

Non Statutory Public Consultation. Emerging Preferred Route.

From: [REDACTED]  
Date: Mon 2/16/2026 9:38 AM  
To: Wicklow Greenway <wicklowgreenway@wicklowcoco.ie>  
Cc: [REDACTED]

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To Wicklow County Council.

[REDACTED]  
My name is [REDACTED] I own and live at [REDACTED] Co. Wicklow / [REDACTED]  
I am the brother of [REDACTED] who own and live at [REDACTED]

The parents of [REDACTED] who acquired both farms some 60 years or more ago. To this day the farms are still fully operational providing much needed employment and adjoin each other.

I am writing to support the submission made by [REDACTED] to Wicklow County Council dated the 18<sup>th</sup> of January 2026 together with an accompanying submission from [REDACTED] dated 11<sup>th</sup> February 2026, engaged by my nephew [REDACTED] to provide professional advice to the family.

- [REDACTED] have advised:
1. Public consultation is inconsistent with the requirements of the Code of Best Practice National and Regional Greenways.
  2. Choice of Emerging Preferred Route appears to be contrary to the Greenway Strategy and Code of Best Practice.

Accordingly, it is not possible for our family to engage in the consultation process in a meaningful way.

Specifically, it is not clear what phase of Public Consultation the Local Authority is currently conducting and what further opportunities for consultation our family will have.

[REDACTED] requests therefore, on our behalf that the Local Authority publish details of a further phase of public consultation in line with the necessary requirements of the Greenway Strategy and Code of Practice.

The purpose of this request is to allow our family and indeed other members of the public, including affected landowners to properly engage in environmental decision-making on this project.

We await your answer on this most important matter by early response.

Yours

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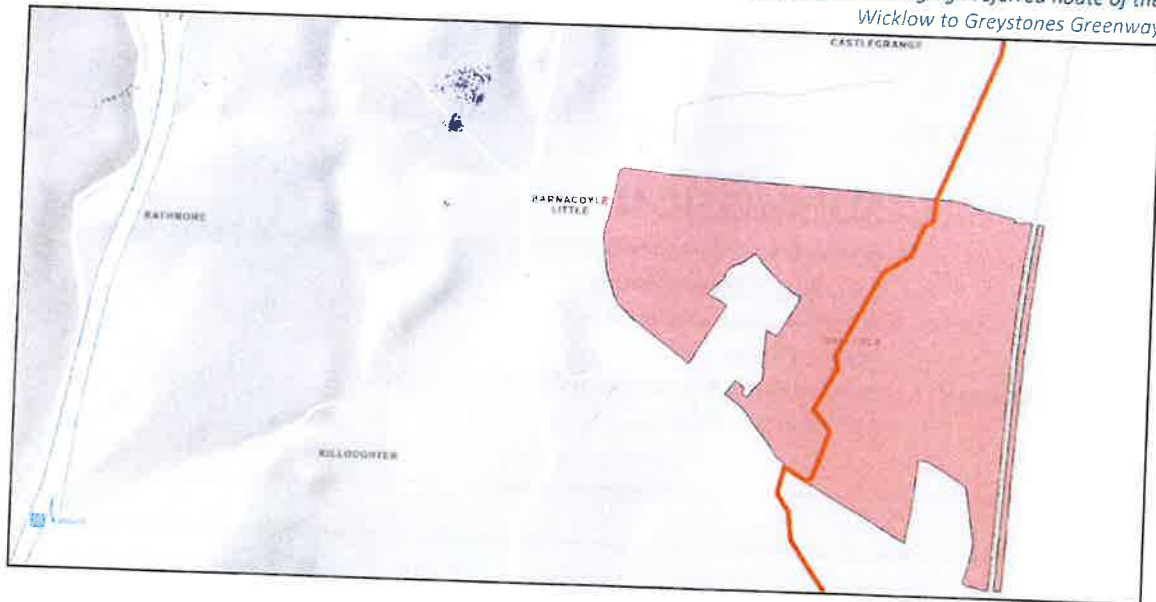
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# 1. INTRODUCTION & EXECUTIVE SUMMARY

have been retained by [REDACTED]  
– to prepare this submission as part of the non-statutory public consultation on the Emerging Preferred Route for the Wicklow to Greystones Greenway.

[REDACTED] for generations and it remains a single, actively managed working farm. While our Client supports, in principle, the development of a Greenway between Wicklow and Greystones, the Emerging Preferred Route for the proposed Wicklow to Greystones Greenway bisects the working farmland of [REDACTED] (see Fig 1 below) with the potential for severe operational and viability concerns for the farm. This and other matters of detail are discussed in our Client's letter of submission, which is attached at Appendix A.

Fig 1. Screenshot from [landdirect.ie](http://landdirect.ie) showing the extent of Folio WW4770 showing the farm lands of Ballybla Farm. This image has been annotated with an orange line to show the location of the Emerging Preferred Route of the Wicklow to Greystones Greenway



This submission raises two principal concerns with the current consultation, which are developed in detail in Section 2 below.

**First, the identification of an Emerging Preferred Route is procedurally premature.** The Department of Tourism, Transport and Sport's *Strategy for the Future Development of National and Regional Greenways* (the Greenway Strategy) and the *Code of Best Practice National and Regional Greenways* (December 2021) made thereunder prescribe a structured, multi-phase programme of public consultation. The Code envisages that a Constraints Study informs the identification of broad route corridor options, which are then subject to public consultation before an Emerging Preferred Route is identified. In this instance, the Constraints Study was not finalised until 26<sup>th</sup> January 2026 – after the current phase of consultation had already commenced – yet the Local Authority has proceeded directly to the identification of an Emerging Preferred Route without an intervening consultation on route corridor options. Moreover, the consultation documents do not include the full options selection report or a comparative assessment of the route corridor options against the scheme objectives and the "Five S" criteria, as required by Section 2.4 of the Code of Best Practice.

This has left affected landowners, including our Client, unable to engage meaningfully in environmental decision-making on this project. It is also understood that the Local Authority has not

informed our Client of his entitlement under the Code to independently engage a Farmer Agronomist or Property Advisor at the project promoter's expense.

**Second, the choice of Emerging Preferred Route appears to be inconsistent with both Government policy and the regional planning framework.** The *Eastern & Midland Regional Spatial & Economic Strategy 2019–2031* (EMRA RSES) identifies a "Coastal Greenway from Wicklow to Greystones" as a strategic natural and green infrastructure asset. The Emerging Preferred Route, however, follows a predominantly inland alignment through private agricultural land, often hundreds of metres from the coast. This raises concerns under several of the "Five S" criteria mandated by the Greenway Strategy:

- **Scenic / See and do:** The coastal corridor between Wicklow and Greystones is designated as an Area of Outstanding Natural Beauty and was described in the Local Authority's own earlier consultation materials as offering "*stunning scenery and a diversity of heritage.*" The Emerging Preferred Route would bypass this landscape, with the coast unlikely to be visible from much of the route.
- **Sustainable:** An existing infrastructure corridor — the Dublin to Wexford railway line — already runs along the coast, and the East Coast Railway Infrastructure Protection Projects (ECRIPP) envisages significant works to that corridor. Co-locating the Greenway with this existing and evolving transport corridor would be more consistent with sustainability principles than the creation of a new infrastructure corridor through undeveloped agricultural land. The Emerging Preferred Route would also sever protected habitats at the Murrough Wetlands from the wider rural landscape, creating a second physical barrier in addition to the railway, in apparent conflict with CPO 18.7 of the *Wicklow County Development Plan 2022–2028*, which seeks to facilitate green bridges over existing transport barriers rather than the creation of new ones.

Moreover, the Greenway Strategy states that the preferred model is to use land already in State control and that, where this is not possible, severance and impact on landholdings should be minimised. The Emerging Preferred Route bisects Ballybla Farm and presumably a significant number of other agricultural holdings along the corridor. Such severance is far less likely to occur were the Greenway developed along the railway line.

On behalf of our Client, we respectfully request that the Local Authority:

1. Publish details of a further phase of public consultation on route corridor options, in accordance with the phased consultation programme prescribed by the Greenway Strategy and the Code of Best Practice, to allow affected landowners and the wider public to engage meaningfully in the process.
2. Make available the full options selection report and the comparative assessment of route corridor options against the scheme objectives and "Five S" criteria that informed the identification of the Emerging Preferred Route.
3. Confirm that, in accordance with Section 2.4 of the Code of Best Practice, our Client may independently engage the services of a Farmer Agronomist or Property Advisor to advise on the agronomic and economic implications of the proposed route for Ballybla Farm, and that the fees involved will be paid for by the project promoter.

The grounds for these requests are set out in full in Section 2 below.

## 2. GROUNDS OF SUBMISSION

### 2.1 Public Consultation Inconsistent with the Requirements of the Code of Best Practice National and Regional Greenways

The Department of Tourism, Transport and Sport's *Strategy for the Future Development of National and Regional Greenways* (the Greenway Strategy) states that the Department "will ensure that project promoters will work with Local Communities, Local Landowners, Local Authorities and other relevant State Bodies and organisations to deliver ... Greenways that are developed with all relevant stakeholders in line with an agreed code of practice."

The Department's *Code Of Best Practice National And Regional Greenways* (December 2021) sets out detailed requirements for the multi-phase process of designing, planning and implementing a Greenway proposal. The Code, which was developed in conjunction with representatives of TII, planning authorities, The Irish Creamery Milk Suppliers Association, the Irish Cattle and Sheep Farmers Association and the Irish Farmers Association, is intended to help design Greenway routes "that have widespread support, that minimises severance of farming land, that provide access to our towns and villages as well as wonderful ways to experience our beautiful countryside". The Code goes on to acknowledge "the important role of farmers / landowners in the process and outlines the procedures to ensure that they are treated fairly and equitably".

It emphasises that:

*"Public consultation will inform project development at four key stages:*

- *Scheme Study Area Public Consultation*
- *Route Corridor Options Public Consultation*
- *Preferred Route Corridor Public Consultation*
- *Preferred Route Consultations with individual landowners."*

It is unclear what stage of public consultation is now being pursued by the Local Authority. Specifically, the Code of Best Practice indicates that the initial consultation informs the preparation of the Constraints Study, while the second phase of consultation concerns the presentation of options for the Greenway Corridor to the public. The Code states: *"Following this initial period of public consultation, surveys will be carried out to identify the potential constraints in greater detail. Based on these surveys and the consideration of views raised at the public consultation, a Constraints Study Report will be completed and made available for public inspection, including on the project website. This report will inform the next stage in the planning process, which is the identification of route corridor options."*

The Constraints Study associated with this consultation was published in January 2026. The document history at page 2 of that document indicates that the final version of the document did not issue until 26th January 2026, after this consultation had already begun. As a Constraints Study has only just been published as part of this phase of the Consultation, the Department's Code Of Best Practice indicates that the next phase of public consultation on the Wicklow to Greystones Greenway should relate to the consideration of broad route corridor options.

However, the current phase of public consultation seems instead to cover elements of what should be the third and fourth phases of public consultation. The Code, at Section 2.4, states:

*"Following the consultation on the route corridor options and further studies and evaluations, an emerging preferred route corridor will be determined. While the views of the Independent Agronomist will be considered during this stage of the process,*

*farmers / landowners within the emerging preferred route corridor may also independently engage the services of their own Farmer Agronomist / Property Advisor to advise on individual agronomy issues and their landholding. The fees involved will be paid for by the project promoter. (See Section 3.1.4)*

*The emerging preferred route corridor will be identified based on the respective advantages and disadvantages of the various options, as well as consideration of the various route corridor options in relation to the scheme objectives and Five S criteria. The issues considered in arriving at the preferred route corridor will also include environmental, engineering and economic factors; and the nature of impacts of the route on individual farm holdings. Every effort will be made to choose the route corridor that maximises the support of potentially affected landowners and the local communities."*

If it is the case that the current phase of consultation is intended as the third or fourth phase of consultation, it is noted that the basis (i.e. *"the respective advantages and disadvantages of the various options, as well as consideration of the various route corridor options in relation to the scheme objectives and Five S criteria"*) for the Local Authority's decision on an Emerging Preferred Route has not been provided as part of this consultation. A summary report prepared by AtkinsRéalis entitled *Summary Options Selection Report Wicklow County Council* (December 2025) provides a very brief and high level overview of constraints on route corridors, followed by a declaration of the Emerging Preferred Route:

#### ***"Findings***

*The assessment highlighted several key trends:*

- *Economy - Coastal route options scored highly for scenic quality and tourism potential but involved higher implementation costs due to bridge structures required to cross the railway line and coastal protection works. Inland options were more cost-effective and offered flexibility for future development.*
- *Accessibility - Both coastal and inland routes improve connectivity between Greystones and Wicklow. Coastal routes aligned strongly with the Greater Dublin Area Cycle Network Plan, while inland routes provided better access to local services.*
- *Social Impacts - All options supported active travel and health objectives. Inland routes offered greater potential for universal accessibility due to fewer spatial constraints, while coastal routes provided amenity value.*
- *Safety Impacts - Coastal routes generally allowed for segregated paths with minimal road interaction, but spatial constraints near the railway limited design widths. Inland routes achieved recommended widths more consistently but involved more road crossings.*
- *Land Use Impacts - Inland routes required more private agricultural land and incorporate greater potential for severance. Coastal routes minimised severance but conflicted with rail infrastructure and environmental designations.*
- *Climate Change Impacts - Coastal routes were more exposed to erosion and flooding, requiring significant protection works. Inland routes offered greater climate resilience.*

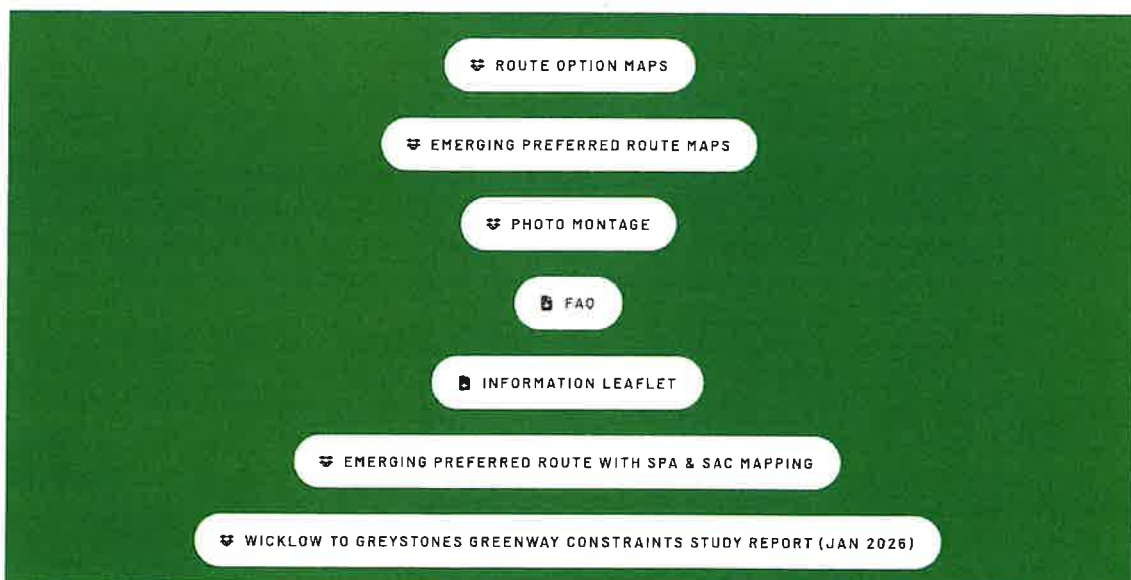
- *Local Environmental Impacts - Coastal routes scored poorly due to direct interaction with Special Area of Conservation (SAC) and Special Protection Area (SPA), while inland routes avoided these sensitive areas and performed better in terms of their impact on ecology and the environment*

### **5. Emerging Preferred Route**

*Following the Stage 2 assessment, the Emerging Preferred Route was identified. The route is approximately 24.8 kilometres in length, with around 83% delivered as an off-road shared path, providing a high-quality and largely traffic-free experience for users. It combines coastal and inland sections to balance scenic value with environmental sensitivity, avoiding designated habitats where feasible. The Emerging Preferred Route also integrates with key transport nodes, connecting directly to Greystones, Kilcoole, and Wicklow rail stations, and links with existing and planned active travel infrastructure, ensuring strong connectivity for both recreational and commuting purposes."*

The full options selection report is not included in the consultation documents, which are as follows:

## Documents



The *Summary Options Selection Report* does not include details of the information that formed the basis for the findings above, how the routes were scored or a comparative assessment of route options in the different Areas (Areas A-E), e.g. would a coastal route be better in one area but an inland route better in another?

This has left members of the public, including our Client, scrambling to understand why the route of the proposed Coastal Greenway would cut through farmland often hundreds of metres away from the coast. The absence of clear rationale for the choice of Emerging Preferred Route or comparative analysis of the route options has left our Client unable to properly engage in this process of environmental decision-making on this project.

In addition to this, it is understood that the Local Authority did not inform our Client that he may retain the services of a Farmer Agronomist or Property Advisor to advise on the agronomy issues affecting his family farm, notwithstanding that [REDACTED] is bisected by the Emerging Preferred Route for the Greenway.

Given this, we submit that the identification of an Emerging Preferred Route at this early stage in the process is not consistent with best practice as outlined in Government policy. In the absence of the comprehensive consultation mandated by the Code of Best Practice that would inform a choice of preferred route, identification of a preferred route at this early stage is grossly premature and risks unforeseen environmental effects and agronomic and economic impacts on lands along the route corridor.

## **2.2 Choice of Emerging Preferred Route Appears to be Contrary to the Greenway Strategy and Code of Best Practice**

The Greenway Strategy, and the Code of Best Practice prepared and agreed thereunder, require that all future greenways comply with the “Five S” criteria, i.e. that Greenways will be **Scenic, Sustainable, Strategic, Segregated** and have lots to **See and do**. As noted above, notwithstanding Section 2.4 of the Code of Best Practice, the consultation documents for this phase of consultation do not include a “*consideration of the various route corridor options in relation to the scheme objectives and Five S criteria*”.

In the absence of this information, it seems that the Emerging Preferred Route, which follows an inland route away from the coast, is less consistent with several of these criteria than other proposed route options as follows:

### **2.2.1 ‘Scenic’ and ‘lots to See and do’**

The coastal area between Wicklow Town and Greystones is designated as an Area of Outstanding Natural Beauty. The *Eastern & Midland Regional Assessment Regional Spatial & Economic Strategy 2019-2031* (EMRA RSES) identifies the proposed “*Coastal Greenway from Wicklow to Greystones*” (emphasis added) at Table 7.1 Strategic Natural, Cultural and Green Infrastructure Assets in the Region.

The information leaflet associated with the April / May 2024 public consultation on the Wicklow to Greystones Greenway stated as follows: “*County Wicklow is a coastal beauty in Ireland’s Ancient East, with a diverse landscape and visual experience bestowing coastline, rivers, mountains, lakes forests, villages and cliffs. As a result Wicklow attracts visitors from near and far for recreation activities, and there is a unique opportunity for Wicklow to develop a new landmark greenway catering for all ages and abilities. The coastal corridor between Wicklow Town and Greystones provides stunning scenery and a diversity of heritage. It is characterised by a long straight shingle beach, inland of which occurs the Murrough Wetland Complex, the largest such complex on the East coast of Ireland. Along the way are the many towns, villages, harbours, monuments and other structures showcasing the interaction of people with the coast from earliest times to the present day.*”

In circumstances where the coastal area is the area that has been identified as scenic and provides ample opportunities for both things to see and do, it is unclear why the Emerging Preferred Route would cut through private farmland hundreds of metres away from the coast. As indicated by the photomontages provided as part of this consultation, the coast is unlikely to even be visible from much of the Emerging Preferred Route for the Greenway.

### 2.2.2 'Sustainable'

Section 6.5 of the Constraints Study (January 2026) prepared in respect of the Wicklow to Greystones Greenway references the East Coast Railway Infrastructure Protection Projects (ECRIPP), which aims to enhance coastal protection in key areas along the Dublin to Wicklow railway line. The Study notes that ECRIPP is in Phase 2, focusing on project concept, feasibility, and option selection and that a public consultation is due to take place later in the year on the Emerging Preferred Options. The Study goes on to state that *"Consultations and information sharing between Irish Rail, Wicklow County Council and both Design Teams is ongoing and this process will inform decision making with respect to optioneering, design and mitigation for the proposed Greenway."* In circumstances where there is an existing infrastructure corridor along the Wicklow to Greystones coast (i.e. the railway) and where proposals to carry out works to that corridor are at an early design stage, it is difficult to understand how the construction of a separate infrastructure corridor through undeveloped land could be more consistent with sustainability principles than a route along the railway corridor.

The Constraints Study explains how the *"railway line has influenced the development of the entire system"* of habitats along the coast: *"The Dublin to Wexford railway line separates certain habitats within the Murrough with wetland habitat (lagoons, fens etc) located on the west and shingle beach and dune habitats located on the east side of the railway. These separate habitats accommodate different bird species."* Given the extent of change wrought by the development of the railway and given that the railway corridor already acts as a physical barrier severing habitats, it is of considerable concern that the Emerging Preferred Route would sever the protected habitat at the Murrough Wetlands from the wider rural landscape, resulting in the permanent obstruction of ecological corridors. In addition to sustainability and ecological concerns, this approach, which seeks to create a new physical barrier within green infrastructure, would appear to directly conflict with CPO 18.7 of the *Wicklow County Development Plan 2022-2028*, which states that it is a policy of the Local Authority to facilitate green bridges over existing physical transport barriers.

Moreover, it is noted that the Constraints Study refers to sustainability under the Greenway Strategy in the context of land ownership:

*"This strategy also identifies the desire for greenways to be developed in a sustainable manner. It notes that the preferred model for the development of greenways is to use land which is already in state control. This provides long-term certainty that the public investment will be usable by the public into the future. When full land ownership by the state is not possible, the following things should be valued:*

- *Severance of landholdings is minimised;*
- *Impact on landholdings is minimised as much as possible."*

As noted above, the Emerging Preferred Route would bisect working farmland at Ballybla Farm and presumably also a large number of farmholdings between Wicklow Town and Greystones. Such severance of and impact on landholdings is much less likely to occur were the Greenway to be developed along the railway line.

### 3. CONCLUSION

In conclusion, while our Client does not object in principle to the development of a Coastal Greenway from Wicklow to Greystones, the Local Authority has not provided sufficient information, within the meaning of the *Strategy for the Future Development of National and Regional Greenways*, and the *Code Of Best Practice National And Regional Greenways* made thereunder, that would allow our Client to engage in the consultation process in a meaningful way. Specifically, it is not clear what phase of public consultation the Local Authority is currently conducting and what further

opportunities for consultation our Client will have. Moreover, the basis for the Local Authority's choice of the Emerging Preferred Route (e.g. "*consideration of the various route corridor options in relation to the scheme objectives and Five S criteria*") has not been provided.

On behalf of our Client, we would ask that the Local Authority publish details of a further phase of public consultation in line with the requirements of the Greenway Strategy and Code of Practice to allow for members of the public, including affected landowners such as our Client, to properly engage in environmental decision-making on this project. We would also request that the Local Authority confirm that, as part of that consultation, our Client "*may also independently engage the services of their own Farmer Agronomist / Property Advisor to advise on individual agronomy issues and their landholding*" and that the "*fees involved will be paid for by the project promoter*".

Please direct all correspondence to 

Prepared by,

