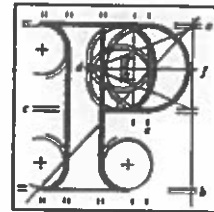


054032

Our Case Number: ABP-307652-20



An
Bord
Pleanála

Date: 31st 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

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

Date: 19 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

I am a resident of Mornington Court, Mornington, East Meath. In September 2020, I submitted my observations in relation to the above-mentioned proposed development i.e. Construction of the Boyne Greenway. As a resident in Mornington Court who is directly impacted by the creation of the Greenway, I have a number of concerns and objections, which I have outlined under different headings below.

I had fundamental concerns in relation to the proposed route outside my estate, its design, construction, loss of green area and gardens and alignment through the Boyne Estuary Special Protection Area (SPA) and Special Area of Conservation (SAC).

I trust that ABP have considered these concerns in full. However, Meath County Council'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 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. It is noted approx. 215m of Tower Road is included within the proposed scheme. 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. Land from my green area opposite my house in our estate is still been taken away, as is our neighbours gardens across the road. I bought this house in 2004 with my husband, we paid €230,000, and over the past 18 years we have contributed a significant amount to the upkeep of the green area through the residents association. We object to this Greenway, and the impact it will have on our estate, our quality of life, with the road now closer to our house and the loss of green area for children to play.



Photo of proposed loss of green area in moving boundary wall.

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

Boyne SPA is designated on account of its internationally important populations of waterbirds, notably wintering wader populations and Little Tern. The **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. I 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.

3. **Environmental Effects:** 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

I believe these measures are severely 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 include:

- **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**
- 4. 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 my estate in Mornington Court, as mentioned above, (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.
- 5. Predicted Users of Greenway:** 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.

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. Furthermore, in my own estate, with the loss of land in the green area, the road, the traffic will be closer to my house, causing disruption to our privacy, and devaluing our property.

6. Roads/Traffic/Parking

- a. *"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.

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.

- b. 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.

Once again, 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.

7. 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.

Summary

I object to this Greenway. 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, to me, and my family, and our quality of life.

Signed_