
Wicklow to Greystones Greenway - Submission re Emerging Preferred Route

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Date Thu 2/12/2026 8:52 PM
To Wicklow Greenway <wicklowgreenway@wicklowcoco.ie>

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Attn: [REDACTED]

Dear [REDACTED]

It was good to meet you and your colleagues at the recent public consultation on the Greenway in Greystones Library.

Please find attached below my submission in relation to the "preferred route" for the proposed Greenway.

Yours sincerely,

[REDACTED]

SUBMISSION ON THE PROPOSED GREYSTONES TO WICKLOW TOWN GREENWAY

1. Having been a cyclist from an early age, I have been heartened in recent years by the development of Greenways in Ireland that allow for safe cycling experiences for the young and not-so-young, particularly those routes that have taken advantage of disused former railways, where little disruption has been caused to farming or the environment and interaction with other forms of transport are minimal. Cycling to school, as I did, along what were then 'safe' country roads and relatively quiet provincial town streets is, unfortunately, rarely an option for today's children. For 30 years I cycled to work or combined cycling with taking the train. I have enjoyed cycling on Greenways in the west and south of Ireland and extensively in France - although they are not obsessed there with bitumen pavement as the surface for their 'pistes cyclables' which, in the main, are more appropriately described as 'greenways' than those here in Ireland.
2. So I had hoped that a Greenway from Greystones to Wicklow Town would be a practical, functional route linking directly with the villages of Kilcoole and Newcastle and providing a safe, dedicated space for cyclists and walkers to journey to work or school in those villages and in the towns bookending the cycleway, while also providing a path for tourists to enjoy at a more leisurely pace, or weekend cycling club members at a faster one.
3. However, that is not what we have been given by Wicklow County Council and their consultants [REDACTED] with their proposed "preferred route". Instead this Greenway route will damage wildlife and biodiversity, disrupt and interfere with farming activity and will fail to achieve one of the original aims of the East Wicklow Greenway supporters which was to bring new tourism and business opportunities to the villages of Kilcoole, Newcastle and Rathnew.
4. Evidently, the original Coastal route corridor preferred by the East Coast Greenway Committee was not possible because of serious erosion due to Climate Change and the plans by Irish Rail to have rock armour and cement barriers along most of the shore to protect the rail line (East

Coast Rail Infrastructure Protection Projects). It is disappointing that no serious effort was made to examine an alternative route that matched the original objectives of the Committee, as the selected route simply follows the outline of the Murrough marshlands along its landward side resulting in a convoluted, tortuous cycleway, zigzagging its way in and out between fields and marshland that would ultimately be unattractive to leisure cyclists and of no value whatsoever to those hoping for a safe, convenient alternative route to school or their place of work. It is also so far away from any of the villages that it was supposed to benefit in terms of footfall and tourism, that it will bring little or no increase in income for the small businesses in any of those places.

5. Unfortunately, the choice of the “preferred route” appears destined to ensure that the project becomes mired in legal actions by farmers for disruption to farming activity and land loss, and court proceedings in Europe for breaches of the EU Habitats Directive because the Murrough Wetlands is a Natura 2000 site combining a Special Area of Conservation (SAC) and a Special Protection Area (SPA). These areas are designated under the terms of the EU Habitats Directive and the EU Birds Directive. They are of international importance and have the highest level of legal protection in Europe.
6. As an experienced volunteer with BirdWatch Ireland who has been counting birds along the East coast at Kilcoole and Newcastle for more than fifteen years, I believe that this ‘preferred’ route will blight and contaminate these areas as a resource for nature. In particular, the birds that use the Murrough to breed in Spring and Summer or for refuge and feeding during the Autumn and Winter will be subjected to constant noise and disturbance from people and dogs. There was a suggestion at the public consultation in Greystones Library that screens could be erected at sensitive places along the route but unless they form a covered tunnel, it would be ineffective because birds do not view their surroundings at human eye level but from the air, so their perspective is very different. They will still perceive threats from human and dog activity all along the edge of what heretofore they considered a wild protected and safe area for them to feed and breed.

7. Already this Winter, especially during January and early February, we have witnessed the flooding of areas all along the selected route from Kilcoole south to Newcastle. Given that Climate Change is going to exacerbate the problems we face with heavy rainfall every Winter and further dramatic coastal erosion, it will be virtually impossible to keep the selected Greenway route open safely throughout the year. On top of that, there is also the flooding that can occur at any time of the year caused by the fact that the outflow from the Kilcoole marshes at the Breaches regularly gets silted up and blocked when there is a combination of a high tide and strong onshore winds. This is an important outflow as it is where the Kilcoole, Ballyronan and NewtownMountkennedy streams enter the sea together: any blockage and the consequential impact is felt very quickly with a rise in the water levels and frequent local flooding.

8. TII publish on their website very specific “Standards for Rural Cycleway Design (Offline & Greenway)” covering the materials to be used in both the surface “pavement” and the foundation layer which is defined as the combined structure of the subgrade, subbase and capping layers upon which the cycleway will be built (see pages 55-59 of the standards document). These include Bituminous Materials for the surface (which are composed mainly of hydrocarbons, with small amounts of sulfur, nitrogen, and oxygen), Hydraulically Bound Materials for the sub grade (which are usually engineered mixtures of aggregates, water, and hydraulic binders (such as cement, lime, slag, or fly ash) and Unbound Granular materials for capping (which usually consist of loose, unbonded aggregates—such as crushed rock, gravel, or sand). During construction, tonnes of this material will require to be transported into a highly ecologically sensitive area and deposited in vast quantities in order to ensure that the cycleway does not sink in the farm/marshland and has an even surface as mandated by TII. It will be impossible to prevent leaching from these highly toxic materials into the sensitive waterways that the route traverses and borders - waterways that are already classified as “not meeting status requirements” under the Water Framework Directive and have been recorded under the recent assessment carried out by LAWPRO for the EPA as deteriorating in quality since 2021. There is no doubt that they will deteriorate further if these types of materials are deposited in large quantities all along the chosen route.

9. I believe that if more serious consideration had been given to one of the original options for the Greenway, namely the 'Regional road corridor' route, it would have avoided most of the issues that I have outlined in this submission and would certainly achieve one of the original aims of such a scheme, which was to bring increased footfall and income to local businesses along the Greenway. If that option could be tweaked to include part of the current choice of route that runs south from Greystones to Kilcoole Railway station and then connect to a corridor running parallel to the coast road all the way to Rathnew - the R761 - it would be more direct and appealing to cyclists as a safe alternative to travel to local schools or workplaces; it would be less disruptive to farming as it would only involve a new boundary along what is the existing edge of their farms; there would be attractive views across farmland and woods along the route; its negative impact on nature and wildlife would be minimised because the existence of the adjacent road means that the quality of the habitat is reduced in any case; it avoids the protected sites in the Murrough thus avoiding the inevitable European litigation/investigation and associated delays at the taxpayers' expense with the project; it is much less likely to be impacted by flooding; it would help achieve some of the aims in the Government's Safe Routes to School Programme and its National Sustainable Mobility Policy while being a much more logical addition to the National Cycle Network plan to link Wicklow's towns than the isolated "preferred route" in the current proposal.

[REDACTED]