

Wicklow to Greystones Coastal Greenway

From: [REDACTED]
Date: Tue 2/17/2026 1:31 PM
To: Wicklow Greenway <wicklowgreenway@wicklowcoco.ie>

 2 attachments (12 MB)
Floodplain.MP4; Submission to the council.pdf;

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To whom it concerns,
Please see attached submission.
Kind regards,

[REDACTED]

To: Wicklow County Council Planning Department
Re: Formal Submission – Wicklow to Greystones Greenway (Emerging Preferred Route)

[REDACTED]
Date: 12/02/2026

To whom it may concern,

I am writing on behalf of [REDACTED] to formally object to the proposed inland route alignment. We support the coastal Greenway initiative from Greystones to Wicklow and recognise the benefits it could deliver to the wider community; however, as a specialised enterprise managing high-value sport horses, beef, and tillage, we contend that this inland alignment departs from national policy and represents an unsustainable burden on private agricultural land.

1. Credibility of the Public Consultation process

I am concerned that Wicklow County Council has not met the transparency and stakeholder engagement standards set out in TII's Project Management Guidelines and the Code of Best Practice for National and Regional Greenways. A Stage 1 Options Selection Report in 2024 identified the Coastal Route Corridor as the Primary Emerging Preferred Route Corridor, yet the coastal option appears to have been removed without publication of the technical reports supporting this change. This is particularly concerning given that the EMRA RSES 2019–2031 identifies a "Coastal Greenway from Wicklow to Greystones" as a strategic natural and green infrastructure asset.

The project website refers to key deliverables (including Stage 1 and Stage 2 options assessments), but only the Constraints Assessment and brief summaries have been published. The full "Stage 2 Options Selection" assessment (Atkins) and the approved Route Selection Report have not been made available for public inspection, preventing stakeholders from reviewing alternatives or assessing the justification for the route selection.

As a result, landowners and the wider public are being asked to respond to what is effectively a preferred route, rather than being consulted meaningfully on the corridor options as required. In summary, key route-selection information has not been disclosed, and the consultation steps appear to have been compressed or bypassed. A further consultation stage is required, where all realistic route options and the supporting assessments are published in full and presented for proper stakeholder review. At a minimum, this should include a clear explanation of how and why the project has shifted away from the coastal greenway identified in the EMRA RSES, together with the full options assessment demonstrating how any inland alternative can be justified against that strategic objective.

Further, landowners have not been clearly informed of their right to appoint an independent agronomist/property advisor, with reasonable professional fees met by the project promoter, as provided for under the Code of Best Practice

2. Violation of National Policy on Land Ownership

Government policy for Greenway development, as seen in successful models like the Waterford and Kilkee/Kilrush Greenways, dictates that State-owned land should be maximized.

Deviation from Policy: National strategy suggests a target of 70% State-owned land for such projects. The coastal route along the railway line meets this criteria.

By choosing the inland route as opposed to the options by the coast along the railway line, the Council has chosen to use at least the amount of state owned land, approximately 90% private ownership along the preferred route. This is a direct breach of the Strategy for the Future Development of National and Regional Greenways and the IFA Code of Best Practice, which mandates that State-owned lands must be exhausted before infringing on private holdings.

3. Breakdown in Inter-Agency Coordination and Abandonment of the Railway Corridor

The Council has not moved away from the railway corridor because it is undeliverable, but because it has failed to properly engage with Iarnród Éireann or demonstrate that the coastal option was genuinely explored. This is evidenced by a meeting convened by a local landowner to facilitate engagement, which was attended by three Iarnród Éireann engineers, yet no representative from Wicklow County Council attended. This calls into question the Council's willingness to seriously explore the coastal route, work through constrained sections, and pursue the engineering solutions that may be required.

In addition, Wicklow County Council appears not to have examined a clear opportunity to deliver the greenway in collaboration with the East Coast Rail Infrastructure Protection Projects. A coordinated approach could minimise environmental disturbance, reduce the requirement for private land acquisition, and deliver coastal protection and active travel infrastructure within a single integrated scheme. National greenway strategy explicitly identifies the value of such inter-agency collaboration, yet this potential synergy has not been transparently assessed or presented.

4. Cost

The estimated cost of the inland route is approximately €4m per kilometre. This is roughly double the national average of €2m per kilometre, driven by the need for private land acquisition, CPOs, and the legal costs that follow. These figures do not account for the substantial flood protection works that will be required along the Vartry floodplain. A coastal solution would deliver significantly better value by coordinating greenway delivery alongside the ECRIPP coastal protection works. Two problems solved with one investment on State-owned land, rather than two separate projects. This represents a serious disregard for value for money and the effective use of public funds.

5. Impact on our Farm

has had no direct engagement or correspondence from the project team regarding the selection of this alignment, despite the scale of impact on our holding.

is a specialist enterprise managing high-value sport horses, beef, and tillage, and the proposed inland route would sever multiple fields, create significant and unmanageable security risks to bloodstock, and materially disrupt day-to-day farm operations. The alignment would run along approximately 1,000 metres of our frontage and pass through several fields, reducing operational efficiency for grazing rotations and grassland management, increasing animal stress (particularly for highly sensitive sport horses), and requiring repeated livestock and machinery crossings. These crossings introduce additional safety risks for both the public and our operations and would impose an ongoing practical burden through gated access points.

The proposal also elevates biosecurity and disease-transmission risks due to sustained public access through the working heart of the farm, including the presence of dogs, which can cause livestock stress, injury, and wider animal welfare impacts. Construction would further undermine farm performance and continuity. In addition, the route may jeopardise our participation in agricultural schemes such as ACRES (geese and swan), which restrict livestock and machinery operations on relevant lands from 1 October to 31 March to support overwintering birds linked to the Murrrough and Broadlough SPA, much of which is within the affected area. Finally, Wicklow County Council has provided no credible long-term management, policing, or operational plan for a greenway running through active farmland, compounding the risks and uncertainty for landowners.

6. Lack of Maintenance Infrastructure and Security

Wicklow County Council currently lacks a dedicated Parks Department. Without a defined management structure, our bloodstock farm is exposed to:

Without active patrolling and maintenance, greenways through private farms become conduits for illegal dumping, trespassing and poaching.

Security of Bloodstock: As a stud farm, the security of our fencing is paramount. The Council has provided no plan for the long-term maintenance of fencing or the prevention of livestock escape/interference, posing a significant liability and safety risk to our equine operations.

7. Flooding and Hydraulic Risk

The proposed inland alignment runs directly through the Vartry River floodplain, a known flood zone that floods extensively several times each year, as evidenced in Appendix A. Any attempt to make this route usable year-round would require significant flood protection and raised construction, which would act as a hydraulic barrier or "de facto dam", displacing floodwater onto adjacent farmland. This would increase flood depth and duration on our grassland and tillage fields, create serious downstream and lateral impacts, and would be inconsistent with the National Flood Risk Management Guidelines. The coastal corridor does not introduce these floodplain risks.

8. Destruction of Protected Habitats

The proposed inland route would directly interfere with statutory protected species and their habitats along the Vartry and across our holding, including Atlantic salmon and sea trout spawning waters, otter holts, badger setts, and designated Whooper Swan foraging areas. We have worked closely with Inland Fisheries Ireland (IFI) for many years to prevent poaching on these protected waters, and introducing a public route with new river access and crossings would leave spawning areas far more exposed to disturbance and poaching, undermining long-standing conservation efforts. The route also cuts through grasslands we manage specifically to support overwintering birds, including pastures left ungrazed for extended periods to facilitate Whooper Swan foraging.

These impacts are being materially understated. The Constraints Study assesses coastal ecology in exhaustive detail, yet provides limited assessment of the ecological consequences of routing the Greenway through undisturbed inland habitat that functions as an extension of the Murrough SAC and SPA. Wildlife does not recognise mapped boundaries, and our lands directly behind the Murrough form part of the wider habitat used by these protected species. In addition, our lands outside the SAC are managed under the ACRES (geese and swan) scheme to provide undisturbed winter foraging for birds associated with the SPA, which has not been properly considered. By contrast, a coastal/railway corridor solution would utilise existing disturbed ground and planned coastal protection works, avoiding the introduction of new ecological disruption through sensitive inland habitats.

In conclusion,

The inland route should be abandoned and revert to the coastal railway corridor, in line with Government policy. Thus, delivering a combined greenway/coastal protection solution making efficient use of public funds.

Signed:

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