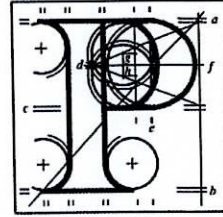


**Our Case Number:** ABP-317292-23



**An  
Bord  
Pleanála**

Councillor Brendan Wyse  
Allenwood South  
Naas  
Co. Kildare

**Date:** 09 August 2023

**Re:** Proposed development of an extension to the existing Drehid Waste Management Facility to provide for acceptance of up to 440,00 TPA of non-hazardous waste material in the townlands of Timahoe West, Coolcarrigan, Killinagh Upper, Killinagh Lower, Drummond, Drehid, Kilkeaskin, Loughnacush, and Parsonstown, County Kildare.

Dear Cllr,

An Bord 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.

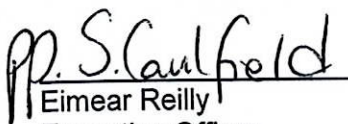
The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the local authority and at the offices of An Bord Pleanála when they have been processed by the Board.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://www.pleanala.ie).

If you have any queries in the meantime please contact the undersigned officer of the Board. Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

  
Eimear Reilly

Executive Officer  
Direct Line: 01-8737184

PA04

Tell	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

## Sarah Caulfield

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**From:** Sarah Caulfield  
**Sent:** Thursday 3 August 2023 14:00  
**To:** brendan.wyse@gmail.com  
**Cc:** Eimear Reilly  
**Subject:** RE: Revised Observation

Dear Brendan,

That's fine. I will highlight this with the case officer.

Kind Regards,  
Sarah

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**From:** Cllr. Brendan Wyse <[brendan.wyse@gmail.com](mailto:brendan.wyse@gmail.com)>  
**Sent:** Wednesday, August 2, 2023 5:25 PM  
**To:** SIDS <[sids@pleanala.ie](mailto:sids@pleanala.ie)>  
**Subject:** Revised Observation

Hi,

I submitted and paid for an observation online for an SID 317292 but I would like to replace the uploaded document with the attached version with minor corrections, if that is possible please.

Thanks,  
Brendan

[\\_Drehid\\_SID\\_317292\\_BrendanWyse\\_v2.pdf](#)

**Councillor Brendan Wyse**  
Kildare County Council  
087-2328867



Councillor

**BRENDAN WYSE**

Allenwood South, Naas, Co. Kildare

087 232 8867    brendan.wyse@gmail.com

## **Submission on SID Application 317292 for the extension of the existing Drehid Waste Management Facility by Bord na Móna plc.**

### **Introduction**

I am an elected representative for the Clane Maynooth Municipal District of County Kildare and I live 2 km as the crow flies from the entrance to the Drehid Facility and 6 km from the facility itself.

My preference for the use of the cutaway Timahoe South Bog when peat harvesting ceased would have been for the entire area to have been rewilded and managed for the return of biodiverse species that once lived on this vast raised bog. The negative impact of the invaluable loss of what is now known to be not only a rare habitat on a global scale, but also a massive carbon sink, is not compensated for, and can never be compensated for, by the community gain fund which is in place.

That said, the facility is now in place and is managed well from an environmental standpoint, with only occasional technical issues causing odours on rare occasions in the Allenwood and Killina areas. It is acknowledged that despite the disastrous decision to place a landfill facility in a peatland area with so much potential for restoration, that little more damage can now be done by this extension.

In this submission, I have provided recommendations that I kindly request should be considered, based on local knowledge garnered from working on the ground with communities close to the Drehid Facility, and my own personal experiences.

I note that the Local Authority may recommend a general contribution for road improvement works, but I respectfully request the Planning Authority to ensure that any financial contributions are directed towards the areas of highest risk to vulnerable road users, by way of planning conditions, as per my recommendations below.



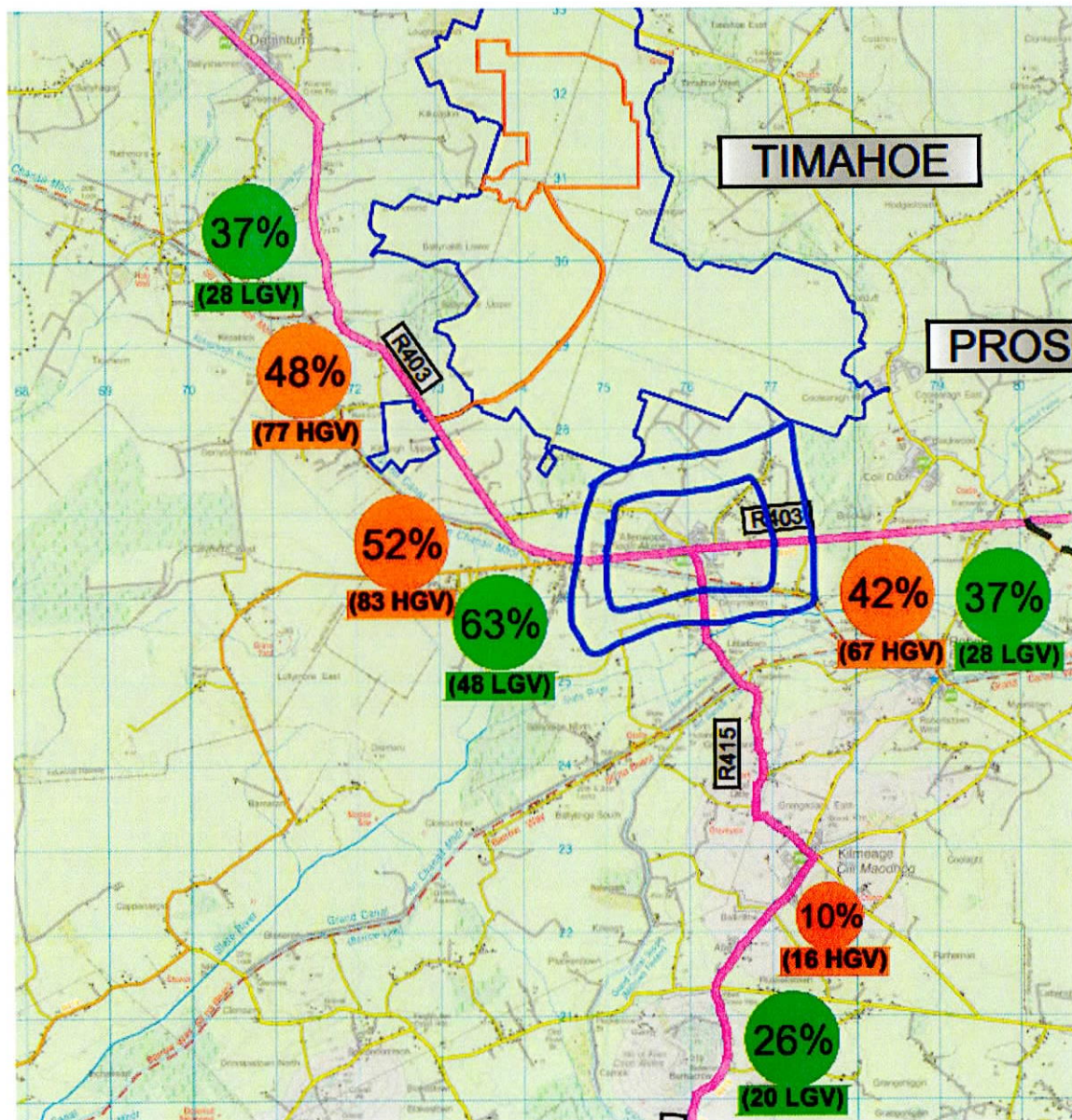
## Allenwood

Allenwood is the closest settlement to the entrance of the Drehid facility.

It is also the settlement through which the majority of haulage traffic to and from the Drehid Facility passes, as shown in Chapter 14 in the application's EIAR. Timahoe South Bog is directly north of the village, and provides a local walking amenity and a rare green space.

The population of the village has increased from 981 in 2016 to 1685 in 2022, due to a combination of increased development within the 2016 village bounds, and an expansion of the built up area used for the population calculation.

Whilst the traffic levels in the Drehid facility may not have increased, and will not increase if the expansion proceeds, the number of vulnerable road users that are using the village centre has increased considerably in the past 6 years and these citizens should be able to use the village centre safely for the duration of the proposed expansion's operation.





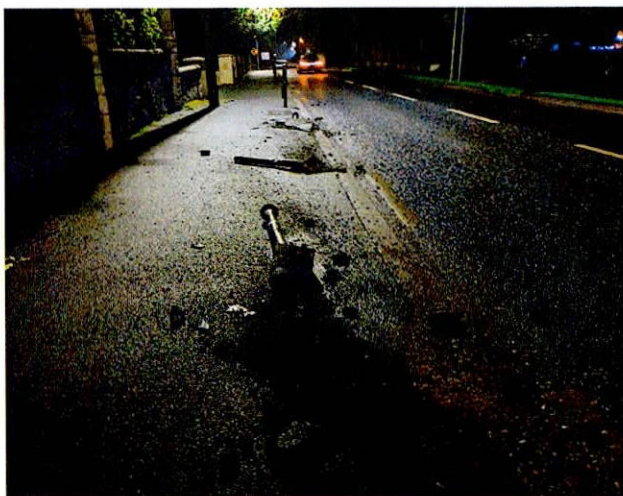
The services in the village are often used by truck drivers, and although parking is limited, most will park up safely. On occasion, trucks will park in unsafe locations such as in front of the Dublin bound bus stop and right on the kerbing at the Zebra Crossings.

Last year, driven by concerns for the safety of our school going children, a massive community effort took place to assess the road traffic safety in the village resulting in a number of actions taking place. Questionnaires were distributed where citizens could report near misses, surveys of the traffic levels were carried out by students of the national school and adult volunteers.



Two folders of documentation were submitted to Kildare County Council. As a result, out of five junctions selected in the county for a detailed road safety assessment to recommend improvements. Allenwood Cross was one and this assessment is currently underway.

The village is lined with rows of bollards, to prevent vehicles parking on the kerbing. These bollards are regularly struck and bent over. Frequently, rows of bollards are hit and bent over or completely removed, showing the dangers related to the heavy traffic flows mounting the pedestrian areas.





I have attached below the recommended traffic calming measures proposed by Kildare County Council in an opinion report for a previous planning application in relation to the facility from 2018.

I submit that these recommendations are the minimum required works required to make Allenwood Cross safe for the proposed lifetime of the expansion. These recommendations were written when the population in the village was much lower, so the need has only grown.

Allenwood Village (Kildare-Newbridge Area)	MD	Traffic Calming Scheme at Allenwood Cross to include resurfacing, anti-skid surfacing on the four approaches to this junction, improved road markings, improved signage, existing traffic signals upgrade to provide a full 4-way pedestrian crossing facility at Allenwood Cross and all associated related civil works in relation to ducting/kerbing/tactile kerbing/footpath and road adjustments/road markings and any other associated works, extend existing footpath eastwards along the R403 from Allenwood Village to the Bluetown Road (land acquisition requirement, tree/boundary clearance, new boundary works, services diversions/alterations and any associated works), extend existing surface water culvert under the R403 west of its junction with the Bluetown Road to accommodate the extended footpath.	€300,000
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The proposed footpath to the Bluetown Road has since been constructed, having been funded by the NTA.

The proposed full 4-way pedestrian crossing facility at Allenwood Cross must be provided if the levels of haulage traffic are to continue, especially given the massive increase in pedestrian traffic around the village centre.

#### Recommendation 1:

*It is recommended, in the interest of road safety, that the Planning Authority stipulate a condition that a financial contribution is to be made by the applicant specifically to cover the costs of providing a full 4-way pedestrian crossing at Allenwood Cross with required traffic signal upgrades, and that this crossing be implemented on the ground before the expansion is opened to receive waste.*

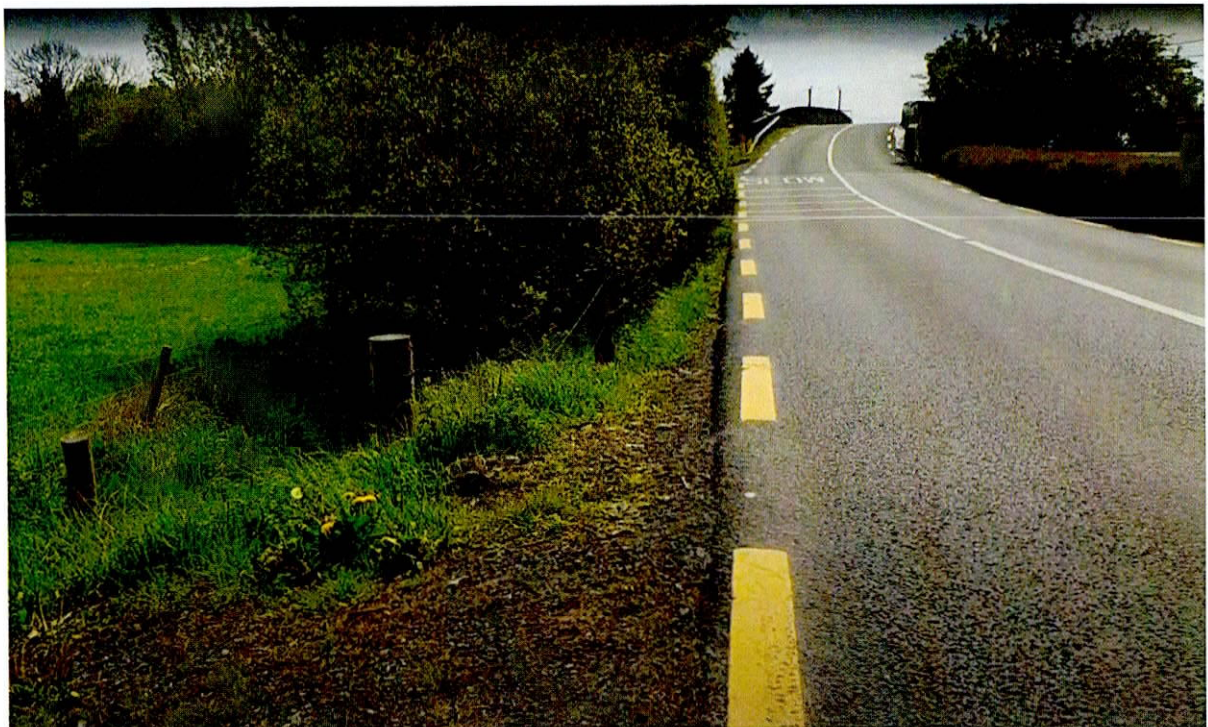


## **Bond (Derrymullen) Bridge**

It is noted that one of the main reasons for the recommended exclusion of Alexandra Bridge from the haulage routes was due to the width of that bridge, and its heritage status.

Bond Bridge, known locally as Derrymullen Bridge, is situated on the southern end of Allenwood village. Like Alexandra Bridge, it is a narrow bridge where minor collisions between vehicles occur regularly. Despite being a protected structure, its east side nameplate, present since 1796, was dislodged following a collision in recent years. It is now sadly missing after surviving for over two centuries without damage.

Unlike Alexandra Bridge, it is regularly used by pedestrians and cyclists. Citizens from Allenwood village walk up to use the Grand Canal towpath every day of the week. It also used by pedestrians and cyclists from the built up area of Allenwood South coming along the canal bank to reach the services of the village.



A new housing estate has been built just north of the bridge since the Drehid facility opened. The area south of the bridge is now being considered part of the built up area of Allenwood by the Central Statistics Office.

There is a severe drop at the road verge and it is unsuitable for standing in off the main road when traffic comes over the bridge. Families with pets, and children on small bikes, would regularly be observed walking on the road while vehicles come over the bridge, sometimes in the middle of the road due to the narrow bridge and its slight angle.

In the opinion report issued by Kildare County Council in respect of the previous planning application in 2018, some engineering measures were identified which would make the bridge safe. The shuttle traffic system would eliminate most road safety risks at the bridge and provide safe pedestrian access across the bridge also.

R415 – Bond Bridge over Grand Canal	Road improvements on approaches and over bridge to include resurfacing, kerbing, anti-skid surfacing, improved road markings, improved signage, and provision of a signalised shuttle traffic system across the bridge along with a pedestrian footpath and	€200,000
	pedestrian crossing facility over the bridge as part of the signalised traffic system and any associated works.	

Given the increase in population in Allenwood, the extension of the boundary of the Allenwood Built Up Area to include the residential area on the opposite side of the bridge from the village, the consideration that the Grand Canal Greenway which is currently under construction and will pass directly by this bridge creating an increase in vulnerable road users, and the fact that haulage is being excluded over Alexandra Bridge which is similarly dangerous, yet a good distance further from the Drehid facility, the following recommendation is made:

#### Recommendation 2:

*It is recommended, in the interest of road safety and heritage protection, that the Planning Authority stipulate a condition that a financial contribution is to be made by the applicant specifically to cover the costs of implementing a signalised shuttle traffic system across Bond (Derrymullen) Bridge, and that this measure is implemented before the expansion is opened to receive waste.*



## Killina

Killina is a rural node and Killina National School is located on a slight bend, just north of the entrance to the Drehid facility. Concerns over road safety have been consistently raised by the local community, the parent's association, board of management and staff of the school, to me and other public representatives.

In 2021, Kildare County Council appointed consultants to carry out a survey and assessment and propose a design for Public Realm improvements in the area. A small portion of these improvements have been implemented but funding was not available to implement the full recommendations.



Results of a survey of parents of the school which was carried out as part of this work in 2021 show that many would use alternative transport to the school if road safety could be improved.

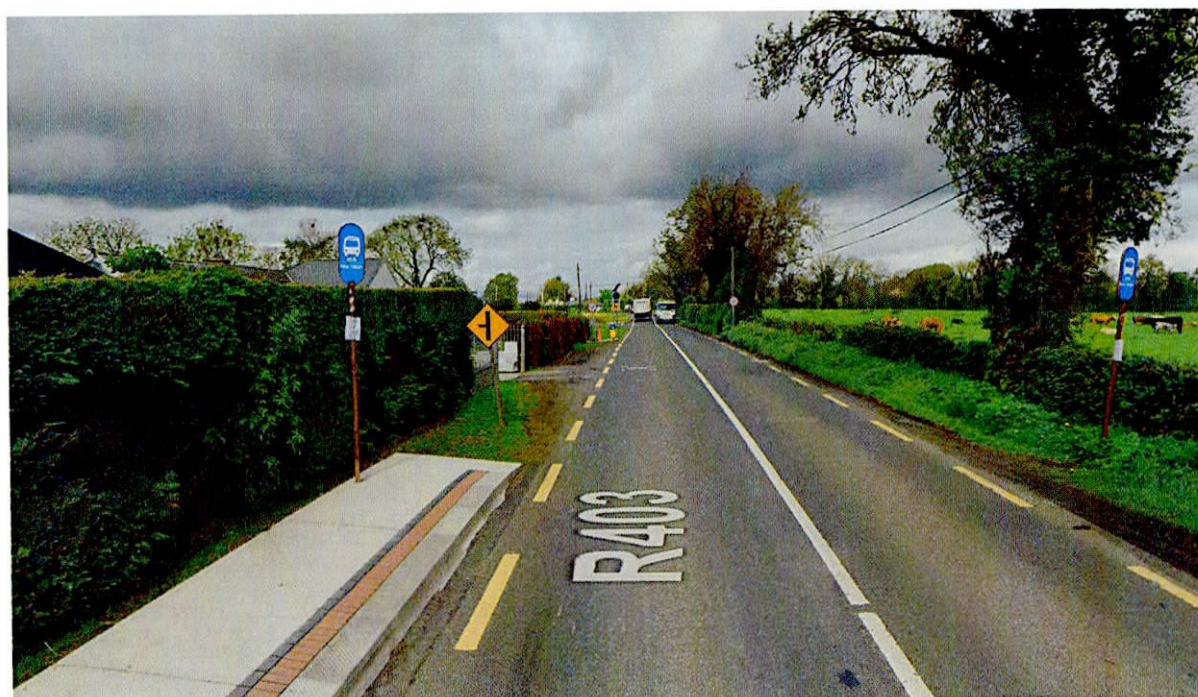
### 2.7.9 Which of the following would encourage you to use an alternative to the car (please tick one or more)?

Table 2.7 Factors encouraging an alternative travel mode to car for Killina NS

Factors encouraging alternatives to the car	Number of respondents	% of respondents
Better footpath facilities	12	60.0
Safer road crossing options	14	54.5
Traffic calming on the route to slow vehicles	21	43.6
Bicycle lanes	3	36.4
Road safety training	1	20.0
I do not typically travel by car	1	43.6
Others to walk or cycle with	1	10.9
Other	5	3.6
Nothing	3	1.8
More frequent bus services	2	1.8



The bus stop on the Dublin bound side consists of a pole on the narrow grass verge and the other bus stop was recently improved, but still lacks a footpath.



The Public Realm project provided detailed plans for road safety improvements at the school and the nearby junction. Kildare County Council recommended a table-top ramp and gateway platform with centre islands in their opinion report from 2018.

Location	Description of Works	Total Cost €
Killinagh	National School on the R403 2, 2km west of the main entrance to the landfill. Issues with speed and difficulties with parents getting in or out of the school.	€250,000 for signage, table tops, gateway platform with centre islands and smart signage

### Recommendation 3:

*It is recommended, in the interest of road safety and to enable children to travel to Killina National School by alternatives to car, such as by bicycle or public transport, that the Planning Authority stipulate a condition that a financial contribution is to be made by the applicant specifically to cover the costs of implementing road safety improvements at the school and the nearby bus stops, and that this measure is implemented before the expansion is opened to receive waste.*



## Derrinturn

The settlement of Derrinturn is on the haulage route north from the Drehid facility and the population has also grown significantly since the landfill first opened, from 1602 in 2016 to 1837 in 2022. New estates extend further now to the north-western end of the village, with no new traffic calming measures in place to accompany this expansion.

The crossroads on the southern edge of the village, Windmill Cross, is a collision black spot. Difficulties with lines of sight, due to the slight hill on the approach to the intersection, combined with lack of traffic calming to enforce speed reduction, appear to be the main cause. The Dublin bound bus stop was in a dangerous location but has been relocated in recent months.



Derrinturn is the settlement with the second highest level of haulage route traffic flowing through it, according to Chapter 14 in the application EIAR.

A signal controlled pedestrian crossing has been installed at the church in the last year, which was funded by the NTA. Specific funding to extend the traffic calming of the village out to the new estate, Cluain Dara, and on the approach to Windmill Cross from the Killina side is now needed.

### Recommendation 4:

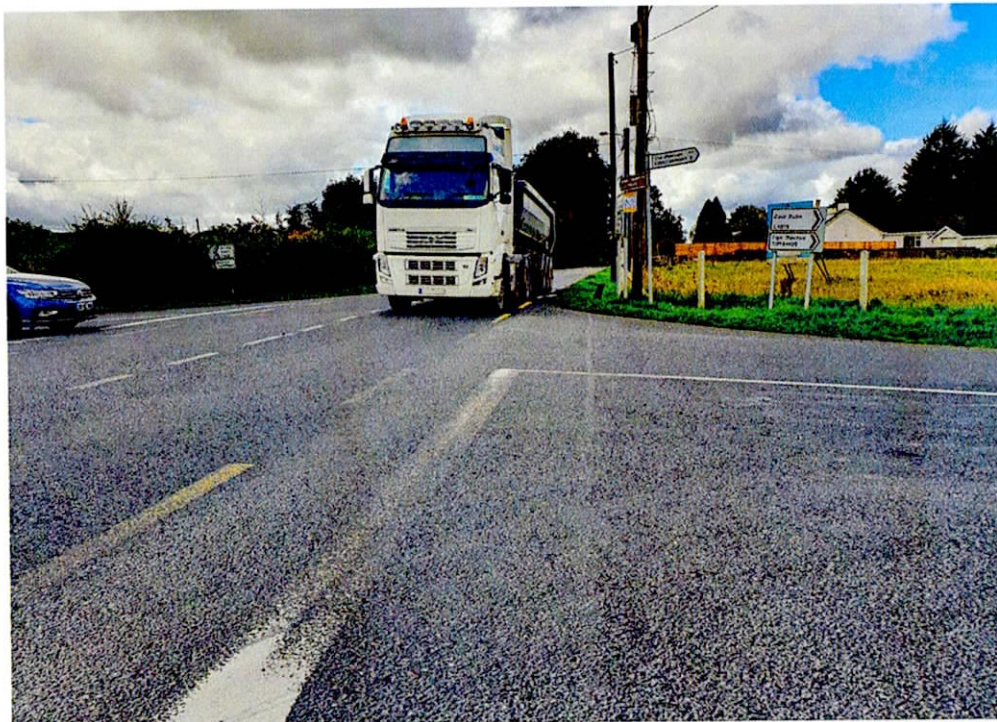
*It is recommended, in the interest of road safety, that the Planning Authority stipulate a condition that a financial contribution is to be made by the applicant specifically to cover the costs of implementing road safety improvements and traffic calming measures up to the Derrinturn village boundaries, and that this measure is implemented before the expansion is opened to receive waste.*



## Dag Weld's (Blackwood) Cross

Dag Weld's Cross at Blackwood, is another junction which was selected for prioritisation by Kildare County Council for the ongoing junction improvement programme. 42% of the HGV traffic to and from the Drehid facility travel through this junction, along with 37% of the LGV traffic.

It is a known accident black spot, due to the restricted lines of sights coming from the minor road and the Naas bound regional road on the south side of the junction. Several electricity and telephone poles impact the view coming from Coill Dubh. Cars from the Naas direction have to edge out to see clearly towards the Prosperous direction.



Given the heavy volume of traffic, and the increase in population in the nearby villages of Allenwood and Derrinturn, the junction has become increasingly busy.

If the Drehid facility is to continue to contribute to the traffic volumes at Dag Weld's due to the new expansion, then proper planning would require the junction to be upgraded in advance.

### Recommendation 5:

*It is recommended, in the interest of road safety, that the Planning Authority stipulate a condition that a financial contribution is to be made by the applicant specifically to cover the costs of implementing road safety improvements at Dag Weld's (Blackwood) Cross, and that this measure is implemented before the expansion is opened to receive waste.*

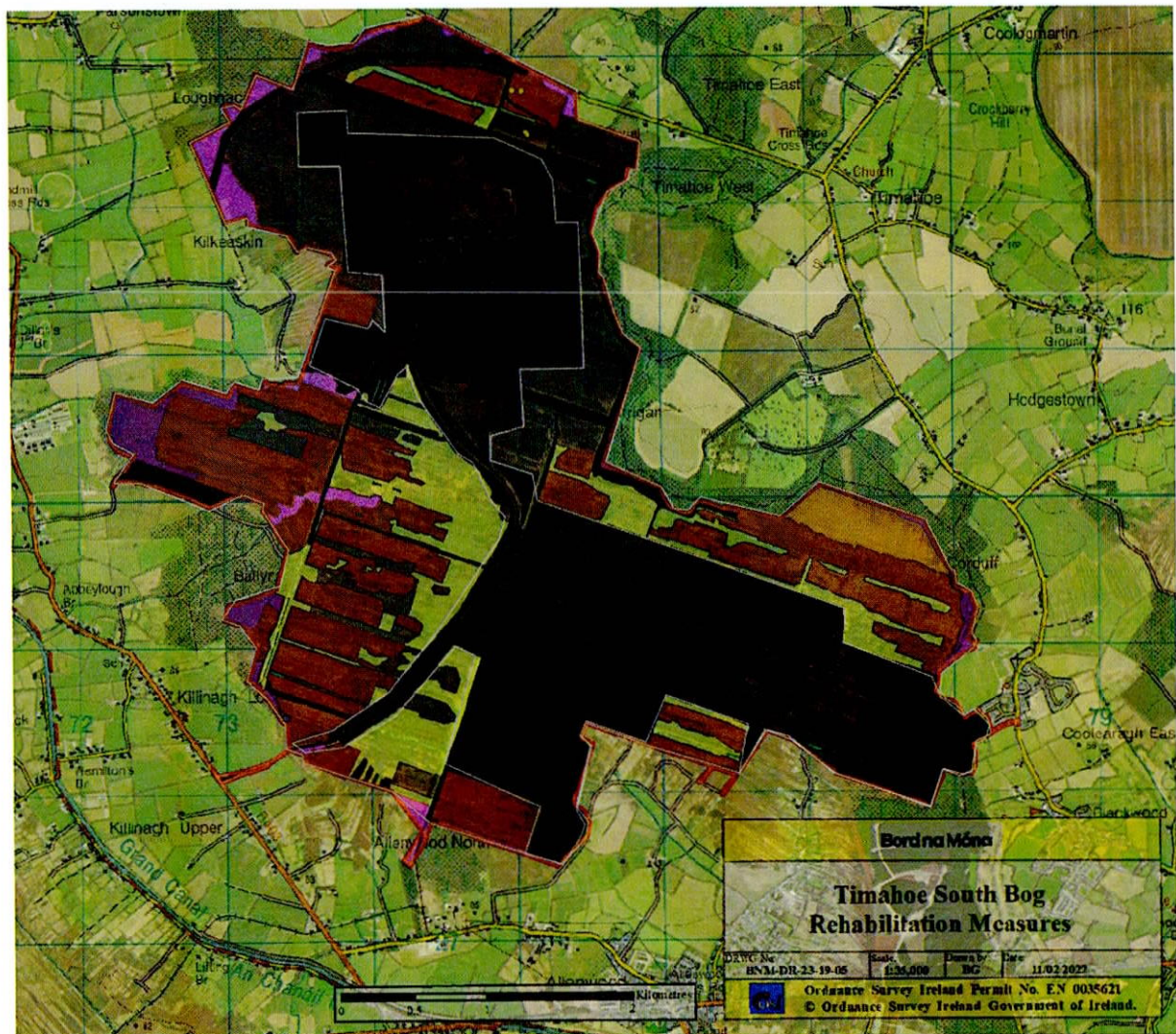


## Timahoe South Solar Farm

Construction is already underway on the large solar farm in Timahoe North Bog. It is noted from the proposed rehabilitation plan for Timahoe South Bog, that the developer intends to construct a similar solar farm in this bog also.

It is submitted that the developer's plans for these peatland areas are excessive and that the long term removal of these areas from the local peatland areas available for amenity and future habitat restoration would be unacceptable.

The developer has provided the latest rehabilitation plans for Timahoe South Bog in Appendix 2-2 of the EIAR. A large area is marked as constrained and described in the plan as the location for a proposed second solar farm.



Analysis of the constrained areas for both the landfill and the proposed solar farm using ArcGIS Pro shows that from the total cutaway area of Timahoe South Bog (1722 Hectares) that 762 Hectares (44%) have been marked as constrained from rehabilitation, leaving only 56% available for rehabilitation.



The Planning Authority is asked to consider the likelihood of the future EU Nature Restoration Law having an impact on lands like this at national level.

It is also noted that specific objectives exist in Chapter 9 of the Kildare County Development Plan 2023 - 2029 to attempt to manage the balance of peatlands that are restored and rewilded, having given consideration to the Biodiversity Crisis. On a county wide level, approximately 70% of former cutaway bogs are to be rewetted, restored and / or rewilded.

<b>RD O32</b>	<b>Encourage the re-wetting, restoring and/or re-wilding of former cutaway bogs and peatlands with an emphasis on maximising biodiversity and carbon sequestration to account for approximately 70% of cutaway bogs. Such projects shall be subject to Appropriate Assessment; shall have regard to any hydrological connection shared with a European Site and their qualifying interest species; shall not adversely affect drainage of surrounding lands; and shall account for any potential likely significant effects and provide mitigation and monitoring where appropriate.</b>
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Recommendation 6:

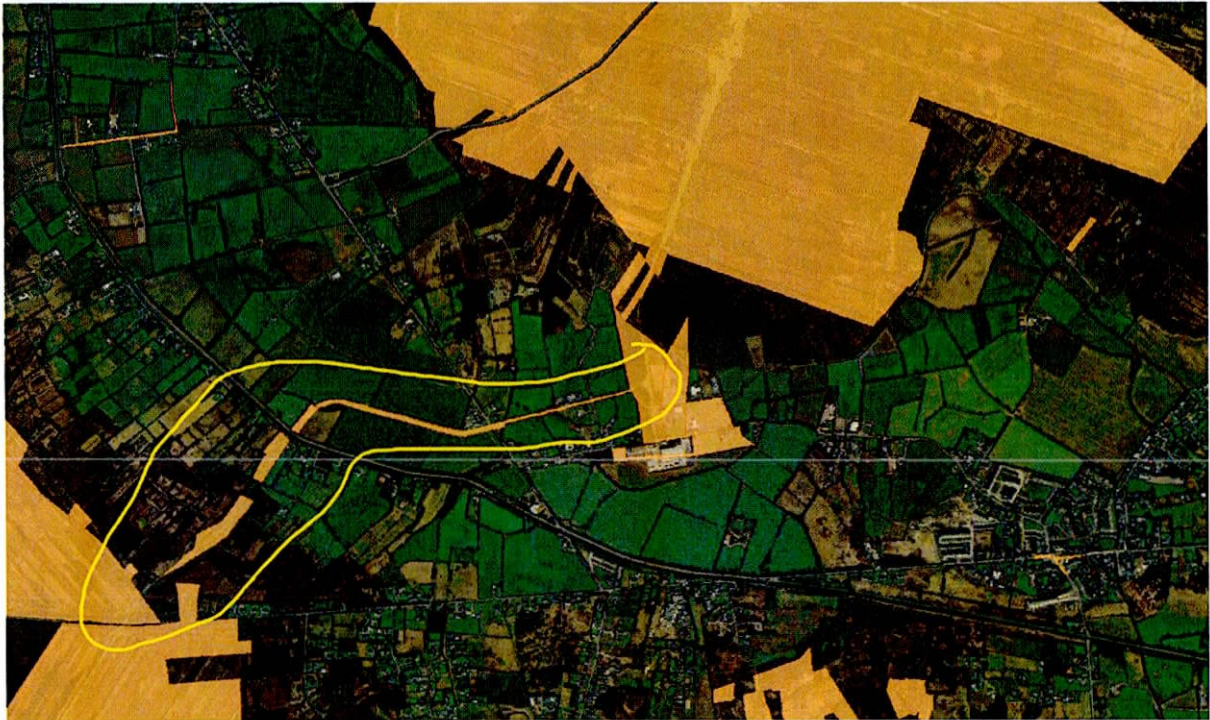
*It is recommended, in recognising the ongoing biodiversity crisis and the climate emergency, that the Planning Authority gives due consideration of the amenity and potential carbon sequestration value of Timahoe South Bog to the surrounding communities and prevents it being excessively exploited and irreversibly destroyed, and requests the developer to provide a revised rehabilitation plan with a larger area unconstrained.*



### **Permeability Link to the Grand Canal Greenway and Allenwood South / Lullymore**

The state lands database shows that Bord na Móna is currently managing the strip of land between the former ESB power station in Allenwood and the R414 in Allenwood South / Lullymore. It is the location of a former railway line used to transport peat to the power station by locomotive.

Several community facilities are currently based in the old power station grounds, and a community park and playground will commence construction here in September of this year.



As the developer has no longer a use for this land, it could be developed as a walking and cycling trail which would link up the future Grand Canal Greenway, and the heavily populated rural communities of Killina, Allenwood South and Lullymore with the power station.

As no significant walking trails or amenities have been proposed alongside the proposed development, and the only form of community gain is a small widely dispersed community fund for local groups, it is suggested that progressing this amenity would compensate for the loss of the large peatland area which is to be filled with waste for the proposed expansion.

#### Recommendation 7:

*It is recommended, in the interest of offsetting the loss of peatland amenity area, that the Planning Authority requests the developer to provide plans to progress and fund a link between the old ESB Power Station in Allenwood with the Grand Canal and the R414 in Allenwood South & Lullymore.*



## Toghers

As an observation, it is noted that the report on the toghers that once crossed the Timahoe Bog is very limited. It refers to pieces of toghers found at various locations, and describes 'short stretches of trackways'.

Yet, we know from more complete and thorough research, that the toghers traversed the bog from one piece of solid land to the other. An example is the detail that was provided when the Lullymore Bog toghers were excavated.

Given the lack of finds, it is impossible to believe that the excavation of the bogs was monitored adequately for together remains when they were being cut away.

Given the possible trajectories for the toghers based on the remains found, and other evidence, such as descriptions from the Civil Survey of the 17th century, I believe the assessment has been deliberately constrained in planning applications to date.

