

AN BORD PLEANÁLA
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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,

I am writing to you with the objective of supporting and campaigning for a 17km cycleway from the Maiden Tower at Mornington, Co Meath to the Bru na Boinne, Interpretation Centre at Newgrange, Co Meath.

I very much 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 the Boyneside trail committee in a very fair and balanced way.

As a resident of the [REDACTED] for the entirety of my life. I am 100% in support of this initiative. In my view it is an essential project that is a need and not a want for the local community. 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.

As well as opening up the spectacular beauty of the river Boyne to the local populace providing an essential amenity which will aid with the physical and mental health and over all well-being of the people who use the walkway it also provides a safe environment to travel via foot and bicycle that does not currently exist. The current road safety for travelling on foot or by bicycle has deteriorated drastically as the population size and traffic levels has increased. The walkway will "kill two birds with one stone" providing an excellent amenity and safe passage in one.

The facts and statistics support this point of view:

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 casualties.

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 Donacarney and Bettystown, and witness first hand, the lack of pedestrian and cycleway infrastructure. This is despite and 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

Currently the following schools are being planned / constructed / expanded

Gael Scoil, Mill Road recently completed in 2019 primary school - 400 pupils

Temporary newly established secondary school (Mill Road) installed currently 120 pupils – likely to grow to 700. This will be a permanent site, located adjacent to the proposed Greenway.

This is on top of existing schools **Grammar School / Le Cheile pupils**

In addition to the population growth there has been a significant increase in the number of new schools and school extensions.

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 my 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. They also recognise, for local communities the benefits for all users as an amenity for physical activity and a contributor to health and wellbeing.

When the initial proposal for this project was made by 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. It was believed it would be a very welcome local amenity and assist in the development of tourism.

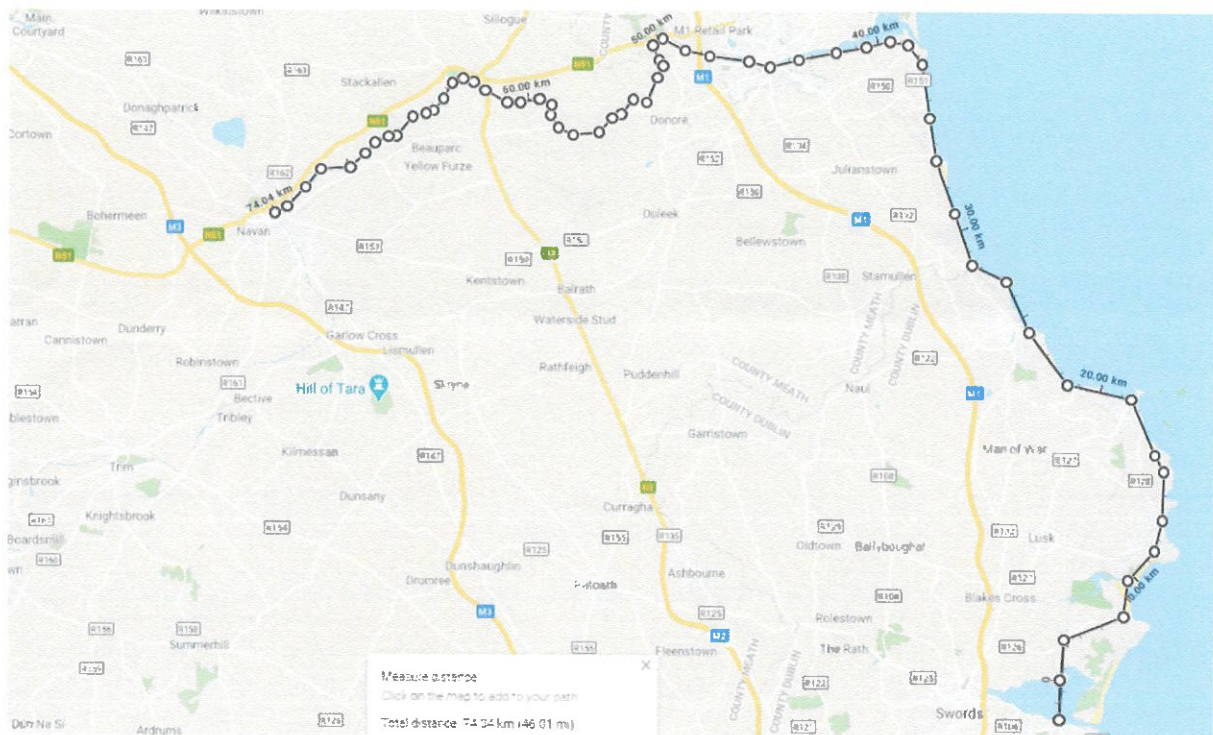
In 2014, the route from the Battle of the Boyne site to the Drogheda ramparts was completed, providing a 7km route from the town of Drogheda to a point 1.5km east to the Bru na Boinne Centre at Newgrange.

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.

Meath County Council are also actively progressing plans and design work for the route from the Battle of the Boyne site at Oldbridge to Slane and Navan, Co Meath.

This could potentially lead to a connected route of 75km.



Residential Amenity

Over the 9 years of campaigning on this project many iterations of a proposed route were reviewed and assessed. These were initially proposed in a feasibility study the Boyneside Trail Committee conducted in 20XX (we attach a copy for reference).

These routes were discussed at numerous public consultations held during this time, by the Committee Public Representatives and latterly Meath County Council.

Arising from these public consultations, routes through residential areas such as the Crook Road were excluded.

On balance, given the environmental constraints of the area, the optimal route has been chosen. A number of concerns were raised during the public consultation process. It is my view, that these concerns have been addressed in full and the route has been appropriately modified.

Flooding Risks

Based on Flood Risk Management Guidelines issued by OPW 2009, local transport infrastructure including non residential lands used for leisure and holidays can be considered "less vulnerable development".

The Greenway is designed not to have any negative impact during flooding events. The structure will not increase or decrease the flooding risk associated with nearby roads or property.

Recently funding was granted of €145,000 for the elevation of some sections of the R151, prone to flooding.

Screenings on the Boardwalk

I would also like to 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. I 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.

I 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.

