comhairle chontae na mí
meath county council

Teach Buvinda, Bóthar Átha Cliath, An Uaimh, Contae na Mí. C15 Y291
Buvinda House, Dublin Rd., Navan, Co.Meath. C15 Y291

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 Ms Lucy Tottenham

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 Ms Lucy Totteham, we make the following observations:

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.

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 main purpose of the works is to eliminate the significant safety risks to road users.

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). Currently floodwaters begin to encroach on the ESB substation during events as frequent as the 10-year return period. Under the proposed scheme water levels at the ESB substation are predicted to reduce by approximately 0.13 m, 0.04 m, and 0.02 m for the 10-, 100-, and 1000-year events, respectively (refer to Table 7-8 of the Planning and Environmental Considerations Report (PECR) and Table 4-6 in the Stage 3 FRA).

It should be noted that the existing stream will not be replaced by a drain; the exiting stream will be diverted into a new two stage channel located in the field northeast of the existing road. The infilling of the existing roadside Newtownmoyaghy Stream will incorporate a conventional filter drain and piped system to manage localised surface water runoff from the road.

The Natura Impact Statement (NIS) lodged as part of the application for this proposed scheme has taken into account the Rye Water Valley/Carton SAC (Site Code: 001398), located approximately 5km east (4.6km hydrologically), and has included proposed mitigation measures to reduce potential for significant effects in relation to water quality, and thus any indirect effects on aquatic habitats and species.

With regards the statement in the submission which notes, "nor has a study been undertaken to identify all biodiversity likely to be impacted downstream by this project", it should be noted, that in addition to the NIS submitted as part of the Planning Application, which examined the potential for significant adverse effects on the integrity of European sites, a Planning and Environmental Considerations Report (PECR) was also submitted with the Application. Section 4 of the PECR assesses the potential impact of the proposed development on key ecological receptors, including downstream aquatic species.

The submission also notes that "fish will not be able to spawn in a drain" and that the "removal of the river would remove the associated biodiversity/species present".
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 NIS and Section 4.2.4 of the 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 stabilize 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 submission notes a concern regarding damage to adjoining trees and tree roots during construction. As noted in Section 4.5.1.3 of the PECR. The felling of the five trees will be carried out with regard to the "Guidelines for the Protection and Preservation of Trees, Hedgerows and Scrub Prior to, During and Post Construction of National Road Schemes" (National Roads Authority, 2006). In addition, it is also noted in the PECR that the root system of the remaining tress will be protected using Root Protection Areas.

The submission notes "no EIS has been undertaken".
As part of the Planning Application, an Environmental Impact Assessment (EIA) Screening was undertaken and this report concluded that an EIA was not required for the proposed scheme.

The MCC Project Team concur with this submission in relation to the need for "radical improvement" of the existing road which is noted as being "extremely dangerous with inadequate width in places for traffic to pass – mostly as a result of the eroding riverbank."

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. This relocation of the stream will allow for the existing channel to be piped and infilled, for the road to be widened, and 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.

Yours faithfully,

Signed: 

On behalf of Meath County Council