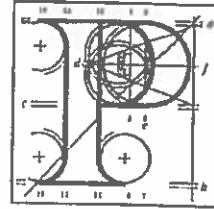


053906

Our Case Number: ABP-307652-20



An  
Bord  
Pleanála

Date: 26th 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 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: 01-8737250

AA02

Tell  
Glao Áitliúil  
Facs  
Láithreán Gréasáin  
Ríomhphost

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(01) 858 8100  
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64 Sráid Maoilbhríde  
Baile Átha Cliath 1  
D01 V902

64 Marlborough Street  
Dublin 1  
D01 V902

LDG - 053906-22.

<b>AN BORD PLEANÁLA</b>	
LDG-	_____
ABP-	_____
20 MAY 2022	
Fee: €	_____ Type: _____
Time:	12:45 By: <u>HAND</u>

An Bord Pleanála  
64 Marlborough Street,  
Rotunda,  
Dublin 1  
D01 V902

18<sup>th</sup> May, 2022

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

Dear Sir/Madam

We refer to our original objections to the proposed Boyne Greenway, Drogheda to Mornington Route, dated 5<sup>th</sup> September, 2020 and wish to make the following additional observations in relation to Meath County Council's Further Information Submission.

The proposed route of the Boyne Greenway, Drogheda to Mornington remains the same and has not addressed any of the issues we raised in our original objections.

In addition, Meath County Council has effectively ignored that their proposed Greenway falls within the Boyne Estuary Special Protection Area (SPA) and the Special Area of Conservation (SAC). Irelands SAC's are part of the Natura 2000 network of European wide protected sites which include the River Boyne and River Blackwater SAC (002299), a fact that Meath Council seems to have comprehensively overlooked.

Meath County Council's proposals for mitigating measures i.e. screening, sound reduction measures, provision of information signage and the appointment of an Ecologist to monitor dune habitat falls short in our opinion of what An Bord Pleanála has requested in relation to the likely effects on the environment and the adverse effects on the sites integrity.

In view of the threshold set by An Bord Pleanála and the acknowledgement of adverse effects in the NIS, Meath County Council's response to the adverse effects on the SPA and SAC is to

suggest potential mitigating measures and this is not an appropriate response. By introduction mitigation, MCC is accepting that there are adverse effects which needs to be mitigated for and in effect disregards the protection and conservation of this European site.

### **Biodiversity**

As stated previously this proposal will result in the elimination of approximately of 160 metres of hedgerows and 290 metres of Treeline, with an overall estimated removal of 47% of existing vegetation along the route. This includes residents in Mornington along the route who will suffer the loss of parts of their gardens, fencing, walls, and well-established mature Flora. This also includes the moving of an existing boundary wall in Mornington Court estate, resulting in a loss of Urban Green Space. Although MCC has a landscape plan to offset this damage, the damage to habitat and biodiversity during construction and thereafter will be significant

### **Predicted users and their ecological impact.**

Meath County Council having assessed various greenways including Baldoyle to Portmarnock Greenway and Wyattville Road, Glenageary, Co. Dublin, estimate that an average of between 900 and 1300 users, at peak times, may use the greenway every day. Meath County Council are not providing any rest facilities, toilet facilities, or parking facilities at any stage on this Greenway. They believe that the majority of people using the greenway will arrive by bus or train. This simple was not the experience of people living in this area during the Covid 19 Pandemic and especially during lockdown. Many people flocked to Mornington and Bettystown beach from all over the county, which resulted in chronic parking issues on the roads, beach and local housing estates. ( **See Attached Photo**) Most disconcertingly was the blocking of access for residents on the Tower Road, including emergency services. In addition, illegal dumping and antisocial behaviour has been a regular occurrence.

If Meath County Council's figures are correct, the above concerns will only increase. Greenway users will park at the beginning and end of the Boyne Greenway and the assumption that people will continue on to the Golf Links Road rather than proceed onto Mornington Beach, the Dunes and towards Maidens Tower, which has stood for over 400 years, is not viable

Therefore, the proximity of the Greenway to the SAC Sand dunes site (Natura 2000) at Tower Cross/Crook Road Bridge will have an adverse effect on habitat, wildlife and the degradation of sand dunes.

While accepting that the idea of a Greenway has merit, the proposed route will have adverse outcomes on current habitats and for future generations to come

NIS Disturbance Data for Water birds within Boyne Estuary.

Stage 2 NIS P. 26 *Moderate -high responses were consistent with disturbances by dogs and also to human presence (e.g. pedestrians and birdwatchers)*

P.37 *There is potential for direct habitat loss, habitat degradation and or disturbance effects due to the location of the Greenway overlapping the SAC boundary.*

*in their conclusion, Adverse effects on integrity could not reasonably be ruled out for Boyne Coast and Estuary SAC in relation to indirect or operational degradation of designated dune habitat and Boyne Estuary SPA in relation to operational disturbance of wintering water birds.*

#### **Road/Traffic design**

Notwithstanding the lack of Traffic Assessment by Meath County Council, the proposed Greenway is only a four metres wide Roadway for the majority of its route from Drogheda to Mornington. Meath County Council have acknowledged that there are significant public safety concerns with the route and thereby, will seek the reduction of speeds from 80km/hr to 50km/hr on this route along with the provision of other traffic calming measures on the R150 which is after all a Regional Road. However, even hitting someone at 50km/hr, will only allow a 50pc chance of surviving. (AA) As the majority of users will be families, children, and cyclists, these measures do not appear adequate enough to ensure their safety.

In addition, the route does not incorporate the majority of schools in the area. The proposed route will only pass by the Drogheda Grammar School, a private school and the local Educate Together National School. There is no access to the Greenway for the majority of school going children including Realt Na Mara Boys N.S. (438pupils), Realt Na Mara Girls N.S.(453 pupils), Gaelscoil An Bhradain Feasa N.S.(410 pupils) and Educate Together S.S. (182 – Year 1&2)

In conclusion, as stated on our original submission of 5<sup>th</sup> September, 2020, 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. Unfortunately, the issues as stated above and in our submission of 5<sup>th</sup> September, 2020. does not permit the Boyne Greenway to meet this standard.



12/16/21  
Harrington  
Caleb Road