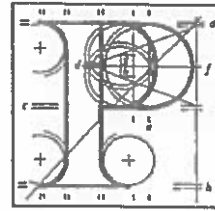


053584

Our Case Number: ABP-307652-20



An
Bord
Pleanála

Date: 19th May 2022

Re: Construction of the Boyne Greenway, pedestrian and cycleway linking Drogheda Town in Co. Louth to Mornington Village in Co. Meath
Townlands at Ship Street in Drogheda, Co. Louth to Mornington Village in Co. Meath

Dear Sir,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it with or without modifications.

If you have any queries in relation to the matter, please contact the undersigned officer of the Board.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Kieran Somers
Executive Officer
Direct Line: 01-873 7250

AA02

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

LDG-Q535P4-22.

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
17 MAY 2022	
Fee: €	Type: _____
Time: _____	By: _____

15/05/2022.

Re: Construction of the Boyne Greenway Drogheda to Mornington, Co. Meath & Co Louth"
AN BORD PLEANÁLA REF ABP-307652-20.

Dear Sir/Madam,

With reference to the above, I would like to make two short observations:

- 1) Herewith you will find enclosed some documents left at our door, signed "Concerned Mornington Residents". I would like to put it on record that whoever this group/body is, and I do not know who they are, they cannot claim to represent the opinion of all people in the Mornington area. My name is below, my address is above, and I am not one of this group.
- 2) I would like to repeat my general support for this project, we need more of the same. Please do take into account though, as I have observed previously, that the R150/151 road will have a lot of raised ramps/crossings. These must be passable for emergency vehicles on the only road we have to Drogheda. A few minutes can make a great difference with certain illnesses, so please do not do anything to impede the response time of emergency vehicles.

Yours sincerely

Boyne Greenway Drogheda to Mornington, Co Meath

In November 2020, An Bord Pleanála (ABP) issued a detailed letter to Meath County Council (MCC) Requesting Further Information on the Boyne Greenway – Drogheda to Mornington

Meath County Council responded in March 2022 and their response and relevant documents are available to view and download at

<https://www.meath.ie/consultations/boyne-greenway-public-consultation-significant-further-information>

Anyone wishing to make a submissions and/or observations in relation to that information can do so free of charge to An Bord Pleanála.

Submissions and/or observations must be received no later than 5.30 p.m. on the 20th May 2022 at:

An Bord Pleanála, 64 Marlborough St, Dublin 1, D01 V902

Please mark the front of the envelope with the following project name:

“Construction of the Boyne Greenway Drogheda to Mornington, Co. Meath & Co. Louth” AN BORD PLEANÁLA REF ABP-307652-20

Below are some of the key points noted from the Further Information Documentation submitted to ABP by MCC

The proposed route for the Boyne Greenway Drogheda to Mornington remains the same, there is no material difference and the extent of the Greenway remains unchanged.

As before the route extends from east of Drogheda (Ship St) to the coast at Mornington at Tower Cross junction, Mornington. Although it is noted approx. 215m of Tower Road is included within the proposed scheme extents. The proposed route is approx. 5.9kilometres in length with approx. 4.1 km or 70% of the route directly alongside the Regional Road R150/151 and approx.1.8km slightly away from the route of the road.

A significant portion of the route falls within the Boyne Estuary Special Protection area (SPA) and Special Area of Conservation (SAC)

Boyne SPA – designated on account of its internationally important populations of waterbirds, notably wintering wader populations and Little Tern

SAC - This European site includes intertidal sand and mudflats, saltmarshes, marginal grassland, and includes Mornington and Baltray sand dune system. It is of particular importance as feeding grounds for wildfowl and waders.

Ireland's SAC's are part of the Natura 2000 network of European wide protected sites

The routing and construction of a Greenway through a European designated site should be avoided as it will have an adverse effect on the integrity of the designated site. We strongly contend that this Greenway proposal should not proceed (along its current route), in order to protect the existence, integrity and safe guard the future of these designated European sites.

Contextual Information -Application for approval

An Bord Pleanala (ABP) have indicated they will judge this application on the likely effects on the environment, and the exclusion of adverse effects on site integrity (SAC & SPA)

Proposed mitigation measures include:

- (a) screening (fencing and soft landscaping) to reduce disturbance to birds and
- (b) the provision of information signage to highlight the importance and sensitivities of the European sites to visitors.
- (c) Appointment of an Ecologist to monitor dune habitat

These measures are inadequate, ineffective and are not suitable to offset the threat to biodiversity, birdlife and wildlife.

Potential effects on Boyne Estuary Protection Area and Special Area of Conservation

- Increase in numbers visiting /using/frequenting the SAC and SPA –
- increased numbers straying into ecologically sensitive areas
- Indirect and direct habitat loss
- Disturbance of Wintering Waterbirds Population
- Disturbance of nesting birds
- Degradation of embryonic shifting dunes
- Loss of Biodiversity
- Climate Change

Biodiversity – overall net loss. The proposed Greenway will result in the removal of 160m of hedgerows and 291m of treeline with an overall estimate removal of 17% of existing vegetation along the route. Landowners/ Residents in Mornington (and in Drogheda) will lose portions of their plots, fencing, boundary walls and/or gardens including well established mature hedgerows, trees – all **natural habitats**. A consequence of the proposed route will remove the existing boundary wall in Mornington Court (and see it rebuilt further within the estate boundary) resulting in loss of open green space currently being used as a safe play area for children.

The proposed Greenway is a **4 metre wide roadway** - intended for pedestrians, cyclists, non-motorised users, joggers, dog walkers, families with buggies etc – and MCC maintenance vehicles

Predicted Users of Greenway

MCC having assessed similar schemes including Waterford Greenway, estimates Average Daily Trips on the Boyne Greenway of between 900-1000 users a day, while in Peak season this number could rise to 1,200 – 1,300 users a day. That is a significant number of people visiting the area each day and raises issues in relation to **Safety/ Security/ Nuisance/ Noise pollution/ Litter** concerns.

Residents on Tower Rd and Crook Rd will see an increased volume of movements from vulnerable road users, pedestrians, dog walkers, families with young children, cyclists, electric bikes, mobility impaired users, scooters thus resulting in increased conflicting traffic activity. For example, potential safety conflicts between Greenway users and residents attempting to exit/enter their property – with multiple instances of said conflicting movements occurring in close proximity to each other. The latest designs still do not include a safety margin between private accesses and proposed infrastructure.

Roads/Traffic/Parking

“There is no car parking provided and it is envisaged most users will come by train, bus or from Drogheda (or Mornington & Laytown) to use the facility” source Boyne Greenway Drogheda to Mornington, Request for Further Information Report.

MCC does not intend to provide any new car parking facilities in Mornington or Drogheda. No assessment of the capacity (existing or future) and suitability (i.e. take bikes on board a bus etc.) of existing public transport services to cater for the predicated Greenway users to the local area has been undertaken. Connecting to and accessing the Greenway will be difficult for many. Mornington's nearest train station is Laytown, a distance of 5.6km and a “leisurely walking” time of approx. 1hr 9mins.

Furthermore, it is MCC contention that traffic impacts on the local road network are not worthy of assessment.

The proposed Greenway will result in uncontrolled parking, loss of privacy & the increased likelihood /potential of accidents/incidents occurring.

(articles in Drogheda Independent)

Meath County Council inform us that they will not provide parking facilities at either end of the Greenway. **Thus, Greenway users will be forced to park in the dunes, on the roadway or in local housing estates.** The proposed greenway will end at Tower Cross junction with a ‘Shared Space’ leading to Crook Road bridge encouraging easy access to the SAC sand-dunes habitat (Natura 2000) site. The proximity of the Greenway to the Special Area of Conservation will lead to increased use by pedestrians, cyclists, families (walking, picnics, dog walking) which in turn will result in habitat loss, degradation and disturbance to nesting birds.

It raises the potential for adverse impacts on the integrity of this European site. MCC proposed mitigation measures, i.e. Information signage will not be

sufficient to deter pedestrians, dogwalkers, cyclists and families from traversing the dunes and damaging the dune habitat.

Amenities/Facilities

There is a distinct lack of public infrastructure along the proposed route - no dedicated amenities/facilities/no rest/seating areas and no toilet facilities are provided (nor do Meath County Council intend providing same). Nor would any amenities be provided at either end of the scheme. This puts the health and safety of users at risk. See Request for Further Information Report which cites MCC's response to above.

Summary

The concept of a greenway/cycle/walking route between Mornington and Drogheda is commendable but the proposed route and design which ABP are considering is unsuitable and comes at too high a cost to our fragile environment, SPA & SAC (European Protected Sites) and to our local community. **For Mornington Court, and Tower Rd Residents, please note that points raised in your previous submission i.e. loss of land, gardens/green area are still relevant, so do add/integrate those points into your submission.**

Concerned Mornington Residents

13/05/2022

It is most important that we all write to An Bord Pleanála. You Must Quote Ref: ABP-307652-20

You can Leave your completed Submission at:
by 5:00PM on Thursday 19th May

Thank you.

Address

Date: ..May 2022

An Bord Pleanála,
64 Marlborough St,
Dublin 1,
D01 V902

Construction of the Boyne Greenway Drogheda to Mornington, Co. Meath & Co. Louth

AN BORD PLEANÁLA REF ABP-307652-20

To whom it may concern,

In September 2020 I submitted my observations in relation to the above-mentioned proposed development i.e Construction of the Boyne Greenway.

I had fundamental concerns in relation to the proposed route, it's design, construction and alignment through the Boyne Estuary Special Protection Area (SPA) and Special Area of Conservation (SAC).

I hope ABP have considered these concerns in full. MCC's Further Information Submission has not addressed the concerns raised in my original observations.

I wish to make the following observations and submissions with regard to the most recent documents submitted as part of MCC's Further Information Submission

I am a resident of Mornington/ East Meath and would make the following key observations:

1. The routing and construction of a Greenway through a European designated site -SPA and SAC should be avoided as it will have an adverse effect on the integrity of the designated site. Furthermore, proposed Mitigation Measures by MCC do not address the issue.

3. Poor connectivity and accessibility to proposed Greenway – it is envisaged users will access by train or bus. No assessment has been made of the capacity and suitability of existing public transport systems to cater for the predicted Greenway users to the local area.

5. No traffic assessment

6 No car parking facilities are provided along nor at either end of the proposed Greenway. This will result in uncontrolled parking on the roadway, in local housing estates and in the dunes area.

7. The proximity of the proposed Greenway to the SAC sand dune system at Tower Cross/Crook Rd bridge will lead to increased use by pedestrians, cyclists, families, dog walkers which in turn will result in habitat loss, disturbance to nesting birds and degradation of sand dunes.

8. There is a lack of public infrastructure along the proposed route (nor do MCC intend providing same) – no amenities/facilities/no rest areas/seating area or toilet facilities

9. Road Safety -the increase in pedestrian traffic (Greenway users) and associated vehicular traffic will increase the likelihood of accidents and incidents occurring – e.g. potential safety conflicts occurring between Greenway users and residents attempting to exit/enter their property

12. No safety margin between private accesses and proposed Greenway

13. Significant Loss of Biodiversity/Natural Habitat –

Acquisition / loss of private lands and mature gardens

removal of sections of existing green open space in Mornington Court

The concept of a greenway route between Mornington and Drogheda has some merit but the proposed route and design which ABP are considering is unsuitable and comes at too high a cost to our fragile environment, SPA & SAC (European Protected Sites) and to our local community. Fighting climate change is more than just providing new sustainable infrastructure, of paramount importance is the protection, preservation and conservation of our limited environmentally important sites. The proposed Greenway will negatively affect the SPA and SAC and proposed mitigation measures will not offset this impact and as such this proposal should be refused in its entirety by ABP.

Signed _____