

Observations on: [REDACTED]

From: [REDACTED]
Date: Fri 2/13/2026 6:15 PM
To: Wicklow Greenway <wicklowgreenway@wicklowcoco.ie>

📎 1 attachment (400 KB)
Observation on the Greystones to Wicklow Greenway Public Consultation.pdf;

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Dear Wicklow Greenway Team,

Please find attached Observations on behalf of [REDACTED]

Please confirm receipt of this observation and keep me informed on any future consultations and decisions.

Regards,

[REDACTED]




13th February 2026

RE: Greystones to Wicklow Greenway Public Consultation

Dear Greystones to Wicklow Greenway Public Consultation Team,

I write as an observation to be considered as part of the Greystones to Wicklow Greenway Public Consultation, running from the 13th of January to the 13th February 2026. I write this letter in good faith and based on concerns regarding the environmental and ecological protection of our coast and seas. I write this observation on behalf of Wicklow Wildlife Welfare.

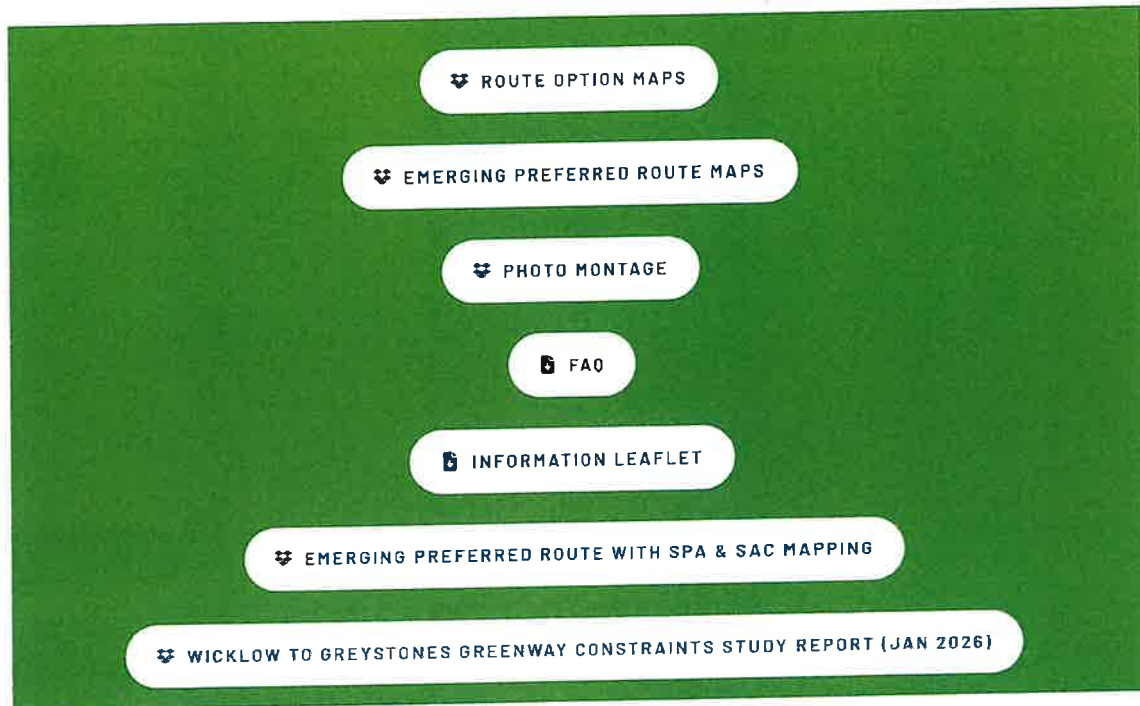
Regarding the public consultation itself, it seems that the consideration of this public consultation being 'non-statutory' in nature is not entirely clear, given the requirement to provide meaningful public consultation at the earliest available opportunity. Regardless of the domestic transposition of such requirements it is not clear that there is not an international and European requirement for such a consultation.

On two occasions during the public consultation period I requested FAIR data, specifically geospatial data in an intraoperative format (GIS, e.g., shapfiles), such that I could meaningfully engage in the public consultation. No such data was forthcoming.

Furthermore, seemingly in response to this request, further images were placed on the consultation website indicating the proximity of the route to Natura 2000 sites. It certainly seems that, though inadequate, this should have been available from the start of the public consultation process and the impact of this addition on the sufficiency of the period of public consultation is not clear to me. However, my intention was to provide meaningful observations of the location of the proposed route to other features of the environment, including but not limited to, water course, connectivity, avian foraging distributions, etc. It should be noted that this request was made to fill the gap (to some lesser degree) due to the absence of extensive environmental considerations available on the consultation website. The only documents available, with the exception of fliers appears to be:




Documents



There appears to be very little environmental data associated with the decision to progress with this 'Emerging Preferred Route' and, while it is clearly preferred over the alternative routes considered, there appears to be no Appropriate Assessment Screening or Appropriate Assessment associated with any of the routes. Zoning of land in the vicinity of Natura 2000 sites requires Appropriate Assessment Screening and/or Appropriate Assessment and it appears to me that a decision to allocate this area for this particular greenway function merits an Appropriate Assessment, and in fact, the wider National rollout of greenways across the country/region would require a plan level Appropriate Assessment and Strategic Environmental Assessment.

It seems to me, having little available data or evidence, that the main impacts of this scheme on birds are likely to be loss of habitat in wet grassland and marsh, interference with water flow to the wetlands due to culverting of streams and drains, disturbance during construction and due to people and dogs when it is in operation. The main impacts on habitats will be potential degradation of shingle beaches, saltmarshes, annual vegetation of drift lines, Cladium fen, alkaline fen, stony banks. This of course relies on the availability of



high resolution geospatial data and construction/operation methods, which are largely absent.

My main concerns revolve around impacts of the proposed emerging preferred route on Natura 2000 sites (Habitats and Birds Directives), particularly [The Murrough Wetlands SAC](#) [002249] and [The Murrough SPA](#) [004186] but also regarding impacts on the Water Framework Directive and Environmental Impact Assessment Directive. I am concerned that the proposed development is contrary to the proper management of the sites mentioned above and does not comply with the Birds and Habitats Directives, nor with proper planning in general.

Birds & Habitats Directive Observations:

It appears to me that the proposed development, and particularly in-combination with other developments proposed in the area, including but not limited to:

- The East Coast Railway Infrastructure Protection Projects (ECRIPP Projects)
- Development of a Hotel, Housing and associated developments [Planning application no. 2460825], available at <https://www.eplanning.ie/WicklowCC/AppFileRefDetails/2460825/0>;
- The proposed Wicklow Harbour Dredging;
- The proposed new bridge over *The Murrough Wetlands SAC*;
- The Part 8 'The Murrough Waterfront Park' [Application 2521], available at <https://www.eplanning.ie/WicklowCC/AppFileRefDetails/2521/0> ;
- Codling Wind Park [An Coimisiún Pleanála - Case reference: OA29N.320768];
- Arklow Bank 2 Wind Farm [An Coimisiún Pleanála - Case reference: OA27.319864];
- Dublin Array Wind Farm [An Coimisiún Pleanála - Case reference: OA06D.321992];
- Numerous foreshore licenses and MULs in the past, present and foreseeable future;


will have Likely Significant Effects on [The Murrough SPA](#) and [The Murrough Wetlands SAC](#).

The proposed project will inevitably have a disturbance effect on SCIs and QIs of the SPA and SAC, as well as direct impacts on the QIs of the SAC and SPAs, including, but not limited to *Annual vegetation of drift lines* [1210] and *Perennial vegetation of stony banks* [1220] but also to other habitats and species present on the site, as well as associated species and habitats.




The Murrough Wetlands SAC was selected for shingle beaches, saltmarshes, annual vegetation of drift lines, Cladium fen and alkaline fen. 1999). The shingle beach in The Murrough Wetlands SAC was ranked as being a site of 'High interest' due to the presence of yellow horned-poppy (*Glaucium flavum*). Along the 'Perennial vegetation of stony banks' of The Murrough Wetlands SAC, yellow horned-poppy (*G. flavum*) was refound along with sea kale (*Crambe maritima*), a species rare in Ireland. Both of these species are classified as Near Threatened on the Irish Red List of Vascular Plants. The overall objective for 'Perennial vegetation of stony banks' in The Murrough Wetlands SAC is to '*restore the favourable conservation condition*'. There should be no decline in distribution or population sizes of rare, threatened or scarce species associated with the habitat. The health and on-going development of the habitat relies on a continuing supply of shingle sediment. This may occur sporadically as a response to storm events rather than continuously. Interference with the natural coastal processes, through offshore (or onshore) extraction or coastal defence structures in particular, can interrupt the supply of sediment and lead to beach starvation. Vegetated shingle is part of a naturally dynamic coastal system. In order to ensure the ecological functioning of all of the vegetated shingle communities present, it is vital to maintain the zonation and transitions to other habitats, including lagoon, saltmarsh and sand dune habitats. The targets for the site include '*to maintain the range of coastal habitats, including transitional zones, subject to natural processes, including erosion and succession*' and '*to ensure that the occurrence of typical species within the range of vegetated shingle communities is maintained*'.

Saltmarshes are stands of vegetation that occur along sheltered coasts, mainly on mud or sand, and are flooded periodically by the sea. They are restricted to the area between mid neap tide level and high water spring tide level. *Salicornia* and other annuals colonising mud and sand have been recorded at the site and need to be protected. The location, character and dynamic behaviour of saltmarshes are governed by sediment supply, tidal regime, wind-wave climate and sea level change. The slope of the saltmarsh allows the development of several ecological gradients such as tidal submergence and salinity, and this influences the development of distinctive zones of halophytic and salt-tolerant plant communities. Maintaining the favourable conservation condition of the saltmarsh habitat in The Murrough Wetlands SAC requires the movement of fresh groundwater and tidal sea water is



important for the functioning of saltmarsh habitats and underpins species distributions. Alterations that compromise the natural hydrological processes will be in contravention to the Habitats Directive. There are a number of priority habitats on the site, which are of particular importance and it is difficult to see how the current proposal would be compatible with the maintenance of these habitats and not have a likely significant effect on them. Annual vegetation of drift lines is found on beaches along the high tide mark, where tidal litter accumulates. It is dominated by a small number of annual species (*i.e.* plants that complete their life-cycle within a single season). Tidal litter contains the remains of marine algal and faunal material, as well as a quantity of seeds. Decaying detritus in the tidal litter releases nutrients into what would otherwise be a nutrient-poor environment. The habitat is often represented as patchy, fragmented stands of vegetation that are short-lived and subject to frequent re-working of the sediment. The vegetation is limited to a small number of highly specialised species that are capable of coping with salinity, wind exposure, an unstable substrate and lack of soil moisture. All of the dune habitats indicated at the site occur as a complex mosaic of constantly changing and evolving vegetation communities. They are inextricably linked in terms of their ecological functioning and should be regarded as single geomorphological units. As such, no dune habitat should be considered in isolation from the other dune habitats present at a site, or the adjoining semi-natural habitats with which they often form important transitional communities. There should be no decline in the distribution of the sand dune habitat, unless it is the result of natural processes, including erosion, accretion and succession. It is important to recognise that the process of coastal erosion is part of a natural tendency towards equilibrium. Natural shorelines attempt to absorb the energy entering the coastal zone by redistributing sediment formation. The construction of physical barriers such as sea defences can interrupt longshore drift, leading to beach starvation and increased rates of erosion. Sediment circulation and erosion also has a role to play in the more stabilised dune habitats. Cycles of erosion and stabilisation are part of a naturally functioning dune system, where the creation of new bare areas allows pioneer species and vegetation communities to develop, thus increasing biodiversity. The construction of physical barriers can interfere with the sediment circulation by cutting the dunes off from the beach resulting in fossilisation or over-stabilisation of dunes. The installation of rock armour since designation has reduced the



mobility of the substrate of the sand dune and shingle habitats at The Murrrough Wetlands SAC, including Annual vegetation of drift lines. The natural circulation of sediment and organic matter throughout the entire dune system, without any physical obstructions and the range of coastal habitats, including transitional zones, should be maintained, subject to natural processes, including erosion and succession. Typical flora for the sand dune habitat.

Any proposed development should include past impacts on the sites, including rock armour and land reclamation and any impact on the breaches lagoon should be thoroughly considered. While many of the habitats overlap between The Murrrough Wetlands SAC and The Murrrough SPA and are present in both, the SPA is also vital for Red-throated Diver, Greylag Goose, Light-bellied Brent Goose, Wigeon, Teal, Black-headed Gull, Herring Gull and Little Tern, with the site being of particular importance for the Red-throated Diver and Little Tern. The Red-throated Diver has a number of pressures and threats at present and is notoriously easily disturbed. It is difficult to see how the proposed works could be completed without having a LSE on the species or its habitat. The shingle ridge at Kilcoole is a vital nesting area for Little Tern and again, it is difficult to see how the proposed works could progress without having a LSE on the species or its habitat. No adequate consideration of alternatives appears to have been made regarding the location of the proposed works and it is not clear what plan the proposed works are a part of. The scope of the project appears to have limited any real consideration of feasible alternative routes and any comprehensive assessment of the ecological impacts of such alternatives compared to what is currently being proposed (e.g., shifting project route away from sensitive habitats and applying a mitigation hierarchy approach). Such considerations must be carried out and include public consultation to ensure compliance with EU environmental law and the Aarhus Convention. Furthermore, there appears to be insufficient baseline/habitat mapping and functional assessment of SAC features to adequately lock in many of the design aspects that are being proposed at this stage.



Biodiversity and County Development Plan Observations:

[Wicklow County Development Plan 2023 – 2028](#) (including CHAPTER 19 MARINE SPATIAL PLANNING & COASTAL ZONE MANAGEMENT) indicate, regarding Cell 7 Wicklow Town and Environs that:

'Although coastal erosion was found to be significant, in light of the environmental impacts of coastal protection works, limited intervention was recommended, other than (a) those works necessary to protect the existing railway bridge and the port access road bridge and (b) the installation of breakwaters north of the harbour to stabilise and improve the recreational value of the beach. The draft East Coast Erosion Study, commissioned by Irish Rail, and completed by Arup in 2020 further recommends the use of offshore islands and beach nourishment for soft coastline and extension and enhancement of the existing coastal protection works.'

Also, in CPO 19.12 it is stated that


'To facilitate the provision of new or the reinforcement of existing coastal defences and protection measures where necessary along the full coastline of the County and in particular to consider the implementation of the measures identified in the Murrough Coastal Protection Study³, the draft East Coast Erosion Study⁴ and any other similar studies that are produced during the lifetime of the plan.

To employ soft engineering techniques or natural solutions as an alternative to hard coastal defence works, wherever feasible.'

And in CPO 19.13

'Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per Article 10 of the EU Habitats Directive.'

And in CPO 19.15



'To ensure the County's natural coastal defences (beaches, sand dunes, salt marshes and estuary lands) are protected and ensure they are not put at risk by inappropriate works or development.'

And in CPO 19.21

'1. No development will be permitted that has an adverse impact on the environmental and ecological quality of The Murrough cSAC.'

And in CPO 19.22

'2. No development will be permitted that has the potential to adversely affect the conservation objectives of The Murrough Wetlands SAC, The Murrough SPA, Wicklow Head SAC, or Wicklow Reef SPA either directly, indirectly or cumulatively.'

Please confirm receipt of this observation and keep me informed on any future consultations and decisions.

Regards,

