Our Case Number: ACP-323799-25

An Coimisiún Pleanála

Paul Johnston
Luimnagh West
Corrandula
Co. Galway

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

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

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64 Marlborough Street
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Eimear Reilly

From: LAPS
Sent: Friday 28 November 2025 09:19
To: Eimear Reilly
Subject: FW: Observation on Newtownmoyaghy road scheme ref TRA 04 023 12
Attachments: Newtown Moyaghy Paul Johnston report Ref TRA 04 023 12.pdf

Follow Up Flag: Follow up
Flag Status: Completed

From: Paul Meredith Johnston <PJHNSTON@tcd.ie>
Sent: Friday, November 28, 2025 8:37 AM
To: LAPS <laps@pleanala.ie>
Subject: Observation on Newtownmoyaghy road scheme ref TRA 04 023 12

Attn An Coimisiun Pleanala
Newtownmoyaghy Road Improvement scheme Ref TRA 04 023 12

I attach an observation on the proposed road improvement scheme which I trust is in order.

Thank you

Paul

Paul Johnston
Luimnagh West
Corrandulla
Co. Galway H91 NXK5

email: pjhnston@tcd.ie
Tel. 087 997 2156

Meath County Council/An Coimisiún Pleanála Ref TRA 04 023 12

Newtownmoyaghy Road Improvement Scheme, Newtownmoyaghy, Kilcock, Co. Meath

Observations on the proposed road improvement scheme

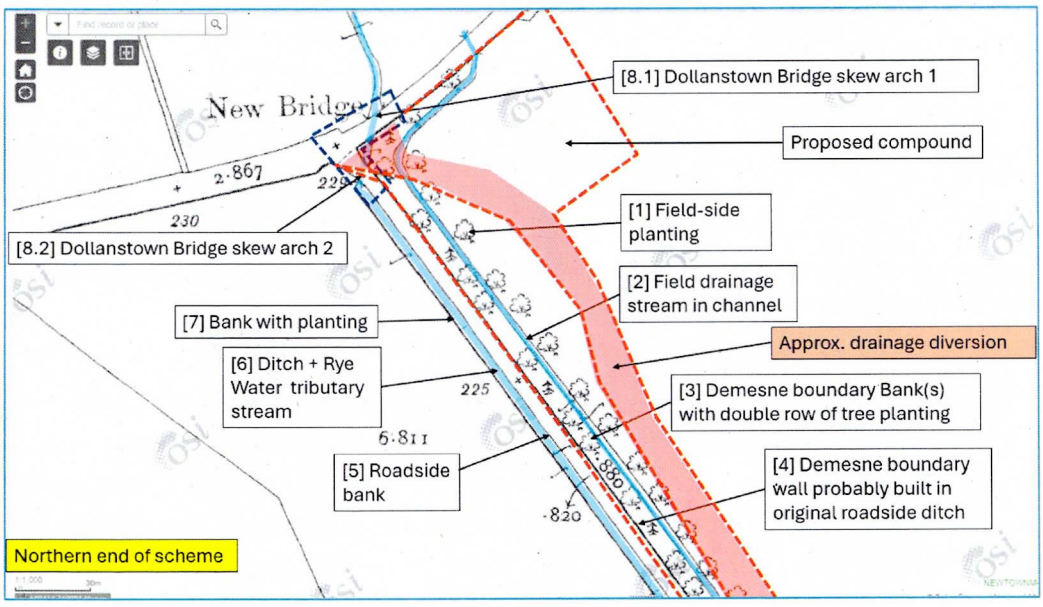
Paul Johnston, Luimnagh West, Corrandulla, Co. Galway : pjhnston@tcd.ie

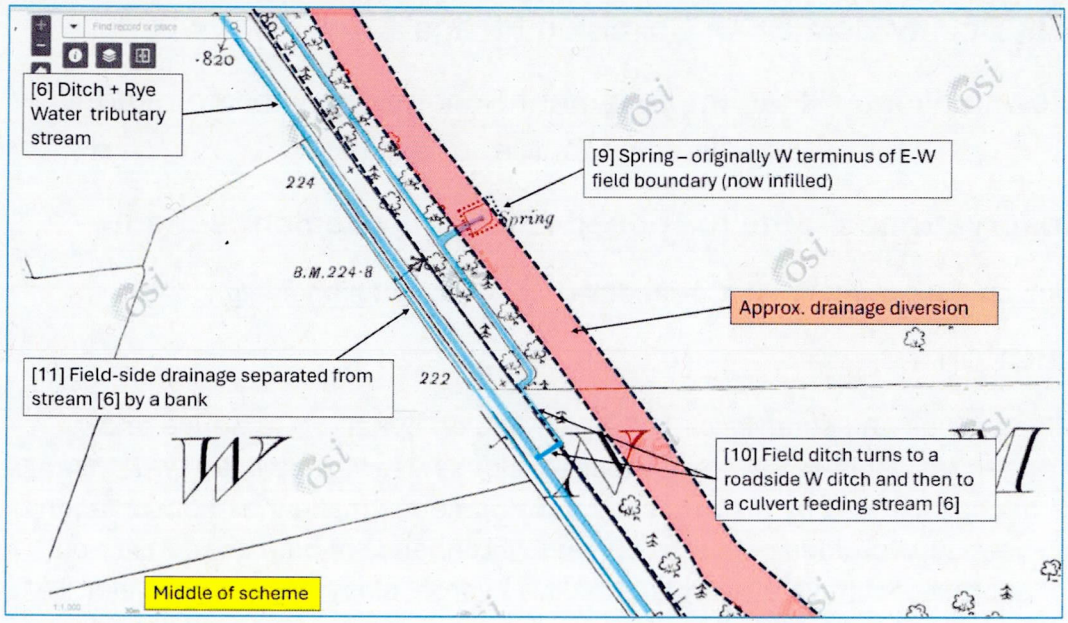
INTRODUCTION

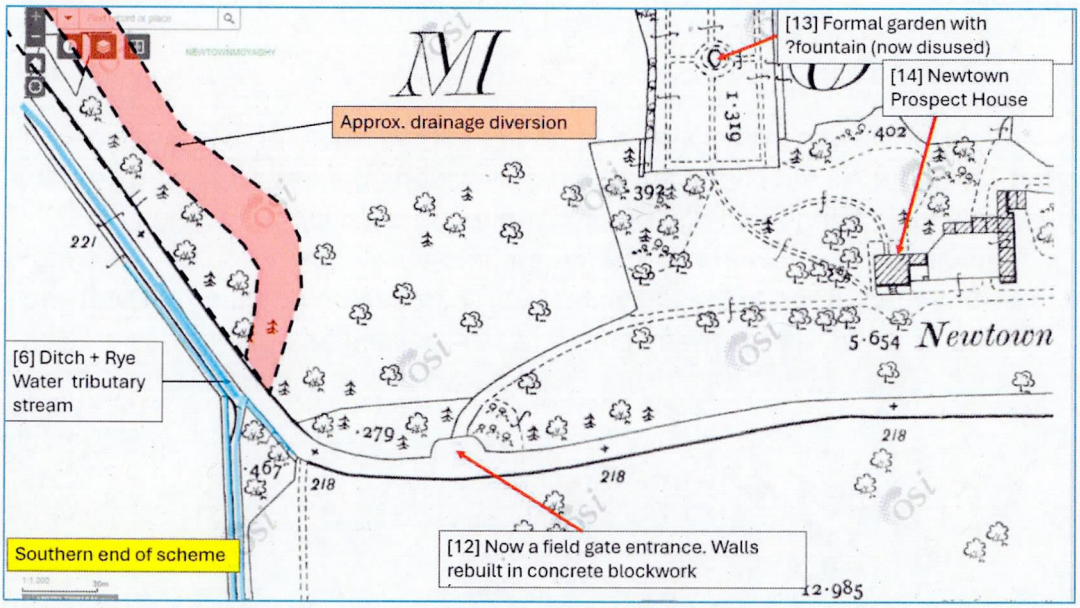
These observations and submission are also made on behalf of Catherine and Townley Angel, residents of Newtown Prospect House, Newtownmoyaghy, whose lands are directly affected by the proposed development. I make these observations as an engineering hydrologist of some 50 years experience in both academia and professional practice. I have also worked on the hydroecology of the Rye Water SAC immediately downstream of this proposed road development scheme. I have also worked as an advisor to An Bord Pleanala and conducted research with the EPA, OPW and NPWS

OBJECTIVES & RATIONALE.

Primary objective of the scheme is stated to be the improvement of the capacity and safety of the Moyglare/Newtownmoyaghy Road by widening it and removing sources of the apparently increasing flooding. The consequential solution proposed in the scheme is to divert the Newtownmoyaghy stream into a new water course, allowing the road to be widened, filling in the old water course. It seems no other alternatives were considered or why the proposed scheme was regarded as optimum.







Images/maps reproduced from '*Archaeology Heritage Desk Based Review and Assessment* V2', N. Roycroft, July 2024, showing current arrangement of drainage channels.

Historically, the road is situated on the floodplain of the adjacent stream, originally bounded by the eighteenth century estate wall on the east side. Parallel field drainage was separated on the east side of the wall, but discharged into the stream via a culvert, as shown on the maps in the Archaeology report, reproduced above. Although the original road was probably a track, some 3m wide, later widening and tarmac sealing has encroached on the floodplain to some 5-6m in width now.

From the perspective of the stream, the proposed scheme represents a major change in its hydrological regime. At the northern end of the scheme it is proposed to route the stream through a right angle into a wide (13m+), two tiered channel, although still separated from the field drainage. This new stream channel, some 850 long, will reconnect to the original stream channel at the southern end. This re-routing represents a major change in the hydromorphology of the stream. Given the good status of the water quality/habitat of the stream in the recent Water Framework Directive (WFD) review (2016-21), eliminating this habitat by filling in the old stream represents a significant environmental impact. The proposed scheme will clearly put at risk the requirement under the WFD to maintain that status by 2027. In any case altering the stream course as proposed comes under the remit of Article 9 of the Arterial Drainage Amendment Act (1995), requiring an application to the OPW (which is not apparent in the planning documentation). The proposed scheme does not accord with principles of nature restoration, as established under the EU Nature Restoration Law.

FLOODING

The flood analysis undertaken as part of the assessment of the proposed scheme has used conventional rainfall-runoff catchment modelling along with hydraulic routing to indicate the benefits of re-routing the stream. As acknowledged, the modelled results are indicative, since there is little opportunity for validation in the field. However, even the reported results also acknowledge that there is a residual chance of flooding under extreme rainfall events, particularly at the northern end of the scheme.

The modelling as presented concentrates on the sources of the flooding (ie extreme rainfall) on a catchment basis, routed hydraulically through the present channel conditions. It is clear that a principal control on the flow into the stream along the road is the pair of stone arch bridges at the northern end. The constriction of the arches limits the flow into the downstream channel but is also a factor in causing upstream flooding, above the bridges (not part of the scheme). However, the observed *causes* of the flooding now experienced along the road is multifarious. Road runoff, overspilling of field drainage (particularly at the northern end) and an overgrown stream channel are significant causal factors which are not necessarily taken into account in the modelling. Re-routing the stream into a much wider/deeper channel would seem to be a 'sledgehammer to crack a nut', at the same time as causing a significant environmental impact.

The land-take from the agricultural field to the east to accommodate the proposed scheme/channel diversion has an additional environmental impact, not addressed in the planning documentation.

ALTERNATIVES

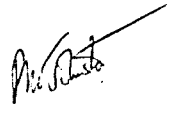
Lack of maintenance of the current stream channel is clearly a contributing cause of the recent observed flooding. Similarly, maintenance/development of field drainage on either side of the road is clearly in need of improvement. Limited widening and strengthening of the road and its margin with the stream channel is an alternative, more cost-effective strategy to creating a safe route for traffic. It is not clear whether the ultimate intention is to cause the proposed scheme to become a future bypass to Kilcock – what is the strategic purpose of the traffic management?

Re-routing the stream into a completely new channel in the field to the east of the current route is not only a negative environmental impact but a major impact on the utility of the then riparian land. Irrespective of the present zoning, a re-routed stream will effectively sterilize future access to the land from the newly widened road. Any future development would be significantly affected by such restriction of access, reducing the value of the land. Bridging the wide, newly proposed channel would be a prohibitive cost.

Another alternative for the road improvement, if necessary, would be the re-routing of the road itself, more or less along the route now proposed for the stream. A new T-junction could be created at the northern end. The existing stream channel could be widened, still allowing for a riparian walking/cycle track along the old roadway. Access to the existing property could still be accommodated. Such a scheme would be much less environmentally damaging and nature would be allowed to assume a more natural course.

SUMMARY

The proposed stream re-alignment under this road improvement scheme is not justified under environmental grounds. Even the flood modelling indicates it will not fully solve the flooding problem under more extreme events, as expected under climate change. A more thorough investigation of the situation in the field is needed coupled with an analysis of alternative solutions to accommodate both road improvement and environmental concerns, is required. The acquisition of a land-take on the east side of the road is not warranted under the circumstances.



Paul Johnston

21 Nov. 2025