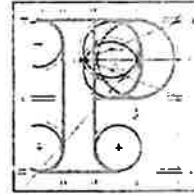


Our Case Number: ABP-318573-23



**An
Bord
Pleanála**

**John Rogers
Crewbawn
Slane
Co. Meath**

Date: 26 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 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. K. M. Gethigan

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

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AN BORD PLEANÁLA	
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CREWBAWN
SLANE
COUNTY MEATH

14th February 2024

An Runaí,
An Bord Pleanála,
Baile Atha Cliath

**OBSERVATIONS OF JOHN ROGERS ON MEATH COUNTY COUNCIL APPLICATIONS
for Road development comprising N2 Slane By-Pass and Public Realm Enhancement
An Bord Pleanála Case Reference HA17.318573**

Issues :

The Boyne Valley World Heritage Site is a premier national site of Irish Heritage. It is an Internationally recognised site of Outstanding Universal Value.

The intrusion of the proposed by-pass into the Boyne Valley so close to the western boundary of the Buffer Zone of the World Heritage Site is an irreversible unnecessary proposal which will have detrimental impact on the integrity of the Brú na Bóinne ensemble.

Our understanding of the extent of cultural artifacts and heritage in the Boyne Valley is evolving by the day. The discoveries made in 2018 and since show how much may yet to be learned about the true extent and significance of the World Heritage Site.

Our knowledge of how rich is the heritage of Brú na Bóinne has been enhanced since the refusal by An Bord of the last application for a by-pass. No sufficient case has been made by the promoters of this by-pass application for An Bord to change its position.

Necessity

There is no need for this by-pass proposal.

The traffic congestion in Slane could have been resolved years ago by restricting HGVs from using the N2. The N33 was intended as the route which would relieve Ardee, Collon

and Slane. Neither Meath County Council nor other responsible authorities have taken steps to ensure the N33 solution was adopted by hauliers and other businesses.

Dublin City Council have recently shown how traffic management solutions can be used to resolve city congestion. An appropriate traffic management approach has never been adopted or attempted for Slane.

The need to enhance road safety in Slane can be resolved immediately with a HGV ban.

No economic necessity has been shown that would justify driving the proposed trenched highway and bridge so close to Knowth, a set of protected structures of Outstanding Universal Value.

Will the project be effective in resolving Slane's congestion ?

The proposal is not a proposal for a by-pass of Slane. The design of the proposed new N2 is not orbital so it will not resolve the congestion arising from traffic running west and east through Slane. In fact it is demonstrable that this "new" proposal will bring more traffic to parts of the village.

So the proposal lacks justification because it will not resolve congestion in Slane and there is in fact an immediate cost effective solution available - a HGV ban, which will force the north/south HGV traffic on to the M1.

Landscape

The plan in this application is to trench the N2 highway into the Boyne Valley.

This is to despoil and transform forever the Boyne Valley landscape immediately adjacent to the envelope of the Outstanding Universal Value World Heritage Site. The "development" of this landscape as envisaged is wholly at odds with the historic and cultural significance of the Boyne Valley where the development is proposed. It is also at odds with the protected status of the valley and the Boyne as Special Areas of Conservation.

The development will be at odds with European Union Environment and Heritage Legislation, the Meath County Development Plan and, indeed, at odds with national legislation.

The Cumulative Impact of Development on the OUV of the World Heritage Site

The EIAR fails to place before An Bord the full extent of these impacts.

For instance, the M1 Business Park North is not referenced as having impact on the World Heritage Site, which cannot be correct as this development is clearly in view and intrusive from the summit of Dowth.

There have been numerous developments of substantial agricultural buildings within the Buffer Zone. These are not referenced in the EIAR.

Increased noise, including intensification of road and transportation noise, is a significant feature of the cumulative impact of developments adjacent to the World Heritage Site.

The expert evidence given to the Inspectors hearing the 2010 Application laid emphasis on the impact of ongoing developments which were already impacting the World Heritage Site and this impact has continued and transformed the setting of this Site of Outstanding Universal Value. The State ought not fund or support any further impacts such as the present proposal to trench a highway and build a Boyne crossing into the valley landscape.

Oral Hearing

I trust An Bord will follow precedent and direct an Oral Hearing leading to a comprehensive report to An Bord. I believe the Inspector(s) should receive expert evidence/commentary in respect of matters relevant to An Bord's consideration of the Application including matters referred to above.

John Rogers

John Rogers