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Transportation & Infrastructure Delivery Department  
Wicklow County Council  
County Buildings  
Whitegates  
Wicklow Town  
A67 FW96

WICKLOW COUNTY COUNCIL CUSTOMER SERVICE 10 FEB 2026 Time Received _____
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**Re: Emerging Preferred Route – Wicklow to Greystones Greenway**

Submitted by email to: wicklowgreenway@wicklowcoco.ie



## Individual Submission / Objection (Part 8)



**Townland:** Coolawinna  
**Submission Type:** Individual Objection under Part 8  
**Date:** 10 February 2026

### 1. Nature of Submission

I am a **lawful occupier and resident** of lands at Coolawinna which are directly and materially affected by the emerging preferred route for the Wicklow to Greystones Greenway as currently proposed by Wicklow County Council.

This submission constitutes a **formal objection** to the proposed development insofar as it traverses, adjoins, or otherwise interferes with the lands on which I reside and lawfully occupy. The objection is made on grounds of **material impact, lack of proportionality, failure of proper planning and sustainable development, and non-compliance with environmental and flood risk policy.**

### 2. Statement of Non-Consent

For the avoidance of doubt, **I do not consent**, in my capacity as lawful occupier and resident, to:

- The use of the lands on which I reside for the purposes of the proposed Greenway;
- Any associated works, access rights, licences, or easements;

- Any temporary or permanent interference with my occupation, residential amenity, or use of the lands.

This position is clear, firm, and unequivocal.

### **3. Residential Amenity, Safety, and Use of Lands**

The lands include my private dwelling and immediately adjoining agricultural areas. The proposal would introduce a continuous public access route in close proximity to my home and the lands.

The resulting impacts would include, but are not limited to:

- A significant and permanent loss of residential amenity and privacy;
- Increased risk to personal and family safety, including child safety, arising from uncontrolled public access;
- Exposure to trespass, antisocial behaviour, uncontrolled dogs, and unauthorised vehicular access;
- An absence of any credible management, supervision, or enforcement regime over the operational lifetime of the Greenway.

The proposal fails to demonstrate how these impacts would be effectively mitigated or managed.

### **4. Agricultural Use, Livestock Welfare, and Biosecurity**

The lands adjoining my residence are actively farmed and support livestock which require secure boundaries and controlled access.

The proposed development would:

- Interfere materially with established agricultural practices;
- Increase the risk of livestock injury, escape, or disease transmission;
- Disturb badger setts and elevate the risk of bovine TB spread;
- Introduce unacceptable biosecurity risks;
- Impose an unreasonable and ongoing maintenance burden on the occupier and land manager.

These impacts amount to a **serious interference with the lawful use and management of the lands** and have not been adequately assessed.

### **5. SAC Access and Environmental Management Obligations**

The lands provide managed access to a **Special Area of Conservation (SAC)**, access which is essential for responsible land management and compliance with environmental stewardship obligations.

The proposed route would:

- Obstruct or compromise necessary access;
- Introduce uncontrolled public pressure at a sensitive ecological interface;
- Undermine established environmental management practices.

I am not satisfied that Wicklow County Council can demonstrate compliance with **Article 6(3) of the Habitats Directive**, namely that the project will not adversely affect the integrity of the SAC, either alone or in combination with other plans or projects.

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## **6. Appropriate Assessment and Ecological Deficiencies**

The proposed route traverses or adjoins lands that are:

- Environmentally sensitive and/or SAC-designated;
- Seasonally wet, flood-prone, and unsuitable for intensive public use;
- Adjacent to habitats protected under EU Birds and Habitats legislation.

The information published to date does not constitute a robust or legally defensible Appropriate Assessment and fails to adequately assess:

- Construction-phase impacts;
- Long-term operational impacts arising from sustained public use;
- Cumulative impacts on protected habitats and species.

Proceeding on the basis of the current documentation would expose the Council to **significant compliance risk under EU and national environmental law**.

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## **7. Flood Risk, Public Safety, and Climate Resilience**

The lands form part of a flood-prone wetland landscape subject to regular seasonal inundation.

The introduction of a public Greenway in this location:

- Creates foreseeable public safety and liability risks;
- Fails to adequately address climate change adaptation;
- Conflicts with OPW flood risk management policy;
- Raises serious concerns regarding durability, maintenance, and long-term viability.

These matters go to the **fundamental suitability of the route**, rather than issues capable of resolution through minor mitigation.

## 8. Availability of Reasonable Alternatives

The proposal relies disproportionately on **private agricultural land**, despite the existence of alternative alignments on **state-owned or previously disturbed corridors**, including the railway alignment.

Best-practice guidance prioritises the use of publicly owned land for greenway infrastructure. Difficulties in inter-agency coordination do not constitute a valid planning justification for imposing disproportionate impacts on lawful occupiers and land managers.

## 9. Proper Planning and Public Interest

The projected cost of the Greenway materially exceeds national norms and is significantly inflated by:

- Environmental and flood constraints;
- Private land acquisition;
- Anticipated legal and procedural complexity.

In these circumstances, the proposal does not represent the **proper planning and sustainable development of the area**, nor a prudent or proportionate use of public funds.

## 10. Conclusion

For the reasons set out above, I respectfully request that Wicklow County Council **does not proceed with the proposed route as currently configured**, and that the proposal be abandoned or fundamentally re-routed away from the lands on which I reside and other privately occupied agricultural holdings.

This submission is made:

- Individually;
  - Without prejudice;
  - And without any implication of consent to the principle or execution of the proposed development.
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