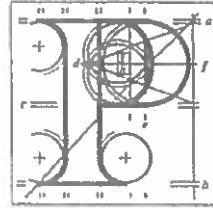


033586

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 / Madam,

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
Glaos Áitíúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

ABP-0525PB-22

May 15th 2022

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

To whom it may concern

I am writing to you today to object to the plans for the above Greenway to go ahead. I recognise we are at the final stages of your decision making and are hoping that you will listen to us from a local perspective having lived in this area of outstanding beauty for the past 24 yrs. We have witnessed change in that time and watched birdlife decrease, traffic increase and general pollution in the area grow. We are not objecting to progressing of society rather protecting what we have left. The idea of placing the busiest of greenways across a SPA makes no sense to us when there are fields inland which could also gain access to the beach at Mornington. We ourselves cannot currently walk safely to a shop as there are not even regular connecting footpaths throughout the village.

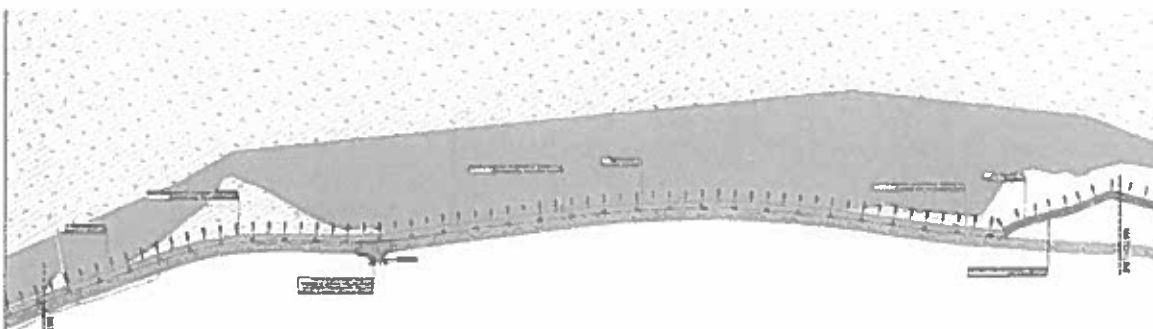
Our main objections are the following

Likely Effects on the Environment and Consequences.

Wildlife - The site is a Special Protection Area (SPA) under the E.U. Birds Directive, of special conservation interest for the following species: Shelduck, Curlew, Oystercatcher, Golden Plover, Grey Plover, Lapwing, Knot, Sanderling, Black-tailed Godwit, Redshank, Turnstone and Little Tern. The E.U. Birds Directive pays attention to wetlands and, as these form part of this SPA, the site and its associated water birds are of special conservation interest for Wetland & Water birds. <https://www.npws.ie/sites/default/files/protected-sites/synopsis/SY004080.pdf>. As you will read in this report there are high numbers in each of these rare breeds and these have not been considered adequately in the NIS report. I would challenge the results of this report and go as far as to say they are incorrect in their suggestions. In answer to the below this has not been adequately dealt with and no reassurances provided. The illustration on the drawing also shows the greenway interfering in the space of the SPA.

We Challenge the statement;

To note, Figures 4.7 to 4.11 in the Natura Impact Statement (NIS) report, issued as part of the planning package, illustrates the habitats within a 50m buffer of the proposed Greenway, which includes the SACs & SPA.



We see that a request was asked for a NIS report but we would challenge how this was carried out as neighbours and ourselves witnessed no bird hide was used and no reference to the Curlew or seasonal Breeding Geese was posted of which there are many.

In particular we also noticed the link below which is misleading.

Boyneside Camping Ltd is listed as INCOMPLETE initially and secondly as Conditional however

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
18 MAY 2022	
Fee: €	_____ Type: _____
Time:	_____ By: <u>reg ppst</u>

An Bord Plenala refused planning permission for a change of use of the golfing range at the above site Order No. 302948-18 Planning Reference LB180961. The main reason cited was protection of the SPA and also a flood plain which sits alongside the greenway. SO in essence what the report suggests is not true as a large site dedicated to tourism (camping & Caravanning) is constantly being revisited by MCC (recently a Animal Hospital has been opened on the site and we have also challenged this with MCC as building works commenced on a site An Bord Plenala stated building would never be allowed) Our concerns are that both these projects are directly linked and will go ahead regardless of An Bord Plenala and the area highlighted below will be one large development within centimetres and not meters of a persevered land area . The reference throughout the report of 50 metres is unfounded and needs more clarity. Our home sits 20 metres from all bird wildlife and nesting and foraging happens on a daily basis in front of our eyes. Having 1500 people and or bicycles passing the area on a daily basis will have a profound effect on their habitat .

5.5.1. Assessment of in-combination effects the potential for in-combination effects was assessed by examining the projects and plans outlined above. No significant projects of a similar nature or scale, specifically those that would be likely to attract additional visitors or tourists to the area and/or those that would be likely to impact the relevant European sites through direct habitat loss, fragmentation or disturbance, indirect terrestrial or aquatic habitat loss or degradation, or indirect/ex-situ disturbance or displacement of animal species and which could contribute to LSE where identified. The planning applications identified in Table 5.4 are generally small-scale developments, which also do not directly impact the estuarine or riverine environments of the relevant European sites or their associated SCIs/QIs. Based on the geographical distance between the respective projects and their nature, any cumulative impact that could contribute to LSE with the proposed development is considered highly unlikely. Whilst it is understood that additional greenway projects and improvements to the existing

Inis Environmental Consultants Ltd.				Natura Impact Statement Boyne Greenway: Drogheda to Mornington					
File Number	Application Status	Decision Due Date	Decision Date	Decision Code	Received Date	Applicant Name	Development Address	Development Description	Local Authority Name
LB180899	Incomplete Application	N/A	N/A	N/A	10/08/2018	Boyneside Camping Ltd.	Coast Road Mornington County Meath	Change of use from golf driving range permitted under planning reference SA/40248 to Touring Campsite	Meath Co. Co.
LB18091	Appealed	17/10/2018	16/10/2018	Conditional	23/08/2018	Boyneside Camping Ltd.	Coast Road Mornington County Meath	Change of use from golf driving range permitted under planning reference SA/40248 to Touring Campsite.	Meath Co. Co.

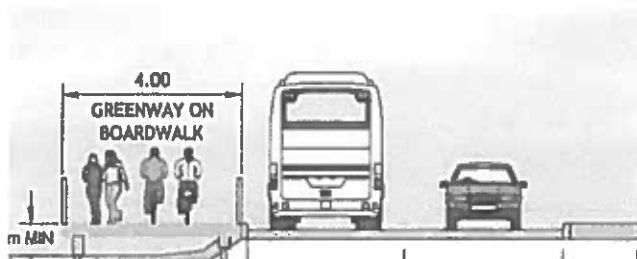
FLOODING - with reference to Appendix C - Stage 1 Road Safety Audit

Boyne Greenway -Stage 1 RSA (PDF, 1.70 mb)

3.5 Problem LOCATION General, possibility of flooding.

PROBLEM; It was observed during the site visit that there are warning signs that some areas are prone to flooding. There is a risk that some users of the greenway may not know where to walk/cycle if the area is flooded. This could lead them to enter the carriageway or fall in areas where they cannot see trip hazards due to flooding. It is unclear if allowance has been made for recent extreme rainfall events combined with high tides and the possible implications of climate change.

RECOMMENDATION It is recommended *where possible* the levels of the greenway should be above flood levels and that a regime of warning users of potential flooding be devised at detailed design stage.



RECOMMENDATION
It is recommended that the railing of the boardwalk be set back further from the edge of carriageway.

Our Concern of the above

I object to the solution provided by MCC

If the level of the greenway is to be above flood levels none of the detailed drawings give us evidence of how high the greenway will be above the estuary or how they are intending to raise the overall road height. This is contradictory and confusing if you look at the above drawings neither will cope with winter high tides and show no suggesting of the main road being raised.

Visual Impact - we have grave concern as to the way this project will visually impact the beauty of the estuary; having not only large lumps of metal and timber crossing a SPA but also its maintenance over its lifetime . There are not adequate illustrations of how the greenway will visually look as it carves through the SPA. We note that there is vandalism on other greenways in Drogheda. With increased crime and attacks also a concern.

We trust An Bord Plenala will make the right decision for the Island of Ireland and still hope that MCC uphold your decision with regards to Boyneside Camping Ltd. As to date they have ignored and allowed Building and licence be granted for an Animal Hospital. We are told that it is simpler for MCC to approve a change of use this way in a few years. *Order No. 302948-18(Planning Reference LB180961.*

We have recently witnessed extended building works that have involved diggers and concrete being poured. We also note that the current owner Mr Eddie Phelan of 12/13 Ashdale, Wheaton Hall, Drogheda, County Louth, is undertaking road works at the entrance of the site on Sunday 16th Jan with inadequate safety shown to the general public.

We sincerely hope that these two projects do not go ahead for all of the above reasons.

Yours sincerely