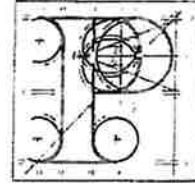


Our Case Number: ABP-318573-23



**An
Bord
Pleanála**

Office of Public Work
c/o Rosemary Collier
Jonathan Swift Street
Trim
Co. Meath
C15 NX36

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 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.

Tel
Glaó Áitiúil
Facs
Lálthreán Gréasáin
Riomhphost

Tel (01) 858 8100
LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde **64 Marlborough Street**
Baile Átha Cillath 1 **Dublin 1**
D01 V902 **D01 V902**

Yours faithfully,

pp Lauren Griffin

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

HA03A

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84 Sráid Maoilbhríde
Balle Átha Cliath 1
D01 V902

84 Marlborough Street
Dublin 1
D01 V902

Lauren Griffin

From: Lauren Griffin
Sent: Monday 19 February 2024 12:38
To: [REDACTED]
Subject: RE: OPW Letter of observation N2 Slane Bypass and Public Realm Enhancement Scheme

A Chara,

The Board acknowledges receipt of your email, official acknowledgment will issue in due course.

Kind Regards,

Lauren

From: Roisin Walsh <[REDACTED]>
Sent: Friday, February 16, 2024 4:37 PM
To: LAPS <laps@pleanala.ie>
Cc: Rebecca Mullin <[REDACTED]>
Subject: OPW Letter of observation N2 Slane Bypass and Public Realm Enhancement Scheme

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A Chara,

Please see attached the OPW letter of observation on the N2 Slane Bypass

Kind regards

Róisín

Roisin Walsh
State/Principal Architect's Office

Oifig na nOibreacha Poiblí
Office of Public Works

Sráid Jonathan Swift, Baile Átha Troim, Co na Mí, C15 NX36
Jonathan Swift Street, Trim, Co Meath, C15 NX36

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<https://gov.ie/opw>

To send me files larger than 30MB, please use the link below <https://filetransfer.opw.ie/filedrog> [REDACTED]

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Roisin Walsh
Clerical Officer - State/Principal Architect's Office

Oifig na nOibreacha Poiblí

Office of Public Works

Sráid Jonathan Swift, Balle Átha Troim, Co na Mi, C15 NX36
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An Bord Pleanála
Marlborough Street
Dublin 1
D01 V902

16th February 2024

RE: N2 Slane Bypass and Public Realm Enhancement Scheme

A Chara,

Introduction

The Office of Public Works (OPW) is a central Government Office operating under the Minister for Public Expenditure and Reform with particular responsibility for Flood Risk and Estate Management, including Heritage. This letter includes observations from OPW Heritage Services and Flood Risk Management/ Arterial Drainage Maintenance. The OPW recognises the need to alleviate traffic related congestion and safety concerns at Slane, Co. Meath. The OPW acknowledges the history of the project and the route selection process that has led to this preferred route.

1. OPW Heritage Services

The Office of Public Works (OPW) has responsibility for the care, operation and maintenance of all National Monuments in State care. This includes the UNESCO World Heritage Property at Brú na Bóinne. Our principal objective is to protect, conserve, maintain and present these sites, and to facilitate appropriate public access where possible. OPW works in partnership with the National Monuments Service at the Department of Housing, Local Government and Heritage (DHLGH), which has responsibility for legislative and policy issues relating to heritage and for the archaeological management of the National Monuments in State care. In addition, the DHLGH is the States Party in relation to World Heritage in Ireland.

The heritage related observations in this letter focus on the potential/ predicted impacts on the Outstanding Universal Value (OUV) of World Heritage Property (WHP) Brú na Bóinne through impacts on its setting. In addition to Brú na Bóinne elements in State Care, the OPW manages, conserves and presents the Church and College at the Hill of Slane (National Monument No.s 666 and 188). Reflecting the emphasis in the Heritage Impact Assessment, the OPW has assessed priority views from Knowth to the Boyne and views from the Hill of Slane to Brú na Bóinne WHP. The OPW has brought a focus on key views of Knowth & Newgrange from the Hill of Slane. Other reciprocal views of the WHP are also of importance to the setting of Brú na Bóinne but fall outside the scope of this letter.



1.1 The Proposed Scheme

The OPW Heritage Services division's assessment focuses on the following elements of the Proposed Scheme: 1 major bridge crossing of River Boyne; 1 new road overbridge to allow the proposed N2 to pass under Rosnaree Road; approximately 3.5 km of mainline N2 bypass Type 2 dual carriageway and 3 at-grade roundabouts at N2 South, N51 and N2 North. The OPW notes that 'the forecast flow on the N2 bypass of Slane is 13,610 vehicles per day annual average daily traffic (AADT) on the southern section which includes the new bridge over the river Boyne, and 11,800 vehicles per day AADT on the northern section' (EIAR).

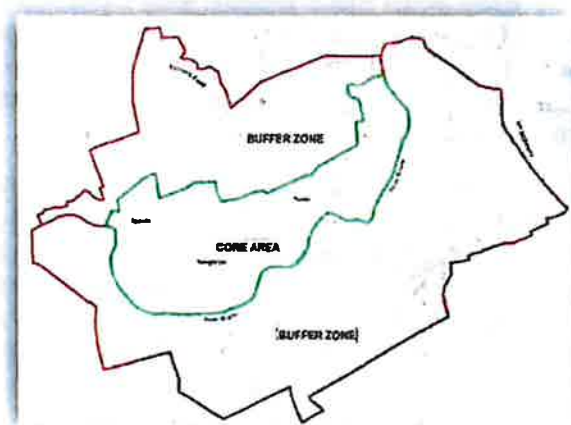
1.2 History of the Route Selection

This planning application is the culmination of a process starting in 1985 to resolve safety and capacity issues on the N2 at Slane. A previous application to An Bord Pleanála was refused in 2012, citing Brú na Bóinne UNESCO World Heritage Property and other archaeological heritage and SAC (River Boyne and River Blackwater Special Area of Conservation) and SPA (River Boyne and River Blackwater Special Protection Area) Natura sites. In addition, the need to demonstrate alternatives including traffic management alternatives and the need to consider east-west traffic movements were cited.

The preferred route is the result of an Options Appraisal process that considered the impacts on the OUV of the WHP and on other sensitive receptors. The route selection took into account the WHP, the SAC and other heritage receptors. A route to the west of Slane would have resulted in no impacts on the WHP. The selected route is outside the WHP Core Area and Buffer Zone, but lies within the setting of the World Heritage Property.

1.3 Brú na Bóinne World Heritage Property and its Setting

The Brú na Bóinne World Heritage Property (WHP) refers to an area that contains one of the world's most important prehistoric landscapes. It was inscribed on the WHP list in December 1993 in recognition of its Outstanding Universal Value (OUV). The WHP comprises a central Core Area (green outline), with a surrounding Buffer Zone (red outline), as depicted below.

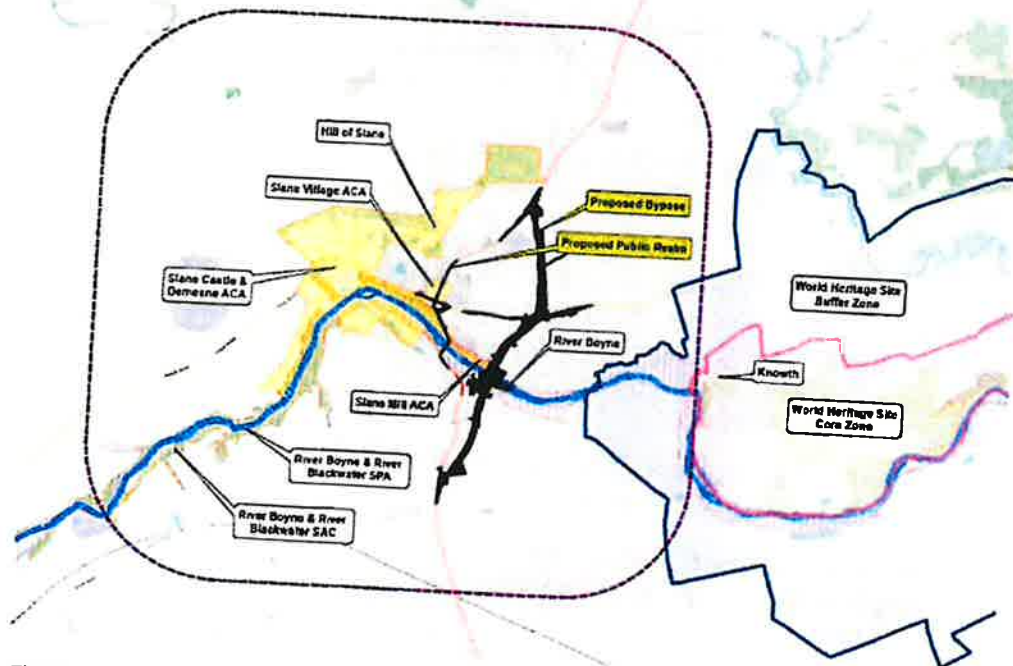




The preferred route is the result of an Options Appraisal process that considered the impacts on the OUV of the WHP and on other sensitive receptors. The route selection took into account the WHP, the SAC and SPAs and other heritage receptors. A route to the west of Slane would have resulted in no impacts on the WHP. The selected route is outside the WHP Core Area and Buffer Zone, but lies within the setting of the World Heritage Property.

The current N2 is located at least 2.7km from the WHP Core Area and at least 1.4km from the Buffer Zone. The proposed Slane Bypass, at its closest where it crosses the N51, is approximately 0.9 km outside the Buffer Zone and 2 km outside the World Heritage Property. This is 500-700 metres closer to the Core Area and Buffer Zone than the existing N2. Knowth Passage Tomb is very close to the western boundary of the Core Area.

The Statement of Outstanding Universal Value SOUV, under 'Integrity' states that 'since inscription in 1993, views out of the property have been impacted by the M1 bridge crossing the River Boyne to the east of the property; the addition of a third chimney and other structures to the cement factory on the skyline to the east south-east near Duleek; the addition of an incinerator stack to the skyline at Carranstown and a housing development. The ambiance of the ritual centre is vulnerable to such disturbances which could potentially threaten the integrity of the property.' The HIA states that development within the setting, unless particularly high or large in scale, has less impact than development within the Buffer Zone or Core Area.



This map shows the location of the proposed bypass in relation to the World Heritage Property, Knowth and the Hill of Slane. *Vol. 1 Non-Technical Summary*



Concerning the preferred route, which is the basis of this planning application, the Heritage Impact Assessment (HIA) states 'the balance of interest, when all relevant disciplines were taken together, led to the selection of Option E/G as the preferred route option for the proposed bypass. This was not one of the western or online route options, which were preferred from the perspective of avoiding impacts on the OUV of the World Heritage Property'. It goes on to describe the route selection as 'a compromise, but one that still delivers considerable avoidance of adverse impacts [on the OUV of the World Heritage Property] embedded in the design'. The assessment during route selection was that the selected option E/G would lead to 'an adverse impact on OUV of some magnitude and moderate significance', primarily due to views from Knowth and from the Hill of Slane. The proposed scheme includes measures to mitigate the impacts identified during the route selection stage. The HIA assesses the impact on OUV of the scheme with mitigations after a 10-year period.

1.4 Statutory Protections

The OPW notes that since the route selection process, statutory protection of the OUV of WHP Brú na Bóinne is now in place through the *Planning and Development Bill, 2023*. The *Historic and Archaeological Heritage and Miscellaneous Provisions Act, 2023* has introduced measures on the implementation of the 1972 World Heritage Convention and recognises in Irish Law properties inscribed on the World Heritage List. In addition to these protections, the World Heritage Property contains the National Monuments of Knowth, Newgrange and Dowth and numerous recorded monuments. In addition, many Protected Views in the Meath County Council Development Plan concern protection of the OUV of Brú na Bóinne World Heritage Property. The River Boyne is also subject to EU level Natura natural heritage protections.

1.5 Assessment of Impact on the Setting and OUV of Brú na Bóinne

During the Construction Stage (36-month duration), construction plant and spoil heaps will be visible on the Bypass route. Though significant, such impacts are of temporary duration.

Operational Stage: The OPW has examined the planning documentation, including the photomontages and *Environmental Impact Assessment Report (EIAR)*, in particular, *Chapter 13 Archaeological Heritage: Appendix 13.1 Heritage Impact Assessment (HIA) of predicted impacts on the Outstanding Universal Value (OUV) of Brú na Bóinne World Heritage Property*, the latter undertaken in accordance with the *UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022)*.

The applicants have adopted a number of design and mitigation measures generally to reduce the impact of the proposed infrastructure.

- Use of cuttings to partially conceal the road
- New planting in cuttings and on road edges
- Use of berms
- Planting of new hedgerows with trees on the top of cuttings to mimic field boundaries
- Reduced speed limit (noise reduction)
- Low noise road surface

Further mitigations specific to the proposed N2 Boyne Bridge are listed below.



1.5.1 Views from Knowth towards the Boyne and the Hill of Slane and Measures to Reduce the Impact

The HIA Statement of Significance identifies the land around Slane as forming a backdrop to views from within the WHP, and views to the WHP from the area around Slane as supporting the OUV of the WHP. It defines how Protected View PV59 from Knowth along the Boyne Valley and towards the Hill of Slane supports the OUV as follows:

'The top of the main mound at Knowth provides an open elevated viewpoint with views west up the valley of the Boyne and northwest towards the Hill of Slane. These views allow and appreciation of:

- Historical associations between Slane and Knowth in the Early Medieval period
- The historical relationship of Brú na Bóinne and Knowth with the River Boyne
- The landscape setting of Brú na Bóinne.'

Specific measures in the scheme design to reduce the impact on OUV in the view from Knowth are as follows:

- The design of the proposed N2 Boyne Bridge – keeping it low in the landscape through use of cuttings, shallow profile, steel which will weather to a dark brown colour
- Use of cuttings to partially conceal the road
- Use of an acoustic bund on the east side of the southern abutment of the proposed bridge
- Planting of new hedgerows with trees on the top of cuttings to mimic field boundaries
- The avoidance of fixed lighting on the south side of the bridge (reducing visibility of lights at periods of low daylight and at night)

Part of the mitigation strategy is that increasingly, over a period of 10 years, the hedgerow planting with trees will conceal high-sided vehicles on the road to the south of the proposed N2 Boyne Bridge. The OPW notes that the positioning of the proposed N2 Boyne Bridge has reduced the visibility of it to 35 metres on Year 1 of the southern end of the bridge and the southern abutment, reducing to the 25 metres of bridge 10 years later. The 10-year photomontage (VPT 01) demonstrates that it is not feasible to screen the view of vehicles crossing the proposed bridge. It is unclear to the OPW, what a structure at higher level is within the photomontages, possibly the Rossnaree overbridge, which is mostly screened in the Year 10 photomontage. The sinking into a cut of the N2 approach to the bridge reduces the visual impact on Year 1; planting will progressively conceal the upper parts of high-sided vehicles over a 10-year period.

Noise Impact at Knowth

Noise from the existing N2 is currently audible from Knowth under some atmospheric conditions. The proposed road will be closer to Knowth. *Appendix 9.5 Operation Noise Prediction with Mitigation* predicts that noise at R1320 at Knowth will change from 46dB to 47dB.



Detail of VPT 01, focussing in on the southern approach to the proposed new Boyne Bridge and what appears to be the Rosnaree overbridge: Year 1



Detail of VPT 01, focussing in on the southern approach to the proposed new Boyne Bridge and the Rosnaree overbridge: Year 10

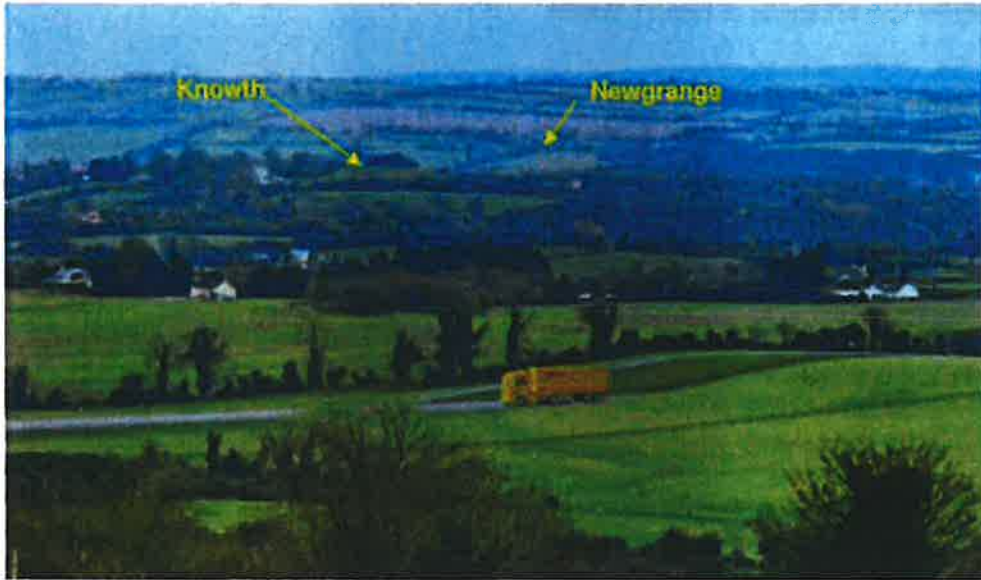


1.5.2 Views of Brú na Bóinne WHP from the Hill of Slane (National Monument site and Carpark) & Measures to Reduce Impact

The view from the Hill of Slane carpark is Protected View PV29 and that from the Church, College and graveyard is PV30. According to the HIA, they both allow appreciation of:

- historical associations between Slane and Knowth in the Early Medieval period
- the landscape of Brú na Bóinne, including the setting of Knowth and Newgrange
- the landscape setting of Brú na Bóinne.

The north section from the N51 roundabout to the north roundabout will be visible in Year 1. The photomontage details below (from the Hill of Slane graveyard and Hill of Slane Carpark) show that the road emerges from a cutting and in Year 1, is exposed on the line of sight between the Hill of Slane and the mounds of Dowth and Newgrange. In addition, there appears to be a lane at a higher level following the existing field boundary/hedgerow. While recognising the importance and statutory protection of the extensive view of the World Heritage Property and its setting from the Hill of Slane, it is the opinion of the OPW that this 'line of sight' element is a particularly important part of that view. This special importance does not appear to be reflected in the HIA description of the predicted change in the two hill of Slane viewpoints: 'short section of bypass with vehicles visible to north of cutting at Norris hill with short section of re-aligned N51 in view looking southeast towards World Heritage Property; North Roundabout with vehicles visible in periphery of view (HIA, p.37).



Views of Knowth and Newgrange in Brú na Bóinne with proposed road in foreground from the Hill of Slane Graveyard, Year 1 (above) and Year 10 (below). Details of Photomontages 17.



Views of Knowth and Newgrange in Brú na Bóinne from the Hill of Slane Graveyard, with the proposed road in the mid ground, Year 1 (above) and Year 10 (below). Protected View PV29, Details of Photomontage 18.

The scheme includes a proposed mitigation for the north section: the planting of a woodland strip on the west side of the road to reduce, over time, the view of the road from the Hill of Slane. The OPW is concerned that 10 years is a long time for the mitigatory effects of planting to become effective. Indeed the HIA concludes that at 10 years, the upper parts of high vehicles will still be visible, per the photomontages above. It is the opinion of the OPW that pending screening, there will be constant visual distraction in the mid-ground of the view towards the WHP in general, but specifically in the view towards Knowth and Newgrange. The OPW suggests that additional measures are considered, such as berming on the west side of this stretch of road combined with planting and the planting of the central reservation and its maintenance to an agreed height. The possibility of lowering the road in a cutting could also be considered.



The OPW notes that more elevated views are afforded by the publicly accessible first floor level of the College building (the National Monument). Possible additional mitigations to counteract negative impacts of the proposed N3 Bypass include improvements in Protected View PV29 Hill of Slane Carpark through new vegetation screening of existing prominent buildings and infrastructure and the removal of the electricity pole located in the foreground.

Noise impact at the Hill of Slane

The OPW notes that the noise from the N2 at Slane Bridge is already audible at the Hill of Slane. *Appendix 9.5 Operation Noise Prediction with Mitigation* predicts that noise at R1322 at Slane Abbey will remain at 51dB. It is noteworthy that traffic on the Bypass will travel at a higher speed than traffic on the existing N2, which is subject to urban speed limits. If existing noise levels are considered an issue on the Hill of Slane, a lower speed limit, if feasible, could provide mitigation to benefit this and other locations.

1.5.3 Other Views from the Hill of Slane

The existing N2 southern approach to the historic Slane Bridge and the bridge are visible from the Hill of Slane School and Church (National Monuments) and graveyard. The proposed new approach roads to the new N2 Bypass Bridge, from the south and north will also be visible in this view. The OPW suggests that the future managed use of the historic bridge is considered, taking into account the proposed Boyne Greenway (Stage 2 of 7 just completed) and proposals to improve the public realm contained in the Scheme Design.

1.6 The Use of Vegetation as a Mitigation Measure

The OPW notes the partial reliance on existing vegetation and the planting of new vegetation as a mitigation to reduce the impact on the OUV of the WHP. The existing vegetation takes the form of hedgerows/field boundaries (managed and unmanaged), individual trees and stands of trees or woodland. The HIA notes that 'it is clear ... that existing vegetation plays a role in screening the proposed bridge in the view from Knowth, in particular an area of woodland on the valley side at Crewbane'. While some existing screening vegetation may be under the control of Meath County Council or TII, much is likely to be on private land. It is possible that none of it has protection in law. The OPW recommends that Meath County Council consider how privately owned vegetation screening and new publicly owned screening will be managed to maintain the necessary level of mitigation.

The OPW recommends that a vegetation and planting design and management plan is generated. The OPW recommends that an arboriculturalist or horticulturalist become part of the project team. Re. new vegetation, the OPW recommends the selection of species to heavily feature native species which will support biodiversity and which will be suited to local ground conditions. The design, species selection and the active management of the screening will be critical to gradual realisation of the mitigatory effect. The design should take into account Climate Change risks such as disease, drought (young trees more vulnerable), exceptionally heavy rainfall and storm force winds. The selection of a wide range of species may mitigate the risk of disease.



It will be essential to the integrity of the OUV that hedgerows and plantings on privately owned land as well as publicly managed locations are managed to maintain, and where relevant generate, the intended screening. These screening obligations will not evaporate after 10 years and will constitute an ongoing risk to the integrity of the OUV. The OPW requests information on how Meath County Council/TII will manage this risk, in particular where the vegetation is not under their direct control.

The OPW notes that 10 years is a long time for the full mitigatory benefits to be achieved. The OPW notes the possibility of generating additional berms, in particular on the west side of the parts of the north stretch of road that features prominently in views between the Hill of Slane and Brú na Bóinne, subject to impact assessment, to reduce the time to achieve screening of the development and reduce the amount of excavation material taken to landfill resulting in reduced transport related carbon emissions.

1.7 Design Quality

The road, bridge and associated infrastructure constitute new elements in a sensitive cultural landscape. As such, the design and material quality of all elements will need careful consideration. The OPW recommends that an architect/landscape architect with suitable experience of integrating infrastructure into a sensitive cultural landscape is engaged on the project.

1.8 The Conclusion of the Heritage Impact Assessment

The Heritage Impact Assessment was undertaken by World Heritage expert, Dr Stephen Carter, of Headland Archaeology. In it, he has noted that any potential effects on the OUV are limited to the wider setting of the Brú na Bóinne World Heritage Property; he has concluded that ‘the operation of the Proposed Scheme (with all mitigation measures embedded in the scheme design) would result in a negligible negative impact on the OUV of World Heritage Property ...[and] that the avoidance and mitigation measures implemented during the design of the Proposed Scheme have reduced any negative impacts on OUV to an acceptable level.’

1.9 Other Heritage and Visitor Experience Related Matters

The HIA references guidance in the UNESCO Toolkit that ‘emphasises the need not only to avoid or minimise adverse impacts but also to identify opportunism to enhance OUV.’ The OPW recognises the positive impact of the removal of N2 through traffic from the village and the potential improvement in public realm. The OPW has suggested improvements at the Hill of Slane carpark. The OPW recognises the potential for increased pedestrian and cycle connectivity between the Hill of Slane National Monument, Slane Village and the towpath on the south side of the Boyne. The OPW recommends that consideration should be given to the inclusion of measures to improve the quality of the approach to the Hill of Slane carpark for pedestrians and cyclists and to the erection of an information panel at the east wall to explain the protected panoramic view of Brú na Bóinne World Heritage Property.



1.10 Heritage Services Summary & Conclusion

The OPW recognises the need to alleviate the congestion and reduce the risk posed by traffic at Slane. The OPW also acknowledges the consultation process that Meath County Council, with their expert in World Heritage, have gone through with the World Heritage Unit of the DHLGH and with ICOMOS.

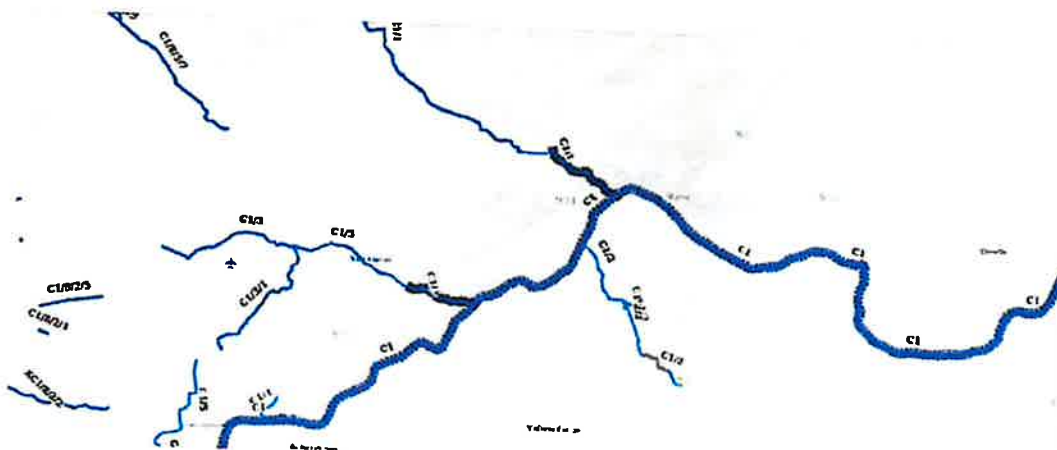
The OPW has expressed concern about the risks associated with reliance on vegetation to protect the integrity of the OUV of the World Heritage Property: on existing vegetation possibly outside the control of Meath County Council/TII and in some locations, on new vegetation with incremental screening over a ten-year period. The OPW has made suggestions to address the risk and recommends that a vegetation and planting design and management plan is generated and implemented, into the future..

The OPW requests that An Bord Pleanála take into account the OPW's observations to support the integrity of the OUV of Brú na Bóinne World Heritage Property.



2. OPW Flood Risk Management and Arterial Drainage Maintenance Observations

The Office of Public Works (OPW) has maintenance responsibility for those Catchment Drainage Schemes completed by the OPW under the Arterial Drainage Acts 1945 and 1995. The map below shows the channels maintained by the Office of Public Works highlighted in blue on the Boyne Arterial Drainage Scheme. The Arterial Drainage Scheme in full may be viewed at www.floodinfo.ie and by selecting the Drainage Map.



Please note that the OPW requires that proposed developments do not interfere with drainage works/flood relief works maintained by this office such as channels, embankments, walls etc. This office also requests that a 10-metre wide strip measured back from the top edge of the bank be retained adjacent to Arterial Drainage Scheme channels to permit access for plant and maintenance. This strip should not be fenced, paved, or landscaped in a manner that would prevent access by plant machinery.

New culverts/bridges on any watercourse or changes to existing structures or drainage channels will require consent from the Commissioners of Public Works in Ireland. The Office of Public Works website; www.floodmap.ie has information on past flood events in Ireland. This data is obtained by searching for a specific location. Links are provided to the relevant information (reports, photos etc.). The map has information on hydrometric stations, rivers, lakes, river catchment areas, land commission embankments, drainage districts and benefiting lands. Further information on Flood Risk Management is available [here](#).



Conclusion

The OPW recognises the need to alleviate traffic related congestion and safety concerns at Slane, Co. Meath. The OPW acknowledges the history of the project and the route selection process that has led to this preferred route.

The OPW has outlined arterial drainage maintenance requirements.

The OPW would welcome clarification of the detailed design and materials of the proposed road and bridge and associated landscaping, and the extent and projected effectiveness of mitigation measures already proposed and additional. The OPW also strongly recommends the development of a vegetation screening design and management plan, with a view to achieving greater, assured and sustainable screening. The management of the screening will be an ongoing activity requiring monitoring and periodic reviews to ensure protection of the OUV of the World Heritage Property. In particular, we draw your attention to the impacts as outlined above on views from the Hill of Slane and views of the Boyne from Knowth.

We look forward to hearing from you.

Yours sincerely,

Rosemary Collier

Assistant Secretary, Head of Heritage Services and Capital Works Delivery

Office of Public Works