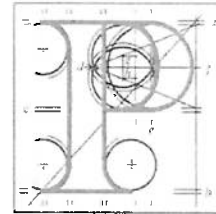


**Our Case Number:** ABP-318573-23



**An  
Bord  
Pleanála**

The Heritage Council  
c/o Virginia Teehan  
Aras na hOidhreachta  
Church Lane  
Co. Kilkenny  
R95 X264

**Date:** 16 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](mailto:laps@pleanala.ie)

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

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Baile Átha Cliath 1	Dublin 1
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Yours faithfully,

*fp Lauren Griffin*

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

HA03A

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The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01 V902

<b>AN BORD PLEANÁLA</b>	
LDG- _____	15 February 2024
ABP- _____	
16 FEB 2024	
Fee: € _____	Type: _____
Time: _____	By: <i>Post</i>

Dear Sir/Madam

**Re: HA17.318573 - Proposed Road Development comprising of the N2 Slane Bypass and Public Realm Enhancement Scheme [LA ROAD DEV – Application] and associated Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS).**

The Heritage Council is a prescribed body under S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia. We seek to provide submissions on forward planning, development control and strategic infrastructure developments as they relate to Ireland's heritage, both cultural and natural heritage.

The development proposal can be divided broadly into two parts. 1. Slane Village public realm enhancement and 2. The N2 bypass dual carriageway and associated infrastructure. The application is accompanied by an EIAR and NIS. The Heritage Council will not comment on the need/justification for the scheme in our submission but will concentrate on impacts on the historic and natural environment.

In general, we recognise that directing traffic away from Slane village will undoubtedly bring benefits to the townscape and the overall historic environment. Although it has been noted that due to the improvements to the N51 west, the EIAR states that it is expected that there will be "a significant future year traffic demand on the N51 West from the bypass to the centre of the village". This rather undermines a key argument for the bypass, which will unavoidably have considerable impact on the area's heritage, with particular concern for the integrity and setting of the Brú na Bóinne World Heritage Property (WHP), some architectural features, and ecological assets.

Our comments will deal with both aspects of the scheme, and are divided as per the following:

1. Built/ Cultural Heritage
  - Archaeological and Cultural
  - Landscape and Visual
  - Architectural
2. Natural Heritage
  - European Protected Sites
  - Flora and Fauna (Habitats in general)
  - Climate Change

**Baill na Comhairle | Council Members**

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## BUILT/ CULTURAL HERITAGE

### Archaeological and Cultural

#### N2 Bypass

Chapter 13 provides detailed information on the rich archaeological and cultural heritage in Slane and its environs. Of paramount concern is the Brú na Bóinne WHP, which undoubtedly is of 'Very High' significance/sensitivity. Therefore, any magnitude of effect will be of concern.

At the outset we point out that the *Guidance and toolkit for Heritage Impact Assessments in a World Heritage Context* (UNESCO 2022) states that:

*'It is always preferable to avoid, rather than minimize, impacts on a World Heritage property's attributes. Any loss of, or damage to OUV is unacceptable, which means that rectification, reduction (to less severe but still significant) or offsetting of impacts is inappropriate in a World Heritage context.'*

This sets a high standard for the EIAR and for any potential delivery of the proposed scheme, yet it appears to the Heritage Council that once a route east of Slane was selected only mitigatory options (i.e. 'rectification, reduction...offsetting of impacts') are available.

The EIAR identifies the main archaeological, cultural and heritage assets in the vicinity of the proposed scheme. The Heritage Council has studied carefully the Heritage Impact Assessment (HIA; appendix 13.1). The construction site is outside the buffer zone of the WHP, therefore as such no concern is raised regarding temporary construction works to the physical integrity of the WHP. Although we have noted there will be visual and noise impacts, which will have a negative effect on the WHP. Given the protracted nature of road construction works, this is going to have a negative impact. The chapter on noise and vibration should have done more assessment on the construction noise impacts on the receptors of Knowth and Newgrange. They have been noted as part of the operational phase impacts but not for the construction phase.

Therefore, it is strongly recommended that the Construction Environmental Management Plan (CEMP) and associated Traffic Construction Management Plan etc, which should be a requirement for schemes of this scale, account for the exceptionality of the location. This is likely to mean that standard CEMP approaches will not be sufficient, and that further effort and emphasis on reducing the area under construction at any one time, as well as the magnitude of noise and disturbance, is needed. The primary objective of this is to reduce the impact of construction, which will have protracted timescales, on the WHP. This is critical given that the landscape impact of construction on the views from Knowth have been considered as "Localised Significant adverse" and those from Newgrange as "slight to moderate adverse".

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In relation to operational phase impacts, the documentation associated with Chapter 13 of the EIAR, indicates that there will be “*an adverse effect of negligible magnitude and slight significance on the Outstanding Universal Value*” associated with the WHP. The assessment is primarily based on the setting of the WHP with two specific functional associations noted in the *Statement of Significance*:

- The relationship between Knowth and Slane in the Early Medieval Kingdom of Brega; and
- The role of the River Boyne in the development of the monumental landscape of Brú na Bóinne.

It is clear from EIAR Chapter 6 and Chapter 13 that ICOMOS Ireland and the National Monument Service have been consulted throughout the emerging route options process. However, we do note that at times chapter 13 could be clearer in terms of methods. For example, tables 13.1 to 13.3 (Significance and Sensitivity) were introduced as part of the “*Assessment Criteria and Significance*” but it appears that these are only used in the summary table of potential effects and mitigations (Table 13.20). There is a question as to why these criteria were not included in the preceding sections in Chapter 13 as well as in the detailed Appendix 13.5 (Archaeological-and-Cultural-Heritage-Inventory). In addition, a clear definition of what constitutes Outstanding Universal Value (OUV) would be useful.

Notwithstanding this, this summary table correctly identifies the Brú na Bóinne site as having a sensitivity value of ‘Very High’. The magnitude of the effect is considered negligible and of minor significance. However, any effect on an international heritage site is a concern, particularly when the options process noted that the eastern road route options would have an impact on the setting of “*some magnitude*”. The design of the scheme did seek to mitigate this, yet there is an over reliance on long term 10-year vegetation screening as a solution. This, by definition, suggests that the first decade of the operational phase of the project would still have a level of impact. Any level of adverse effect, even if minor, on an asset of this sensitivity, is a concern. It does appear that there will certainly be a view of the bridge crossing (as detailed from the photomontages) from Knowth, while the roundabout will also be visible from the WHP particularly at night.

The views from Slane Hill towards Knowth (see also landscape and visual section below) will also be impacted. Given the reciprocal views between the two, which is a key part of the OUV assessment, the new bridge/road alignment will bring a significant change. Whilst it may be correct that the bypass would not obstruct directly views towards Knowth, there is a considerable material change to the landscape when looking in that easterly direction. The assessment in section 13.4.2 of the EIAR regarding the view to Knowth, which states that the operation of the new road “*would simply add a new man-made feature in the foreground of the view*”, causing a “*low level of visual distraction*”, is not credible.

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We welcome the inclusion of the Heritage Impact Assessment in the EIAR documentation (Appendix 13.1). We note the role of the 2022 UNESCO guidance on the practice of HIA which it states has been used, although we do point out that this particular HIA is unduly repetitive in places. We take the view that the HIA in Appendix 13.1 would have benefitted from a discussion of what Outstanding Universal Value actually is, as well as a discussion setting out the current knowledge of what a monumental landscape is. Both of these items would have framed the assessment of impact on the Brú na Bóinne WHP.

The Retrospective Statement of Outstanding Universal Value (2013) is provided, as well as County Development Plan policy, and details from the 2017 Management Plan. We note on p19-21 a 'Statement of Significance' is provided, yet the origin of this is unclear and presumably it was drafted by the author of the HIA. This is based upon an analysis of how the wider setting of the WHP supports OUV and we query how this was compiled. As it stands this is primarily based on views, protected or otherwise. We note that one of the key associations identified (p19-20) is the connection between Knowth and Slane during the early medieval period and this visual connection is referenced numerous times throughout the HIA.

What is not included in this part of the HIA is the enclosure ME019-085 in Slane townland which lies partly within the proposed scheme (Chapter 13, p.13.17; 13.30). This large sub-rectangular enclosure, with a ditch up to 3.5m wide, and probable attached field system on the south-west side, revealed a cow atlas dating to 660-820 Cal. AD. This indicates that this is an early medieval settlement site of a classic high-status form. A portion of this will be removed by the proposed scheme, and as it relates to an attribute identified by the HIA as contributing to OUV (i.e. high status settlement during the early medieval period), it is unusual that it is not considered by the HIA. While the significance of ME019-085 is assessed in Chapter 13, (p13.30) this is done from the point of view of its potential status as a National Monument rather than its contribution to OUV.

The issue of road noise is also a concern. From even a slightly elevated position, this can significantly impact on the setting of a heritage asset<sup>1</sup>. Noise reverberation can significantly affect the integrity of a heritage asset. Chapter 9 identifies Knowth (R1320) and Newgrange (R315) as Noise Sensitive Locations (NSL's). Appendix 9.4 is essential here. It is unacceptable, given the sensitivity of the WHP in this scheme, that no detailed assessment of noise annoyance levels in the context of the WHP is provided. The following information has been extracted from the appendix:

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<sup>1</sup> A suggestion is to experience Dromoland Castle walks in County Clare in the context of the Ennis/Limerick M18 motorway. Although it must be said that the proposed N2 bypass is significantly further away (2.7km approximately) from the WHP, then the M18 motorway is to Dromoland castle and grounds (1km approximately); and the motorway has higher speeds.

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Receptor ID	Description	Predicted Noise Levels Opening Year (2026)		TII Condition for Noise Mitigation Satisfied?			Mitigation Required?	Predicted Noise Levels Design Year (2041)		TII Condition for Noise Mitigation Satisfied?			Mitigation Required?
		Do-Minimum	Do-Something	(a)	(b)	(c)		Do-Minimum	Do-Something	(a)	(b)	(c)	
R1320	Knowth	46	47	No	Yes	No	No	48	48	No	No	No	No
R315	Newgrange Monument	59	57	No	No	No	No	62	61	Yes	No	No	No

The main issue here is that there is no detail/commentary that accompanies this modelling analysis. A higher standard is required here for the impact that road noise may have on the WHP. The following points are made:

- Is a standard annoyance 60dB Lden level (general road scheme and receptors) suitable for assessing impacts on the OUV of the WHP?
- Given that the new scheme will bring the road closer to Knowth and Newgrange, with assumed higher speeds compared to the current road through the village, how could the “do something scenario” be:
  - Either equal to or only slightly worse in both 2026 and 2041 years for Knowth
  - Have less noise impact on Newgrange for both 2026 and 2041 years?

Finally, it is important to note that there is a Dark Sky Monitoring station located within the Brú na Bóinne WHP. Therefore, it is essential that there is no significant increase in light pollution from the scheme. The description of the proposed scheme for the mainline bypass in section 4.4 of Chapter 4 in the EIAR, does not adequately describe the lighting on the mainline however section 4.4.14.3.2 does state that the three roundabouts (and their 60 metre approaches) will have new lighting.

Furthermore, the EIAR states that an extension of public lighting from the village as far as the bypass is needed to facilitate the increased traffic on the N51 west. Additional lighting is also to be provided along the existing N2, south from the roundabout towards Slane, extending to the existing lighting columns on the approach to the village. This will undoubtedly be seen from Knowth as identified in table 12.15 of Chapter 12 – which notes that “the northern roundabout junction will be perceived at distance in north-western portions of the view”. It is not clear if the lighting will be extended to the southern roundabout from the existing lighting to the south of Slane. Regardless, the additional lighting that is proposed, when cumulatively considered, will be an unwelcome addition to the skyline, and therefore negatively impact on the WHP.

We note that the *Guidance and toolkit for Heritage Impact Assessments in a World Heritage Context* (UNESCO 2022) provides provision for an Environment and Social Management Plan. This states that where a major project is approved in relation to a WHP ‘it is good practice for the proponent to draw up an Environmental and Social Management Plan (ESMP) which describes how the project will be implemented in respect of relevant legislation and agreed mitigation measures.’ (p52)

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We submit that the crucial mitigatory measures identified in the EIAR proposed to mitigate impact on the OUV of the Brú na Bóinne World Heritage Property (e.g. bridge design to include matters such as finish and visibility, lighting regimes, planting, bunds to reduce noise and visibility etc.) be captured in such a plan or by specific planning condition if the scheme is approved.

### Public Realm Enhancement

There is no comment on this aspect of the scheme which will aid the perceptions and the experience of wider cultural heritage in Slane village.

**County Development Plan compliance:** There remains concern regarding compliance with policies HER POL 6 and HER OBJ 11 of the Meath CDP 2021-2027.

## Landscape and Visual

### N2 Bypass

As noted in the EIAR provided, the site location is likely to encroach on three specific landscape character areas, as identified in the Meath CDP 2021-2027<sup>2</sup>. However, the proposed scheme is largely confined to the Boyne Valley LCA, which is considered to be of 'Exceptional Value', with smaller sections of the proposed scheme located in the Central Lowlands and Rathkenny Hills LCAs. LCAs of 'exceptional value' are defined as 'Areas which are of outstanding value by nature of their dramatic scenic quality, unspoilt beauty, conservation interests, historic, cultural or other associations that influence landscape value. These areas may be of national or international importance'. It follows that this LCA is noted as being highly sensitive to change where the 'introduction of a change is likely to significantly alter the character to the extent that it would be difficult or impossible to restore' and that it has low capacity for change with regards to road infrastructure.

In the assessment, the selection of 'Very High' for the sensitivity of the Boyne Valley LCA is more suitable. The LVIA itself states that if the LCA is of "Exceptional landscape quality" has "no or limited potential for substitution", has "Key elements/features well known to the wider public" that "The landscape receptor is of very high susceptibility to the Project and has little or no tolerance to change" and that it "is a Nationally/internationally designated/valued landscape, or" has "key elements or features of national/internationally designated landscape" it should be of Very High Sensitivity.

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<sup>2</sup> The landscape character assessment was prepared as part of the previous plan but is now included as Appendix 5 in the new plan.

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Irrespective of this, it is undoubtedly the case that a new road will have a significant visual and landscape impact on this LCA.

At a local level, the assessment correctly identifies that the new river Boyne bridge will be prominent in localised areas. The weathering steel consideration for aesthetics is noted in section 4.4.9.6, however The Heritage Council does question whether the selected material and colour will weather and be assimilated into the landscape overtime, as suggested. The removal of mature trees and hedgerows along the route will also have an impact.

There is a recognition that the scale and prominence of the road network is rightly identified as increasing at a local level. However, the specific evaluation of the wider operational phase impacts in the LVIA is difficult to reconcile with the view of the Landscape Character Assessment of the Meath CDP 2021-2027, that it would be difficult for a linear road to be accommodated. While maturing of vegetation will aid this accommodation there is a need for the viewshed analysis to fully inform this assessment.

A total of 19 protected views and prospects have been Included in this viewshed analysis. Of key importance, and in line with the HIA associated with Chapter 13 of the EIAR, the views from Knowth West (Montage A12.1a to A12.1e) are of key importance. The new scheme is visible from this location, and the most acute point is the river crossing, which is likely to be visible in perpetuity. Similar to our comments on archaeology, when speaking of a WHP any effect is of amplified importance.

The construction impacts will undoubtedly be perceived from Knowth and given the length of road works (circa 36 months) this can be a protracted experience. While operational phase impacts are considered to have an effect initially, the EIAR states that they are expected to reduce overtime. Although one of the reasons given – that the proposed scheme will become an established feature within the overall view – is unconvincing. Views from Newgrange itself will be impacted, particularly during construction.

The view from Cullen Hill towards Slane Hill VPT06 and VPT08 will encounter a significant view change, although these are not protected views. However, the most impactful changes are associated with the bridge crossing at a local level (views VP09, VP11, and VP12, VP13) and the views from the Hill of Slane Graveyard (VP17 and VP18) towards a large section of proposed scheme. Therefore, there is undoubted visual change from certain viewpoints that will have a negative effect on landscape, particularly the Boyne Valley LCA.

### Public Realm Enhancement

There is no comment on this aspect of the scheme in relation to landscape and Visual impacts. Please see section below on architectural heritage regarding this aspect.

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**County Development Plan compliance:** the proposal does not fully comply with Policies HER POL52 and POL53 of the Meath CDP 2021-2027, with particular concern for the large removal of hedgerows and the impact on the Boyne Valley LCA.

## Architectural

### N2 Bypass

Chapter 13 details the impacts of the proposed scheme on buildings and structures of architectural merit. To avoid duplication, any comments are confined to NIAH assets that are not protected structures (addressed under cultural and archaeological heritage). This will include nationally and regionally important NIAH assets and Architectural Conservation Areas.

There are a number of architectural assets that merit comment in the context of the scheme. *Slane Mill Architectural Conservation Area* is located immediately adjacent to the site. Of the overbridges identified in the scheme, the Rossnaree Road overbridge along with the Boyne Crossing bridge, is likely to disrupt the setting of Slane Mill ACA when viewed from Rossnaree Road. Similarly, the view from the towpath towards the ACA when approaching from the east will also be interrupted. The views of Slane Hill are also likely to be disrupted when approaching from the east either from the Rossnaree Road or the towpath. The views analysis discussed under our landscape comments demonstrate this. The assessment of 'low' or 'slight' effect for the ACA in Table 14.10 is not convincing. There are sections from Rosnaree Road (from the junction with the N2 to the Battle of the Boyne public information board), and from the towpath along the river, where the views to the ACA will be disrupted. In fact, the plate 13 on page 71 of Chapter 13 illustrates the view from a section of this road. In addition, Fennor Castle does not seem to be discussed in the assessment in Chapter 14.

In addition, table 14.8 is clearly in error, when BH4 (Two Story farmhouse) is earmarked for demolition but is considered to experience a 'Low' magnitude of effect which is considered 'not significant'. Irrespective of the importance of the asset, this is inaccurate. While the impact on the Ledwidge Museum will be significant during the construction phase.

### Public Realm Enhancement

Again, there is no objection to the public realm enhancement improvements of the scheme, whereby any reduction in HGVs will be of benefit to the village of Slane. Although it is difficult to reconcile the contradiction between a rationale for the bypass, which is the reduction of traffic in Slane, with the increase in traffic in an east west direction due to the improvement of the N51 west. Reducing traffic will undoubtedly aid the architectural

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environment of Slane Castle, the village and indeed specific assets such as Slane Bridge, yet the proposed work on the N51 is likely to undermine the ambitions for centre of Slane.

On more detailed aspects, there is concern regarding demolition of sections of the Rubble stone (BH45 and BH61) walls. This is done to achieve a cycle/pedestrian link to a proposed car park, the logic of which is not immediately apparent. There is a need to justify demolition in this case.

It is noted that there will be a greening strategy with new tree planting to enhance the character of the streetscape, with new street trees, mixed shrubs and hardy perennial planting envisaged in places. While section 4.4.13.8 details a planting strategy, this largely relates to the relationship with other features of the design as well as street users. It is important that maintenance requirements do not unilaterally inform the final greening strategy. A greater level of detail is needed here for species and sward mix for the soft landscaping, while the trees should be native, as should any wildflower strips. Should permission be granted, a detailed condition for a comprehensive greening strategy is needed. This will be particularly important due to the need to mitigate as far as possible the loss of existing mature trees and hedgerows (which are important townland/cultural features) to facilitate the road aspects of the scheme.

**County Development Plan compliance:** The proposal does not comply fully with policy HER POL 16 and policy HER POL 19.

## NATURAL HERITAGE

### European (Natura 2000) Protected Sites and National Heritage Areas (NHAs/ pNHAs)

The River Boyne and River Blackwater are designated as a Special Area of Conservation (Habitats Directive) and Special Policy Area (Birds Directive). This site traverses the proposed scheme and is protected for Alluvial Forest Habitat and species that include Otter, Kingfisher, and River Lamprey. The Boyne crossing, east of Slane, both in terms of construction and operational phase impacts, is the immediate concern. The pathways of impact are clear and can extend to the Boyne Coast and Estuary SAC/SPA and North West Irish Sea SPA also. Two pNHAs (Boyne Woods and Slane River Bank) are in immediate proximity to the scheme. While further downstream are located several pNHAs.

Of key concern is the loss of any nesting/breeding habitat for the qualifying interests of the designation. Although the scheme involves land take within the designation, the EIA clearly states that, with the exception of outfalls, the bridge crossing will not incur in-river works. Therefore, the main concern from a designated sites perspective is the potential impacts further downstream, namely towards the estuary and the alluvial forests. This is

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only likely to occur if there is a significant pollution/catastrophic event during the construction phase.

It is essential that the construction phase is carried out in a way that ensures no once off pollution/ sediment loading event into the river, which would undoubtedly lead to significant impacts on the habitat of the protected species noted above, the alluvial forest downstream, and could significantly harm the Boyne Coast and Estuary SAC/SPA. Detailed contingency plans in the form of a Construction Environmental Management Plan, and the presence of an Ecological Clerk of Works during these sensitive stages is needed. It would be good practice if Meath County Council could commission an independent ecologist to oversee the project ecological supervision by the eventual contractor. The aquatic ecology chapter rightly identifies this risk. This will be of key importance, and we recommend that ABP put strong emphasis on this in the conditions attached should planning permission be granted.

The aquatic ecology chapter also identifies rightly the potential of culverts to be a barrier to migration of fish species. Some species can manage barriers better than others (Salmonids, and eel may slide on moist slopes), however, we would suggest that culverts be designed at a suitable ledge height, so as not to impede migration. This is required at the Mattock (Mooretown Stream).

## Flora and Fauna (habitats in general)

The terrestrial ecology chapter identifies a set of existing habitats, as well as key species. There are some methodological points to be made:

- Greater mapping of the hedgerow habitats and drainage ditches (which flow into the River Boyne) is needed. In the case of the latter, there is a noted negligible impact but given the lack of baseline information, this is hard to consider.
- The involvement of a Botanical Society of Britain and Ireland recorder would be better practice for identifying plant species/ records.
- While lack of access to land for surveying does happen, it should have been possible to use aerial photography to give an estimation of the ecological potential.
- Teagasc soil mapping is available online and should be used.
- Some existing ecological baseline information in Slane village itself to identify urban biodiversity should be provided (the landscaping scheme/green strategy should maintain these ecological assets, when identified – see comments on landscaping for the public realm above)

From the onset, it should be an objective of the scheme, that no riparian vegetation be unnecessarily removed during the construction phase. This is not only important from a habitat perspective but also soil stabilisation/flooding attenuation. Overhanging trees particularly *salix* and *alnus* spp, offer cooling shade and refuge for aquatic species. These

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are particularly important during low water/ high temperature extremes. Any removal should trigger the need for compensation planting.

Artificial light associated with the proposed scheme is of concern. However, the EIAR chapter on terrestrial ecology notes that the bridge over the Boyne will not be lit during the operational stage. This will be significant for some aquatic/terrestrial species. Silver eels avail of dark sky conditions during heavy floods for migration. This should be ensured by condition if necessary. The increase in lighting from Slane to the new bypass via each road is unwelcome while the increase in traffic will potentially bring a greater level of lighting impact which may not be adequately addressed in the EIAR.

Several bird species including some of conservation concern have been noted. The EIAR reports that wintering birds (swan species) are currently displaying avoidance behaviour on encountering the existing bridge, when travelling up stream. The bridge design has avoided large vertical features which will reduce the potential for collisions. This is noted and welcome.

The impact on **otter** and **badger** during construction is of concern. Pre-commencement construction surveys for both are required, along with **Kingfisher** and **bat** species. These are mobile species and given the works involved, there is potential for direct impacts. There are active and main badger setts within the zone of influence. Again, the direct impact on the badger and its habitat is significant with the loss of a number of badger setts concerning. Similarly, the barrier effects the road will induce are significant, and some form of badger pass/‘ecoduct’ ought to be considered. Again, we strongly recommend that ABP require pre-commencement surveys as part of any planning conditions, some of which are recommended in the relevant EIAR chapters.

Some habitat types, namely hedgerows and treelines, will be lost (in excess of 4km it seems) as part of the land take for the proposed scheme. This will negatively affect bat foraging/connectivity and remove habitat for bird species, including those of conservation concern. Given the significant agricultural use in the vicinity, these hedgerows and treelines are the only habitat available for shelter and foraging. Any losses should be kept to an absolute minimum. Occasionally construction schemes unnecessarily remove hedgerows and treelines. This should be avoided. We strongly recommend robust implementation, by means of condition, if approved, of planting of native species and shrubs along the entire length of the route. The National Biodiversity Data Centre has helpful [guidance](#) on hedgerows and this can be consulted for landscaping design. This should be done before completion of works. This compensation planting is essential for reducing the long terms impacts that badger, bird species, and bats will inevitably incur due to the proposal. In general, for both the public realm and the new road elements, there is a need for a detailed planting/greening and landscape strategy to compensate for the significant loss of hedgerows/habitat.

**County Development Plan compliance:** The proposals do seek to comply with policies HER POL 27 to HER POL 42. However full compliance with HER POL 27, HER POL 28,

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HER OBJ 35, HER POL 34, HER POL 37 is only possible by robust conditioning, if ABP are minded to granted permission.

## Climate Change

The climate chapter details construction phase and operational phase impacts, along with the resilience of the proposed scheme to more varied climate events.

In terms of the construction phase, the transport of materials, vehicle movements, importation of materials etc will increase emissions. This is an undoubted concern regarding all large infrastructure projects, irrespective of mitigation measures.

Secondly, whilst it is essential that transport infrastructure should be resilient, the EIAR should primarily deal with the impacts of the proposed scheme on the environment, not vice versa. Accordingly, our comments are confined to the concern that any increase/betterment in road infrastructure encourages car use/ HGV movements.

There may be minimal differences between the current road situation, which does facilitate car movements, and the proposed scheme. Yet better infrastructure may be more attractive to users. Comments in section 19.3.2.2 are not valid when describing the proposed scheme as part of “regional and national sustainable mobility strategies”. Whilst the public realm enhancement measures encourage sustainable forms of mobility, this would be for short local trips. Accordingly, it is not clear how the proposed bypass could have greenhouse gas “emissions reduction potential”. At best, it may be neutral compared to the existing situation.

Chapter 19 has not provided a clearer layout in terms of the comparison of GHG emissions between the proposed scheme and what currently is in place, at a more project-based level (it is couched in total national/regional transport emissions). Tables 19-22 and 19-29 have been studied as part of our review of the scheme and if we take the most likely intermediate scenario (an intermediate level of EV uptake), the report suggests that there will be increases by 13% and 25% in 2026 and 2041 respectively against the 2019 baseline emissions, regardless. This tests the impact in the absence of the proposed scheme. Table 19.29 then suggests that the proposed scheme (replacing the current road) would not add significantly more emissions than the current road would otherwise do.

Whilst this may be the case, a dual carriageway that accommodates higher speeds can lead to greater emissions while generally, the betterment of the infrastructure may encourage greater car use, leading to some level of increase. We would recommend that ABP satisfy itself that the difference is negligible between the current road and the new proposed road in terms of emissions, or at least not so significantly worse that it would outweigh the positive aspects of scheme.

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**County Development Plan Compliance:** It cannot be said that the proposal meets the requirements of Policies MOV POL 3, and MOV POL 11 of the Meath CDP 2021-2027.

## CONCLUSION

The above paragraphs detail the concerns/ observations of the Heritage Council on the proposed scheme. However, the main concerns of the Heritage Council relate to the bypass element of the scheme insofar as there are no undue negative effects on built/ cultural or ecological assets. Every alternative should be exhausted, particularly given the proximate motorway network, before a dual carriageway bypass is considered for the eastern environs of Slane.

Cumulatively the combined impacts of the bypass on natural and cultural built heritage are significant, even when mitigation is considered.

There will be an alteration to the landscape character of the Boyne Valley, particularly in the vicinity of the bridge, while there will be a negative effect on the setting of Slane Mill ACA. Of key importance are the views from and towards the WHP, which will be negatively affected. We consider that the noise impact assessment is not adequate in terms of the potential impact on the WHP. The opinion of ICOMOS and National Monument Service is essential in this regard.

The construction phase impacts, in particular direct habitat loss, will be the main ecological concern. This will have a negative effect. There are operational phase impacts on bat, otter and badger foraging, and habitat connectivity. Such is the effect from large road schemes, which ultimately have a negative effect on local ecology. Mitigation is essential to reduce this effect. While it cannot be said that the proposed bypass will aid attempts at reducing GHG emissions.

In summary:

- Public realm enhancement and the bypass will bring considerable benefits to the historic environment of Slane, and the enjoyment of it.
- However, the envisaged east-west increase in traffic due to the N51 west improvements undermines this ambition, as well as an argument for the bypass.
- The scheme will have negative impacts on the Boyne Valley LCA with mitigation achieving only modest amelioration.
- View from Slane Hill towards Knowth will be negatively impacted.
- There will be negative impacts on the setting of Slane Mill ACA with little mitigation possible.
- The noise assessment is inadequate in terms of the potential impact on the WHP.
- There will be a negative impact, even if considered negligible or slight in the HIA, on the WHP
- Significant hedgerow loss will lead to negative impacts on ecology, even with mitigation.

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- Construction phase impacts on the River Boyne and Blackwater SAC need to be mitigated, to include pre commencement surveys and robust construction environmental management planning.
- Bypass scheme risks encouraging car use, therefore increasing GHG emissions.

I trust that ABP will take full account of this submission in their determination of the application.

Yours Sincerely,

*Virginia Teehan*

Virginia Teehan

Chief Executive Officer

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