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Submission re. Impacts of the Emerging Preferred Route on South Lodge, Clonmannon

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From [REDACTED]  
Date Fri 2/13/2026 8:30 AM  
To Wicklow Greenway <wicklowgreenway@wicklowcoco.ie>  
Cc [REDACTED]

📎 1 attachment (136 KB)

South Lodge submission Feb 2026.pdf;

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**Re: Impacts of the Emerging Preferred Route on** [REDACTED]

Dear Sir/Madam,

I am making this individual submission in response to the non-statutory public consultation on the Emerging Preferred Route (EPR) for the Wicklow to Greystones Greenway.

At the outset, I wish to state that I support the development of sustainable transport and recreational infrastructure where it is appropriately located, environmentally robust, and proportionate in its impacts. However, while my property is not shown as being directly on the proposed route, it would nevertheless experience **direct, indirect, and cumulative impacts** should the inland alignment proceed at Clonmannon.

For clarity, my signature is included on both the Clonmannon Community Group submission and the Wicklow Coast Route Action Group submission. While I support the broader strategic, environmental, and policy concerns outlined within those collective representations, this letter is intended to

formally document the **specific and material impacts** the Emerging Preferred Route would have on my individual property and agricultural operation.

### **Omission from Constraints Reporting**

It should be specifically noted that I keep equine livestock for high-level showjumping and eventing purposes, with over half of my land dedicated to equine grazing, exercising and schooling. Despite the proximity of my lands to those identified in Section 4.6.3.2 of the Constraints Report — including neighbouring properties recorded as E3 and E4 — my holding has been omitted.

My herd number is [REDACTED] and this represents a material agricultural constraint that should have been captured within the baseline study. I have separately written to [REDACTED] regarding this omission and request that the record be formally corrected.

The absence of this information calls into question the completeness of the constraint identification process in the Clonmannon area.

### **Access and Security Risks**

My property is accessed by **two gates directly off the privately held** [REDACTED] which provides the sole access to my home and lands as well as to neighbouring properties.

Any greenway running along or crossing this private avenue would introduce a substantial and ongoing security concern. Establishing a continuous public corridor immediately adjacent to residential entrances materially increases the risk of trespass, opportunistic crime, interference with gates, and uncontrolled movement near livestock areas.

This would represent a fundamental and permanent alteration to the security environment of my property and raises serious questions regarding proportionality and the protection of constitutionally recognised property rights under Articles 40.3 and 43.

### **Equine Welfare and Safety Risks**

As acknowledged within the project documentation, horses are highly sensitive animals vulnerable to sudden movement, unfamiliar activity, and noise and light. The proximity of a busy greenway to actively managed equine land presents foreseeable safety risks.

Stress in horses is a recognised welfare issue that can result in gastric ulcers, bolting, fencing damage, and injury to both animals and handlers. These risks would arise during construction and persist throughout the operational life of the greenway due to:

- constant pedestrian and cycling activity
- noise and visual disturbance
- the likely presence of dogs, including those off lead
- activity incompatible with a controlled equestrian setting.

These are well-established equine management risks and should be evaluated accordingly.

### **Visual Interface and Functional Impact**

My eastern paddocks — where the majority of horses graze — would be directly overlooked by the greenway, while greenway users would remain continuously visible from the grazing lands. This creates an unavoidable and

permanent interaction between public recreation and a high-value equestrian operation.

Such proximity has the potential to diminish the functional suitability of the land for equine purposes over time.

### **Hydrology, Protected Lands, and European Environmental Obligations**

Drainage from my lands, including field drains and pond waters, ultimately flows into the Murrough system — a landscape of recognised ecological sensitivity. I have personally observed eels and other protected species within these connected water features.

The surrounding area includes protected designations such as **Special Area of Conservation (SAC), Special Protection Area (SPA), and other wildlife zones**, and parts of the agricultural landscape may also fall within **Areas of Natural Constraint (ANC)** classifications that support the continuation of viable farming.

Any routing decision that has the potential to affect hydrological pathways, surface runoff, habitat continuity, or species protection must be assessed with full regard to **European environmental law**, including the Habitats Directive and Birds Directive. Failure to demonstrate beyond reasonable scientific doubt that designated sites would not be adversely affected creates a clear planning vulnerability.

It is essential that a precautionary approach be applied. Where uncertainty exists regarding ecological effects, **avoidance** — rather than mitigation — is the established planning principle.

The introduction of paved or semi-permeable surfacing raises legitimate concerns regarding:

- contaminated runoff
- sediment transfer
- altered drainage patterns
- downstream ecological disturbance within designated areas.

These matters should be robustly examined at route-selection stage to ensure legal compliance and avoid foreseeable planning risk.

### **Material Planning Risk and Greenway Policy**

The Government's **Strategy for the Future Development of National and Regional Greenways** identifies a **preferred model** which prioritises the use of land already in State ownership or control wherever feasible, thereby reducing private land impacts and improving deliverability.

Given the availability of alternatives along the coastal corridor and other State-associated lands, the current inland proposal raises concern that this preferred model is not being followed. Departing from established national policy where less constrained options may exist introduces avoidable planning risk and calls into question whether the Emerging Preferred Route represents the most appropriate and proportionate solution.

### **Additional Residential and Operational Impacts**

Even where land is not directly acquired, proximity effects must be properly considered. Likely impacts include:

- increased noise levels

- litter
- security risks associated with a nearby public corridor
- artificial lighting within a currently dark rural setting
- heightened flood risk where ground conditions are already sensitive.

Collectively, these represent a material change to the quiet enjoyment, safety, and operational viability of my property.

### **Coastal Alignment as the More Appropriate Strategic Option**

In light of the constraints associated with inland routing through actively managed agricultural land and environmentally sensitive areas, the coastal corridor remains the most logical and strategically robust solution.

A coastal-aligned route delivered in coordination with Irish Rail — particularly where coastal protection works are already required to address erosion and climate resilience — would represent stronger long-term planning, even if more complex or costly in the short term.

Infrastructure of this scale should prioritise durability, environmental alignment, and minimisation of private-land impact rather than short-term expediency.

### **Request**

Accordingly, I respectfully request that Wicklow County Council:

1. Correct the Constraints Record to reflect my equine operation
2. Assess the **direct, indirect, and cumulative impacts** of inland routing on adjacent equestrian properties
3. Fully evaluate the security implications of routing a public greenway along or across a privately held access avenue
4. Apply a precautionary approach where hydrological connectivity to SAC/SPA and related habitats is present
5. Ensure full alignment with European environmental obligations
6. Reconsider the strategic merits of a coastal alignment delivered in coordination with Irish Rail

It is difficult to conclude that the Emerging Preferred Route represents the least constrained, most proportionate, or most sustainable option for the Clonmannon area.

Yours faithfully,



[REDACTED]

to [REDACTED] Wicklow County Council regarding this omission and request that the record be formally corrected.

The absence of this information calls into question the completeness of the constraint identification process in the Clonmannon area.

### **Access and Security Risks**

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[REDACTED]

**Non-Statutory Public Consultation – Emerging Preferred Route (EPR)  
Wicklow to Greystones Greenway**

The Senior Executive Officer  
Transportation and Infrastructure Delivery Department  
Wicklow County Council  
County Buildings, Whitegates  
A67 FW96

13 February 2026

**Re: Impacts of the Emerging Preferred Route on [REDACTED] Clonmannon**

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[Redacted]

It is difficult to conclude that the Emerging Preferred Route represents the least constrained, most proportionate, or most sustainable option for the Clonmannon area.

Yours faithfully,

[Redacted signature block]

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Dear Senior Executive Officer,

I am writing to follow-up on a request I previously made during Stage 1 of the Greystones–Wicklow Greenway process, for which I did not receive supporting information.

I am seeking clear information on how the preferred route option overlaps or interacts with areas of special consideration for nature and wildlife, including:

- Special Areas of Conservation (SACs)
- Special Protection Areas (SPAs)
- Natural Heritage Areas (NHAs)
- Areas of Natural Conservation (ANCs)
- Bird sanctuaries and designated bird habitats
- Areas where protected or priority species are recorded

In particular, it would be helpful to receive:

- Maps or route overlays showing the preferred option in relation to these designations
- Any environmental constraints mapping used to inform route selection
- Confirmation of whether Appropriate Assessment screening has been undertaken to date

I attended the project display at Wicklow Library, where I spoke with Sean from Atkins, who suggested that I submit this request again to ensure the relevant information could be provided.

This information is important to allow sufficient time to review and understand the environmental context of the preferred option in advance of preparing a submission before the 13 February deadline.

I would appreciate confirmation of receipt of this request and an indication of when the information might be made available.

Kind regards,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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Is d'úsáid an duine/na ndaoine chuig a bhfuil sí seolta agus sin amháin atá an teachtaireacht seo. D'fhéadfadh go bhfuil faisnéis faoi phribhléid nó faoi rún de réir bhrí an dlí is infheidhme inti. Má fuair tú an ríomhphost seo de bharr earráide, léigh i dteagmháil leis an seoltóir chomh luath agus is féidir, le do thoil. Ní gá gurb ionann na dearcaí a léirítear sa ríomhphost seo agus dearcaí Comhairle Contae Chill Mhantáin. Tá aon iataín seiceáilte ag scanóir víris agus dealraíonn sé go bhfuil siad glan. Bí cinnte go ndéanfaidh tusa scanáil ar gach teachtaireacht chomh maith, le do thoil, mar ní ghlacann an Chomhairle dliteanas ar bith i leith éilliú ná dármaiste do do chuid córas.

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Constraints Report Omission [redacted]

From: [redacted]  
Date: Wed 2/11/2026 8:07 AM  
To: [redacted]  
Cc: Wicklow Greenway <wicklowgreenway@wicklowcoco.ie>

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De: [redacted]

Thank you for your response and for providing the additional Constraints Report and mapping.

Having reviewed the documents, I wish to formally note that I maintain equine livestock for high-level showjumping and eventing purposes, with over half of my land dedicated to equine grazing and exercising. Despite the proximity of my property to those identified in Section 4.6.3.2 of the Constraints Report — including neighbouring holdings recorded as E3 and E4 — my lands have not been included.

My herd number [redacted] and this constitutes a material agricultural constraint that should have been captured as part of the baseline assessment. The omission raises concern regarding the completeness and accuracy of the constraint identification process in the Clonmannon area.

I would appreciate written confirmation that this omission will be acknowledged and that the Constraints Report will be updated accordingly.

I shall be making a separate full submission, however I wish to note this omission in advance of my individual submission.

I look forward to your response.

Kind regards,

[redacted signature]

On 30 Jan 2026, at 15:17, [redacted] wrote:

Dear [redacted]  
The Constraints report is now available on the Greenways website <https://wicklowgreenways.ie/blessington-lakes-egreenway1/preystones-to-wicklow>  
We have also added maps showing the emerging preferred route alongside the designated SAC and SPA areas.  
Appropriate Assessment screening will be undertaken at the next phase (Phase 3 Design & Environmental Evaluation) when the design is sufficiently progressed to undertake.  
In the meantime, the emerging preferred route is currently on display and open for submissions until 13/2/2026.

Regards,

[redacted]  
[redacted]  
[redacted] Transportation & Infrastructure Delivery

Comhairle Contae Chill Mhantáin, Halla an Chontae, Bóthar an Stáisiúin, Cill Mhantáin, A67 FW96  
Wicklow County Council, County Building, Station Road, Wicklow Town, A67 FW96

[www.wicklow.ie](http://www.wicklow.ie)

<image001.png>

From: [redacted]  
Sent: Tuesday 27 January 2026 13:14  
To: Wicklow Greenway <wicklowgreenway@wicklowcoco.ie>  
Cc: [redacted]  
Subject: Information request in advance of submissions