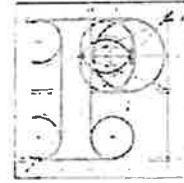


Our Case Number: ABP-318573-23



**An
Bord
Pleanála**

Fionan O Muircheartaigh
41 Nutgrove Park
Dublin 14
[REDACTED]

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 Lauer Griffin

Elmear Reilly
Executive Officer
Direct Line: 01-8737184

HA02A

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64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902

TO: An Rúnal, An Bord Pleanála.
Date : 14 February 2024

SID Application : N2 Slane Bypass

Observation on Planning application regarding N2 Slane Bypass Project AND RELATED WORKS

SID Application : HA 17 318573 N2 Slane Bypass.

Name : Fionan O Muircheartaigh
41 Nutgrove Park
Dublin14

14 February 2024

Introduction.

DRAFT

This proposal raises important issues that invade one of the richest areas of our Irish heritage, and raises issues of International, national, regional heritage history and landscape and environment, the consequences of which if implemented, would have a detrimental adverse impact and in some cases will be irreversible.

Heritage and our neolithic past

Any destruction of the record of our neolithic past will be irreversible. If retained, non destructive investigation and conservation is developing. Investigative methods are always advancing and will enable over time to map a more comprehensive picture of our past - and to enrich the lives and understanding of Citizens and Tourists and Future Generations.

Economic necessity

The economic necessity of routing a motorway so close to Knowth is not established, nor is it clear that it affords adequate protection to protected areas. The costs and benefits are partially and inadequately dealt with.

Environment, transport

The strategy appears to be inconsistent with the governments Climate action policy. It is clear that there has been little attempt to modify the general approach to transport at Slane to take on the Governments revised priorities in the light of the Paris agreement, and the much touted net zero strategy

Tourism and fisheries

The Slane /Knowth area has exceptional landscapes and is an area of exceptional natural beauty. Together with the historic Boyne fisheries, it is typical of the kind of destination of interest to Modern Tourism from home and abroad. It could put one of our most historic fisheries gravely at risk.

The options therefore require closer scrutiny in the light of our enhanced understanding of the unique ecosystem, and the revitalised understanding of the interaction between major physical infrastructure policy, and the topography, landscape, history, climate and transport policy

The following issues arise which are not adequately considered by the Applicant.

- DRAFT**
- (1) The *Archaeological and heritage studies outline the unique and rich inheritance the residues in the Area of development in the Knowth catchment. These issues are given insufficient weight in the application.*
 - (2) The *tourist dimension:* Since my time as Assistant Secretary General, Department of Tourism, Forests and Fisheries, the development of such tourist assets has become a key part of the development of specialist tourist product, and the creation of knowledge and educational opportunities for Citizens and Tourists alike *in situ*. The unique history of the landscape and area give it a great potential as a prime tourist centre. Such centres tend to assist conservation. It also seems inconsistent with both "see and do" and "sustainability" – two key principles of tourism development. Who would go to see a trench motorway gouged of the historical goldmine that is this area?
 - (3) The *landscapes, protected areas and landscapes:* It is difficult to reconcile development of these historic landscapes and special areas of conservation with the numerous EU Environment or heritage directives and national legislation. The adequacy of the measures envisaged for landscape conservation are based on a misconception, that you can retain the landscape while making a deep incision into it.
 - (4) Fishing in the Boyne valley is a unique part of the Boyne heritage. This is encapsulated not just in fact, but also in myth and legend. As regards fact the Boyne was a leading river for salmon fishing in the first half of the 20th century. The Boyne drainage scheme devastated the Fishing for about sixty years. Major works of the type envisaged, could have a devastating effect on the ecosystems necessary to sustain and maintain that recovery. The river is embedded in the myth and legend of the river, dating back to Fionn MacCumhail and an Bradan Feasa. This is all part of the rich potential tapestry of future tourism

development , another potential loss not adequately addressed in this application.

- (5) Economic : the Justification for putting the Motorway through such a rich geological site is a major issue. The evaluation of major interests and tradeoffs made are central. The need to pursue a historically discredited "Motorway approach" through the heart of the area in the changed circumstances of rapidly changing government climate policy , transport policy, the Paris agreement and Global warming also needs to be updated and properly ventilated.

Mitigation

The Bord should examine critically the mitigation measures. The surveys done with limited investigation are literally a drop in the bucket. Quite apart from the failure to address the adequacy of the mitigation proposed there is more fundamental question – how can mitigation measures address needless potential destruction of the irreplaceable past?

There is a clear need to address and advance an approach that does not involve the destruction of the unique ecosystems of the Keshagh district.

Conclusion

There are therefore critical issues of public interest at large in the matter. In all the circumstances I believe , and request the Bord to arrange a public hearing about the project. This would ensure An Bord, the promotor and the citizenry should have an opportunity afforded to observers to pursue the public interests that arise (- heritage , history , archaeology , tourism, economy , transport policy and the green transition-) in this matter.

The fact that this Application is going **directly** to An Bord Pleanala, and the fact that many issues as set out above have been inadequately addressed / and or not considered as set out above in the Application underlines the need to afford concerned parties an opportunity to convey their concerns and evaluate the response of the promoters of the project.

For all the reasons above , I am requesting that An Bord convene a public oral hearing on the matter.

Fionan O Muircheartaigh. [MA(Nui)].M.Sc (Dub). B. Phil (Oxon). B.L (Kings Inns)]