comhairle chontae na mí
meath county council

Teach Buvinda, Bóthar Átha Cliath, An Uaimh, Contae na Mí. C15 Y291
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Our Ref: TRA 04-023-12-1-4
Your Ref: ACP-323799-25

Transportation Section
27th January 2026

An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
Ireland.

Proposed road improvement scheme at Newtownmoyaghy Stream, Kilcock
Submission re observation from Mr Paul Johnston

Dear Sir / Madam,

We acknowledge receipt of your correspondence of 22nd December 2025 which included eight submissions received by An Coimisiún Pleanála in relation to the above proposed development and an invitation to provide observations in relation to the submissions received.

Regarding the submission from Mr Paul Johnston, we make the following observations:

"Objectives & Rationale"

As noted in Section 4 of the S.177AE Planning Application Report, the main objectives of the proposed scheme are as follows:

- Reduce the risk of errant vehicles and/or users leaving the Newtownmoyaghy Road and entering the adjacent stream.
- Improve road safety for all road users during flood events.
- Bringing the current road carriageway up to current standards by increasing carriageway width, road pavement reconstruction and provision of associated line marking and signage.
- Improve journey reliability by reducing the frequency of local road flooding events and risk of future road closures and diversions.

Section 5 of the S.177AE Planning Application Report provides information on the various options which were considered to achieve the above stated objectives. The options were developed taking into consideration the existing conditions in the Newtownmoyaghy area and beyond and included opportunities for repair, reinforcement, realignment, rerouting/diversions or new infrastructure. The six Design Options considered were:

- Option 1 – Concrete Box Culvert the existing stream to facilitate widening of the road.
- Option 2 – Open Channel and Concrete Box Culvert to facilitate part infilling of the existing stream/part culverting and widening of the road.
- Option 3 – Open Channel Diversion (West side of road) away from the road to facilitate infilling of the existing stream and widening of the road.
- Option 4 – Open Channel Diversion (East side of the Road) to facilitate infilling of the existing stream and widening of the road.
- Option 5 – Acquisition of lands to the East of the existing road to facilitate realignment and widening of the road.
- Option 6 – Proposed New Link Road - to connect to a distributor road constructed recently to the west as part of the Millerstown development.

The Options Assessment was conducted in accordance with the Transport Appraisal Framework (TAF) guidance. The results of the Assessment identified that Option 4, Open Channel Diversion (East side of the Road) to facilitate infilling of the existing stream was the most balanced option taking into account all the TAF criterion, which include Safety Impacts, Climate Change Impact and Environmental Impacts.

The preferred Option 4 eliminates the safety risk of vehicle entry into the stream and the consequential environmental risks, where the stream bank edge is continuing to erode at the road interface. This proposal also reduces the risk to vulnerable road users where the existing road is widened to provide a grass verge with a filter drain system to cater for road drainage.

A visual aquatic assessment of the section of Newtownmoyaghy Stream to be diverted was undertaken during ecological surveys. Results are outlined in Section 3.3 of the Natura Impact Statement (NIS) and Section 4.2.4 of the Planning and Environmental Considerations Report (PECR). No evidence of protected species was recorded, and the watercourse is considered to have limited salmonid potential due to the lack of oxygen-rich gravel beds and signs of poor water quality.

Section 4.5.1.9 of the PECR notes that the proposed new channel diversion will incorporate pools and boulders, as well as imported certified clean gravels. The addition of the imported certified clean gravel to the new channel will not only stabilise the stream bed and reduce levels of suspended solids during the stream diversion, but it will also add habitat value for aquatic life within the new stream.

The proposed new diverted stream channel is circa 550 m long and runs roughly parallel to the existing channel, albeit at the other side of the road. It has been positioned to be away from the mature trees and predominately outside the 1 in 10-year flood zone. This re-routing was designed and modelled to use the same channel inverts across the reach length and is designed to not increase existing modelled water levels, as indicated in the Stage 3 Flood Risk Assessment (FRA) which accompanied the application. The proposed two stage channel allows for flow depth to be maintained at lower flows while the upper stage caters for the larger flood flows, with sloped banksides to provide improved side slope stability (a feature lacking in the existing stream characteristics).

The risks associated with the diversion works have been identified and appropriate mitigations measures proposed in the NIS (particularly Section 8.0) and the PECR to manage the identified risks in order to ensure that the water quality status is maintained. There is considered to be a greater environmental risk associated with the current situation whereby existing road drainage runs untreated directly into the Newtownmoyaghy Stream and the risk of errant vehicles entering the stream increases over time as the ongoing stream erodes the verge and edge of the existing road.

The Office of Public Works (OPW) have been consulted regarding the diversion works and they have confirmed that the stream does not come under the remit of Article 9 of the Arterial Drainage Amendment Act (1995). In addition to this the OPW have been consulted with respect to a Section 50 application for the currently designed culvert sizing as part of the hydraulic modelling exercise. The section 50 applications have been approved by the OPW.

Along with proposals noted above re measures to create a suitable habitat for aquatic flora and fauna within the new diverted stream drawing 11434-2012 submitted with the NIS application contains details of the proposed landscaping to be provided as part of the scheme. This includes details of a new mixed native hedge along the boundary of the new proposed channel to mitigate the loss of any existing landscaping at the section of the stream to be piped and infilled.

"Flooding"

It is acknowledged that this scheme will not fully address existing and predicted flooding during extreme events, which would otherwise entail a much broader scale flood relief scheme. The primary purpose of the works as stated above is to eliminate the significant safety risks to road users. However, the Stage 3 Flood Risk Assessment (FRA), which accompanied the application, was conducted in accordance with the PSFRM methodology and includes consideration of climate change (see Section 2.3). Based on the hydraulic assessment undertaken it is predicted that the proposed channel and road improvements will reduce flooding on the Newtownmoyaghy Road (see Section 4.3 of the FRA). It is also predicted that the proposed channel will not exacerbate flood risk downstream of the proposed study area.

Section 4.3.3 of the PECR includes an assessment of the agricultural grassland which will be impacted by the proposed new diverted stream.

"Alternatives"

As discussed above and in Section 4 of the S.177AE Planning Application Report, six design options were considered at the optioneering stage. The Options Assessment was conducted in accordance with the Transport Appraisal Framework (TAF) guidance. The results of the assessment identified that Option 4, Open Channel Diversion (East side of the Road) to facilitate infilling of the existing stream was the most balanced option taking into account all the TAF criterion, which include Safety Impacts, Climate Change Impact and Environmental Impacts

The main objectives of the proposed scheme are as noted above and detailed in Section 4 of the S.177AE Planning Application Report.

The proposed channel alignment is designed largely to run just outside of the 1 in 10-year flood event area and the portion of the field west of the new channel is largely within the flood zone. Access over the new channel is proposed at two different locations via box culverts which will be designed to cater for vehicles.

"Summary"

The existing road edge and verge of the L-6219 Newtownmoyaghy Road has, in discrete sections, collapsed into the adjacent stream due to erosion from stream flood events compounded by vehicles passing close to the road/stream interface. The present narrow road width increases the risk of vehicles travelling on, and on occasion over, the edge of the road and into the existing stream. This has become both a health and safety risk for road users and an environmental risk due to the potential release of hydrocarbons and other vehicle pollutants entering the adjacent stream.

The proposed scheme is deemed necessary to deal with this ongoing road safety issue associated with the erosion of the road edge of the L-6219 public road, which carries approximately 2,400 vehicles a day on average.

The scheme will relocate a circa 550m long portion of the stream into a green field area east of the existing road. This will greatly reduce the risk of vehicles leaving the road and entering the stream, and the resulting safety and environmental consequences. In addition to this the proposed scheme will also replace the existing over-the-edge road drainage, which currently runs directly into the stream untreated, with a filter drain and a petrol interceptor.

The scheme is intended to deal with an existing road safety issue in the public interest. The lands identified for the scheme are deemed suitable and necessary for the delivery of the scheme and, subject to receipt of planning consent, it is hoped that an agreement can be reached with the registered owners of the private lands required to allow the scheme to proceed.

Yours faithfully,

Signed: _____

On behalf of Meath County Council