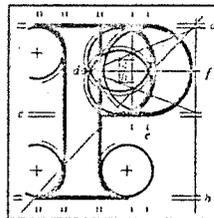


Our Case Number: ACP-323799-25



An  
Coimisiún  
Pleanála

Lucy Tottenham  
Cloragh  
Ashford  
Co. Wicklow  
A67 P038

**Date:** 05 December 2025

**Re:** Proposed road improvement scheme  
at Newtownmoyaghy Stream, Kilkcok, County Meath.

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Commission has approved it with or without modifications.

If you have any queries in relation to the matter please contact the undersigned officer of the Commission at [laps@pleanala.ie](mailto:laps@pleanala.ie)

Please quote the above mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

Yours faithfully,

Eimear Reilly  
Executive Officer  
Direct Line: 01-8737184

AA02

Teil (01) 858 8100  
Glaó Áitiúil 1800 275 175  
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Láithreán Gréasáin Website [www.pleanala.ie](http://www.pleanala.ie)  
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An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1  
D01V902

AN COIMISIÚN PLEANÁLA	
LDG-	085728-25
ACP-	323799-25
28 NOV 2025	
Fee: €	Type:
Time: 9:15	By: Pm

Tuesday 25<sup>th</sup> November, 2025

**Re: Newtownmoyaghy Road Improvement Scheme in the townland of  
Newtownmoyaghy, Kilcock, Co. Meath**

*To who it may concern:*

I wish to object to the above scheme on the following grounds:

***Flooding***

No alternatives have been considered to alleviate the apparent flooding problem. Nowhere in the report has careful clearing of the vegetation in the river blocking the river been suggested (while maintaining existing shrubs/trees). Why not move the road/expand it rather than move the river? This would be a far cheaper alternative! (and leave the County Council more funds to allocate to much needed housing in the area!!!)

Inadequate flood risk assessment: The Strategic flood risk assessment carried out places this site within Flood Zone A (highly likely to flood, history of flooding). No flood management measures have been considered to take into account future climate change – like the extreme rain which hit last week. A drain replacing a river would not have the capacity to cater for extreme weather/flooding, as debris carried downstream will constantly block a drain entrance and be extremely dangerous to clear in a flood event. The nearby ESB sub station would be at risk of flooding. As would the nearby houses.

***Sensitive Species/Biodiversity/Trees/EIS***

Natura Impact Study: The inadequate study undertaken notes the existence of otter and kingfisher. A Kildare County Council study undertaken at Carton Demense (attached) notes existence of brown trout, salmon, eels, minnows, lampreys, pike and white-clawed crayfish (sensitive and in some cases – protected species). Nowhere in the current Natura study does it make reference to measures to be taken to prevent disturbance/impact to these species during construction or long term. Nor has a study been undertaken to identify all biodiversity likely to be impacted downstream by this project – flora and fauna. Both during construction and future impacts. Fish will not be able to spawn in a drain. Kingfisher are listed on Annex 1 of the EU birds directive. While white-clawed crayfish is on Annex 2 and Annex 5 of the EU Habitats directive. Removal of the river would remove the associated biodiversity/species present. It is essential to protect all waterways and all endangered species from improper planning.

Trees: Even if trees adjoining the site are not disturbed, tree roots will inevitably be damaged by digging during construction – another threat to the biodiversity in the area – and a danger to the public – future dead trees falling on the road.

Environmental Impact Study (EIS): No EIS has been undertaken. This is essential to ensure protection of this environmentally sensitive area. Particularly as it is within a known flood zone. And particularly as moving a waterway has dire consequences to sensitive species. A detailed EIS is required.

***Traffic/Speed calming/Accident prevention***

While it is acknowledged that this road is in need of radical improvement and is used as a 'rat race' at certain times. It is extremely dangerous with inadequate width in places for traffic to pass – mostly as a result of the eroding riverbank. No alternative (widen existing road instead of moving the river/ traffic lights/ speed calming measures/ a wall between river and road to prevent cars plunging into the river) have been considered.

I would ask that Meath County Council be requested to reconsider the options, follow through with their commitment to protection of biodiversity and create a safer road in the public good without destroying the existing nature-rich habitat and overspending on an unnecessarily complicated project in the process.

I object to the Newtownmoyaghy Road Improvement Scheme and request that planning is denied.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Lucy Tottenham', with a stylized flourish at the end.

Lucy Tottenham

## SITE SYNOPSIS

### SITE CODE: RYE WATER VALLEY/CARTON

### SITE CODE: 001398

This site is located between Leixlip and Maynooth. It extends along the Rye Water, a tributary of the R. Liffey.

The Rye Water in Carton Estate is dammed at intervals, creating a series of lakes. Reed Grass (*Glyceria maxima*) is frequent around the lakes, along with Yellow Flag (*Iris pseudacorus*), Reed Canary-grass (*Phalaris arundinacea*), Bulrush (*Typha latifolia*), Water Forget-me-not (*Myosotis scorpioides*), Marsh Marigold (*Caltha palustris*) and Starwort (*Callitriche* spp.). Along the remainder of the site the river has recently been dredged and much of the Reed fringe removed.

To the north-west of Carton Bridge a small clump of Willows (*Salix* spp.), with Dogwood (*Cornus* sp.) some Alder (*Alnus glutinosa*), Ash (*Fraxinus excelsior*) and Elder (*Sambucus nigra*) occurs. The ground flora found here includes Golden Saxifrage (*Chrysosplenium oppositifolium*), Meadowsweet (*Filipendula ulmaria*), Common Valerian (*Valeriana officinalis*), Wavy Bitter-cress (*Cardamine flexuosa*) and Bittersweet (*Solanum dulcamara*).

The woods on Carton Estate are mostly old demesne woods with both deciduous and coniferous species. Conifers, including some Yew (*Taxus baccata*) are dominant, with Beech (*Fagus sylvatica*), Oak (*Quercus* sp.), Sycamore (*Acer pseudoplatanus*), Ash and Hazel (*Corylus avellana*) also occurring. The ground flora is dominated by Ivy (*Hedera helix*) with such species as Hedge Woundwort (*Stachys sylvatica*), Wood Speedwell (*Veronica montana*), Woodruff (*Galium odoratum*), Wood Avens (*Geum urbanum*), Common Dog-violet (*Viola riviniana*), Wild Angelica (*Angelica sylvestris*), Ramsons (*Allium ursinum*), Ground-ivy (*Glechoma hederacea*) and Ivy Broomrape (*Orobanche hederaceae*) also occurring.

Hairy St. John's-wort (*Hypericum hirsutum*), a species legally protected under the Flora Protection Order (1987), occurs in Carton Estate; there is an old record from the estate for the similarly protected, Hairy Violet (*Viola hirta*), but this has not been recorded from here in recent years. Another species listed in the Red Data Book, Green Figwort (*Scrophularia umbrosa*), occurs on the site in several locations by the Rye Water. The woods at Carton Demesne are the site of a rare Myxomycete fungus, *Diderma deplanatum*.

Within the woods, Blackcap, Woodcock and Long-eared Owl have been recorded. Little Grebe, Coot, Moorhen, Tufted Duck, Teal and Kingfisher, the latter a species listed on Annex I of the EU Birds Directive, occur on and about the lake.

The marsh, mineral spring and seepage area found at Louisa Bridge supports a good diversity of plant species, including Stoneworts, Arrowgrass (*Triglochin palustris*), Purple Moor-grass (*Molinea caerulea*), Sedges (*Carex* spp.), Common Butterwort

(*Pinguicula vulgaris*), Marsh Lousewort (*Pedicularis palustris*), Grass-of-parnassus (*Parnassia palustris*) and Cuckooflower (*Cardamine pratensis*). The mineral spring found at the site is of a type considered to be rare in Europe and is a habitat listed on Annex I of the EU Habitats Directive. The Red Data Book species Blue Fleabane (*Erigeron acer*) is found growing on a wall at Louisa Bridge. The Rye Water is a spawning ground for Trout and Salmon, and the rare, White-clawed Crayfish (*Austropotamobius pallipes*) has been recorded at Leixlip. The latter two species are listed on Annex II of the EU Habitats Directive. The semi-aquatic snails *Vertigo angustior* and *V. moulinsiana* occur in marsh vegetation near Louisa Bridge; both are rare in Ireland and Europe and are listed on Annex II of the EU Habitats Directive. The scarce Dragonfly, *Orthetrum coerulescens*, has been recorded at Louisa Bridge.

The main importance of the site lies in the presence of several rare and threatened plant and animal species, and of a rare habitat, thermal, mineral, petrifying spring. The woods found on Carton Estate and their birdlife are of additional interest.

15.10.00