consideration of Demographic Changes for Proper and Sustainable Planning

This Greenway application differs from many applications, in say, the West of Ireland, with much lower population densities and predicted growth rates.

The demographic changes being experienced in LBM and South Drogheda, Co Meath are significant. Failure to plan, design and construct sustainable transport systems will have a very serious detrimental impact on the quality of life and residential amenity of this region.

It is not equitable for the citizens of LBM and South Drogheda, Co Meath to have break neck housing development, while having no consideration for amenity, recreational value and quality of life.

Therefore, demographics and future population size should be given appropriate weighting in any decision made by the Board.

Best International Practice

The development of cycleways along coastlines and rivers, allowing for environmental considerations is good amenity development policy. This is the case in many European countries. Please refer to Appendix 2 with references to routes in Holland and France.

Sustainable Transport

It is very regrettable that areas such as East Meath and Drogheda have been developed as commuter belt accommodation zones. This strategy with the lack of good public transport infrastructure, pedestrian and cycleway amenities, pushes people to using their cars far more frequently, than they would, if such infrastructure was in place.

Cycling should not need to be viewed as a dangerous activity.

Two new localised bus routes were recently commenced on the R150 with regular services every 15 minutes.

Despite having 2 train stations in the area, our citizens still need to use a car to drive to train station.

Justification and Purpose

It is our view that this application is strongly justified on planning grounds. The project will deliver a safe accessible transport route for local communities and schools. It will enhance the overall quality of life in the area and promote healthy living and appreciation of our local wildlife and heritage.

It will be fundamental in the development of a tourism offering for East Meath and Drogheda. It is key to the development of Boyne Valley Tourism. It will assist in the development of local employment, bike shops, coffee houses and restaurants and overnight accommodation.

It will link the beaches of Bettystown and Laytown with the historic town of Drogheda, and onwards to the Oldbridge / Battle of the Boyne site.

There is some pedestrian and cycling activity on the R150 and R151 currently. This is extremely dangerous and in its present form, on safety grounds must be actively discouraged.

This project will assist in the development of further planned routes in the region and support the future development of a national sustainable transport network, consistent with current Government Policy.

Connectivity with Other Planned Routes

The benefits of greenway construction have been clearly demonstrated in the number of very successful schemes throughout Ireland.

In the Government Strategy, for the Future Development of National and Regional Greenways (2018), The Department of Transport, Tourism and Sport recognises the benefits that can arise from the further development of Greenways in Ireland, as a tourism product with significant potential to attract overseas visitors. The also recognise, for local communities the benefits for all users as an amenity for physical activity and a contributor to health and wellbeing.

The Boyneside Trail Committee when formed in 2011 had planned to develop a 17km greenway route from the Maiden Tower at Mornington to the Bru na Boinne Centre at Newgrange. We believed it would be a very welcome local amenity and assist in the development of tourism.

In 2014, the route from the Battle of the Boyne site to the Drogheda ramparts was completed, providing a 7km route from the town of Drogheda to a point 1.5km east to the Bru na Boinne Centre at Newgrange.

Since this time other local authorities have developed routes which could, in future link with this proposed route. Fingal County Council are actively developing the Fingal Coastal Way and recently obtained planning for the Broadmeadow Way from Malahide to Donabate.

Some bigger plans are looking to develop from Newbridge House at Donabate, along the coast, via Rush, Skerries, Ardgillan Castle, Balbriggan and then possibly on to Laytown and into the Boyne Valley at Mornington, Co Meath. Fingal County Council are actively promoting the Newbridge House to Newgrange plan.

Screenings on the Boardwalk

We note in the construction methodology, the visibility of people using the greenway from the bird habitats, will be mitigated through the use of boardwalk barrier screenings. We welcome this proposal. This will ensure any additional activity does not stress bird colonies or give rise to effects such as light flicker resulting from human movement.

With regard to dogs, the key risk here is, not birds seeing the dogs, but dogs seeing birds and barking or chasing after them. Any screening must be designed to mitigate this risk.

Consideration should be given to primarily protecting the bird habitats and secondly utility and amenity of the structure.

In designing screenings, it is key that the engineers consider high tides, flooding and high winds in their design and construction.

A secondary benefit of the development of the facility, is that it will create a definitive boundary between bird habitats and the general population.

We welcome the opportunity to make a submission on this planning application, and trust the Board will give serious consideration to our submission and grant conditioned permission for this proposal.

Yours Sincerely,



Boyneside Trail Committee