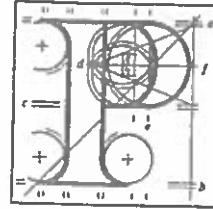


054027

Our Case Number: ABP-307652-20



An
Bord
Pleanála

Date: 30th 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: 01-873 7250

AA02

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

64 Marlborough Street
Dublín 1
D01 V902

LDG-054027-22

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

Date: 17th 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,

I am a resident of Mornington/East Meath and 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: -

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. These measures are inadequate, ineffective and are not suitable to offset the threat to biodiversity, birdlife and wildlife.
2. 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**.

3. 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. This is where my children play at present. We have also been informed that the MCC plan to use our existing green space as storage for their equipment, machines and supplies. Which will mean there will be no same space for my children to play while the proposed Greenway is being built.
4. 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. 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 9 mins.
5. 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 and the increased likelihood /potential of accidents/incidents occurring, (articles in Drogheda Independent)
6. 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.**
7. 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.
8. 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.
9. 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.

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.

Yours sincerely