

NAVAN RAILWAY LINE

Supporter Guide: How to Make Your Submission

Route Option NR-LO-00228 | NSPC1 Consultation | Deadline: 17 July 2026

This guide is for anyone who cares about the Dunsany Nature Reserve, the Skane river, the wildlife and heritage of County Meath, and the legal integrity of Ireland's EU nature obligations. It explains what is proposed, why it matters, and how to make your voice heard before the 17 July 2026 deadline. You do not need to be a lawyer or an ecologist. Your direct experience, local knowledge, and honest concern are all valid and valuable.

1. What is being proposed

Irish Rail (Iarnrod Éireann) is consulting on a preferred route for the Navan Railway Line, connecting Dublin (M3 Parkway) to Navan via Dunshaughlin. The route reference is NR-LO-00228. The consultation is called NSPC1 (Non-Statutory Public Consultation 1).

The preferred route passes directly through Dunsany Nature Reserve - a privately-owned rewilding estate of approximately 600 hectares in County Meath. The reserve contains:

- A Special Area of Conservation (SAC) linked to the River Boyne (Skane river corridor)
- Confirmed maternity roosts of multiple Annex II bat species under the EU Habitats Directive
- Annex II and IV species including otter, Lesser Horseshoe Bat, and Nathusius's Pipistrelle
- 40 verified bird species confirmed in an independent acoustic biodiversity audit (Polliknow, June 2026), with 80 further species detected pending expert review; the full community could exceed 120 species — including Red Kite (29 confirmed acoustic clips), Eurasian Woodcock, Garden Warbler, and two Red Listed species, the Eurasian Curlew and European Turtle-Dove
- Priority Annex I habitat 91E0 alluvial woodland, among the rarest habitat types in Ireland
- Springs, wells, and a river (the Skane) already classified as 'At Risk' and 'Poor' under the EU Water Framework Directive
- A demesne landscape classified as 'Very High Value' under the Meath County Development Plan 2021-2027
- The Dunsany Castle Demesne Architectural Conservation Area (ACA) under the same plan

2. The deadline and how to submit

The NSPC1 public consultation closes on 17 July 2026. Irish Rail invites observations under three headings:

- Topic 1: Your views on the Emerging Preferred Route and station locations
- Topic 2: Environmental considerations during construction, operation, or maintenance
- Topic 3: Local knowledge the design team should be aware of

Submit online: <https://www.irishrail.ie/en-ie/about-us/iarnrod-eireann-projects-and-investments/navan-railway-line/nspc1-epr>

Email: navan@irishrail.ie

Phone: (01) 703 4451

Post: Navan Railway Project, Iarnrod Éireann, Haymarket House, Smithfield, Dublin 7, D07 CF98

Videos, photographs, maps, and sketches are all accepted alongside written text. You do not need to use legal or technical language. Write in your own words about what you know, what you have seen, and what concerns you.

The NSPC1 is not the final decision. A formal Railway Order application to An Bord Pleanála will follow, at which stage a full Environmental Impact Assessment and Natura Impact Statement must be submitted. However, the NSPC1 record directly informs what goes into that application. The more robust the public record now, the stronger the case later.

3. The eight strongest arguments

You do not need to use all of these. Pick the ones that resonate with you and write in your own words. Every submission counts - they are individually read and registered.

3.1 The Skane River is already classified as 'At Risk' and 'Poor'

The Skane river (Waterbody SKANE_020, Code IE_EA_07S010300) is formally classified under the EU Water Framework Directive as 'At Risk' and its River Status is 'Poor'. The underlying Trim groundwater body (IE_EA_G_002) is also classified as 'At Risk'.

EU and Irish water law prohibit any further deterioration of a water body already in this condition. Railway construction - with earthworks, drainage disruption, concrete, bridge works, and routine glyphosate herbicide application - would make an already poor river worse. Irish Rail's own Biodiversity Guidelines for Staff acknowledge that instream works can cause water pollution from fuel spills, sedimentation smothering fish eggs, and cement/concrete toxic to fish.

A June 2026 independent site audit (Polliknow) confirmed that 100% of land parcels around Dunsany are rated Extreme or High groundwater vulnerability under the GSI classification. This means that any contaminant introduced at the surface, whether from earthworks, concrete, fuel, or herbicide, reaches the groundwater and downstream river system extremely rapidly. The River Boyne SAC is directly downstream.

A question any supporter can put to Irish Rail: What specific, evidence-based plan does Irish Rail have to avoid further deteriorating a waterbody already classified as 'Poor' and 'At Risk' under the WFD, given that 100% of the surrounding land has Extreme or High groundwater vulnerability?

3.2 The Habitats Directive integrity test has not been passed

The EU Habitats Directive (Article 6.3) requires that any plan or project likely to significantly affect a Natura 2000 site can only be authorised if it will not adversely affect the integrity of that site. The Skane connects directly to the River Boyne, which is a designated SAC (Special Area of Conservation).

The proposed route would pass through the Skane catchment, disturbing confirmed Annex II bat maternity roosts and priority 91E0 alluvial woodland. Under the European Court of Justice case law established in *Sweetman v An Bord Pleanála* (C-258/11) and *Waddenzee* (C-127/02), the burden of proof is on the project to demonstrate beyond reasonable scientific doubt that integrity will not be adversely affected. That burden has not been met in the current NSPC1 documentation.

3.3 The route destroys what Ireland is legally required to restore

Ireland is required under the EU Nature Restoration Regulation (which became law in June 2024, directly applicable in all member states) to restore 30% of degraded habitats by 2030, 60% by

2040, and 90% by 2050. Ireland must submit its draft National Nature Restoration Plan to the European Commission by 1 September 2026 - just weeks after the NSPC1 deadline.

Dunsany Nature Reserve is one of the most advanced privately-funded rewilding projects in the country. Its habitats are actively recovering. The proposed railway would destroy the very type of restored habitat the Nature Restoration Regulation is designed to protect and expand. Minister of State for Nature Christopher O'Sullivan has stated publicly: 'We know the state of nature is abysmal. The talking is over. Now is the time for action.' Approving a railway through Dunsany is the opposite of action.

Ireland spends only 0.9% of GDP on nature - the lowest in the EU, against a European average of 2.2%. 90% of Ireland's EU-protected habitats are in poor condition. The State cannot simultaneously submit a nature restoration plan to Brussels and approve destruction of a functioning restored habitat at home.

3.4 The geology is uniquely sensitive

The Dunsany area sits on Dinantian Upper Impure Limestones with a vulnerable karst formation - a rock type characterised by caves, sinkholes, and underground drainage that is highly sensitive to physical disturbance. Railway earthworks, piling, and cutting in karst terrain can collapse underground drainage routes, cause surface subsidence, and permanently alter groundwater flow patterns.

Additionally, the Galtrim Moraine - a glacial feature that terminates at or near Dunsany - is recorded in the GSI Meath County Geological Site Report as nationally and globally significant. Before 1960s quarrying, Galtrim was the only place in the world where an esker was observed crossing a moraine. The moraine consists of unconsolidated glacial till. Excavation through moraine material causes soil instability, sudden compaction, hydrological changes, and sedimentation in adjacent rivers. An Bord Pleanála required EirGrid to specifically address the Galtrim Moraine in the North-South 400kV Interconnection environmental assessment - establishing it as a material planning consideration for linear infrastructure in this corridor.

A question any supporter can put to Irish Rail: Has a hydrogeological assessment of the karst and moraine geology along the corridor been carried out, and what specific risk assessment has been prepared for the Skane catchment?

3.5 Alternative routes exist - and Irish Rail's own documents show it

Irish Rail's own Long List Rail Options document (Figure 5-2) shows at least 20 route options assessed at long-list stage. Options 5 and 6 follow the M3 motorway corridor directly from Navan to Dunshaughlin and M3 Parkway - bypassing Dunsany entirely. These options are shorter, follow existing infrastructure, and serve the actual population centres of Dunshaughlin and Ratoath.

The options that became the Emerging Preferred Route (Options 1, 1A, 1B and related) swing west through Kilmessan and then curve back through Dunsany - a corridor that contains no station, no population catchment, and no public benefit that justifies the ecological cost. The only apparent reason for this loop is to follow the trace of a railway line that last carried freight in 2001 and last carried passengers in 1947 or 1958.

The assumption that the old single-track freight corridor constitutes a usable 'pre-existing' alignment is factually wrong. There are no remaining tracks, no cleared corridor, and no residual easement. The corridor through Dunsany has been a maturing rewilded woodland for 25 years. Irish Rail's own Biodiversity Guidelines acknowledge that non-operational track 'returns to a wild natural state providing an ideal environment for various bird and plant species.' That is precisely what has happened here.

3.6 Wildlife strikes are already rising and will get worse

Official data from the Commission for Railway Regulation (CRR) and the Railway Accident Investigation Unit (RAIU) show Irish rail collisions with large animals rising from 22 in 2019 to a peak of 158 in a recent year, driven primarily by deer. Irish Rail's own CRR Safety Performance report states: 'Boundary fencing which is used as a primary control for livestock is not as efficient against deer.'

The annual figures are: 2017 - 23 collisions; 2018 - 38; 2020 - 72; 2021 - 74; 2023 - 86-121; 2024 - 91-158. The RAIU 2024 Annual Report recorded 139 large animal incursion notifications. Dunsany holds a resident red deer herd. A new high-frequency electrified commuter service through the demesne would place that herd in a permanent collision zone on a network where the problem is already uncontrolled.

European research (Frontiers in Ecology and Evolution, 2017) found mortality of 60.5 birds per km per year on a high-speed line with 53 runs per day - and Ireland has no measurement programme for bird or wildlife strikes at all. The SNCF (France) recorded 2,562 wildlife strikes in 2024 alone, causing 302,343 hours of delay and costing EUR 2.17 million. A question any supporter can put to Irish Rail: What measurement and mitigation programme for wildlife strikes is proposed for the Navan corridor, and on what baseline survey is it founded?

3.7 The County Development Plan protects this landscape

The Meath County Development Plan 2021-2027 applies multiple overlapping statutory protections to the Dunsany corridor, each of which would need to be formally overridden for the railway to proceed:

- LCA Map 2: Dunsany is in the 'South East Lowlands' character area, classified as 'Very High Value' - the highest landscape value category in the plan
- LCA Map 7: Dunsany is within the prehistoric cultural landscape layer
- LCA Map 10: Dunesne included in the 18th/19th century designed landscape layer
- LCA Map 15: Traditional Woodland/Scrub land use designation
- LCA Map 18: Secondary Tourism designation - the county's own plan recognises an economic tourism function
- Appendix A.07: Dunsany Castle Dunesne Architectural Conservation Area - a named ACA under the plan
- Kilmessan ACA - the adjacent village also carries ACA designation

3.8 State enforcement of habitat protection has already failed in Meath

The Irish Times reported on 9 June 2026, citing NPWS figures obtained by Social Democrats TD Liam Quaid, that reports of habitat destruction in Ireland almost doubled from 301 in 2021 to 581 in 2025 - but prosecutions have not kept pace: from 33 in 2021 to only 28 in 2025, a rate of one prosecution per 21 reported incidents.

Meath had just ONE prosecution in the entire 2021-2025 period - among the worst counties in Ireland. The northeast (where Dunsany sits) had by far the greatest number of reported incidents but no corresponding prosecutions. NPWS has only 110 conservation rangers nationally. Minister James Browne - the same minister whose department oversees the SAC and Wildlife Act regime - refused to disclose regional staffing levels.

Approving a railway corridor that destroys protected habitat in Meath compounds an already broken enforcement regime. The State cannot credibly claim it will protect Dunsany's ecology during construction and operation when it is failing to protect far simpler habitats from straightforward illegal destruction.

3.9 There is a sewage main running under the old railway corridor at Dunsany

This argument does not appear in Irish Rail's NSPC1 materials, but it is publicly documented. When the Dunshaughlin Sewerage Scheme was being constructed around 2005-2006, Meath County Council laid a sewer main longitudinally along the former Clonsilla-Navan railway alignment, from approximately 200 metres north of Dunsany Bridge southward to Warrenstown College near Drumree. Rail Users Ireland documented the issue in detail ('Dunsany Manholes and Railways Don't Mix', railusers.ie, 2007).

The sewer pipe runs along the alignment with nine manhole access points at approximately 100-metre intervals. Iarnród Éireann's own permanent way standards require these manholes to be relocated away from the trackbed. However, because the pipe runs longitudinally, moving the manholes is impossible without diverting the entire pipe. This means the sewer main would have to be fully relocated before railway construction could begin.

On top of this, Dunsany Bridge is approximately 12 metres wide - below the 14.4 metre minimum required by current rail safety regulations, and already sub-standard even without the sewer. The manhole adjacent to the bridge sits in the position where the Navan-bound track would need to go, making a two-track railway physically impossible and single track extremely difficult. The proposed Navan line is planned as double-track and electrified, which would require additional clearance under the bridge, most likely by lowering the track alignment - which would further expose the sewer pipe.

When Rail Users Ireland raised this at a public meeting in Navan in November 2005 the meeting was ended abruptly. The only formal statement Meath County Council gave was that the sewer 'does not preclude the railway from possible reopening in the future.' Iarnród Éireann's own engineering standards directly contradict that claim.

A question any supporter can put to Irish Rail: Has the cost of diverting the Dunshaughlin Sewerage Scheme sewer main from the alignment at Dunsany been included in the project cost estimate, and who will bear that cost?

4. Key facts and figures you can cite

Fact	Source
2,300 species depend on oak trees in the UK (same species at Dunsany)	CEH Dataset, Quercus petraea/robur, 2019
Skane WFD status: 'At Risk' and 'Poor' - legally cannot be further degraded	EPA catchments.ie, Waterbody SKANE_020
Trim groundwater body: 'At Risk' - WFD Code IE_EA_G_002	EPA catchments.ie / GSI
High to extreme groundwater vulnerability across the demesne	GSI Groundwater Vulnerability Map
Karst (vulnerable limestone) formation beneath the demesne	EPA / GSI Geology Map
Galtrim Moraine: once the only place worldwide where esker crossed moraine	GSI Meath County Geological Site Report
90% of Ireland's EU-protected habitats are in poor condition	Irish Times, 21 May 2026 (NRP article)
Ireland spends 0.9% GDP on nature - lowest in EU (EU average 2.2%)	Irish Times, 21 May 2026

Irish rail deer/large animal strikes: 22 (2019) to peak of 158 (recent)	CRR Railway Safety Performance Report
SNCF France 2024: 2,562 wildlife strikes, 302,343 hours delay, EUR 2.17m cost	SNCF Group wildlife on tracks data
Meath: 1 wildlife prosecution in 5 years despite near-doubled reported incidents	NPWS data, Irish Times 9 June 2026
Non-operational track returns to 'wild natural state' - Irish Rail's own words	Irish Rail Biodiversity Guidelines for Staff
Ireland's draft NRP due EC: 1 September 2026 - weeks after NSPC1 deadline	Irish Times, 21 May 2026
Priority Annex I habitat 91E0 alluvial woodland present at Dunsany	Ecological survey records
13 of 54 breeding bird species at Dunsany are Red Listed	Polliknow survey data (Dunsany estate)
Sewer main with 9 manholes runs longitudinally on the former railway alignment at Dunsany; full diversion required before any track can be laid	Rail Users Ireland, 'Dunsany Manholes and Railways Don't Mix' (2007)
Dunsany Bridge: 12m wide, below 14.4m minimum - sub-standard for double-track electrified railway, requiring safety derogation	Rail Users Ireland technical analysis citing Iarnrod Eireann Permanent Way Standards
Independent acoustic audit (June 2026): 40 verified bird species confirmed over 3 days via BirdNET v2.4 (Cornell Lab); 120 total species detected including Red Listed Curlew and Turtle-Dove; 6,707 verified acoustic clips	Polliknow Site Biodiversity Audit, Dunsany Estate, 19 June 2026
100% of land parcels around Dunsany rated Extreme or High groundwater vulnerability: any construction contaminant reaches the Boyne SAC groundwater system extremely rapidly	GSI Groundwater Vulnerability Map, cited in Polliknow Site Biodiversity Audit, June 2026
Dunsany Estate confirmed as connective habitat for River Boyne and River Blackwater SAC (2,265 ha) and SPA (424 ha) — the Natura 2000 network	Polliknow Site Biodiversity Audit, June 2026; NPWS Designated Areas
608 unique species recorded within 5 km of Dunsany in the GBIF biodiversity database, including 1,289 bird records —	GBIF occurrence records, cited in Polliknow Site Biodiversity Audit, June 2026

an extraordinary baseline for County Meath	
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5. Questions to put to Irish Rail

These can be included in a submission as direct questions requiring answers:

- What specific, evidence-based plan does Irish Rail have to avoid further deteriorating the Skane waterbody, already classified 'Poor' and 'At Risk' under the WFD?
- Has a seasonal bat survey programme covering all four seasons been completed for the Dunsany corridor? If so, when and by whom?
- Has a full Article 6.3 Appropriate Assessment screening been completed for the impact on the River Boyne SAC? If not, why not?
- What hydrogeological assessment has been carried out for the karst limestone and Galtrim Moraine geology along the corridor?
- Why were Options 5 and 6 (M3 corridor alignments) dismissed, and on what environmental evidence basis were they found to be less suitable than NR-LO-00228?
- What measurement and mitigation programme for wildlife (deer, birds, bats) collision is proposed for this corridor, and on what baseline survey is it founded?
- What routine herbicide and pesticide application is planned along the track corridor, and what specific measures will prevent glyphosate and other chemicals from entering the Skane catchment?
- Has the cost of diverting the Dunshaughlin Sewerage Scheme sewer main from the railway alignment at Dunsany been included in the project cost estimate, and if so what is that cost? If not, why not?
- Has the condition, depth, and ownership of the existing sewage infrastructure on the former railway alignment been confirmed and assessed by the project team?
- Has any technical assessment of the impact on the Galtrim Moraine been prepared, consistent with the assessment required by An Bord Pleanála for the EirGrid North-South Interconnection project in the same geological zone?

6. Contacts

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Minister for Transport: Darragh O'Brien TD, Department of Transport, Dublin 2

Minister of State for Nature: Christopher O'Sullivan TD, Department of Housing, Local Government and Heritage

Minister for Housing, Local Government and Heritage: James Browne TD

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BirdWatch Ireland: Unit 20, Block D, Bullford Business Campus, Kilcoole, Co Wicklow | info@birdwatchireland.ie

Irish Wildlife Trust: info@iwt.ie | Padraic Fogarty, campaigns@iwt.ie

Friends of the Irish Environment: info@friendsoftheirishenvironment.ie

Heritage Council: Virginia Teehan, CEO | heritageireland.ie

7. Where to read more

Primary sources:

- [Irish Rail NSPC1 consultation page](#)
- [Irish Rail preferred route map \(ArcGIS\)](#)
- [EPA catchments.ie - Skane waterbody data](#)
- [GSI Groundwater Data Viewer](#)
- [Meath CDP 2021-2027 Landscape Character Assessment](#)
- [Meath CDP Chapter 8 Cultural and Natural Heritage \(ArcGIS\)](#)
- [GSI Meath County Geological Site Report](#)
- [RAIU Annual Report 2024](#)
- [CRR Railway Safety Performance in Ireland 2021](#)
- [CEH Oak Ecology Dataset \(2,300 species\)](#)
- [EU Nature Restoration Regulation text](#)
- [Irish Rail Biodiversity Guidelines for Staff](#)
- [Railway Ecology - Springer Nature 2017](#)
- [European Commission anti-bird strike LIFE project](#)
- [BirdLife NABU Electrocutions and Collisions Report](#)
- [Sweden Wildlife and Traffic](#)
- [SNCF France wildlife on tracks](#)
- [ICOMOS Principles Concerning Rural Landscapes as Heritage 2017](#)
- [Rail Users Ireland - Dunsany Manholes and Railways Don't Mix](#)
- [Rail Users Ireland - Meath CC admit blocking alignment](#)
- [Transport \(Railway Infrastructure\) Act 2001](#)
- [LRC Issues Paper on Compulsory Acquisition of Land 2017](#)

"There is no such thing as development if the destruction is greater than what is aimed to be achieved."

- Sonja Moore