

2. Non-Compliance with Code of Best Practice

We contend that the selection of this route contradicts the *Code of Best Practice for National & Regional Greenways (Dec 2021)*, agreed upon by TII and the IFA.

- **Preference for State Land:** The Code agrees that State-owned land should be utilized in preference to private agricultural land. In this instance, approximately 90% of the proposed route traverse private farmland.
- **Existing Alternatives:** There is an existing pathway along the Murrough (State land) that has been used by the public for generations. This route complies with the criteria in *Section 2.2 Scheme Study Area*. It is also the preferred route of all the people of Wicklow.
- **Minimizing Severance:** *Section 2.4.1* of the Code states that Greenways should minimize land severance by following the perimeter of farms. The proposed route violates this by bisecting our active holding.
- **Note on Acquisition:** We wish to state clearly that we will not agree to any request to enter into a voluntary land acquisition agreement. We dealt with the Co.Co. in relation to the construction of the M11 and all we will say is what is said and promised is soon forgotten and ignored.

3. Environmental Concerns, Climate Change & Coastal Erosion

The proposed route contradicts the *Wicklow County Council Climate Action Plan 2024-2049*, which prioritizes Climate Resilience and Biodiversity.

- **Climate Change :** We have again been reminded in the month of January 2026 of the destructive effect of climate change and its impact on Wicklow, The Senior Engineer with Wicklow County Council, **Michael Flynn** described conditions at Bray Harbour as dramatic, saying it was “almost like a new beach has arrived,” with massive amounts of sand, stones, and debris covering roads and walkways. “This level and intensity of rainfall is not something our infrastructure was ever designed to handle,” Highlighting a growing concern, Mr Flynn noted a dramatic increase in the number of severe weather warnings issued for Wicklow:

2024: 8 warnings

2025: 27 warnings

2026 (to date): 14 warnings — within the first week of February

“*This is not a normal weather pattern,*” he said. “*The cumulative impact of these events is taking a major toll on infrastructure.*”

Given the above views of the Councils own senior engineer why then is the Council proposing to build new infrastructure directly in the path of rising floodwaters. The need for a Greenway along the coastal route has to be questioned when the Garden County already has the best walking routes in the Country. Reality needs to be brought into the discussions and the real needs of the County should be identified and prioritised. Unlike the Waterford Greenway there is no old disused rail line in which to build this Greenway at minimal cost.

- **Flood Plain Risks:** A significant portion of the route (Kilcoole to Wicklow) lies on a flood plain. At least 20 acres of our holding is submerged during winter; with climate change, water levels are predicted to rise further. Constructing a viable path here would arguably require raising the level to at least 3 or 4 metres above sea level, driving the estimated cost (based on €2m per kilometre standard) potentially toward €4m to €5m per kilometre which would bring this section to a cost of potentially €80m. This is an irresponsible use of resources for a project that will be frequently impassable in the winter months.

- **Carbon Release:** Construction on agricultural land, including the removal of hedgerows and trees, will release carbon and disturb local wildlife and nesting birds.
- **Lack of Agency Coordination:**
 - It is unacceptable that Wicklow County Council is not coordinating with Irish Rail, who have already plans in place for rock armour works covering a total of 4 kilometres from a total distance of 8 kilometres of the Newcastle to Murrough route. A further 2 kilometres of the route per the Irish Rail report has a substantial buffer between the shoreline and the railway of 40 to 80 metres and as a result no immediate intervention is planned at this stage.
 - A joint approach to protecting the existing Murrough coastal route (which is the route the public wish to retain) would be the logical, environmentally sound solution, rather than building a new route inland on a flood plain. But perhaps we are just silly expecting that joined up thinking would be the order of the day.
 - In addition, no doubt Irish Rail financial forecasts already include provision for substantial funding for the protection of the rail line from Bray and commercial reality would require the Council and Irish Rail to link up so that the best outcome is achieved for the least amount of spending. Instead, the preference seems to be for the worst outcome with the highest potential spending. We will be engaging with Government Ministers, the media on this point in particular so the insanity of the proposal is clear for all to see.

4. Public Spending & Strategic Priorities

As residents and taxpayers, we question the validity of this expenditure in the current economic climate.

- **Misallocation of Resources:** Wicklow faces severe infrastructure deficits. Our road network is in poor condition having some of the worst maintained roads in the country and commuters face daily gridlock in driving to work e.g. the M11 and essential transport deficits (e.g., the promised DART extension) are not getting the attention they deserve and urgently need.
- **Priorities:** What our population needs most of all at this time is new homes for young people that want to settle down and live in Wicklow and instead of prioritising this need we have talk about Greenways which will benefit only a small number of people.
- **Lack of Economic Benefit:** The inland route bypasses the villages of Newtown, Kilcoole, and Newcastle, offering them no economic benefit while exacerbating traffic and parking congestion in Greystones and Wicklow Town.

5. Maintenance and Liability Concerns

We have little confidence in the Council's capacity to maintain this new infrastructure, given the current state of neglect in roads, bridges, flood defences and indeed the huge delay in carrying out the repairs on the Bray to Greystones section which has been closed now for years and which the public have demanded be reopened but to no avail.

- 1 **Burden on Landowners:** Landowners are already burdened with the costs of maintaining roadside boundaries. We fear the Council will inevitably shift the maintenance burden of the Greenway boundaries (weeding, briar control, fence repair, flood damage etc) onto farmers.
 - a. Currently Landowners folio goes out to the middle of the public road and hence this makes them liable for everything even though the Councils and Government collect just under €2b in car tax each year and just under €4b in tax on fuels (nearly 55% of what we pay for fuel is tax). In effect they collect nearly €6b a year and its the local farmer you will see maintaining the ditches. If a tree falls on the public road and causes an accident a claim will come against the Landowners insurances with the result that annual premiums will increase significantly. With thousands of trees with Ash Dieback along the

road its only a matter of time before accidents arise from falling trees. The cost of all this cleanup is left to farmers/landowners.

- b. Even though as Landowners we did not cause the Ash Die back virus we are facing another huge bill to remove around 30 trees with the disease situated along our 250-metre boundary with the public road. Any claim along the road would make us liable so we have little doubt that the same will happen along the Greenway over time in that farmers will be responsible for trees inside and outside the Greenway. With the emergence of more diseases affecting trees such as Hawthorn, Oak, Spruce we can foresee more and increasing costs for the Landowner.
- c. Given the dire need for improved infrastructure, the state of the public road, the need to deal with climate change we can expect that the Council will over time look to make the Landowner responsible for various parts of the upkeep of the Greenway.

6 Specific Questions and Concerns: We require formal written responses to the following:

- i. How will the Council protect the SPAs & SACs should Broadlough flood due to coastal erosion?
- ii. What guarantees are in place regarding the on-going maintenance of the Greenway covering not just fencing against wild deer damage, vandalism and deterioration over time, but all maintenance, repairs etc. At the very least we will demand that the Council maintain a Bond in place to be called upon by us to meet the cost of the on-going maintenance when they fail to do the necessary works in a timely manner. This is a standard condition imposed by the Council when others are expected to carryout certain works e.g. building sites.
- iii. How will emergency services access this inland route during medical emergencies or fires given it is fenced off from public roads?
- iv. We would also require a full legal indemnity to us as the landowner against any claim arising from Greenway users trespassing or interacting with farm operations.
- v. We expect that any additional insurance costs for the Landowners will be met by the Councils.
- vi. If lands are acquired under a CPO please clarify if the Council will then take the CPO land into its ownership or will it remain in the Landowners folio thereby again making the landowners responsible for all the maintenance as legally the Landowners are still the owners of the Greenway that is located on their property.
- vii. Where will car parking be provided so as to prevent illegal parking by users of the Greenway.

Conclusion

The proposed route is detrimental to our livelihood, contrary to agreed Codes of Practice, and represents poor value for public money compared to the protection and utilization of the existing coastal route. We urge the Council to abandon this inland option and focus on a collaborative approach with Irish Rail to secure the preferred coastal path. Also consider greater investments in the many beautiful walking routes already in existence across the Garden County.

Sincerely,

