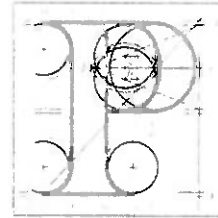


Our Case Number: ACP-324383-26



An
Coimisiún
Pleanála

Garry Mentanko
Rosebud Cottage
Ballyvall
Ferrybank
Co. Kilkenny
X91 C6Y6

Date: 06 August 2026

Re: Proposed IDA Belview Infrastructure Development
Belview, Slieverue, County Kilkenny

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,


Muirín Gowen
Executive Officer
Direct Line: 01-8049323

AA02

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SUBMISSION TO AN COIMISIÚN PLEANÁLA

Application: IDA Belview Infrastructure Development, Belview, Slieverue,
County Kilkenny (Section 177AE)
Submission by: Garry Mentanko
Date: July 25, 2026

AN COIMISIÚN PLEANÁLA	
LDG-	089573-26
ACP-	324383-26
04 AUG 2026	
Fee: €	Type:
Time: 10:03	By: POST

Dear Board,

I am writing to make a submission on the IDA road application at Belview. I live at Rosebud Cottage, Ballyvalla which is located on L3412 and upstream of the proposed road and culvert on the Rathpatrick Stream.

I do not oppose the principle of the road upgrade—better infrastructure and safer access are welcome for the IDA to access their future site. We are pleased about the proposal to limit the traffic on our road and close off access at either end while still allowing pedestrian access to the Giles Quay route. The buffer zone of planting between roads is also welcome.

However, I have serious concerns about the flood risk assessment and the environmental documentation submitted with this application. I believe they are incomplete in several important respects, and that these gaps could have real consequences for my property and the wider environment.

1. The Rathpatrick Stream Has Not Been Properly Assessed for Flood Risk

The IDA's Flood Risk Assessment classifies the site as Flood Zone C (low risk). But that classification is based on mapping for the River Suir—not the Rathpatrick Stream, which is the watercourse that actually flows through the site. The FRA itself notes that the stream wasn't included in that modelling.

This is a significant gap. The Council's own Strategic Flood Risk Assessment (SFRA) for Variation 6 of the County Development Plan specifically identified flood zones along the Rathpatrick Stream. The OPW and OPR also raised concerns about gaps in the flood mapping for this area during the recent Variation

6 consultation. The Council's Chief Executive's Report directly addressed this point. The responded by:

- a. Acknowledging the issue: It directed the SFRA (Strategic Flood Risk Assessment) to be updated to map the flood zones correctly.
- b. Identifying that the OPW and the Office of the Planning Regulator (OPR) had already highlighted "gaps" in the flood mapping for the area, meaning the official maps were incomplete.
- c. Recommending further action: The council committed to updating the flood zone mapping in the SFRA with higher-resolution maps, which directly responds to your point about the stream's classification needing correction.

The stream has a documented history of flooding, including the March 2018 flood and the October 2023 flood on my property. I do not believe the site has been properly assessed for flood risk. The Board should require the IDA to carry out a site-specific flood risk assessment of the Rathpatrick Stream itself, not rely on mapping for a different watercourse.

2. Operational Drainage Impacts Are Not Assessed

The proposed road includes a drainage network that will discharge over 2 litres per second into the stream on a permanent basis. This is a material change to the stream's hydrology.

The Natura Impact Statement (NIS) focuses on construction-phase risks such as siltation and pollution, but I do not see an assessment as to what this additional flow will mean for the stream over the long term. The stream is connected to the Lower River Suir SAC, which supports species that are sensitive to changes in flow, including salmon and lamprey. In my view, the NIS should have addressed this, and it has not.

3. The Unauthorised Upstream Works Have Not Been Considered

There have been significant unauthorised works on the neighbouring property upstream (Marine Steel Ltd), including the widening and lowering of the stream channel and the clearance of approximately 6 acres of scrubland. Kilkenny County Council has opened an enforcement file (ENF26039) which remains active.

The IDA's environmental reports make no reference to these works as it likely they were not aware of them however this is a problem. The stream has several times been physically altered upstream at this address and any assessment of the road downstream should take that into account. The Board cannot properly assess the impact of the development without knowing the current condition of the stream. I would ask that the Board require the IDA to address this.

4. The Survey for Otters Was Not Adequate

My wife and I have observed otters in the Rathpatrick Stream on several occasions over the last five years. However, I understand that the NIS states that no otters were recorded during the 7-day camera survey.

Otter is a Qualifying Interest of the Lower River Suir SAC. If the survey failed to record a species that is visibly present, then the baseline data for the NIS is not reliable. I do not believe the Board can accept the conclusion that there will be no impact on otters without a more robust survey, longer term survey.

5. Property Flooding

As stated, my property flooded to approximately 2 feet (600mm) in October 2023. The floodwater came from the Rathpatrick Stream. This was a deeply upsetting occurrence which caused us to have to move from our home for 8 weeks. This stream has also flooded several times previous to this in the last 25 years.

The IDA's Flood Risk Assessment does not mention this event. This is not a modelled scenario—it is a documented fact. If a flood occurred in 2023, it can occur again. Kilkenny County Council responded to our flood by closing and rebuilding the bridge over the Rathpatrick stream to allow for increased outflow however this has not been tested against similar weather events such as occurred on Oct 23, 2023.

The Board should not approve a development that has not assessed the risk of increasing flood frequency or severity on my property.

6. Flood Risk Assessment Gaps

The proposed culvert has a freeboard of only 0.3 metres between the design flood level and the soffit. That is a very narrow margin and if the culvert becomes blocked, or if the design flow is exceeded, water could back up and flood upstream—including my property. The reports do not address this risk I believe and I would like to see some sort of maintenance plan as to how the culvert will be kept clear.

Following downstream along the IDA property, one can find many trees collapsed across the waterways which residence such as myself have had to monitor and clear. Who will be responsible for this maintenance?

The attenuation pond is a good addition to the plans to gather water from the new road however its closeness to the stream concerns me as to what happens should it overflow. There is also no indication as to what ongoing maintenance would be done on it.

I also note that the Office of Public Works (OPW) was not included on the list of prescribed bodies consulted for this application. The OPW is the lead agency for flood risk management and must give consent under Section 50 of the Arterial Drainage Act for culvert works. This appears to be a procedural gap that should be addressed.

Finally, the drainage design has only been assessed against the Mid-Range Future Scenario for climate change, with a 20% allowance. The OPW's own guidance recommends that the High-End Future Scenario (30%) should also be considered. For a road that will be in place for decades, this should have been done.

7. Road Flooding Along L3412

The L3412 is the only access route to my property and others in the area. In the 2023 flood, when the stream burst its banks, the water was not able to escape from the south side of the L3412 into the IDA fields due to a stone wall blocking its flow. This has since been altered, with openings/pipes in this wall along several points to allow road water to more easily run into the field and not directly into the stream.

The buffer zone of newly planted trees and shrubs which will separate the two roads will need to be planted in a land fall to ensure that road water on L3412 will still be able to escape.

8. Public Parking at Closed Ends

Finally, I have concerns as to the access that the public will have to on both ends of the proposed closed L3412. Unless this is managed early, there remains the possibility of people parking up on either end. I would like to see some referece to preventing this as well as how it will be prevented in the future when the works are completed.

Request

I am not asking for the road to be cancelled. However, I am asking that the Board:

1. Require the IDA to carry out a site-specific flood risk assessment of the Rathpatrick Stream, rather than relying on mapping for a different watercourse.
2. Require the IDA to assess the operational-phase effects of the road's drainage on the stream's hydrology and the SAC.
3. Require the IDA to consider the cumulative effects of the unauthorised upstream works and the proposed development.
4. Require a robust aquatic ecological survey of the stream, including a proper survey for otters.
5. Require the Flood Risk Assessment to be updated to include the 2023 flood event and to assess the risk of flooding to my upstream property.
6. Require the IDA to explain why the OPW was not consulted and why the High-End climate scenario was not assessed.

7. Require the IDA to assess the risk of the road flooding and blocking access.
8. Require a plan to prevent parking up.
9. Withhold approval until this information is provided.

I have photographs of the upstream works, the 2023 flooding, and the location where I have observed otters. I am happy to provide these if required.

Yours sincerely,

Garry Mentanko
Rosebud Cottage, Ballyvall, Ferrybank, Co Kilkenny
X91 C6Y6