



N2 Slane Bypass Road Scheme

An Bord Pleánala Oral Hearing

FINAL STATEMENT

1st April 2011

Previous Oral Submission

On Thursday the 17th of February you heard submissions from representatives of the community in Slane. Fourteen speakers including business people, the school principal, people caught up in the last major incident and others all gave accounts of the significant and unusual difficulties facing the village over the last number of decades. After each incident this community has been promised that a solution would be found and implemented before more deaths and injuries took place. For decades, the solution promised was a bypass of our village. Only now is this solution finally within our reach.

Management History

In all of this drawn-out history, the one thing that has remained constant, has been the consistent negligence on the part of the responsible authorities in this matter. Successive governments, including a minister of transport from Co Meath, who might have been expected to have some understanding of this appalling situation have ignored this issue. The National Roads Authority seem to have had bigger fish to fry elsewhere building a fast, modern road network throughout the country, yet were apparently unable to solve this comparatively small-scale problem in Slane. Our own local authority, Meath County Council, who are very well aware of the exact extent and nature of the problem, have tinkered with the cosmetics over years without designing and implementing a lasting meaningful solution.

Local Resignation

You heard the representative of the Slane Bridge Action Group listing the names of the members of our community who have been sacrificed on this altar of inaction; each one was a hammer-blow to the immediate family and represents another open wound in Slane's 'death by a thousand cuts'. Our community is sickened by this – older members of the community are stoically resigned to the situation stating 'You'll never get a bypass' whenever the subject comes up, drawing on their long years of bitter experience and broken promises. More recent arrivals to the village were perhaps naïve enough to believe that as we lived in a republic and a democracy, we would be looked after.

Psychological Impact

The road safety issue in Slane has had a significant impact on the psychology of our community. You have heard how, on a day-to-day basis, ordinary people doing the most ordinary of things in their own home place are constantly looking over their shoulders for the next incident – a HGV whose brakes have failed, a tractor shedding its load on Mill Hill, another vehicle failing to negotiate the corner onto the bridge. This apart from the constant daily battle of through traffic, cars, vans, jeeps in their hordes, racing through the village, jumping the traffic lights, overtaking each other, chatting on mobile phones as they slam on the brakes to stop their vehicles at the traffic junctions, with no courtesy or acknowledgement of how each of these seemingly insignificant actions contributes to the overall malaise afflicting our village.

Current Bypass Proposal

The current proposal seems to have been first initiated as long ago as 2001 following the last fatality. It beggars belief to accept that it was not possible to design and construct a suitable bypass within two to three years of the commencement of this process. Full-scale motorways have been designed and built the length of the country in a fraction of the time! We have never received any clear explanation from any authority as to why this small project should have taken so long.

Interim Measures

Since the last fatality in 2001, a series of highly invasive measures were installed in the village – the traffic-light system in the Square and the so-called gantries on Mill Hill. These have worked to an extent in that the number of fatalities has decreased yet the crashes continue to happen, most notably that of 29th March 2009, which could so very easily have resulted in multiple fatalities and was not prevented or ameliorated in any way by any of the measures introduced.

These measures were installed as temporary measures only. *This* is what we were promised. They are at best a sticking-plaster over a very serious wound that does nothing to remove the dangers or provide a long-term fix. In fact, it appears that in the case of some of the accidents, they have been a contributory factor; the opposite of what was intended. These measures were installed at significant cost to the environment of the village and it is interesting to note that none of the present objectors chose to object to the visual intrusion they create! The people of Slane accepted them as a necessary evil – this was all that was on offer from our ‘expert’ National Roads Authority and Meath County Council. The community was able to accept them as an interim measure that was in the greater common good. However, many in the village, after long years of bitter experience believe that this is all that would ever be done – and the refrain was repeated – ‘you’ll never get a bypass...’

Following the 2009 incident we got some additional measures – a non-skid surfacing on the Collon Road between Stanley Heights and the Square in the southbound lane. This is of very limited use when drivers choose not to adhere to the speed limit or when the brakes on a vehicle fail. We also got a 30kmph speed limit – one of the first such limits in the country. As we have already explained, this is enforced very patchily by the Gardai and all but a few locals seem to even try to keep to the limit. In fact, many drivers passing through go so far as to harass and overtake those sticking

to the limit. Thus, it seems that these limits, because of the poor levels of enforcement, are contributing to the dangers in the village on a daily basis.

Objectors to the Proposal

A number of the objectors here at this hearing have suggested alternatives to the proposed bypass. While their creativity and imagination might be commended, most of these suggestions, it should be noted, have come from people who have only very recently come to this situation and who do not experience the realities of day-to-day life in the village of Slane.

It is a very great pity that none of these people whether local or otherwise, chose to concern themselves with the scandalous road traffic situation in the village and the battle that has been waged by various local people over years with little or no resources to have the problem properly dealt with. It is a great disappointment that these individuals have chosen to jump in at the eleventh hour using their considerable skills and resources in such a negative way. It seems that throughout this hearing there is a significant imbalance on the emphasis being placed on other issues relative to that of the safety of the people of Slane and the users of the N2. It is interesting and encouraging that we are not the only ones to have made such an observation.

This is the way the system seems to work and these people are completely within their rights.

However, 'community' is a word that has been used a lot on both sides of the debate so far. This is not what community is about. One of these objectors has repeatedly tried to put words in the mouth of the Slane community on a number of points that have been raised. As you have seen, we are well able to speak for ourselves.

Slane Already Bypassed

One of the alternatives that has been put forward is that Slane has already been bypassed by the N33 north of Ardee and the M1 motorway. If these roads were intended as a bypass of Slane, we were never told about it, and let me tell you now, these roads do not work as a bypass. The N33 is 17km north of Slane and the M1 is 9km to the east at its nearest point. These roads do not bypass Slane and they don't even go in the directions that much of the N2 traffic is travelling. The implication of presenting this as a solution is that somehow it can be 'made work'. This has not been clearly detailed so this suggestion cannot be taken seriously.

HGV Ban

Another alternative suggested has been a HGV Ban. It is clear from what we have heard from Meath County Council that a ban was explored only as yet another additional interim measure pending construction of a bypass for the village. Let me be as clear as I possibly can: a HGV ban on its own is not acceptable to us. We have suffered too long to be fobbed off yet again with another sticking plaster solution which is as likely to create as many problems, if not more, as it is trying to solve.

Some figures help to illustrate how unacceptable a HGV ban would be as a 'final' solution. The EIS clearly shows us that 16% of the traffic traversing our village each day is HGV traffic (EIS p.5-1). This leaves 84% of the current traffic of approximately 9,200 vehicles a day. This is still an excessively large volume of traffic

for this environment to cope with satisfactorily. HGVs are a problem but so is the sheer volume of daily traffic. The EIS also clearly tells us that HGVs are involved in 35% of the traffic incidents in the village (EIS p. 5-8). What will a HGV ban do to reduce the remaining 65% of crashes?

Some have even suggested ‘why not try a HGV ban?’ On the surface this may sound like a very reasonable proposal but we absolutely cannot entertain it. This might have been an acceptable interim solution 10 years ago when the gantries were being installed but we will not accept this now when we have a bypass almost within our grasp. In any case, how is the success or failure of such an exercise to be assessed? Do we measure it in the number of deaths transferred from the streets of Slane to some other unfortunate townland in the wider area? Where else in the country has permission to construct a bypass been dependent on prior testing of a HGV ban? We have certainly seen bans being implemented *after* the building of bypasses and *this* is what should happen in Slane.

The discussions over the course of this hearing have shown that a ban is likely to be unworkable. Where are trucks to go, who will ensure that they go there, who will install and staff the necessary checkpoints distinguishing long-distance HGVs from locally-bound ones? One suggestion forwarded by an objector was that height restriction barriers should be erected at all access points to Slane village to enforce a HGV ban and prevent trucks coming through Slane and that speed ramps should also be installed. Can this *really* be considered a credible suggestion? Height restriction barriers and speed ramps along with the gantries, traffic lights, road markings and flashing speed indicators to further destroy what’s left of our beautiful Georgian village?

In any event, the recent closure of Slane Bridge and the resultant chaos is a taste of what we might expect were a HGV ban to be implemented.

Possible Western Route

The other solution suggested is the Western route. However, the Further Information has detailed the very significant direct physical impacts of such a route on homes in the area and the Slanecastle Demesne Architectural Conservation Area. This possible route is twice as long as the present proposal and would be significantly more expensive. You have heard Lord Mountcharles speak about the likely affects on the businesses associated with Slane Castle.

World Heritage Site

Turning to the issue of visual impact, we have heard from Dr Comer about the likely view that might be taken by a UNESCO/ICOMOS Reactive Monitoring Mission to the area following the construction of a bypass. He consulted widely with stakeholders on both sides of the debate and delivered a report to the effect that a bypass could be constructed provided there was no associated knock-on development. He pointed out that a number of developments on the outskirts of Drogheda including the M1 motorway bridge, the retail park, the Irish Cement Works at Platin, the Carranstown incinerator and a housing estate at Donore have already negatively affected the visual integrity of the WHS.

Part of what Dr Comer said in his presentation and subsequent cross-questioning came as a surprise to many concerned that the Buffer Zones are not of any great significance in the assessment of visual impact on the WHS. We were told that UNESCO/ICOMOS would take into account the area surrounding the WHS as far as the eye could see. *This seems to have come as something of a surprise to Meath County Council and the State Party, the Department of the Environment.* Now, The Slane Community has already put on the record the fact that we understand the importance of Brú na Bóinne internationally. We do understand and fully accept the need to manage this fragile patrimony for posterity. However, it unfortunately seems necessary to remind the authorities concerned that this is *our* landscape as much as anyone else's, it is in our parish and you have seen the map of the boundaries, our neighbours own the land there. Many of us have grown up in and around this landscape, experiencing it every day.

Slane Victim of UNESCO

It is very difficult to believe that UNESCO/ICOMOS would realistically expect that an area comprising a large portion of North Leinster should be effectively sterilised in order to preserve the integrity of the WHS. This is the most populated part of this country, and has been described by many contributors to this hearing as a living landscape. Surely it is easy to be so principled about the standards of management and preservation that should be applied in the Brú na Bóinne landscape from the remove of Paris.

We would like to ask were management guidelines not made clear at the time when this state was applying for WHS status for the area twenty years ago? Were such guidelines not made clear in 1993 when this status was granted? Was it not made clear in 2006 when the Carranstown incinerator was examined by a reactive monitoring mission? There was no loss of WHS status then. Has the failing been on the part of UNESCO or does the failure lie with the Department of the Environment and Meath County Council? If there has been a cumulative impact gradually gathering over years of inappropriate and ineffective management are the people of Slane now expected to bear the brunt of this mismanagement by being expected to forego a badly needed infrastructural project so clearly in the common good? Given the appalling record in the management of road safety in Slane, it is easy to take a cynical view and see us, once again, as the victims of monumental incompetence in the poor management of the landscape.

WHS of no Benefit to Slane

It is worth pointing out here that this mismanagement extends to the treatment of the local community in the enjoyment of the benefits of the WHS. Slane was completely sidelined as a stakeholder in the WHS in 1993 with the opening of the visitor centre on the south bank of the river. We have seen a very significant fall in the numbers of tourists visiting our village, once the lifeblood of many of the businesses that have since disappeared. With the stroke of a pen and with no meaningful consultation, a very significant part of the natural hinterland of our village was effectively taken away from us. In any other part of the world with a WHS, a village like Slane would be regarded as being a host community and a gateway to the WHS.

Time and again, the authorities, most notably the DoE seem to have taken a perversely narrow view of any attempts on the part of local people to establish

tourism-related or other businesses in the area benefiting from the traffic generated by the WHS. Is this the UNESCO vision? Is this what World Heritage is about? If so, it is clearly at odds with the recent shift in emphasis on the part of UNESCO described to us by Dr Comer with the inscription of more sites in the developing world rather than the West as this policy change is surely linked to an attempt to grow the economies of third world countries through tourism.

Why can't some of this thinking be applied here for the benefit of the Slane Community? Surely, heritage protection applied in such an inflexible orthodox way so as to be an impediment to the very safety of the local host community must be strenuously challenged.

WHS? No Thanks!

To have experienced the steady economic decline of the village while within a stone's throw of such a large tourist market on our doorstep – over 200,000 visitors a year pass through the Centre which incidentally we understand runs at a loss – is one thing. Douglas Comer suggested that the Slane bypass could be the proverbial straw that breaks the camel's back for UNESCO. Be very clear that further delays to this bypass will represent the straw that breaks the camel's back for our community.

To expect us now to accept that we cannot have a basic standard of road safety on our own streets because of this WHS adds insult to injury. If this is what World Heritage means it seems quite clear that we would be far better off without it. This issue has almost been a taboo throughout this hearing and if UNESCO would choose to be so strict as to remove WHS status because of the construction of the bypass that is their decision. The megalithic cemetery will still be there, the monuments and their art will continue to be just as spectacular, the solstice alignment at Newgrange will continue to function unaffected. And the visitors will continue to come as they did before Brú an Bóinne was a WHS.

Poor Road Safety *PROTECTS* WHS

Dr Comer spoke of the danger of knock-on development being attracted by the new road. One statement in particular was most objectionable to our ears where he suggests, and I quote from page 22: “ if a fast SAFE route from Slane to Dublin is established, there will be a great incentive for the development of more housing and structures that will provide services to residents and travellers passing through Slane, especially when economic conditions improve’. He seems to be seriously implying that it would be best for the WHS if the current road were left as it is to act as a deterrent to further residents moving to Slane and further businesses being developed. He did nothing to dilute the implications of this proposal later on in his report and clearly is prioritising the status of the WHS above the safety of the current residents of Slane. Is this a reasonable position to hold? Where is the greater common good in this strategy? Is this the kind of fervent fundamentalism that we can expect from UNESCO on this issue?

Dr Comer, later in cross questioning, did go further, undermining his own position by saying that a Reactive Monitoring Mission would, in fact, take into account the safety situation and the need for the bypass in their assessment. It seems that much of what Dr Comer put before this hearing is a ‘worst case scenario’ or an opening gambit in a negotiation process designed to shock the parties concerned into treating the WHS

with proper care and attention. Bear in mind that in spite of this hard-line position, he still did say that the bypass would be acceptable if accompanied by proper management and development controls. We look forward to such measures being put in place, not that the Slane community will be regarded as stakeholders.

Visual Impact Assessment

We have a number of observations to make on the issue of the visual impact of the proposed road. The language used to describe the proposed road has been consistently negative with the word ‘intrusion’ frequently used. There is an automatic presupposition on the part of many of the objectors that any additions to the viewshed of the WHS are automatically to be regarded as negative. This may be the position taken by the landscape architecture profession in their assessment of individual cases but the terminology is not neutral and as such is unhelpful. We strongly challenge the automatic assumption that any addition to the landscape is intrinsically detrimental to the overall experience of that landscape. Clearly, not every development can be regarded as a positive addition but by corollary, the possibility must be considered that some developments at least, if not being neutral in their impact might possibly be positive in their contribution.

In relation to the current proposal, surely a bridge crossing a river valley is not something that is not so out of place as to be a significant negative feature jarring the sensibilities of any reasonable observer? The assessment of new features inserted into the landscape is highly subjective. The various experts have used various assessment schemes, which were designed to try to reduce the levels of subjectivity in these exercises, but cannot do so with any level of completeness. Why else do we see separate experts on the issue including Dr Comer, Mr Hastings and Mr O’Leary taking up stances on this issue so diametrically opposed to each other? Those setting out to see insult and injury in a situation will generally be successful. Those opposed in principle to new roads, new bridges, motorways or bypasses, are hardly going to carry out visual impact assessments and suddenly realise that the impact isn’t actually that bad after all and admit that they were wrong!

In relation to the preservation of some kind of ‘visual envelope’ around the WHS, we have no clear guidelines from UNESCO or any other body as to what the objective of such a policy is. The inscription of the Brú na Bóinne WHS is based on the internationally important assemblage of prehistoric monuments, many of which are over 5,000 years old. While it is to be accepted that the curtilages of these monuments should be protected from inappropriate development, we have no clear reasoning as to why the wider landscape should be similarly protected.

We have heard some discussion about something termed ‘the authenticity of the setting’ in relation to the monuments of the WHS. It is not at all clear what the term ‘authenticity’ actually refers to. It seems to be implying that the landscape of Brú na Bóinne is somehow the landscape of the builders of the passage tombs and must be preserved as a result. If this WERE the case then we might have a truly unique phenomenon on our hands, justly deserving of an extraordinary level of care. However, while the landscape of the Brú na Bóinne area may be the same physical space that was occupied at one time by the passage tomb builders, it is clearly no longer their landscape and hasn’t been such for thousands of years.

Many major elements have been added since and are visible – the modern agricultural regime, field boundaries, houses, farms, barns, telephone poles, roads, etc. All were present at the time when the WHS was inscribed in 1993 and all are additions to the original Neolithic landscape. Please let us have some clarity on this issue – is there an intention in the pursuit of the protection of this perception of ‘authenticity’ to turn the clock back to 3,000BC in terms of the perceived appearance of the landscape? If this is not the aim of planning policy for the area, then what is? What do we take to be ‘Year Zero’ in the protection and management of this landscape? 1993 – the year of inscription, or maybe sometime before this? It seems that Dr Comer didn’t understand the nature of the landscape he observed around him on his visits to the area and it appears likely that a UNESCO/ICOMOS Reactive Monitoring Mission to the area similarly might not understand the cultural origins of the Brú na Bóinne landscape which actually lie in the much more recent past than some appear to think.

This is a living landscape; the vast majority of the land in the WHS is in private ownership, NOT State ownership; and is located in the most populated region in the country. Is it reasonable that a complete sterilisation of this landscape be the objective? In an ideal situation for the management of the WHS we might be looking at a landscape in complete State ownership where nobody lives. Then could the high ideals of UNESCO be imposed without hindrance on the area. Clearly, this is not a realistic option yet we have authorities managing this landscape along these lines who consistently neglect the needs of the local community. Real people live here in Slane and the surrounding area and there are many families that have been here for generations. It seems that we are being sacrificed as hostages to fortune on this issue and this unacceptable.

Balloon Test

The balloon test was an interesting exercise in that for us it highlighted the number of separate elements present in the view from Knowth and Newgrange, the majority of them are recent in date and yet none of them are being held up as examples of negative intrusions. It was most instructive to see the scale of the balloons in the middle to far distance in comparison to the scale and impact of these other elements. The fact that arrows had to be used on the photomontages indicating the locations of the balloons tells its own story as does the animation of traffic moving across the virtual bridge!

This process was also very interesting in that it was apparent that the current traffic on the N2 was visible to viewers from the top of Knowth. Given that much of the new road will be located in cuttings in its approach to the proposed bridge, it seems likely that there will be an overall positive impact in that the visibility of the traffic would be reduced by the proposed road.

Partnership Approach

Clearly there is a need for protection but this should be done in partnership and cooperation with the local landowners and the Slane community in a balanced, reasonable, sustainable way. We have heard that there is currently a process underway to redraft the management plan for the WHS, the current version of which is several years out of date – a fact, which is telling in itself. Another fact that is just as telling is that although there is representation on the steering committee overseeing this process for landowners within the WHS, there is no representative of the Slane community

involved. We are stakeholders. We deserve an input and we certainly deserve to derive some benefit from the WHS, as we had been doing for generations. We have ideas of our own as to how the WHS could be made work for the local community in a sensitive and sustainable way. For example, one approach taken in the management of other World Heritage Sites is that visitors are required to buy their tickets a day or more in advance of their admissions to the sites, ensuring the local area benefits from the business generated. This is not an unreasonable suggestion; it is standard accepted practice elsewhere and should be explored immediately for the benefit of Slane and the wider Boyne Valley.

Completely Bypass the Village

It has been stated that the people of Slane have had their eyes opened to the fact that the proposed bypass does not fully bypass the village. While this may be a revelation to some objectors, there has been an extensive consultation process leading to where we find ourselves today, with public meetings held in 2003, 2004, 2005, 2008 and October 2009 where interested parties could attend and comment. So in actual fact, we have been aware of this for some time now, as you will see from our original submission on the EIS.

However, the point is valid and we do take it on board. The current proposal would be significantly improved were an additional relief road to be constructed between the N2 north of Slane Village, perhaps from Grasslands Fertilisers, running in a westerly direction to link with the R163 at Harlinstown Cross. This would help to complete the circuit of the village and remove all unnecessary traffic from the village centre. Such a relief road need not be a dual carriageway – single carriageway would be sufficient as it will not form part of the N2 and it might be possible to minimise its visibility in the landscape by following the southern side of the valley of the Mooretown River. This might be achieved at little extra cost to the overall project and would maximise its effectiveness overall.

We wonder why Meath County Council did not choose to include this in their design brief for the road – if they sincerely want to solve the problem, they should give this proposal every consideration. Surely the best time to build such a relief road would be as an integrated component in the construction of the bypass. At the very least provision should be made within the current design for the subsequent construction of such a road.

Traffic Calming on the N51

In our original submission on the EIS we strongly urged that a traffic calming programme be designed and implemented on the eastern and western approaches to the village on the N51 and along the length of these roads within the speed limit zones as necessary. This needs to be as robust and effective as possible as speeding along these stretches of road is a daily occurrence.

We want absolutely no transference of the current dangers from the N2 on to the N51. The provision of a roundabout on the N51 to the east of the village accompanied by a 50kmph speed limit would not be sufficient. Even within the current 50km and 60km limits on the N51, speeding is common. It is highly unlikely on present experience that drivers will choose voluntarily to remain below a 50km limit for a distance of 1.5km between the roundabout and the village. It must be pointed out that similar

problems are experienced on a daily basis on the western approach to the village and there is no roundabout currently planned here.

Drivers need to be forced by whatever means necessary to respect the speed limits set and we need to see detailed plans for continuous traffic calming along these stretches of road. This suggestion has not been addressed as part of the current process and without seeing the plans for such measures in advance we would question whether they would be implemented at all.

Conclusion

If this proposal does not succeed in getting permission, what options are left open to the people of Slane? There *are no* realistic alternatives.

If this project gets kicked to touch pending revisions or resubmission or a completely new proposal, all we have between us and the next pile up in our village is an unenforced and largely ignored set of speed limits.

It very much looks like we have used up our luck in the miraculous escape from the last major incident in 2009. We are unlucky enough to have a WHS on our doorstep. We are unlucky enough to have missed the largesse of the Celtic Tiger years; we were also unlucky enough not to have had effective and responsible leadership at both local and national level. We sincerely hope that now is the time that our luck changes.

We thank you for your time and patience and also for the courtesy you have displayed towards our community over the duration of this hearing.

We urge you to look favourably on this application.

Bypass Slane Campaign