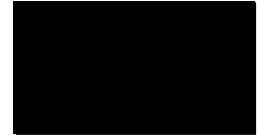


AN BORD PLEANALA

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Time: 11:19 By: hand



10/09/2020

An Bord Pleanala
64 Marlborough Street
Dublin 1
D01 V902

Objection to: Application No: APB-307652-20
Application by Meath County Council (MCC) for Construction of the Boyne Greenway Drogheda to Mornington, Co. Meath & Co. Louth (APB-307652-20)

Dear Sir/Madam,

I wish to object to the planning application by MCC for the Construction of the Boyne Greenway Drogheda to Mornington, Co. Meath & Co. Louth (APB-307652-20) being granted even with conditions, and make the following submission in support of my objection.

These submissions and objections are based on two main concerns:

- 1) The Health and Safety of the community involved, and the influx of people the proposed Greenway would bring in.**
- 2) The environmental impact the Greenway would have on the local community and on The Boyne Estuary Special Protection Area (SPA) for wild birds and The Special Coast and Estuary Area of Conservation (SAC)**

According to the Strategy for the Future Development of National and Regional Greenways July 2018. Prepared by the Department of Tourism, Transport and Sport "There is an excellent opportunity now to develop new Greenways in a way which can transform more rural areas around the country, provide a wonderful experience for visitors and locals, and contribute to the health of the nation". The greenways developed so far have demonstrated the potential of Greenways as economic contributors to rural communities through increased tourism. In addition, the benefits for the health and wellbeing of local communities through the use of Greenways as recreational amenities are significant. The challenge now is to ensure that future investment in Greenways is done in a way that delivers the greatest benefits for the areas in which they are located and for Ireland as a whole.

It has been proposed by MCC that a Greenway be constructed between Drogheda and Mornington as per application to on Bord Pleanala.

As a native who constantly visits the area, which is now considered to be composed of Mornington, Bettystown Laytown and Donacamey, this is a small land area that has seen an enormous growth in its population in recent years (2016 census >11,000) this has included the construction of houses as well as both national and secondary schools, to serve the growing needs of the area.

As a result this has overall impacted on the volume of traffic on the surrounding narrow country roads. These roads lead from inland ie Drogheda to the beautiful beaches on the east coast.

This proposed Greenway route will be adjacent to the R151 (Mornington Bridge to Tower Road) a busy narrow, regional road serving the area of Drogheda, Mornington, Bettystown, Laytown and Donacamey. On a daily basis, this road carries considerable traffic, being used by commuters using cars and buses, and farmers and businesses using large delivery trucks, tractors, vans and cars, as well as cyclists and pedestrians. This proposed Greenway, unlike other Greenways which might use unused rail lines or canal tow paths, intends to pass by numerous private residences, a housing estate and a busy shopping complex on this road, not in the least scenic or peaceful as would be the ethos of a Greenway.

The Greenway Plan – Drogheda to Mornington as per MCC application Ref. ABP-307652-20. As per proposal this would be a 4-metre-wide, 5.9 km long, on a public road, Greenway/pedestrian route running from Ship Street at Drogheda to the Tower Road/Crook Road junction at Mornington. This would mean that the Proposed Greenway would be 70% directly alongside a busy public road, and over 50% of this proposal would encroach on the European protected sites.

Nowhere in the planning documentation is there any mention of the number of people that the proposed Greenway would attract per day/year. What standards have been applied to the calculations regarding the width size of the areas allocated for walkers, cyclists and motorised vehicles?

This proposed Greenway route fails to enhance the environment and quality of life of the community/residents of Mornington/Tower Road/Crook Rd and the surrounding area. This Greenway would result in the community suffering significant disruption and negative impacts in their daily lives in numerous ways:

- 1) Difficulties for cars/tractors/delivery trucks etc, leaving or entering their driveways and properties**
- 2) The substantial increase in the volume of traffic doing the Greenway starting at Tower Road.**
- 3) The danger of cyclists/people/children walking in front of vehicles**
- 4) Access to bus stops and space for buses to pull in**
- 5) Added difficulties and danger for two buses to pass each other on the narrow, busy regional road**
- 6) Lack of public facilities**
- 7) Safety issues for people using the Greenway as proposed along an extremely busy road.**
- 8) Increased potential for accidents to happen, eg child slips from marked pathway and straight onto the busy road.**
- 9) Vandalism, nuisance and security concerns of the local community now totally overlooked by passers by.**
- 10) Loss of privacy to local community.**
- 11) increase in the noise level to the local community.**

My other objection to this proposed Greenway relates to the Environment impact on Estuary Special Protection Area (SPA) for wild birds and The Special Area of Conservation (SAC)

Whilst MCC employed and tasked DFBL, the Consulting Engineers, to devise a Greenway from Drogheda to Mornington that would lessen "...the ecological impact of the proposed cycle and pedestrian infrastructure on the existing Boyne Estuary Special Protection Area and the Boyne Coast and Estuary Special Area of Conservation, both during construction and long term during the operational stage". This Planning Application fails as the route choice along the R150/R151 encroaches into, rather than protects, the integrity of the SPA and SAC (European Sites).

This application presents a significant extra encroachment of human activity on to the wild and natural habitat found on the Boyne estuary. The only mitigation is to deny permission for this proposed development.

The Planning Application is being less than honest in that the Greenway route at Ref. A, Para 1.2 is described as 4.1km adjacent to the R150/R151 road and 1.8km away from the road, total 5.9km. Only at Ref. A, Para 2.3 do we see that the Greenway will 'overlap' for 2.4km into the SPA. These figures conflict with the table provided at Ref. A, Appendix A as this calculates to 2.1km within the SPA. I estimate a more accurate distance of encroachment by the Greenway into the SPA as can be seen from Annex A. (attached table) to be approx. 3.1km. I estimate over 50% of Greenway encroaches the SPA.

The maps/drawings to show how the Greenway encroaches into the SPA and SAC are at the Route Alignment Drawings where the length of the Greenway is indicated every 10 metres. However, there are no outlines of the SPA and SAC (European Sites) on these drawings. Is there a reason MCC have not included this important information on its documents?

The SAC/ SPA dune system at Mornington unlike other dune systems in Ireland (Co. Clare) is not protected by fencing and/or other means. This is an area that has been enjoyed by locals and visitors for years. There are no parking, or any other facilities at the Mornington end of the Greenway unlike the start of the proposed greenway where there is an Iarnrod Eireann (Irish Rail) pay parking facility at the viaduct near Ship St in Drogheda. The Resident Engineer, MCC, confirmed that there is no proposal to upgrade parking at Mornington as part of this project. The planning application includes a derisory bench and 4 bicycle parking stands at the end of the proposed Greenway at the edge of the SAC at Mornington.

During the COVID-19 outbreak Ireland has seen a major increase from stay-at-home tourism, thus Greenways have increased in their usage. Considering that many people per day could use the Greenway and because this is a very congested and ugly route, people will be encouraged instead to spend their time at the dunes and sea. This will result in people trampling across the dunes at Mornington(SAC and SPA) with their bicycles, dogs, etc, thereby doing untold damage to the soft coastal dunes. This unrestricted and increased access to the dune system will result in irreparable damage to this delicate ecosystem and to coastal erosion. It would appear that MCC has little regard for the European protected sites SAC and SPA and is willing to sacrifice them to get this section of the Greenway through construction

and into operation. Proper planning would dictate that the SAC and SPA are first fully protected and managed before any Greenway is planned and construction undertaken.

The planning application outlines the potential long-term impact and probable method of spread of high-risk invasive plant species like the Japanese knotweed that has been discovered on the proposed Greenway route. The plan does not specify mitigation measures required to avoid these significant impacts.

The most disturbing influences to wild birds in a SPA are walkers, joggers, dogs off leash and cyclists. As the proposed Greenway encourages all of the above-mentioned influences, MCC cannot guarantee that the users of the Greenway will NOT have a significant impact the integrity of the SPA.

The mitigation measures proposed in the planning application fail profoundly to protect the integrity of the SPA/SAC as:

Disturbance will occur to the wintering birds as they arrive in August / September during both the construction and operational phases of the proposed Greenway.

Limiting construction work to daylight hours only is not sufficient as birds feeding on the intertidal mudflats do so in front of the incoming tide irrespective of whether it is day or night.

Camouflage netting of the Greenway during construction will do nothing to minimise noise disturbance to the birds on the SPA.

The screening proposed to counter the impact from dogs and noise transfer to the birds and other species in the SPA/SAC is insufficient and lacking in detail. If the Greenway was routed away from the SPA/SAC then such screening may not be required.

The lighting proposed for the Greenway is insufficient and lacking in detail. If the Greenway was routed away from the SPA/SAC then adequate and proper lighting that would make the Greenway safe for people could be used.

The wintering birds also use the lands adjacent to the Estuary SPA/SAC. People, cyclists and animals off leash using the proposed Greenway will disturb the birds.

No mitigation measures are proposed to cater for additional pollution of the SPA/SAC by users of the Greenway.

The proposed Greenway route will pass through a non rural area as it nears Ship Street, this area will not make for pleasurable walking or cycling and possibly be a hazard to the numerous part takers of the proposed Greenway. Naturally the views as one nears Drogheda become those of unsightly industrial sites.

The route of the Greenway as proposed by Meath Co Co (MCC) does not stand up to the planning criteria of:

- proper planning and development of the area between Drogheda and Mornington;
- the probable significant adverse effects of the proposed Greenway on the environment and it's inhabitants; and
- the likely significant adverse effects of the proposed Greenway on the Boyne Estuary Special Protection Area and the Boyne Coast and Estuary Special Area of Conservation (European sites).

This planning application should be refused and returned to MCC

Yours sincerely,

