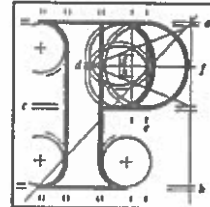


Our Case Number: ABP-307652-20



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 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	Tel	(01) 858 8100
Glaic Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

AN BORD PLEANÁLA	
LDG-	_____
ABP-	_____
20 MAY 2022	
Fee: €	Type: _____
Time: 9.40	By: hand

15th May 2022

Planning Reference Number ABP-307652-20

Construction of the Boyne Greenway Drogheda to Mornington – pedestrian and cycleway linking the Drogheda Town in County Louth to Mornington Village in County Meath.

Dear Sir/Madam

I am writing in connection with the above proposed Boyne Greenway from Drogheda to Mornington. Originally, I thought this was a wonderful and much needed development for the area. The population has increased dramatically in the last few years and the roads are far too dangerous to cycle on, let alone walk.

Unfortunately, and sadly I now have to object in the strongest possible way. The Greenway is to end at a Special Area of Conservation (SAC) and a Special Environmental Protection Area (SEPA) SPA/SAC 001957, the area is protected under EU & Irish law. Meath County Council are proposing to add over 1,000 extra pedestrians to the SAC & SEPA with NO FACILITIES. Where are 1000 people a day to go to the toilet? The wording of the Boyne Greenway to Mornington Village implies there is a "village", that there are facilities but there is nothing but a beautiful beach and the SAC & SEPA.

There have been numerous reports done on the SAC & SEPA by NPWS and all state that the area is being DESTROYED by pedestrian and vehicular traffic. And now this greenway is going to effectively wipe out the whole area and subject it to huge coastal erosion.

Meath County Council are WELL aware of the problem and just keep saying the land is in private ownership. Despite this, they ignore the enormous environmental impact on the area.

Meath County Council are saying the proposed car park at Mornington is not going to go ahead and pedestrians and cyclists will use "public" transport. If that IS the case, why do the hundreds of beach goers to Mornington not use public transport currently. The dunes and unique eco system are being destroyed by vehicular traffic already, what will this DRAMATIC increase in cars & pedestrians do to an already fragile environmental area.

Meath County Council agreed with the landowner in 2014 to install a boardwalk of approx. 250metres through the dunes to "supposedly" protect the dunes. The agreement was the MCC would "maintain" the boardwalk. In the following 8 years, not ONCE have they maintained the boardwalk, it is now overgrown and covered over. MCC have done absolutely nothing to demonstrate they want to protect this unique area and this proposed greenway with no facilities or infrastructure to handle the increase of visitors just compounds MCC ongoing neglect of the area.

So, to summarise, for the following reasons I am objecting to the proposed Greenway until ALL these issues are addressed.

1. **The negative impact of construction and environmental damage that will be caused by the increase of walkers and cyclists associated with this greenway and precedence set in the case of An Bord Pleanála case number ABP-308079-20.**

This greenway, under these revised plans is set to be constructed through the Boyne Coast and Estuary Special Protection Area (SPA) and Special Area of Conservation (SAC). This site is protected under the European Union Habitats Directive and Irish Statute Law.

Appropriate Assessment Process guidelines as set out by the European Commission 2000, 2001 would dictate that "if adverse impacts on the site cannot be avoided, then mitigation measures should be applied during the Appropriate Assessment process to the point where no adverse impacts on the site remain". The current greenway proposals cannot deliver the necessary mitigation measures to protect SAC/SPA, this greenway cannot be constructed in its current location without having adverse impacts on the site in question.

2. Alternative routes that do not access the SPA/SAC are available but have not been considered.
3. The SAC in Mornington is at present close to extinction due to the combined neglect of Meath County Council, National Parks and Wildlife Service, and the landowner Mr Donal Kinsella. The dune system that anchors and the complete SPA/SAC is under severe pressure. The biodiversity that makes up the SAC is being driven and trampled over daily. The neglect of this protected site is currently under review by the Minister of State for Heritage and Electoral Reform Malcolm Noonan.
4. There are no parking facilities where the greenway is set to end/begin in Mornington. Parking is currently unregulated, and the entire SAC is being used as a carpark and 4x4 testing ground. A file is currently with Meath County Council Planning Enforcement Department.
5. There are no toilet facilities in Mornington where the greenway will end/begin.
6. The area is also mentioned in MCC Environmental and Wildlife Policy. How do MCC propose to "protect" the Wildlife and Wintering birds and unique ECO system by increasing the pedestrians by up to 7,000 a week?? The area will become one giant toilet and dumping ground. MCC have provided ONE single public bin in ALL of Mornington !!!!

The following is on Meath County Councils Website :

. Environment and Wildlife

Laytown, Bettystown and Mornington Beach Management Plan and Natura Impact Statement (NIS)

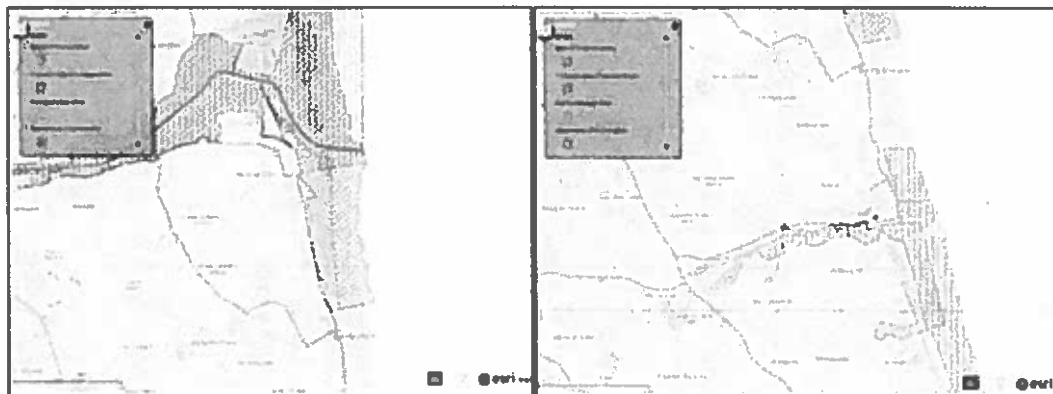
2.1 Natura 2000 Sites

There are 2 No. SPA's Special Protection Area (SPA) and 1 No. Special Area of Conservation (SAC) located on the Laytown, Bettystown and Mornington Beach. This includes the following;

- Boyne Estuary SPA;
- Boyne Coast and Estuary SAC; and
- River Nanny Estuary and shore

Figure 2.1: Boyne Estuary SPA & Boyne Coast and Estuary SAC (© NPWS)

Figure 2.2: Boyne Coast and Estuary SAC & River Nanny Estuary and shore SPA (© NPWS)



2.1.1 Boyne Estuary Special Protection Area (SPA) and River Nanny Estuary and shore SPA

The Boyne Estuary Special Protection Area (SPA) and River Nanny Estuary and shore SPA have been designated Special Protection Areas under the EU Birds Directive (79/409/EEC). The Boyne Estuary supports nationally important numbers of many wintering birds including Shelduck, Golden Plover, Lapwing, Black-tailed Godwit, Redshank, Turnstone, Oystercatcher, Grey Plover and Sanderling.

Many water birds are winter visitors to Ireland's shores. They migrate here over thousands of kilometres from their breeding grounds further north. Light bellied Brent Geese and Knot are two such species that fly south over the winter period to less harsh environments where food is more readily available.

Estuaries provide rich habitats for many wildlife species and have an abundance of invertebrates (animals without backbones) such as worms, snails and crustaceans that provide food for bird communities. The Boyne Estuary supports intertidal mudflats and saltmarsh habitats. These are important areas where flocks of birds gather to feed and roost.

2.1.2 Boyne Coast and Estuary Special Area of Conservation

The Boyne Coast and Estuary is designated a Special Area of Conservation (SAC). The Boyne Coast and Estuary SAC includes most of the tidal sections of the River Boyne, intertidal sand and mud flats, salt marshes, marginal grassland, and the stretch of coast from Bettystown to Termonfeckin that includes the Mornington and Baltray sand dune systems.

The Boyne Coast and Estuary SAC is a coastal site that supports a high diversity of habitats. A total of eight habitat types seen here including the estuary, tidal mudflats, embryonic shifting dunes, marram dunes, fixed dunes, Salicornia mud, and both Atlantic and Mediterranean salt meadow are protected under Annex 1 of the European Union Habitats Directive because they are rare and at risk of being lost or damaged.

2.2 Sand Dunes

Dunes are dynamic ecosystems that support an array of plant, bird and animal life. Marram grass is the main dune building species. It helps bind loose, windblown sand into ridges and dunes. This allows other plant species to begin to take root and grow. The more stable areas of dunes support a high diversity of plant species including common bird's-foot-trefoil, wild thyme, lady's bedstraw and wild pansy along with a

variety of grasses, mosses and lichens. Many of these species are important food sources for butterflies and bees that live on the sand dunes.

Although created and shaped by natural processes, sand dunes require conservation measures to protect them from erosion caused by human activity. Public use and trampling by horses can wear away grass cover on the dunes allowing the wind to further erode the fragile dune system. If this continues much of the existing sand dunes will disappear along with the wonderful plant and animal life they support.

The dune system in Bettystown is National Parks and Wildlife System protected but most are in private ownership. During periods of very good weather, reports have been received of anti-social behaviour particularly in the vicinity of the dunes.

The installation of a timber boardwalk through the dune system was completed in 2014. It was installed to minimise the paths through the dune system by encouraging the use of this designated path to the beach thereby assisting in the protection of the dune system.

End

And finally, I am enclosing some photos of the SEPA/SAC and this is a tiny example of the haphazard parking that currently exists within the SEPA/SAC. The projected tourist figures for this Greenway would absolutely destroy the area and until such time as there are steps taken to provide protection for the dunes, provide car parking & toilet facilities I am strongly objecting to the proposal for the Greenway.

Yours truly,

