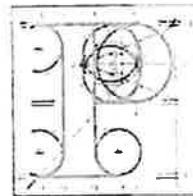


Our Case Number: ABP-318573-23

Planning Authority Reference Number:



**An
Bord
Pleanála**

International Council on Monuments & Sites
c/o Fidelma Mullane
8 Merrion Square
Dublin 2

Date: 19 February 2024

**Re: A proposed Road Development comprising of the N2 Slane By-Pass and Public Realm Enhancement Scheme
Within the Townlands of Slane, County Meath**

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

PP O'Reilly

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

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An Bord Pleanála
Strategic Infrastructural Development(SID)
Case Reference Number HA17.318573

16 February 2024

Observation of ICOMOS Ireland to N2 Slane Bypass and Public Realm Enhancement Scheme

This project has been described as a public realm enhancement scheme to improve road safety along the N2 through Slane village and to allow the village to thrive and develop without the congestion. It also encompasses public realm enhancements, traffic management measures and works on the N51 between the proposed bypass and the centre of the village to further enhance community safety and wellbeing. An application for development consent has been submitted to An Bord Pleanála. The inspector's report refers to the need for engagement of a World Heritage Expert which has been done. The inspector's report states that "*Eastern Options would have a minor adverse impact of moderate significance on the OUV of the WHP.*" But it then goes on in conflict with that statement to say that "*the HIA did not identify significant negative impact on the WHS by any of the any of the Eastern routes.*" ICOMOS Ireland would advocate that where a World Heritage Property is concerned a *minor adverse impact of moderate significance on the OUV* is not within the limits of acceptable change. It would be important to have greater clarity on this point.

We have reviewed this application in terms of any potential impact on the Brú na Bóinne World Heritage Property (WHP), its buffer zone and setting. We have also considered the potential impact on Cultural Heritage being mindful of impacts of the wider heritage and setting within which the WHP is located. We are mindful in particular of the impact on the village of Slane, an important 18th century planned village, and Architectural Conservation Area.

We acknowledge that doing nothing is not an option for the Applicant in terms of the need to make provision for human safety on a section of roadway that is very dangerous and where considerable loss of life has been endured. Also, we believe that the level of traffic flow coming through Slane village is unsustainable and requires a solution to be found. ICOMOS Ireland have a concern that the scheme deals with the issue of North South traffic, but there is no indication as to the scale of the East West traffic and how it is to be managed. We suggest that the East West traffic be controlled by a HGV ban/restriction as part of the Public Realm Enhancement Scheme.

In relation to the Eastern route options the most significant visual impact is the bridge



section crossing the river. In the HIA it is stated that the visual impact of the road from the WHP and Hill of Slane is reduced through use of natural landform combined with cut and fill and planting. It is suggested that following the pattern of hedgerow field boundary planting in the area would mean that planting could develop so that shielding would improve over a 10-year period. It is important that this would be maintained as we note that the HIA refers to poorly maintained hedgerows. From the photomontages and our meeting on site in May 2023 with the applicant and consultants, it is clear that there will be some, but minor, visual impact from the WHP and from the Hill of Slane but that this will be significantly further reduced as the shielding planting is established.

Considerable work has been done to minimise the visual and auditory impacts; The applicant advised that *"due to topography and alignment the cutting, which is in rock would be shielded from view"* so efforts to minimise impact are proposed through the alignment and route of the road cutting through topography to conceal the road, routing it behind established planting, and using the undulating topography to screen sections of the road. The southern section of the preferred option is 440 m further away from the WHP Buffer Zone and the bridge crossing is better screened than it was in the previous proposed scheme. In terms of visual and audible impacts ten years is a considerable length of time for these to be impactful.

Visual impact has also been addressed in the general approach to the bridge design keeping this as a simple horizontal element and using colour along the spandrel /parapet walls. The bridge is kept low which also reduces the span widths as it crosses the river, canal and towpath. However the location of the abutments are also constrained by the Special Area of Conservation (SAC) (requiring a minimum of 10 metres from river edge to abutment footing). The stated objective for a muted approach to the bridge design appears appropriate, however there is a need for skilled detail design to achieve excellence as well as subtlety. ICOMOS Ireland is of the view that this is not apparent in the designs submitted.

While the above indicates the commitment of the applicant to address cultural heritage impacts, ICOMOS Ireland recommends that the following important points should be taken on board. The impact of the road on the cultural landscape is not only visual and noise-related. There is also an impact on the general character and visitor experience. The new road should be factored into this. Therefore much greater consideration needs to be given to the detailed design of the new road, the bridge and the overall landscape integration of this new intervention. The new road should be considered as a new addition to the cultural landscape and therefore needs to be designed and implemented with an objective towards quality and harmonious integration.

The cuttings and plantings are proposed as noise and visual mitigation measures. Planting along the road edges, including the zones of the cuttings, is also intended to integrate the road, reading as another 'natural' boundary line across the landscape. Some of the mitigation is dependent on the character of mature woodland planting

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which however is not protected in any way. This occurs on privately owned land. The landscape is dynamic and a consequence of this, there is a risk of future removal/ loss of strategic swathes of planting/woodland leading to exposure of the road. In this regard attention is drawn to the recently removed *leylandii* trees which had screened the water treatment works from the Newgrange monument. The water works are, as a consequence, now quite visible and discernible from Newgrange.

When considering the Western route options a finding of “no impact” on the World Heritage Property was not weighted strongly enough in the view of ICOMOS Ireland. Natural heritage designations, at that time (2019), had stronger protection comparatively because of the direct effect in law of designations arising from the relevant European Directives. At that time there was no provision in legislation concerning World Heritage Properties but importantly that position has now changed. The Historic and Archaeological Heritage and Miscellaneous Provisions Act, 2023, introduces measures to assist in implementing the World Heritage Convention 1972 concerning protection of World Cultural and Natural Heritage and in particular it recognises for the first time in Irish Law properties inscribed in the World Heritage List under Article 11 of that Convention.

The Planning and Development Bill 2023 Clause 48 Subsection (1) imposes an obligation on a planning authority “to prepare strategy for conservation, etc., of natural and built heritage and landscape” and in subsection (2) *The strategy shall include objectives for the conservation, protection, management and improvement of* – (e) UNESCO sites, having due regard to the reasons for the inscription of the site concerned on the World Heritage List of UNESCO. Clause 48 Subsection (3) states that “UNESCO site” means a site which has been inscribed on the World Heritage List by the World Heritage Committee of UNESCO as a—
(a) natural heritage site,
(b) cultural heritage site, or
(c) mixed cultural and natural heritage site.

So, the legal protection which applied at the time the decision was made concerning routes in 2019 predated the stronger protection which is currently in place as described above.

ICOMOS Ireland’s primary concerns relate to the design quality of the proposal which we maintain, is not appropriately considered in the context of such a highly sensitive location. We suggest that unless this concern about the design is revised and mitigated it cannot be said that there will not be adverse impacts on the cultural and natural heritage and in particular on the World Heritage Property. There is a real need to engage a properly skilled design team with the competencies to make provision for the appropriate level of sensitivity to be applied. The use of concrete crash barriers are not appropriate to this location. A wider take line for the road allowing greater room for greenery would be more appropriate. The width adjustment made in this instance makes the road much harder and more intrusive.

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Supporting the road proposal, Meath County Council propose to implement public realm improvements in Slane village centre. ICOMOS Ireland support this approach and welcome the integration of the public realm projects as part of the overall proposal. We would have concern however, that the public realm proposals submitted appear somewhat insensitive to the distinctive architectural character of Slane village – an Architectural Conservation Area. The highest standards of design and specification are required in this instance. How the design is handled, the thought given to the detail where the bridge and public realm proposal seeks to integrate with the highly sensitive cultural landscape, with existing infrastructural assets or spaces will be of the utmost importance. It is essential, in our view, that the design of public realm is undertaken with architectural, urban design and architectural conservation expertise, as well as appropriately experienced and qualified landscape architectural input. ICOMOS Ireland would advocate for the appointment of an appropriately qualified Grade 1 Conservation Architect to join the design team at this stage so that the conservation needs of this project can be properly addressed before a design crystallises.

Slane is a village of immense architectural and urban quality and the material specification and design should reflect this. It will be so important for the design proposals to be sensitive to their location in terms of design, form, materials, height and visibility in the context of the high quality architectural treatment of the village of Slane. This is not indicated in the proposed submission. We would be concerned that some of the design, material and street furniture proposals jar with the existing context. Proposed interventions at the Francis Ledwidge Cottage will completely alter the current rural character and setting of this important asset and need to be reconsidered. Much greater information in terms of visuals (using available 3D visualisations) should be provided as well as material samples of proposed finishes. ICOMOS Ireland are concerned by the visualisations presented in the proposal. In terms of design, detailing, materiality and construction – of built and planted elements - this needs the appropriate range and degree of expertise, skill and experience to be fully integrated within the design team. Standard road design solutions are not appropriate in this instance – e.g., at the interchanges, or along the central median. The proposed scheme appears to have adopted standard, engineer-led solutions which have not taken sufficient regard to the highly sensitive context of this road. This is an immediate issue and the drawings as presented do not provide sufficient detail or level of design in our view.

In conclusion, whilst ICOMOS Ireland considers that the current proposal addresses many of the serious problems of the previous proposal we believe it will result in impact on the WHP and the surrounding cultural landscape. If the road proposal is to be considered, then we would propose greater mitigation measures should be implemented, as outlined above. While outside the scope of the current proposal, we note that the village does require more intervention assistance than public realm – there is considerable vacancy, including of key buildings (including protected structures). A more comprehensive integrated regeneration strategy for the town –

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possibly in partnership with the Heritage Council, would be important. Finally, ICOMOS Ireland remains of the view, previously communicated to TII and Meath County Council, that the proposed road scheme and route, is the outcome of a narrow focus of geographical/spatial context. This immediately restricts possible alternative solutions, and routes, which would not bring the WHP into consideration regarding impacts.

Fidelma Mullane
President of ICOMOS Ireland

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