



The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

5th September, 2020

AN BORD PLEANÁLA
LDG- 030663-20
ABP- _____
10 SEP 2020
Fee: € _____ Type: _____
Time: 12:30 By: Hanel

RE: **Construction of Boyne Greenway Drogheda to Mornington, Co. Meath
& Co. Louth (APB-307652-20)**

Dear Sir/Madam,

I wish to object to the proposed Boyne Greenway, Drogheda to Mornington on the following basis. But first I wish to refer to the following.

NATIONAL GREENWAY STRATEGY.

According to the National Greenway Strategy a greenway should be developed in an integrated manner, which enhances both the environment and quality of life of the surrounding area. If this is the criteria for a Greenway, then the following issues would suggest that this proposed development does not meet this standard.

PROPOSED ROUTE

The proposed greenway is 5.9 k.m. in length, starting in Drogheda and finishing on the Crook Road in Mornington Village. 4.1 k.m. or 70 % is directly alongside R151 the main road into and out of Drogheda. This completely diminishes the concept of integration with the natural environment. The route also passes through an area of unsightly industrial activity, including

a gas storage plant. [REDACTED] station and a Sewerage Treatment Plant. The [REDACTED] site has been identified as a site which poses potential risk to public safety by reason of the nature of the substance handled as defined by the Drogheda Borough Council Plan , 2011 to 2017. A designated zone of impact has been established around it. The Greenway route as planned, runs through [REDACTED] car park.

Meath County Council are also aware of the asbestos dump at Stewarts Bank in the SPA circa 2003, as discovered by Drogheda Port. This has never been removed and the proposed greenway goes through Stewarts Bank. I fail to see how a proposed Greenway going through an asbestos dump is not considered a health and safety issue for the construction workers and the greenway users.

I wish to refer to the Boyne Greenway Drogheda to Mornington, Transportation (Route Option Assessment Report) section 1.4.22.

In particular the Plan proposed an East Coast Trail in County Meath (identified in Figure 1.2 as Route M1) noting the following:

“There has been no route selection study so far for this national route along the coastal section of county Meath. It should follow the River Boyne Estuary eastwards from Drogheda to Mornington, where it can turn south to Bettystown. There are environmental sensitivities along the estuary and careful assessment will be required for the selected route, which should be segregated from the R151 regional road that carries considerable traffic between Drogheda and the satellite villages on the coast” (1 Attached)

Please note according to the EcIA Report July 2020, 1.2.2, “ there is approximately 4.1 km of the proposed greenway to be constructed alongside the road or very close to the road edge”. (2 Attached)

Under the same section, point E Subsection 1, “ no engineered barriers are proposed. This will minimise any visual impact both from the road or estuary side”. (3 Attached)

All of the above will create serious safety concerns for the Greenway user. Please also note that since January 2019 six more housing developments have commenced within the local area with approximately 400 or more houses in the village of Mornington, accessing the R151 and therefore increasing intensification of this regional road.

DESIGN ISSUES.

The proposed Greenway for most of its route is a four-metre-wide roadway, with no amenities at its starting or finishing point. This will lead to traffic issues in and around the Mornington Village area. There is no public infrastructure along the proposed route and none are included in the plan. There are no safety measures built into the proposed route. All cars overtaken another car on the R151 heading into Drogheda will be as close as one metre away from the users of the Greenway. Residents who are losing part of their properties will exist their properties straight out on to the Greenway.

I would like to refer to the EcIA Report July 2020 , which states on page 29 “ This section is the final section on the Boyne Greenway, where the construction method will be of mixed or shared street facilities on Tower Road. This is a local /residential road, with very light traffic flows and slow traffic speeds, suitable for shared facilities. (Attached 4)

The current speed limit on this section of the Road is 60 km Please note that in excess of 150 bus journeys take place up and down the Tower Road every day, excluding school buses, due to the significant service enhancement between Drogheda and Laytown, which commenced August 11th 2019. (Attached 5) On average two cars will pass this stretch of road every 30 seconds, which is 240 cars every hour. The road is more congested during the summer months as people try to access the beach in Mornington and Bettystown.

The design does not take into account this level of traffic and there is no traffic calming measure included in the plan.

LOSS OF PRIVATE LANDS

A number of houses on the Tower Road, Mornington, will lose up to four metres of their front garden and the movement of the Boundary wall in Mornington Court housing estate will result in loss of green open space currently used as a safe play area for children.

I can find no other example of a greenway going through other peoples front gardens, or a children’s play area in the whole of Ireland and fail to see how this complies with the National Greenway Strategy.

Referring again to the Boyne Greenway Drogheda to Mornington, Transportation (Route Option Assessment Report) section 1.4.2

“ The Strategy sets out the importance of early and widespread consultation with landowners and communities along and adjacent to the proposed Greenway routes. The Strategy also emphasises the need to minimise the impact on landholding by minimising severance as far as possible and providing accommodation works such as fencing and underpasses where required. The Strategy also sets out the importance of access to Scenery and things to See and Do in order to attract tourists.” (Attached 6)

Please note that none of the above was afforded to the residence of Tower Road , who are losing their property and has already been referred to Point 1.4.2 Route Option Assessment Report, this Greenway for the majority of its route is seriously short of scenery and “things to See and Do”

SPECIAL PROTECTION AREA.

If major issues with the proposed route design and loss of property are not enough then I would like to also point out that over 50% of this proposed greenway’s length, will encroach on the Boyne Estuary Special Protection Area (SPA) for wild birds and the Special Area of Conservation (SAC) which is a European Protected site and will lead to significantly damaging impact on biodiversity , birdlife and wildlife.

The proposed Greenway is 5.9 km. in length, 2.4 km of this greenway will be within the SPA/SAC area, with approximately 700 metres of this within the intertidal zone. Therefore, the best part of 41% of this greenway goes through a SPA. While we note that construction work will be carried out at certain times of the year to avoid disturbance, there is a fundamental flaw in the report in that they are basing their assumptions on the report that is two years old and the bird counts took place on a total of twelve days in March 2018.

“The Boyne Estuary is the second most important ornithological importance for wintering waterfowl, with black-tailed Godwit *Limosa Limosa* occurring in internationally important numbers and nine other species having populations of national importance. Of particular significance is three species that regularly occur , Golden Plover, *Pluvialis apricaria*, Bar-tailed Godwit and Little Tern *Sterna albifrons* are listed on Annex 1 of the EU Birds Directive. (EcIA 3.1.1.2) (Attached 7)

The bird count in March would not take into account the above statement since a number of these species arrive in late August/September and are gone by March,

The proposed Boardwalk to compensate disturbance to the feeding birds, is suggesting no lighting in these areas on the assumption that the boardwalk will only be used during daylight to avoid any disturbance to the Birds. It is difficult to see that this boardwalk will not be used on a nightly basis considering the population in the area. So therefore no lighting in certain areas will create personnel security issues and lead to anti social behaviour. As was the case at Oldbridge when the boardwalk on the Drogheda Canal was set on fire in July 2018.



Portion off the fire damaged Boyneside Trail pathway. 26th July, 2018

Due to the fact that this study was carried out in 2018, it does not take into account that there is now Otter activity within the area and an nursery of Harbour seals have also taken up residence within the SPA and will be affected by the increase in human traffic.

We also notice that the last count of Curlew (*Numenius Arguata*) was carried out 4th December 2017 , since then there has been a marked increase in the Curlew using slob lands as a feeding area and they definitely will be disturbed by pedestrian activity .

The Greenway is designed to facilitate up to 1,500 people a day at peak times. It is beyond logic to suggest that such numbers will have no negative impact on a SAC/SPA area. If Meath County Council are so confident that no negative impact will take place , why are they proposing an Ecological Clerk of Works to monitor the situation for up to three years after completion. What will Meath County Council do if the ECOW reports damage to the SAC/SPA? Their only option then would be to close off the greenway and write off the cost as a complete waste of public funds.

We wish to thank An Bord Pleanála, very much for the opportunity to express our opinions and hope they will be taken into account in your decision-making process.

