

An Bord Pleanála
64 Marlborough Street
Dublin 1
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07 September 2020

Dear Sirs,

AN BORD PLEANÁLA	
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ABP-	
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Re: Proposed Boyne Greenway Drogheda to Mornington, Co. Meath and Co. Louth

I welcome the opportunity to make a submission on the proposed Drogheda to Mornington Greenway as submitted to An Bord Pleanála by Meath County Council.

I am supportive of the proposal and requesting that An Bord Pleanála approve permission for this project to proceed as it represents essential infrastructure for this developed area and on balance is in accordance with the proper planning and development of the area.

My name is [REDACTED] and I have lived in Drogheda since 1995, I am also a landowner for part [REDACTED] of the route of the Boyne Greenway and as such have been provided with a notification of the current application by Meath County Council. I was also one of the original promoters of this proposal, an idea which developed out of the 2012 RTE Local Heroes campaign. The Local Heroes campaign focused on the town of Drogheda and what local people could do to reverse the decline in the economy, community and morale which stemmed from not only the previous years of economic difficulty but many years of neglect preceding the economic downturn.

I wish to re-affirm that, as an impacted landowner and as part of the community in the area that I am fully in support of the proposed development of the greenway.

The proposal for the greenway (previously called the Boyneside Trail) is an initiative born from the community. It gained momentum during the RTE local heroes campaign when the visiting experts exposed the neglect of the river, the lack of cycling infrastructure and confirmed the importance of river/riverside based activities.

The community support for this proposal can be clearly evidenced by the response to the non-statutory public consultation process which received a significantly greater number of submissions that ever received by Meath County Council and the submissions were in excess of 98% supportive. To receive a high number of negative submissions would not be unusual but the exceptional level of positive submissions, I would suggest, is unprecedented.

At the inception of this project, the original committee considered the advantages and challenges presented. As the project design developed the range of both altered slightly and we now see them as:

The identified advantages of the provision of the Boyne Greenway (see expanded discussion below)

- The Proposal will provide a world class Riverside Greenway for the local community and visitors to the region
- The proposal is part of national greenway and cycleways policies and is included in a number of national routes including the Newbridge-Newgrange proposal.
- The proposal reverses the historic neglect of the River Boyne and the Boyne Estuary.
- The proposal addresses, in part, the considerable dearth of safe and sustainable cycling and pedestrian facilities in the area.
- The proposal provides a sustainable mode of transport for the population of Laytown, Bettystown and Mornington (Circ. 15K) to the town of Drogheda and the public rail and bus networks and in reverse for the people of Drogheda to Mornington beach.
- The proposal provides a medium to allow the education of school children and the wider community on the importance of the local environment.
- The proposal Provides safe and sustainable pedestrian and cycling access to a number of schools in the area.
- The proposal will protect the estuary by providing a physical barrier to further encroachment and dumping into the estuary.
- The proposal will provide an amenity which will be accessible by all and positively improve on the physical and mental health of the population.
- The proposal will help sustain the tourism and hospitality industry in the area.
- The proposal will support the development of new tourism and hospitality industry in the area.

The identified challenges presented by the provision of the Boyne Greenway (see expanded discussion below)

- The proposal has the potential to impact on the adjacent SAC & SPA
- The proposal is in part located in a flood risk zone
- The proposal will impact on some private properties
- The proposal will bring additional people to the area
- Some people do not like change and development.

Looking in greater detail at the advantages,

World class Greenway

As part of the process the committee engaged with Engineer [REDACTED] author and greenway activist [REDACTED] and representatives of Mayo County Council all of whom were involved with the development of greenways in Ireland and internationally and they reiterated what we already believed, which was that if developed the Boyne Greenway would surpass any that have gone before. There reason for this was the diverse nature of the landscapes traversed (Marine, village, estuary, SAC, SPA, working port, large urban centre, river, canal, European historic centre of Oldbridge and the world heritage monument of Newgrange). This wealth and quality of existing collateral cannot be replicated anywhere else.

In the time since the initial concept for this project there has been a considerable level of development of greenways and trails and of interlinked routes nationally. The proposal was initially in the greater Dublin cycling network and has since also been include in the Newgrange to Newbridge proposal which is a joint initiative between Fingal and Meath county councils and is also on the Cobh to Carlingford proposal. The greenway activist [REDACTED] has proposed a vast network of routes across the country and the subject proposal is included in that also. This interlinked network, when developed, will encourage the promotion of Ireland as a destination for cycling and activity type holidays.



Returning to the river Boyne

One of the immediate observations made by the brand, tourism and economic experts brought in by the Local heroes campaign was that the town and the people had turned their back on the river Boyne and it was imperative that it be reversed. The development of a boardwalk and greenway was the obvious solution which was recommended and is now enshrined in the development plans for both Meath and Louth.

Sustainable infrastructure

The East Meath area has been one of the fastest growing areas for the past 10-15 years, unfortunately this growth has been predominantly residential developments without some of the essential linking infrastructure and amenity required to service such development, two of the identified deficits was cycling and pedestrian access to Drogheda which provides for the public transport hub, retail and entertainment requirements of the original and new residents, and safe cycling and pedestrian access to the schools in the area. These omissions have led to a significant and unsustainable reliance on the private car. The provision of a safe greenway as proposed will assist with a significant modal shift from the private car to cycling and walking.

Environment Education

It is a worldwide known fact that much of the damage we inflict on the environment is more to do with lack of education and understanding rather than intentional or wilful actions. The provision of the Boyne Greenway will allow the use of the facility by schools as an outdoor classroom to teach future generations of the importance and fragility of our environment and how their actions can impact in a positive or negative manner, it will also show the more mature users the impact discarded plastics in other areas is having on this important region and in doing so increase the pressure to improve how we care for our local environment.

Protecting the estuary

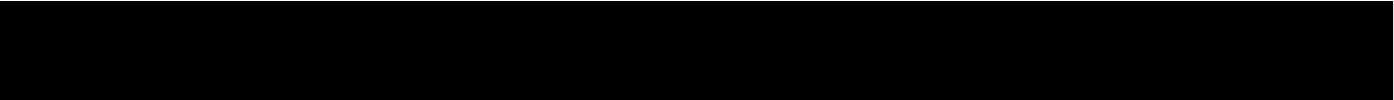
Historically there has been a considerable level of encroachment on the estuary through dumping and land reclamation. Even though the level of encroachment has significantly reduced it continues its slow march and has been difficult to police. The proposal to locate the boardwalk on the edge of the estuary creates a hard line which will effectively terminate this creep and protect the current extent of the estuary.

Physical and mental health

The need for an amenity to assist with strengthening the physical and mental health of the nation has been with us for some time but has been brought into sharp focus in the current Covid – 19 environment. The existing section of the greenway from Drogheda town centre to Oldbridge was very heavily used during the lockdown and was a lifesaver for many, but it was only available to some of the people, the continuation of the route to Mornington will open up this benefit to a much greater population.

Tourism & hospitality support

The development of a greenway has been demonstrated in all areas, both nationally and internationally to provide a significant boost to the local tourism and hospitality sector with a spin off boost to the local economy. The development of the proposed greenway will help sustain the existing tourism and hospitality sector and will also be a catalyst to the development of new enterprises in the sector. In the current covid climate and looking forward to the new reality, it is important that this type of development is implemented to address the needs of an enhanced level of home tourism in a safe outdoor space.



A review of the challenges

As noted above there were a number of challenges facing the proposal and I believe that the final design as proposed has addressed each of them to ensure that on balance it is justifiable to allow the project proceed. The challenges have been considered in greater detail as follows:

Impact on the SAC & SPA

The primary concern was that one of the most valuable assets of the proposal, the proximity to the SAC & SPA was also one of its biggest challenges. As European important sites it was necessary that impacts be assessed and designed out as far as possible. There are no absolutes in relation to impact, the very idea that man exists has its own impact, what has been considered is how that impact could be reduced to a minimum and where it cannot be eliminated it is balanced against the benefits.

The Boyne coast and estuary SAC includes the intertidal area of the river Boyne and the sand dunes on the coast. To protect this SAC the greenway location has been retained outside of the intertidal zone for the majority of the route and has been completely removed from the Dunes. There are number of areas where due to the proximity of the highwater mark to the road (ch. 2010 – ch. 2095, ch.3680 - ch. 3740, ch. 3840 – ch. 3860, ch. 4050 – ch. 4320) representing approximately 7% of the total 5867m route. In each of these locations the existing terrain is erosion protection rip rap or within the shipping turning area. Even though the qualifying plant species are not evident in these locations the route is on a raised boardwalk to minimise the impact on the terrain below.

The Boyne Estuary SPA has a defined target of no significant decrease in the range, timing and intensity of use of areas by the qualifying bird species. The proposed greenway has been maintained, in general, outside but adjacent to the defined area for the SPA. The extent of encroachment is the same as the SAC and due to the existing terrain in these affected areas they are not suitable feeding grounds. The disturbance of overwintering birds has been considered due to the proximity of the greenway and even though there is existing continuous vehicular and cycling traffic in these locations and the primary feeding points are a significant distance into the estuary, there is the possibility that increased walking and walking with dogs could cause a disturbance, for this reason it is proposed that in these locations the balustrade to the boardwalk on the river side should be imperforate up to 900mm above the deck to ensure that the birds will not be startled by the flickering between a walkers legs or by dogs barking, the provision of this imperforate balustrade will also have the additional beneficial result in a reduction of the possibility of the birds being startled by the existing levels of traffic on the adjacent road. Because of this additional benefit the provision of the greenway may result in a positive impact on the SPA or at the very least it can be seen not to cause a “Significant decrease in range timing or intensity of use by the birds”.

There may be some residual disturbance if persons stop to birdwatch or to point out the different species to their children but the negative impact of this will be more than compensated for by the following considerations:

- Through immersion of the community in the environment we will as a collective develop a greater respect for and wish to protect the environment.
- The provision of the greenway will allow the provision of spaces for outdoor classrooms where the local children can learn about the biodiversity first-hand and understand their responsibility to protect it.
- The provision of a greenway will allow the provision of hides in appropriate locations to facilitate the monitoring of bird numbers without disturbance of the birds
- The provision of a greenway will bring greater focus on the level of litter being washed through the estuary and will assist in a reduction in this type of antisocial behaviour upstream

- The development of the SAC and SPA was predominantly to provide an area for endangered overwintering birds, the level of activity (and possible disturbance) on the greenway between November and March will be significantly reduced from that expected during the summer months

Nationally and internationally it has been demonstrated that wildlife will over time become accustomed to changes in their environment. An initial disturbance, if any, to the birds by the installation and use of the greenway would be recovered as they became accustomed to its presence and use.

It should be noted that some of the bird numbers in this SPA have suffered a significant decline in the past when the Drogheda interceptor sewer was commissioned as it reduced the artificially elevated nutrient levels in the estuary, the numbers are returning to the natural balance.

If the board considers that the proposal may still impact to an unacceptable level then, on the basis that the proposal is a removable structure, a condition can be imposed that bird counts be carried out in the first 5 or 10 years of operation and if a "Significant decrease in range timing or intensity of use by the birds" is established then the promoters must remove or divert the offending section of greenway and monitor the return of the bird numbers.

Flood Risk

In general the proposed level of the greenway is above the 1:200 year tidal flood event for the river. In some areas, due to the levels of the adjacent road, it was more practical to adopt a lower level which may allow the structure to flood in an extreme event. This is an appropriate engineered solution as the materials and construction of the greenway is such that as the tide recedes the water will slowly ebb away and the structure will remain unaffected. Due to the slow nature of tidal events and the minimal potential flood depth there is no potential hazard to users of the greenway even in a 1:200 flood event.

Impact on private lands

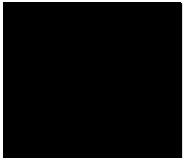
One of the difficulties of developing a modern greenway in a built up area is that it will impact on private properties. From ch 4730 to ch 5130, in order to provide a public road and the greenway the proposal will require the acquiring a strip of land in various ownerships which are currently in agricultural use, this should not cause a significant difficulty to the lands. From ch 5120 to ch 5220 there is a requirement to set back the boundary wall of private properties (4 No.) to varying degrees with up to 2.0m reduction in garden depth, from ch 5215 to ch 5475 it will be necessary to set back the boundary wall of the [REDACTED] development by up to 1.0m, this alteration does not impact on any individual dwellings in the development. From ch 5485 to ch 5590 there is an impact on 8 dwellings with a garden reduction varying from minimal to 1.5m.

In the case of impacts on private dwellings in most cases the existing gardens are significant and the reduction should not radically impact on the value of the residential property. Any measured negative impact can be balanced by the positive impact of the provision of the pedestrian and cycling facilities coupled with individual compensatory agreements.

The alignment of the route has been designed to minimise impacts on private dwellings and has been successful in that endeavour, if it is considered by the board that this minimise impact is unacceptable then it can be eliminated completely by localised reductions in the width of the proposed greenway from 4.0m wide down to 2 or 2.5m wide

Concern for change

A more embedded, and less vocalised in a formal forum, concern is the aversion to change and to encouraging additional people to visit the area. This could be understood in a remote area of the countryside, but in the subject area, where extensive development has already occurred and where



many of the people voicing that concern are living in houses provided by the development or in businesses supported by that development it is more difficult to understand. I am confident that when the greenway is developed, the same people will realise that their fears were unfounded and that the benefits accruing considerably outweigh any residual negative impacts.

Conclusion

Notwithstanding the benefits and challenges discussed above the level of community and business support has been evident to the promoters from the beginning and has been the driving force behind the campaign. The promoters sought funding for and delivered the initial design and feasibility. Due to the manner in which capital funding is allocated it was necessary to pass the responsibility for delivery over to the local authority however this has not lessened the community's resolve to ensure that this essential amenity and infrastructure is delivered.

The planning system, as defined in legislation is a holistic system which assesses all aspects of a proposal and its impacts in a positive and negative way on the area for which it has authority. As part of the process it must consider environmental, community, economic and heritage matters and in many cases assess the balance between these issues attempting to increase the positive whilst ensuring there is no significant negative impact on any one aspect. However, where there are significant positive aspects to a proposal then minor negative impacts to other elements may be acceptable. To this end, considering the exceptional positive aspects in relation to the health and wellbeing of the community, the economic benefits arising and the benefits in relation to heritage etc., a considered impact on the environment should not, unless it can be proven to be significantly detrimental to that environment, be used to prevent the project.

The planning authority has a responsibility, not only to prevent inappropriate development but also to facilitate and support essential development.

As noted above, the planning protection alone will not ensure protection of the biodiversity within the Boyne Estuary we also need regulation and policing. Regulation will be implemented if demanded by the community as a whole rather than a few specialists and policing is most effectively delivered through passive surveillance and community alerts. The provision of the greenway and the resulting increase in interest from the community at large will go a long way towards providing the required regulation and policing.

As the proposal is an essential development for the people of the area I ask that if the Bord are uncomfortable with any aspect of the proposal that they allow the designers modify or clarify as required in order that a positive decision can be delivered.

In summary, the proposal, will provide a fantastic asset to the local community, will provide essential infrastructure and will be in accordance with the proper planning and development of the area. Any potential negative impacts on the birdlife will be balanced and outweighed by the positive impacts to the wildlife accruing.

Yours sincerely

