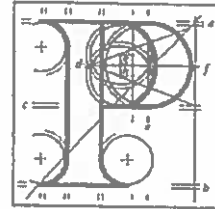


053993

POur 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 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: 01-8737250

AA02

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Glaó Áitiúil	LoCall	1890 275 175
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

LDG-053993-22

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
20 MAY 2022	
Fee: €	_____ Type: _____
Time: 12:45	By: nand

An Bord Pleanála Ref: ABP-307652-20

18th May 2022

Re: Proposed Boyne Greenway – Drogheda to Mornington.

Dear ABP,

I previously submitted observations to ABP in relation to the above-mentioned proposed development i.e Construction of the Boyne Greenway-Drogheda to Mornington, in September 2021.

Then, I had fundamental concerns in relation to the proposed route, its design, construction, alignment, and impact on the Boyne Estuary Special Protection Area (SPA), Special Area of Conservation (SAC) and Natura 2000 site.

I trust that ABP have taken these concerns on board in full. I note that ABP requested further information (RFI) from MCC, and I have reviewed their response. I wish to state that MCC have not addressed any of the concerns raised in my original observations. In fact, I am more concerned than ever because MCC now accept that their Proposed Boyne Greenway will have an "Adverse Impact", which says it all really and their proposed Mitigation measures are wholly substandard.

I wish to make the following observations and submissions with regard to the most recent documents as submitted by MCC in their response to the RFI. I am a resident of Mornington/ East Meath, with a particular interest in Nature, Birdwatching, Safety and a sense of Social Justice when it comes to local families who face losing significant parts of their properties if it is decided to allow the Proposed Boyne Greenway to proceed.

1. There is a significant lack of information on the full impact of this proposal on the Boyne Estuary SPA/SAC/Natura 2000 site. The Proposed Greenway will abut and/or enter the Boyne Estuary SPA/SAC/Natura 2000 sites on a number of occasions, which is an Irish and European site of major importance and significance. MCC now accept that the Proposed Greenway will have an "Adverse Impact" on the Boyne Estuary SPA/SAC/Natura 2000 site, which is somewhat of an understatement. Their proposed remedial actions are lacking and too many issues are deferred until the Construction phase. It will then be too late to address these issues. Quite simply there does not appear to be compliance with National and European Legislation including the EU Birds and Habitats Directives.

2. To call this a Greenway is a stretch of the imagination as some 4.1Km will be of Tarmac type construction (similar to a road) which will actually run parallel to 2 very busy Regional Roads (R150 and R151). In fact, it would be true to say that 4.1Km of the existing roads (R150 and R151) will be widened by some 50%. I note that the proposed 4.1Km of Greenway/Roadway will be slightly higher than the existing roads, but this will clearly constitute a Serious Risk, which has not been properly Risk Assessed, for example MCC do not plan to erect any barriers separating the Proposed Greenway from the adjacent Regional Road. I understand that MCC require that there has to be a 1m Grass verge/divide between a New footpath and a road. How come the Greenway is not treated in a similar fashion. MCC talk about people enjoying the proposed Greenway! How could parents out for a walk on the 4.1Km Tarmac/Asphalt section with a number of young children, enjoy the scenery when Double Decker Buses, Delivery Trucks and a constant stream of other vehicular traffic will whizz past within a metre of them!! with no protection at all.
3. MCC have stated that they will conduct a Traffic Count during the Construction phase of the Proposed Greenway. This is a "Cop-Out" and relates to my concerns at 2 above. If a Traffic Count is undertaken as proposed then it will result in a significantly reduced Traffic Count Outcome as locals will simply avoid the area, due to the inevitable traffic delays which will occur during the Construction Phase.
4. Fire hazard: The materials used for the Boardwalk part (1.8Km) of the Proposed Greenway should be fire proof. A number of years ago vandals set fire to part of the existing Drogheda-Oldbridge Greenway and serious damage was caused. I understand that MCC plan to use the same type of product for the boardwalk sections.
5. Impact on certain Residents, who stand to lose a significant part of their property/gardens. Most of the Residents thus affected are "Old Stock" Mornington people who have lived there all their lives. A good proportion are elderly and they are very fearful for their future as there is talk of CPO's.
6. The impact on the Residents mentioned in 5. above as the Proposed Greenway will be built in front of their properties and there will be a steady stream (moving in both directions) outside their homes of:
 - Walkers
 - Runners
 - Parents with Children and Buggies
 - People with dogs
 - Cyclists
 - Electric Scooters
 - Electric Cyclists
 - Skateboards and Roller Skates
 - Wheelchairs
 - Children on Scooters
 - Children on bikes

These Residents will have to navigate across the Proposed Greenway before they can enter the public road from their homes. MCC expect some 1,000 to 1,300 people will use the Proposed Greenway daily.

7. The Noise generated by all of 6. above, which will impact on all residents along the route of the Proposed Greenway.
8. The loss of Privacy caused by all of 6. above, which will impact on all residents along the route of the Proposed Greenway.
9. Currently, there are no Public Toilet Facilities in Mornington or at the Drogheda end (and MCC have stated that they do not plan to provide any). What will the 1,000 to 1,300 people do if they are caught short, especially families with children. I understand that MCC will provide receptacles for Doggy Poo bags along the Proposed Greenway but nothing for humans. Clearly a health issue.
10. Currently, there are no Shops or Restaurants/Cafes in Mornington or at the Drogheda end. Where will the people who use the Proposed Greenway get refreshments?
11. Significant impact on the Mornington Court Estate, who as part of the Proposed Greenway will lose a large part of their Green Play Area.
12. Lack of Access/Difficult to Access certain parts (Boardwalks) for the Emergency Services in the case of a Medical or other Emergency. Recently and sadly, there has been well publicised reports in the local media of lone Female Walkers having been accosted and/or attacked on the Drogheda-Oldbridge Greenway. There are a number of isolated areas on the Proposed Drogheda-Mornington Greenway where women would be vulnerable.
13. MCC state that people using the Proposed Boardwalk will travel by Bus or Train to it. I wish to point out that Laytown Train Station is some 5Km from Mornington. The reality is that most will travel by Private Car, which has been completely omitted by MCC, because people arriving by car will in turn need a place to park. MCC clearly state that they will not be providing any Car Parking facilities at either the Drogheda or Mornington ends of the Proposed Greenway. Currently there are no public parking facilities at the Mornington end. When MCC closed entry for Cars to the Beach at Bettystown in 2020, there was a significant increase in the number of cars which then started to park illegally at the Maiden Tower, Tower Road and Crook Road areas in Mornington. Formerly Green verges were destroyed, and local Residents had difficulty accessing their properties. The introduction of the 5Km travel restriction at the start of Covid-19 pandemic brought a further increase of the illegal parking. Quite simply the Proposed Greenway will cause a further escalation of this dire situation.
14. People who use the Greenway will not stop at the Tower Road as stated by MCC. They naturally will continue to the Mouth of the River Boyne and the Beach, they will then negatively Impact on a fragile and dynamic dune system, which is contrary to European Environmental Legislation.

The concept of the Proposed Greenway route between Mornington and Drogheda has some merit but the proposed route and design which have been forwarded by MCC to ABP is totally unsuitable. It comes at too high a cost to our fragile environment, SPA, SAC and Natura 2000 (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, conservation and management of our limited environmentally important sites. The proposed Greenway will negatively affect the SPA, SAC and Natura 2000 (European Protected Sites). The mitigation measures as proposed by MCC will not offset this impact. Because of the foregoing the Application by MCC to build the Proposed Drogheda-Mornington Greenway should be refused in its entirety by ABP.

Yours in Anticipation,

MCC Meath County Council