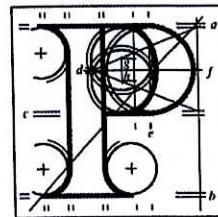


Our Case Number: ABP-317292-23



An
Bord
Pleanála

Lorraine Quinn
Drehid
Carbury
Co. Kildare

*soft
Hand copy rec'd
3rd July '23 via postal*
*Hand copy rec'd
4th July via post.*

Date: 10 July 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 Madam,

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.

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

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Websíte	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

Lorraine Quinn
Drehid
Carbury
Co Kildare
03-07-2023

An Bord Pleanála
64 Marlborough Street
Dublin 1.

Bord Pleanála Case reference: PA09.317292

Re: Bord Na Mona Proposed further developments to the existing Drehid Waste Management Facility in its landholdings located within the townlands of Timahoe West, Coolcarrigan, Killinagh Upper, Killinagh Lower, Drummond, Drehid, Kilkeaskin, Loughnacush, and Parsonstown, County Kildare.

Dear Sir / Madam,

I wish to make the following submission and request the bord to refuse this application by Bord na Móna Plc for an extension of the existing Drehid Waste Management Facility (developed pursuant to a grant of permission from Kildare County Council (Ref. 04/371) and An Bord Pleanála (Ref. PL09.212059)) to provide for the acceptance of up to 440,000 tonnes per annum (TPA) of non-hazardous waste material.

Serious consideration should be given to the Inspectors report on a previous application (ABP-300506-17) which was justly refused planning permission.

The Applicants "Pre planning public information event on Thursday the 14th of July 2022, was a complete farce. This event was NOT public consultation. No details of the intended haul routes were on display and the plans were presented as "a fait accompli". When questioned the representative simply replied that haul routes were "yet to be determined" – That is not proper public consultation in accordance with the Aarhus Regulation 1367/2006/EU

I consider that such changes would be likely to have a major negative impact on the environment due to:

- Major increase in traffic
- Major increase in vermin
- Major increase in flies creates risk of airborne disease

- Further airborne pollution to the environment, smells / odours
- Unknown origin of the proposed additional waste
- National increase of vehicle movement over long distances creates greater CO2 pollution to the environment.
- Negative impact on homes and amenity lifestyle due to the impact on the environment.
- Possible / Probable water pollution
- Risks of unknown waste carried by birds to other lands

The unacceptable rise in traffic from source to site will have the greatest impact for those living closest to where the site exists and also along the haulage routes. The impact on the road infrastructure, rural minor roads and bog roads, which were not built for the heavy volume of HGV traffic that would ensue, would cause serious problems. Already homes are experiencing vibration from these heavy HGV Trucks.

"ABP-300506-17 Inspector's Report Page 9 of 182

4.1.2. Other Technical Reports Transportation Section

This section is of the opinion that the proposal should be refused for the following;

The increased HCV (note: in the context of this appeal, all parties have used the terms 'HCV' and 'HGV' interchangeably to refer to waste and related heavy vehicles) traffic will endanger public safety on the local (substandard) road network.

It would endanger public safety by way of traffic hazard and obstruction of road users due to the movement of the extra traffic generated.

"The proposed development would, therefore, give rise to traffic congestion and would endanger public safety by reason of traffic hazard"

Nov 2022 - Reported accident on the Clane / Sallins Road – "a lorry lost control and crashed through the wall of a bridge over the Liffey in Clane" The vehicle was carrying a cargo of domestic waste.

Images of the truck and its contents in the River Liffey



The possibility / probability of contamination to the water and aquifers is extremely high given the fact that leachate does occur. The applicants' assurances and proposed mitigation measures are unproven and therefore unacceptable.

The use of the word "unlikely" when talking about any impact to underground water is not acceptable.

Given the state of water in Ireland and the ongoing pollution in many areas, aquifers, streams & rivers must be protected from all possibilities of potential contamination.

Water is not a commercial product like any other but, rather, a heritage which must be protected, defended and treated as such.

The EU Water Framework Directive establishes a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater. It aims to prevent and reduce pollution, promote sustainable water use, protect and improve the aquatic environment and mitigate the effects of floods and droughts

Ireland has been referred to an EU court over its failure to adopt laws on protecting water quality. (Date released: October 13, 2022)

- Water quality in Ireland has further declined. While improvements are being made in some areas, these are being offset by declines in water quality elsewhere.
- At the current level of progress, Ireland will fail to meet the EU and national goal of restoring all waters to good or better status by 2027

The EU Water Framework Directive (2000/60/EC) requires all Member States to protect and improve water quality in all waters so that we achieve good ecological status by 2015 or, at the latest, by 2027. It was given legal effect in Ireland by the European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003). It applies to rivers, lakes, groundwater, and transitional coastal waters. The Directive requires that management plans be prepared on a river basin basis and specifies a structured method for developing these plans.

6.2 EXISTING ENVIRONMENT - Non-Technical Summary (pg 10)

"Hydrological connectivity however was identified between the proposed development to the following European sites; River Barrow and River Nore SAC (002162), the River Boyne and Blackwater SAC (00229), the River Boyne and River Blackwater SPA (004232 and the Boyne Coast and estuary SAC (001957)"

The Cushaling River is a surface water pathway between the Proposed Development and both the SAC and drinking water protected area. The Cushaling River becomes the Figile River in the downstream direction (near Ticknevin). The latter merges with River Barrow near Monasterevin,

There is, nevertheless, a risk present from the Proposed Development on both the SAC and drinking water protection area

1. One sub catchment incorporates both the existing WMF and the landfill expansion area, and drains to the Cushaling River (Figure 8-• A pipe culvert outflow from the old settlement ponds to Cushaling River.

the Proposed Development is located entirely within the sub catchment of TSB that drains to the Cushaling River. Under the Proposed Development, the Cushaling River will receive additional discharges from the new landfill

Whilst the Cushaling River is not a designated site or protected area, it is a headwater of the River Barrow and as shown in Figure 8-5, the Cushaling River is hydrologically connected to: • The River Barrow and River Nore Special Area of Conservation (SAC).

Mitigation includes using a pump as stated in the below image –

So, in times of reducing emissions BNM will use diesel generated pumps!!!



Photo 5 Hand-Carried Sump Pump

As described in Section 8.4.21 and Section 8.5.2.2, the pumped water will be directed to swales which will lead the water to attenuation lagoon and ICW systems before draining to the Cushaling River. In Stage 1 construction, the pumped water will be led to the existing attenuation lagoons and ICW system, south of the WMF. Once the new attenuation lagoons and ICW system is constructed in Stage 1 of the Proposed Development, water from sump pumping will be led to this system. In both cases, the respective attenuation lagoon and ICW systems serve to mitigate potential effects on the Cushaling River.

2. "8.5.2.8 WFD Status of Surface Water Bodies A WFD compliance assessment of the Proposed Development is presented in Appendix 8-4. Key aspects of the assessment are described below. The Cushaling River, as the principal receiving water body, is part of the Figile_010 river water body. The water body is classified as being at "Poor ecological status" in the period 2016-2021 (see Section 8.4.6), and is associated with "Poor invertebrate status or potential". Impaired water quality and river morphological conditions are likely contributing to the "Poor invertebrate status or potential"

Describing the Cushaling River as being of "Poor ecological status" is not an excuse to pollute it further –

What inspections / if any have been carried out in relation to the membrane used on the existing landfill which is in operation now for close on 20 years

The manufacture indicated that the membrane used had a life span of 20 years before it disintegrated.

Already, the existing waste facility is an unknown possible Pandora's Box. If, at any time now or in the future any noxious leachate escapes into water accidentally or through liner/glue failure in the future, a massive loss of water supply throughout would ensue. To increase this possibility or indeed eventual probability in any way, the continuation of this site could prove to have very hazardous and uncontrollable consequences.

Has an application for substitute consent been made separately to An Bord Pleanála under section 177E of the Planning and Development Acts or would one be required to do so considering the previous uses of the so mentioned bog in the application

"Bord Na Mona was found to be in breach of its license in the Management Facility in June 2013 by the Environmental Protection Agency (EPA). Failure to comply as the EPA found, including the acceptance of 14,000 tons of untreated cleansing waste and lack of documentation to show the BMW composition of waste matter accepted. There were discrepancies in the recording of actual tonnage accepted. Discrepancies were also noted when weighbridge records were compared with 2012 Q4 Report. It appears that it was not clear whether some waste was household or commercial."

The photographs submitted as part of the application are not very accurate – VP5 –

(Montage post-mitigation establishment)

Local road, Timahoe East VP5



My Image taken on Saturday 1st July 2023 from VP5



Notwithstanding that this development is happening in a bog, be it a cutover bog it is still a carbon sink and on the matter of climate change it is of grave importance.

I therefore request that this planning application be refused in its entirety.

Yours sincerely.

Handwritten signature of Lorraine Quinn in blue ink.

Lorraine Quinn N.K.E.P.G