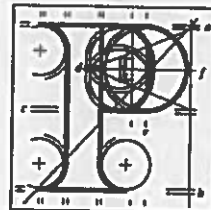


Our Case Number: ABP-307652-20



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: 01-8737250

AA02

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LDG-054036-22.

To: An Bord Pleanála

Boyne Greenway Drogheda to Mornington

Ref: D01 V902

AN BORD PLEANÁLA
LDG- _____
ABP- _____
19 MAY 2022
Fee: € _____ Type: _____
Time: 12:21 By: hand

This is an addendum to my previous submission.

Receipt No: 110283

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 Board Walk runs 4 meters at the back of my home⁴ _____ which stands on 2 acres 3 roods and 14 perches.

Approx 174 meters west and 350 meters east.

Running 4 meters at the back of my home at a height of 3 meters and width of 4 meters we lose all our privacy. The impact so close to our home will result in a devaluation.

SAC: This European site includes intertidal sands and mudflats, Saltmarches, marginal grassland and includes Mornington and Baltray sand dune system.

It is of particular importance as feeding grounds for wildfowl and waders.

My family have lived here for over 60 Years, where we enjoy watching the wild life.

The routing and construction of a Greenway through a European designated site should be avoided as it will have adverse effect (as acknowledged in the Natura Impact Statement Stage 2) 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.

An Bord Pleanala have indicated they will consider/judge this application on the likely effects on the environment, noting the legal test for Appropriate Assessment is not the exclusion of significant effects, but the exclusion of ADVERSE effects on site integrity. Inview of this threshold set by ABP and the acknowledgement of adverse effects in NIS, Meath Co Council's response to the adverse effects on the SPA and SAC is to suggest potential mitigation measures, this IS NOT AN APPROPRIATE RESPONSE. By introducing mitigation, Meath Co Council are accepting there is an adverse effect which

needs to be mitigated and in effect disregards the protection and conservation of these European sites.

The proposed mitigation measures includes

Screening (fencing and soft landscaping) to reduce disturbance to birds.

Provision of information signation to highlight the importance and sensitivities of the European sites to Visitors.

These measures are inadequate, ineffective and are not suitable to offset the adverse threat to Biodiversity, birdlife and wildlife.

FIRE / HEALTH AND SAFETY:

Being so close to our home this is a Fire Hazzard.

It only takes a butt of a cigarette to cause a fire. Look what happened on Board Walk at Oldbridge, Drogheda.

On 28th July 2018 at midnight, firefighters were called to a fire on the Board Walk at Oldbridge, Drogheda. Vandals set it on fire and caused a lot of damage



Fire at Oldbridge.



How will Fire Brigade get to the scene of a fire ?

If a walker or jogger has a **CARDIAC ARREST OR FALL** how will the Emergency service get to the scene. If cardiac arrest or accident happens in secluded are, who will notify the Emergency service.

Toilet Facilities:

There is a distinct lack of public infrastructure along the proposed route.

No dedicated amenities, no rest or seating area and **no toilet facilities are provided** (nor do Meath County Council intend providing same)

Where do parents bring children to the toilet ? along the route in the **SPA AND SAC**. This puts the health and safety of users at risk and more damage to the **SPA AND SAC AREA**.

No amenities to be provided at either end of route.

The café is closed

Meath County Council have assessed similar schemes including Waterford Greenway (on a unused railway line), estimates average daily trips on Boyne Greenway of between 900 / 1000 users a day, while in Peak season this would rise to 1200 to 1300 users a day. That is a significant number of people visiting the area each day and raises issues in relation to **Safety, Security, Noise pollution and Litter concerns.**

Residents on Tower Road and Crook Road 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. Potential safety conflicts between Greenway users and residents attempting to exit/enter their property.

The latest design still **DO NOT INCLUDE A SAFETY MARGIN** between private accesses and proposed infrastructure. **Safety issues have not been addressed.**

There is no car parking provided and it is envisages most users will come by train, bus or from Drogheda to use facility. Laytown Train station is approx 5 kms away.

Meath County council inform us that they will not provide parking facilities at either end of the Greenway, users will be **forced to park in the dunes, on the roadway or in local housing estates.**

This is already happening during the summer months, since no cars can park on Bettystown Beach. It was seen during the Lockdowns with Covid, people came in cars to walk on beach with no parking facilities they parked on road ways in local estates and on numerous occasions Emergency Services could not get through.

Meath County Council have not adequately assessed the impact of their assumption that no new car parking facilities are needed in Mornington or Drogheda. No assessment of the capacity, existing or future and suitability (ie 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.

Meath County Council contend that traffic impacts on the local road network are not worthy of assessment. The proposed Greenway will result in uncontrolled parking, loss of privacy.

SPECIAL PROTECTION AREA AND SPECIAL AREA OF CONSERVATION:

Boyne Estuary Special Protection Area: 004080

This area is a highly sensitive from an ecological and environmental perspective. It is one of the best feeding grounds for Birds.

Intertidal flats occur along the sides of the channelled river. From my home I see many birds including Black tailed Godwit, Shelduck, Oystercatcher, Golden Plover, Grey Plover, Lapwing Knot, Curlew, Redshank and Turnstone to name but a few. Of particular significance is that the Golden Plover, Blacktailed Godwit and Little Tern are listed on Annex 1 of the E.U. Directive. And yet over 50% of the proposed Greenway encroaches on this European protected site 0004080 leading to significant damaging impact on biodiversity, birdlife and wildlife.

These birds are particularly sensitive to human and dog presence which will interfere with their feeding habits. Plus the many children and adults looking for toilets, these will add further disturbance.

Disturbance during the proposed development and increase users will have major impact on the ecology and integrity of this European site which is also a Wildfowl Sanctuary. The removal of 160 m of hedgerows and 291 m of treeline with an overall estimate removal of 47% of existing vegetation along the route. Disturbance and impact to the fauna of the area will result in a significant loss of habitat impacting negatively on the breeding birds.

It will radically alter the unspoilt landscape which we enjoy every day.

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. The proposed route fails to enhance the environment and quality of life of the community.

At the start of the proposed Greenway it will pass by Flogas, one of Flogas LPG Terminals. Here we have storage of large tanks of LPG, another source for a major fire and risk of major explosion.

On the opposite side of the road we have Sewage Treatment plant, with large bulk lorries entering and exiting this plant daily. Notwithstanding the terrible odours which come from this plant.

All the above, raises the potential for adverse impacts on the integrity of this European site. Meath County Council proposed mitigation measures, ie information signage will not be sufficient to deter pedestrians, dogwalkers, cyclists and families from damaging this area.

The concept of a Greenway/Cycle/ walking route between Mornington and Drogheda has some merits, but the proposed route and design which An Bord Pleanála are considering is unsuitable and comes at too high a cost to our fragile environment, Special Protection area and Special Area of Conservation, which are European Protected sites 004080 and to our LOCAL COMMUNITY.

Signed

[Redacted signature]

[Redacted signature]

[Redacted signature]

Dated: 17th May 2022