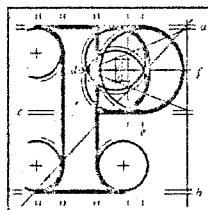


Our Case Number: ACP-323830-25



An
Coimisiún
Pleanála

Mountmellick Tidy Towns Committee
c/o Barbara Lalor
42 Harbour Street
Mountmellick
Co. Laois

Date: 11 December 2025

Re: Proposed flood relief scheme
in Mountmellick, County Laois

Dear Sir / Madam,

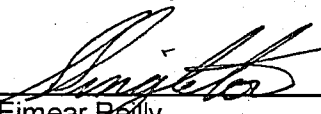
An Coimisiún Pleanála has received your recent submission in relation to the above-mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed development shall not be carried out unless the Commission has approved it or approved it with conditions.

If you have any queries in relation to the matter, please do not hesitate to 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,

PP 
Eimear Reilly
Executive Officer
Direct Line: 01-8737184

JA02

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Mountmellick Tidy Towns Group

Submission on the Mountmellick Flood Relief Scheme

Submitted to An Coimisiún Pleanála under Section 175 & 177AE of the Planning and Development Act 2000 (as amended)

Planning Reference: JA11.323830

1. Introduction

We, the undersigned residents and community members of Mountmellick and the surrounding area, wish to make a submission on the proposed Mountmellick Flood Relief Scheme.

We fully support the need to protect the town from future flooding, especially following the severe events in **2017** and **2020**:

"Mountmellick experienced unprecedented flooding... a second major flood event took place in February 2020."

Stage 1 Report, Section 2.1 – Flood History

However, we believe elements of the current proposal would cause **unnecessary loss of local heritage** and may **create new environmental and downstream flood risks**. We ask that these elements be reconsidered before approval is granted.

2. Removal of the Historic River Walk Wall

A key concern is the proposed demolition of the historic stone wall along the River Walk. The application indicates that this wall would be removed and replaced with a fence:

"The existing stone wall... is of solid construction and would hinder the efficient use of the proposed flood storage area... it is proposed to remove the stone wall and replace it with an open fence."

Stage 1 Report, Section 7.4.1

Only a short length of the existing wall will remain visible:

"The remaining length will be replaced or buried."

Stage 1 Report, Section 7.4.1

This wall is an important feature of the town. It holds heritage, social and visual value and forms part of a well-used riverside amenity. The report itself confirms this sensitivity:

"Construction works may impact the Mountmellick Heritage Trail... [and] the River Owenass bank walkway."

Stage 1 Report, Section 3.1 – Constraints Assessment

The importance of heritage in this area is also clearly acknowledged:

"71 NIAH sites, 78 Protected Structures, a Zone of Archaeological Potential and a potential Architectural Conservation Area."

Stage 1 Report, Section 3.1 – Cultural Heritage Inventory

Despite this, there has been *no Heritage Impact Assessment, no alternatives analysis, and no justification showing demolition is unavoidable.*

A Practical Alternative Exists

We the Local Tidy Town Group propose a compatible, functional and heritage-sensitive option:

Retain the existing wall and introduce engineered openings (arches or controlled flood voids).

This solution would:

- Achieve the same hydraulic function identified by the scheme engineers; allowing water to flow into the adjoining lands when required
- Retain the historic boundary line
- Protect the character of the River Walk
- Follow conservation principles of minimum intervention and reversibility
- Protect the town's built heritage and community identity;
- Reduce cost, waste, and intervention.

This approach is used in other flood schemes in Ireland and the EU and deserves full consideration.

Request to the Board

We respectfully ask An Coimisiún Pleanála to:

- **Reject demolition of the River Walk wall, and**
- Require assessment of a design that **retains the wall with engineered openings**, rather than replacing it.

3. Downstream Flood Risk and Lack of Confirmed Storage

Another concern relates to the overall hydraulic approach. The proposed scheme focuses on containing floodwater within reinforced embankments and channel walls:

"Containing flood flow from the Owenass so that it does not connect with the flood flow from the Pound."

Stage 1 Report, Section 8.5.1

It states the works are intended to:

"...prevent interaction... and will control and store the water allowing it to pass through the town..."

Stage 1 Report, Section 8.5.1

This approach increases conveyance — meaning water is forced through town at higher speed and volume, rather than spreading or storing naturally.

The Scheme Admits New Risk Will Be Created

The report clearly acknowledges that this approach may create new areas of flood vulnerability in major weather events:

"117 residences will be impacted by the 0.1% AEP event as a direct result of the scheme."

Stage 1 Report, Section 9.7 – Modelling Outcome

Furthermore, flood storage measures — essential to prevent downstream impacts — are *not yet included* and instead listed as possible future works:

“The works are still to be confirmed... options include off-line storage upstream, a second diverted channel, or a combination of the above.”

Stage 1 Report, Section 9.6 – Future Mitigation Options

This means the proposed design is not yet complete and relies on uncertain future additions.

Environmental Impact

The scheme may also affect sensitive habitats:

“Alteration of flood regimes upstream and downstream... may negatively impact protected aquatic and terrestrial species.”

Stage 1 Report, Section 3.1 – Environmental Constraints

Given the proximity to designated conservation areas, this uncertainty is not acceptable at approval stage.

Request to the Board

We request that the Board require Laois County Council to:

- Include full and confirmed upstream or off-line flood storage in this application
- Provide complete catchment modelling for downstream areas under climate change scenarios
- Demonstrate that no residential, heritage, or environmental receptor will experience increased risk

4. Policy Alignment

This submission aligns with policy requirements including:

- **Architectural Heritage Protection Guidelines (2011)** – retention and minimum intervention
- **National Planning Framework Objective 17** – climate resilience that protects heritage
- **EU Floods Directive** – avoid transferring risk elsewhere
- **Laois County Development Plan Policies HER01 & HER10** – avoid demolition where alternatives exist
- **Planning and Development Act 2000** – require assessment of alternatives

5. Conclusion

Mountmellick deserves a flood relief solution that protects the town's future and its history, safety and its heritage.

The alternative solution proposed by the community; retaining the historic wall with engineered openings and incorporating proper storage, achieves flood resilience without unnecessary damage to the town's identity. We urge the Board to uphold heritage policy, proportionality, and best practice by requiring modification of the current design.

We ask that the Board require revision of the scheme so that it is:

1. Heritage-sensitive
2. Environmentally responsible
3. Hydrologically complete
4. Fully consistent with local and national policy

Signed on behalf of the Mountmellick Tidy Towns Committee

Signature: Barbara Labor
Name: Barbara Labor
Position: Treasurer / P.R.O. M.T.T.
Address: 42 Harbour Street
Mountmellick Co. Laois
Date: 2/12/2025

Signature: Maura Reddin
Name: MAURA REDDIN
Position: Chairperson M.T.T.
Address: 16, Emmet Street
Mountmellick Co. Laois
Date: 2-12-2025