

Greystones to Wicklow Greenway Public Consultation Observation [REDACTED]

From: [REDACTED]
Date: Fri 2/13/2026 3:49 PM
To: Wicklow Greenway <wicklowgreenway@wicklowcoco.ie>
Cc: [REDACTED]

1 attachment (534 KB)
[REDACTED] Greystones to Wicklow Greenway Submission to WCC.pdf;

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To whom it may concern,

Please see attached observation on the Public Consultation of the Greystones to Wicklow Greenway Route.

Kind regards,
[REDACTED]

[REDACTED]
[REDACTED]
Date: 12th February 2026

To: Wicklow County Council Planning Department

Re: Formal Submission - Wicklow to Greystones Greenway (Emerging Preferred Route)

To whom it may concern,

[REDACTED] formally object to the Emerging Preferred inland route of the Wicklow to Greystones Greenway.

I strongly support the greenway initiative, and the benefits it could deliver to the wider community. However, it is difficult to understand the practical rationale behind abandoning the existing coastal walking corridor and amenity in favour of acquiring almost entirely private lands to deliver the scheme. The failure of Wicklow County Council to clearly justify the route selection change from the primary coastal route to the stakeholders and public is staggering. This public consultation process lacks clear, transparent sharing of information and appears not to follow the National Greenway Guidelines.

The inadequate information provided for the public consultation process restricts meaningful public engagement and appraisal of the proposed route to ensure the best greenway is brought forward for the community of Wicklow.

My grounds for objection are set out below.

[REDACTED]
Firstly, I would like to comment on the lack of engagement with landowners on this route selection. We have had no engagement or correspondence from anyone on the scheme selection.

[REDACTED] with high-value sport horses, beef, and tillage. The route would sever our holding, create unmanageable security risks to bloodstock, and destroy the operation of many land areas around the proposed route. The route has close to 1000m of frontage on our farm which is very significant and will have a great impact on the landholding, performance and current operations. The proposed route has the potential to reduce the value of the farm business and holding.

In Section 4.6.3.2 of the Constraints Report the equine holdings are listed. This does not include [REDACTED] and should be updated and included in further works.

The proposed route goes through a number of fields splitting the farm holding. This will impact

livestock rotations, reduce efficiencies in grassland management, stock density control and increase stress on the animals particularly sport horses which are highly strung animals. Severance of the fields and holding will create traffic crossings along the greenway for our livestock and machinery. This will create an additional risk to our farm animals and also to the public safety during these crossing operations. These gated crossings will affect the farm operations significantly.

Biosecurity and disease transmission will increase with the public presence in across our farm and can introduce diseases through people and dogs. Even low risks can have high significance in equine operations. The presence of dogs along an extensive boundary would present a significant concern for the farm. Uncontrolled or stray dogs can cause cattle to panic, potentially leading to abortions in pregnant cows, increased stress levels, and physical injuries. Horses are particularly sensitive to disturbance, and heightened stress from dogs can result in agitation, fence running, and a greater risk of injury.

During construction of the greenway, this will have a great impact on the holding and performance of the farming enterprise.

The greenway has the potential to affect the agricultural schemes we are allowed to enter, particularly the ACRES (geese and swan). This scheme restricts all livestock or machinery operation on lands from 1st October to 31st March around the Vartry River and the lands close to the Murrough and Broadlough. All of these lands are affected by the proposed route. The scheme is used to promote the production of an undisturbed foraging area to support overwintering geese and swans from the SPA area of the Murrough and Broadlough and allow them to forage on our land.

The Council has no Parks Department, no policing plan, and no credible long-term management proposal for a greenway through working farmland. A lack of maintenance of the greenway would have the potential to affect the farm.

2. Public Land has Not been Prioritised

The 'Code of Best Practice - National and Regional Greenways' states "The project promoter will make every effort to minimise the number of private land holdings directly affected by a proposed Greenway. The strategy will be to use existing suitable State-owned lands (Coillte, Bord na Móna, flood defence, etc.) along the proposed route corridors. These lands will be prioritised in determining the preferred route corridor options."

I believe this option of using public land has not been fully exhausted by the WCC in the route assessment. Currently the scheme is using nearly 90% private land to complete the route. This is a complete outlier compared to all previously completed routes and clearly does not align with the Code of Best Practice mentioned above.

In contrast, the option of a coastal route would result in greater than 95% of public lands being utilised. The lack of a detailed explanation and justification to landowners on this route selection

is quite staggering. Again the lack of information provided publicly makes it very hard to comment on in detail and only emphasises Wicklow's approach to rush this proposal through.

3. Public Consultation, Transparency and Process

On review of the information available, I am concerned that a lack of public consultation has taken place allowing public input and sharing of reports completed on this greenway and that the correct procedure has not been followed. I have listed some items below to substantiate this.

In 2024 the 'Stage 1 Options Selection Report' was completed although not publicly available. Quoted from the document on the WCC greenway website "Summary Options Selection Report", the report presented the outcome of this assessment, which was the selection of the Coastal Route Corridor as the Primary Emerging Preferred Route Corridor and the Field Boundary Route Corridor as a Secondary Corridor.

I fail to understand how the primary option has been removed and no evidence or reports have been provided to the public to substantiate this drastic change from the initial public consultation in 2024 where the coastal route was the primary route.

The WCC website outlines the current status of the scheme in Stage 2 and outlines the reports completed as part of the Greenway Development thus far. See below "Phase 2 Options Selection. Following a Feasibility & Constraints Assessment, a Stage 1 Route Corridor Options Assessment, Identification of an Emerging Preferred Route Corridor and a Stage 2 Route Options Assessment"

Of the documents referenced above, only the Constraints Assessment, together with route drawings, has been made available to the public during the two public consultation events.

The two summary documents presented named 'Stage 1 Options Selection Executive Summary Report' and 'Summary Options Selection Report' are very poor documents which outline no information on the details of the reviews that have taken place. For example on review of the Fingal Greenway all of the reports were shared publicly as part of the second public consultation and are freely available to view. This report has been completed by Atkins for this greenway, but why has this not been shared publicly? A 3-page FAQ sheet is not substantive information for a project of this scale. This report would have provided significant information on the justification on the route selection and the drastic change from the 'Primary Emerging Preferred Route Corridor' along the coast. This was the primary route identified in the Stage 1 route option report which was presented to the public as part of the initial public consultation in 2024.

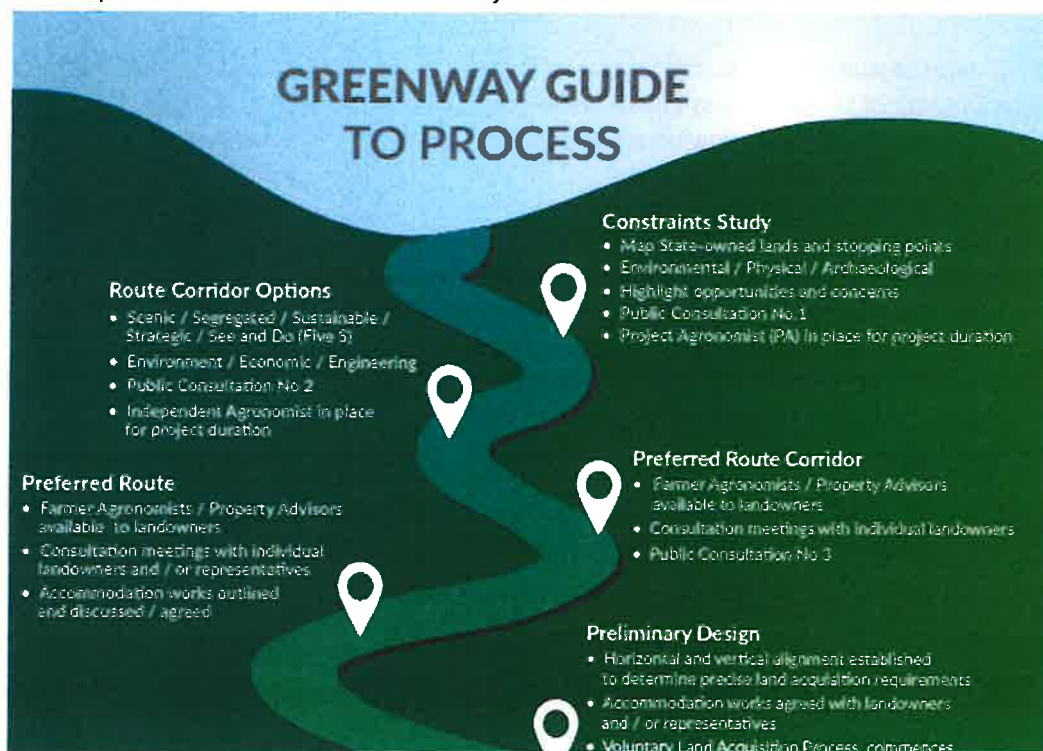
The way the process has been handled has created great unrest among landowners impacted by this route. This route was not discussed in any way at the first public consultation or prior to the public consultation in January. This is poor landowner engagement and management, and is against all of the guidelines on Greenway development available.

This poor project management has created such a surprise to the Landowners who are proposed to provide up to 90% of the land for this Greenway and has created great stress and anger at the process. It appears the standard procedures for stakeholder engagement during the Options Selection phase were not followed. Had the TII PMGs been applied, the public would have had a formal voice in determining the route at the appropriate stage.

The TII's Project Management Guidelines state in section 2.1.5 - "Second Public Consultation (Proposed Options) The Project Manager will ensure that relevant stakeholders are informed of relevant Project information and have access to relevant Project information. In the Second Public Consultation, the proposed options will be presented to stakeholders. Project Liaison Officers (PLOs) will be available, and the Project Team will be available to provide input on the proposed options and enable stakeholders to provide feedback on the proposed options, highlighting issues and opportunities."

This was not followed and landowners have been left in the dark up to now. This is incredibly surprising considering up to 90% of the land will be provided privately.

The 'CODE OF BEST PRACTICE - NATIONAL AND REGIONAL GREENWAYS' outlines the process required to be followed for Greenways as illustrated below in the flow chart.



The second consultation must be completed on the options corridor, not the preferred route. This document also states in section 2.4.1 'The approved Route Selection Report, including the preferred route, will be made available for public inspection.' This has not been provided to the

public despite requests from interested parties and it is not available to view on the project website. The route has been selected by WCC with no public or landowner input! The full review of the options which has been detailed in depth in the Atkins report ' Stage 2 Options Selection' and has not been publicly disclosed for public information nor any option other than the preferred route presented very vaguely without adequate justification as part of this public consultation.

It is clear from this that all relevant information has not been provided to all stakeholders, and this current second public consultation is not a review of the proposed route options.

Furthermore, the constraints report should be published as part of the initial public consultation process as outlined above in the Greenway guide This was completed in 2024 with no constraints report. WCC only made the constraints report publicly available on this round of public consultation. Additionally, the revision of this document suggests the final version was only published on the 26th of January, (see extract below) after the public consultation process had started on the 12th of January. This again highlights the failure of Wicklow to follow the correct procedure and to provide the public with adequate information to adequately review the proposed route.

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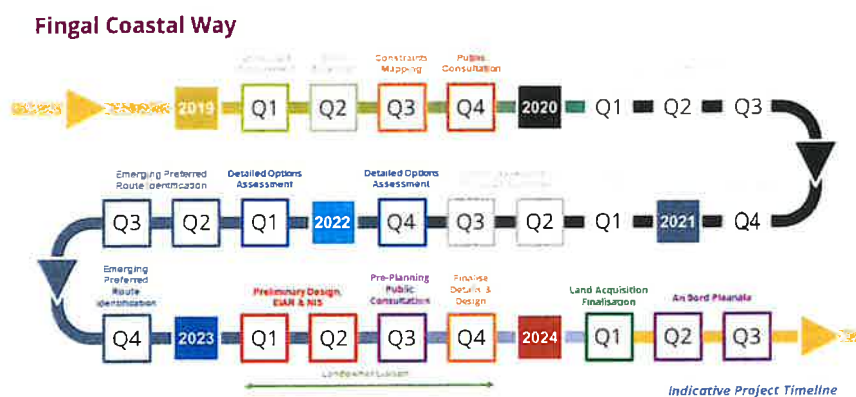
Document history

Revision	Purpose description	Originated	Checked	Reviewed	Authorised	Date
Rev 0	Working Draft	DB	LP	CF	CF	19/06/2023
Rev 1	Working Draft	DB	LP/CF	CF	CF	26/04/2024
Rev 2	Final	DB	LP/CF	CF	CF	26/01/2026

Furthermore, the TII Project Managers Handbook outlines a third public consultation should take place, it is only here where the final preferred route is proposed to the public for consultation. See extract from TII Project Managers Handbook, "2.1.9 Third Public Consultation (Preferred Option) A Public Consultation will be held to inform stakeholders of the preferred option. Project Liaison Officers (PLOs) and the Project Team will be available to provide input on the preferred option. The Public Consultation will enable stakeholders to provide feedback on the preferred option. Agronomists will be available, who will work to minimise impacts, finding an optimal route utilising public lands where possible"

This is the current step WCC are completing and have failed to complete the correct second step of the public consultation. The process has not been followed correctly and has led to a lack of public and key stakeholder input into the route selection.

Again, on review of the Fingal Coastal Way far more public engagement was given on the route selection process as per the TII's Project Management Guidelines (PMGs). The below flow map is available to view on the Fingal greenway website which clearly outlines a more comprehensive public consultation process in which all of the options were presented to the public for review. All of the public comments can be freely viewed on the project website. Where is the 2024 public consultation public comments held for this project? This should be freely available to view on the project website.



In summary no substantiated information and options reports has been shared on the route selection with the public and WCC has not followed the guidance of the TII's Project Management Guidelines nor the 'Code of Best Practice - National and Regional Greenways' for the section of the Greenway Route. This information must be shared with the public and a further 2nd round of consultation taking place outlining all the available routes to the public. Furthermore, there is substantive evidence to suggest that this second round of public consultation process must be restarted due to circumventing the National guidelines.

4. WCC Stance on SPA and SAC Permitted Development

WCC has taken a very hard stance on not entering into the conservation areas and simply has drawn the cycle route directly around these areas. It appears WCC is taking the approach that not affecting the conservation area will not harm this environment when it is simply drawn next to it on a map and it is not possible to complete any development in the conservation area. This is not the case and has been shown by other Greenways around the country.

Looking at Broadmeadow Greenway which is a very good comparable project to this Greenway. Broadmeadows is adjacent to a live railway and within an estuary that is designated as a Special Protection Area (SPA) and a Special Area of Conservation (SAC). How is Fingal able to manage all of the Stakeholders and environmental constraints to deliver a greenway in Dublin that is a far more complex engineering design over the estuary than this Greenway? They have worked in collaboration with Iarnród Éireann to deliver this project. This public consultation has not provided any information from Iarnród Éireann on why a collaborative approach similar to that completed in Broadmeadows. Fingal has worked within the SAC and SPA area and fulfilled the requirements of the Article 6(3) of the Habitats Directive to complete the greenway project.

Why can Wicklow not take a similar view? Where is the evidence to substantiate why they haven't taken a view on working within the Natura 2000 site which Fingal have proven to be possible on two separate greenways named Broadmeadows and Fingal Coastal Way and Kildare Co. Council with its Barrow Blueway Greenway.

Reviewing the constraints report from Fingal Coastal Way they have taken an entirely different view to the statement in section 3.1.3 of the Wicklow Constraints report. The two sections are similar although there are notable differences in the context of the wording relative to permitted development. I have extracted the section below from their applicable report which outlines that the Natura 2000 sites don't inhibit development within the site and development is possible within these sites. How can Wicklow not provide evidence as to why this approach can not be taken in Wicklow and utilise mitigation measures to enable development?

"Whilst understanding the high level of protection afforded to Natura 2000 sites, the Habitats Directive does not seek to entirely prohibit projects or developments that may potentially impact a Natura 2000 site. Rather, the directive provides methods for allowing the delivery of projects, even those that have the potential to cause significant impacts on the integrity of the conservation site. If it can be shown that it is possible to mitigate the potential impacts of a development on the habitats or species for which a Natura 2000 site is designated, and if it can in turn be proven that the conservation objectives of the site are met, then the project can proceed. This process follows the requirements of Article 6(3) of the Habitats Directive which requires any plan or project to be subject to Appropriate Assessment (AA) of its implications for the site in view of the site's conservation objectives. However, even in cases where mitigation is not possible, for example where areas of habitat for which the Natura 2000 site is designated will be permanently lost and the integrity of the site is adversely affected, and in the absence of alternative solutions, it may still be possible to undertake a project for imperative reasons of overriding public interest (IROPI). These reasons can include those of a social or economic nature. Should it be proposed to undertake a coastal trail route under this methodology (set out in Article 6(4) of the Habitats Directive) it is necessary to provide all necessary compensatory measures to ensure that the overall coherence of the Natura 2000 site is protected. Outlined within this report are details of Natura 2000 sites (SACs and SPAs) within and around the study area as well as legally protected habitats outside the Natura 2000 complex (Annex I habitats) which are found within the study area."

The only information given on the decision by Wicklow to justify not allowing development is the below which is not sufficient information to justify this reasoning.

"It would be difficult to justify these measures within the Appropriate Assessment process."

Why ? Where is the information to justify this statement? Fingal has proven otherwise.

"The scale of intervention required would likely trigger an Imperative Reasons of Overriding Public Interest (IROPI) test, which the Greenway would not meet because it is not considered strategically critical infrastructure."

Fingal has argued that 'these reasons can include those of a social or economic nature'. Why can Wicklow not use this approach if required to justify the options within.

5. Coastal Erosion and East Coast Rail Infrastructure Protection Projects

Why can this scheme not be delivered in collaboration with the East Coast Rail Infrastructure Protection Projects? This is an ideal opportunity to work with in providing this infrastructure as one, minimising the effect on the habitats all the while delivering the infrastructure in one scheme and protecting the coastal line and the SAC habitats.

As one scheme it could be argued that it meets the Imperative Reasons of Overriding Public Interest (IROPI) test for Article 6(3).

The document named "Strategy for the Future Development of National and Regional Greenways" identifies this collaborative approach as an opportunity for Greenway projects, something which is evident Wicklow hasn't explored on this greenway route. The below statement from this document clearly outlines the opportunity and goal of the scheme to work with other government organisations to develop collaborative schemes to deliver for both coastal erosion and cycle infrastructure. "The development of flood defence schemes offers the potential to develop both pathways and cycle ways in the delivery of the scheme defences. The Department will work closely with the OPW, local authorities and, where appropriate, the NTA, to identify possible synergies between flood defence works and the provision of cycling infrastructure including Greenways."

I believe this is a missed opportunity and hasn't been properly exhausted by Wicklow to minimise the quantity of Private land required to complete this scheme.

6. Flooding and Wetlands

Rather than addressing the coastal problem, the Council's chosen route runs directly through the Vartry floodplain, a known flood zone that floods extensively several times a year. This will require substantial flood protection works at enormous cost, and any raised embankment would displace floodwater onto adjacent farmland, violating the National Flood Risk Management Guidelines. The coastal corridor does not create these risks.

WCC have noted "that the inland sections of the emerging preferred route may still experience some localised flooding." Our lands experience yearly flooding and we witness this every year. The route passes directly through the Vartry River flood plain. To construct the greenway on this floodplain will create a significant raised embankment and bridge crossing over the Vartry River. The effect of this crossing and raised embankment to alleviate flooding on the greenway will create increased upstream flooding on our farm land and not allow the floodplain to drain as quickly as it currently is. This construction will constrain natural flood flows, create unintended flood "pinch points" and increase flood heights during extreme events. This all will have a significant effect on our farm land and its performance.

The constraints report identifies the Coolawinnia wetlands as A rating nationally important. The route proposed will affect these wetlands as the floodplain which promotes the wetting of these lands particularly around the crossing point of the Vartry River will be inhibited by the development. The report states "The wetland sites associated with The Murrough Wetland SAC are afforded protection as they contain qualifying interest habitats. It is important that the greenway is designed so as to avoid interaction with this area of fens, wet woodland and wetland habitats.". This route will directly affect the wetlands around the Murrough, reducing the downstream flooding due to the bridge and significant embankments required to drain the greenway restricting water on the upstream side of the river.

7. Environmental Considerations

Despite the SAC and SPA the current route is more harmful inland and it directly affects the habitats of the wildlife protected in these areas as our farm is an extension of these protection zones. The area around the railway track is already disturbed by the railway line, and is constantly disturbed by public interference along the line and the threat of coastal erosion. The flora and fauna along the wild and undisturbed habitat will be more affected on the proposed route than next to the railway track. Our farm lands are a direct habitat for these endangered species and we constantly see them wandering on our lands. The estuary of Broadlough and the Muragh east of our lands is an imperative bird area and part of the SPA. The birds of this area are not confined to the wetlands, with swans and geese feeding on our farmland on both sides of the proposed route. The wildlife do not know a boundary on a map and the farm lands directly behind the Murrough is an extension of their habitat. The proposed route will have a far greater environmental impact on the protected flora and fauna of the Murrough SAC and SPA. Additionally our land outside of the SPA has protection measures in place during the winter as part of the ACRES (geese and swan) scheme allowing swans and geese from the Murrough grazing over our land. This has not been considered in the constraints report and as part of the feasibility study. The proposed route will significantly affect the grazing of these geese with the construction process and public presence deterring them away from using these grazing areas.

Choosing the inland route threatens both Sea trout and Atlantic Salmon spawning waters. We have worked closely with the IFI (Inland Fisheries Ireland) to prevent poaching of these protected waters for many years. The inland route would leave protected spawning waters vulnerable to unchecked poaching, undermining our years of conservation efforts to safeguard

them.

8. Value for Money

The inland route requires the purchase of up to 90% private land through CPO. CPO costs, and legal exposure on the route will likely be significant with this high a private acquisition required. This will incur a significant financial burden on the project before commencing any works. This route passes through a flood plain and low lying marsh land which will require significant engineering input to bring it up to TII specification. Requirements to satisfy landowners will be very large due to the quantification of private land being provided and will increase project costs. The coastal route provides a straightforward engineering and construction solution on existing state owned land in their control. This reduces any risks from third party stakeholders and is within the States control. Existing coastal erosion projects can assist this project and create economies of scale. It would deliver far better value for the tax payer to enhance the scope of the coastal protection project to include a greenway within it. The coastal project will be completed regardless and with correct engagement of the governments own stakeholders this incorporation of this greenway is more than possible and makes the most practical sense.

Conclusion

I am in full favour of the Greenway project and policy behind the community amenity but as outlined in this submission, the current route is not the most appropriate route for this Greenway and is significantly flawed. Public land has not been properly utilized on this proposal. The greenway creates a significant impact on our farm and a large number of other landowners, including increased flooding, farm performance and the environment around the route.

A clear lack of information has been provided by WCC to enable sufficient public consultation on this scheme. The guidelines of Greenway Strategy and Code of Practice have not been followed and contain significant irregularities. I would ask that the Local Authority publish all of the relevant information available to them which they have used in the route selection. An additional round of public consultation should take place in line with the requirements of the Greenway Strategy and Code of Practice to allow for members of the public, including affected landowners, to properly engage in environmental decision-making and route selection on this project.

Yours faithfully,

A thick, horizontal redaction bar in a dark purple or blue color, obscuring the signature of the author.