

Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's name

Dermot Keenan Elaine Keenan

(b) Observer's postal address

Derrylea, Monasterevan, Co. Kildare. W34EY95

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

324055

- (b) **Name or description of proposed development**

Proposed development of a 9-no. wind turbine renewable energy project and 110kV on site substation

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

In the townlands of Cushina, Clonsast Lower and Chevychase or Derrynadarragh near Bracknagh, in County Offaly and the townlands of Aughrim and Derrylea near Monasterevin in County Kildare

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

1. Introduction and local context

We are the residents of the property identified in the Environmental Impact Assessment Report (EIAR) as Residential Location R42, located on L-70481 (Derrylea Road) in the townland of Derrylea, County Kildare.

Our home forms part of a small group of nine dwellings (R37, R40, R42, R44, R46, R47, R49, R51, R53) situated along this local road. These houses share a common rural setting and community character and are among the nearest occupied dwellings to the proposed Derrynadarragh Wind Farm with Turbine 1 at 810 m from our house.

L-70481 is a narrow, tree-lined local road, notable for a mature avenue of trees with an estimated age of 150yrs that extends along both verges (See **Pics 2-5 Section 5**). The road is extensively used by residents and visitors for walking, running, and seasonal recreation such as collecting chestnuts and observing autumn foliage. It is also part of the proposed underground grid-connection route and will be used for pre-construction traffic before completion of the new Cushina River bridge.

L-70481 is not part of the primary turbine-delivery route, which connects from the R419. This submission concerns the elements of the proposed development within County Kildare, particularly the works proposed along L-70481 (Derrylea Road) and the potential effects on the adjoining residential community and the mature tree avenue.

2. Basis for objection

2.1 Inadequate assessment of mature trees and elevated risk of loss

The NIS acknowledges the presence of mature roadside trees along L-70481 and proposes trenching for the grid connection along a section of this road.

Appendix 16 of the NIS (*Arboricultural Report*) confirms that excavation will occur within the root protection zones of these trees and that an arborist will supervise and conform to BS3998: 2010 Tree Work and follow Section 6.5.5 of the Purple Book 2015 "Guidelines for Managing Openings in Public Road".

While this acknowledges the issue, it does not demonstrate that the works can be completed without irreversible root damage.

There was no detailed methodology for this work within the original EIAR submission and only on our request was methodology prepared by Arbtech Ireland on behalf of Inis Onshore Wind, with the intention to **retrospectively** add it to the existing "Arboricultural Report." This report contains no detail on the management of large plant entering the site for construction activities and the risk of physical contact to trees and overhanging growth.

There is admission in the Arbech Ireland methodology report of irreversible negative impact to the avenue of trees as stated below in report within sections **6.12** to **6.15**.

6.12 *Construction activity can negatively impact trees, causing temporary and lasting damage.*

unless measures are taken to ensure the rooting systems, stems, and crowns of trees are sufficiently protected during construction works.

6.13 *Compaction caused by construction traffic and root severance during excavation can*

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cause damage and death to affected sections of the root system, negatively impacting living processes, potentially destabilising the tree, and creating conditions favourable to the ingress

of wood decay fungi.

6.14 *Bark damage to the stems of trees during construction can cause necrosis of the underlying tissue and create conditions favourable to the ingress of wood decay fungi.*

6.15 *Mechanical damage to the crowns of trees during construction causes the loss of photosynthetic material, and damages woody material, creating conditions favourable to wood decay fungi.*

The trees form a continuous, mature avenue of significant landscape, ecological, and cultural value for the Derrylea community and wider area.

No Tree Preservation Order (TPO) is currently recorded for these trees in the Kildare County Development Plan 2023–2029 or on the Council’s interactive planning map, yet section 205 of the Planning and Development Act 2000 (as amended) empowers the Council to make one.

We respectfully request that Kildare County Council:

1. Refuse permission for the grid-connection route along L-70481 unless the applicant can demonstrate that no trenching or excavation will occur within the root zones of mature trees; or
2. At minimum, require a redesign of the grid-connection alignment to avoid the tree avenue and a Tree Protection Order to ensure its preservation.

These trees are irreplaceable within any reasonable timeframe. Replacement planting, as mentioned in the EIAR, cannot restore their ecological or amenity value for generations.

2.2 Construction traffic, safety, and amenity

L-70481 is a narrow rural road, bordered by mature trees and grass verges, without footpaths or lighting.

The EIAR (Chapter 14 – *Traffic and Transportation* and Appendix 14 – *Traffic Management Plan*) identifies that this road will carry pre-construction and grid-connection traffic, including heavy goods vehicles (HGVs) transporting materials and plant.

The route is regularly used by pedestrians, runners, children, and families from the surrounding area.

The introduction of construction and cabling traffic on this road would create serious road-safety risks, increase the potential for verge and root damage, and disrupt everyday community use of what is effectively an informal local amenity.

The completion of the Cushina River bridge is a key project milestone as the application states “*an additional access from L-70481 will be used for construction on the south of the river Cushina, prior to completion of the bridge crossing*”. There is no indication within the Planning application of a projected bridge works completion timeline within the construction phase therefore the L-70481 road could be used for the majority of construction traffic.

The Traffic Management Plan discusses turbine delivery on regional routes but omits any feasible plan for this section of the grid connection.

The applicant’s assertion that all traffic impacts will be “minor and temporary” is therefore unsupported as the plan details the movement of 84 HGV/LGV vehicles per day at start of Construction or 8 per hour and peaking at 107 HGV/LGV vehicles per day during construction months 10-12 or 11 trips per hour on rural roads.

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There are several other Solar Farms (ABP-318436-23/ABP-310367-21) along the L7178 Treason/Bishopswood road which links with the L-70481 at various stages of planning. There is another solar farm at Kilmullen/Ullard (Laois planning file ref.250611) due for decision. There are upgrades to existing 110Kv Overhead lines in Inchacooly (case ref 2560147) due for decision.

The possible cumulative effect should all or any of these planning applications be granted and construction overlap will result in total congestion of our rural roads and years of disruption. Due to the possibility that all these activities may occur concurrently the relevant Councils must consider the cumulative disruption of all current applications granted and pending in our area and associated traffic volumes which has not been done as part of this application.

There is no reference to the L-70481 as a Haul Route in Volume 14.2-“Figures” from Kilmurray Sand and Gravel Quarry or Roadstone Quarry Tullamore, yet this is the main construction route prior to completion of the Cushina river bridge.

Given these deficiencies, we submit that the proposal is contrary to the proper planning and sustainable development of the area.

If the Planning Authority were to consider approval, strict limits on traffic movements, timing, and road reinstatement would be necessary, but the lack of space for safe passing or footways makes even temporary HGV use incompatible with the character of L-70481.

2.3 Incomplete noise and cumulative impact assessment

The EIAR (Appendix 8.5, Table 8-24) lists cumulative noise levels for a number of receptors but omits R42 and the Derrylea cluster.

This omission is significant because Cushina Wind Farm, approximately 4.3 km north-west, is the only nearby development capable of contributing to cumulative turbine noise.

Without modelling the Derrylea dwellings, the applicant has not demonstrated compliance with the Wind Energy Development Guidelines (2006) criteria (35 dB LA90 or +5 dB above background).

Predicted turbine noise at R42 is 28–39.7 dB LA90 (10 m height), but no background measurements were taken in this area.

The cumulative omission means the EIAR cannot support the conclusion of “no significant effect”.

We therefore request that permission be refused based on inadequate assessment.

Alternatively, if further information is sought, a complete re-model of the Derrylea cluster should be required before any decision.

2.4 Night-time lighting and loss of rural character

The EIAR confirms that the turbines will be equipped with steady red aviation lights visible from nearby dwellings, including the Derrylea cluster.

No assessment of night-time visual impact or mitigation such as shielding or adaptive lighting has been provided.

In a low-ambient rural area, these lights would be visible from all houses on L-70481 and would represent a constant source of light pollution, contrary to Policy NH 5.9 of the Kildare County Development Plan (to protect rural dark-sky character).

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2.5 Construction noise hours and community disturbance

The CEMP adopts standard working hours of 07:00–19:00 Monday–Friday and 07:00–14:00 Saturday.

For a quiet residential area with families and young children, a 07:00 start is inappropriate. The nearest dwelling (R42) is within a few dozen metres of the works area for the grid connection, where excavation, ducting and reinstatement will occur.

Early-morning machinery operation would cause unacceptable disturbance to residential amenity and breach the Council's stated objective to "protect the amenities of rural dwellings and the character of rural areas" (CDP Policy RS 5.3).

2.6 Inadequate and token amenity provision

The EIAR describes the "amenity area" within the wind-farm site as a grassed space with two car-parking spaces and a picnic bench.

Access to this amenity area is only proposed via the L-70481 Derrylea road with no access for any amenity trail.

Based on recent visit to the nearby Moanvane Wind Farm in Ballykean Walsh Island Co.

Offaly and evidence of this Amenity area bringing an element of Anti-Social behaviour to the area (see **Pic 1 Section 5**) I request the removal of plans for any Amenity Area in Derrylea to be removed from the Application as it is of no benefit to our area.

In contrast, the project's construction and connection works would cause direct loss of established public amenity along L-70481 by damaging or restricting access to the tree-lined road used by the local population for recreation.

The claimed "amenity area" therefore does not offset the real and permanent amenity loss caused by the project and will likely lead to Anti-Social Behaviour and unwelcome gatherings and activities.

3. Summary of key grounds for refusal

1. **Inadequate protection of the mature tree avenue on L-70481**, posing irreversible loss of landscape and amenity value.
2. **Unassessed safety and traffic impacts** from construction and cable-laying works on a narrow community road.
3. **Incomplete cumulative noise assessment**, omitting the Derrylea cluster and Cushina Wind Farm interaction.
4. **Unassessed night-time lighting impacts** on nearby dwellings and the rural dark-sky environment.
5. **Unsuitable construction hours** in proximity to occupied houses with young families.
6. **Minimal and inadequate amenity provision**, failing to compensate for local disruption and landscape impacts.

For these reasons, the proposal would seriously injure the amenities of the area, endanger public safety by reason of traffic hazard, and conflict with the objectives of the Kildare County Development Plan 2023–2029, particularly Policies NH 5.5, NH 5.9, and RS 5.3.

4. Conclusion

We respectfully request that Kildare County Council recommend refusal of permission to An Coimisiún Pleanála for the sections of the Derrynadarragh Wind Farm project within County Kildare, in particular the proposed grid-connection and construction work along L-70481 (Derrylea Road).

Should the Council consider any form of approval, we request that it first require:

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- Full re-routing of the grid connection to avoid the mature trees.
- A Tree Preservation Order on the Derrylea Road avenue.
- Revised construction hours (not before 08:00 on weekdays, 08:00–13:00 on Saturdays, none on Sundays or public holidays).
- Completion of a cumulative noise model including Cushina Wind Farm; and
- Independent road-safety and arboricultural assessments.

Pic 1: Moanvane Wind Farm Amenity Area.

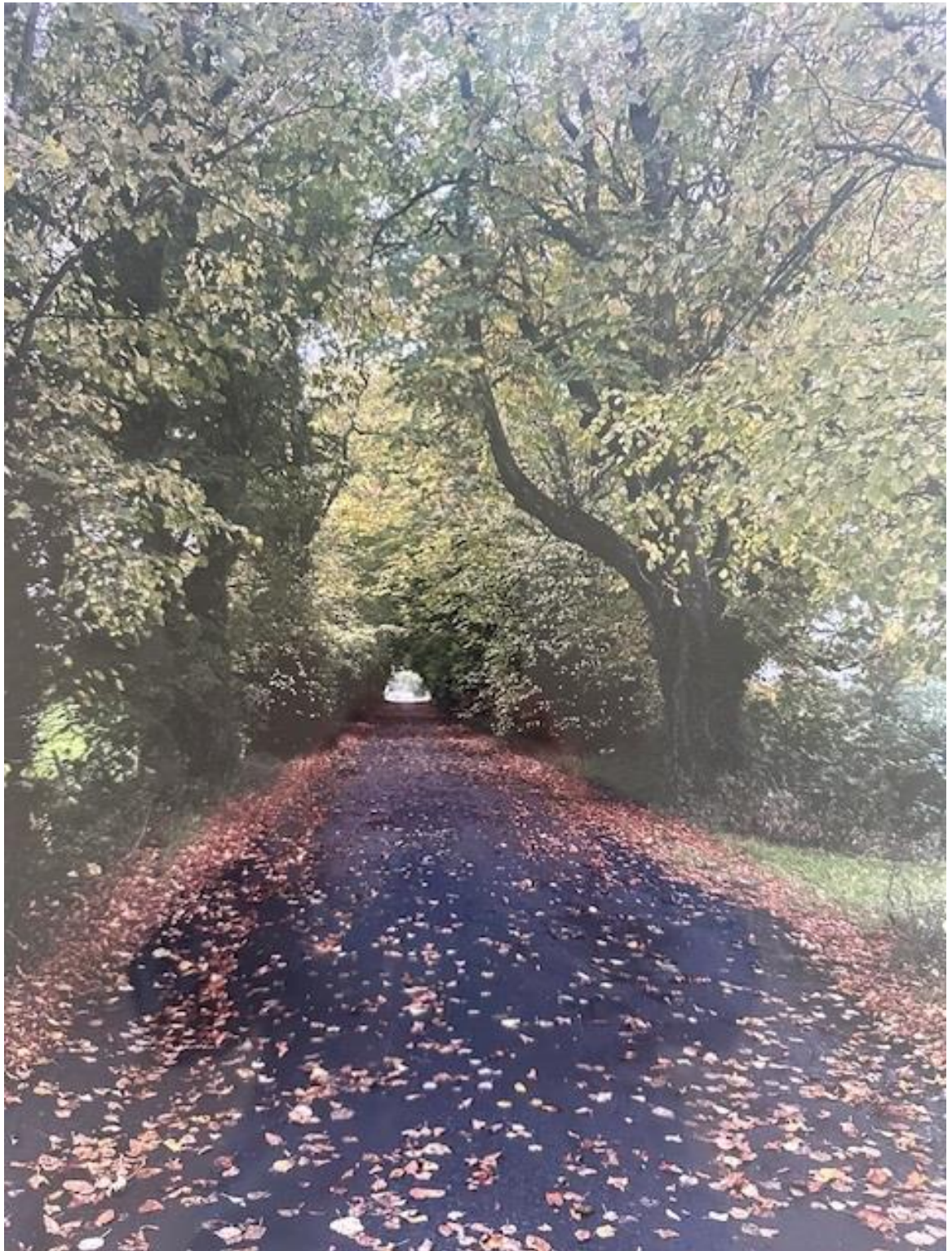


Pic 2- 5: Derrylea Tree Lined Avenue.

5. Grounds



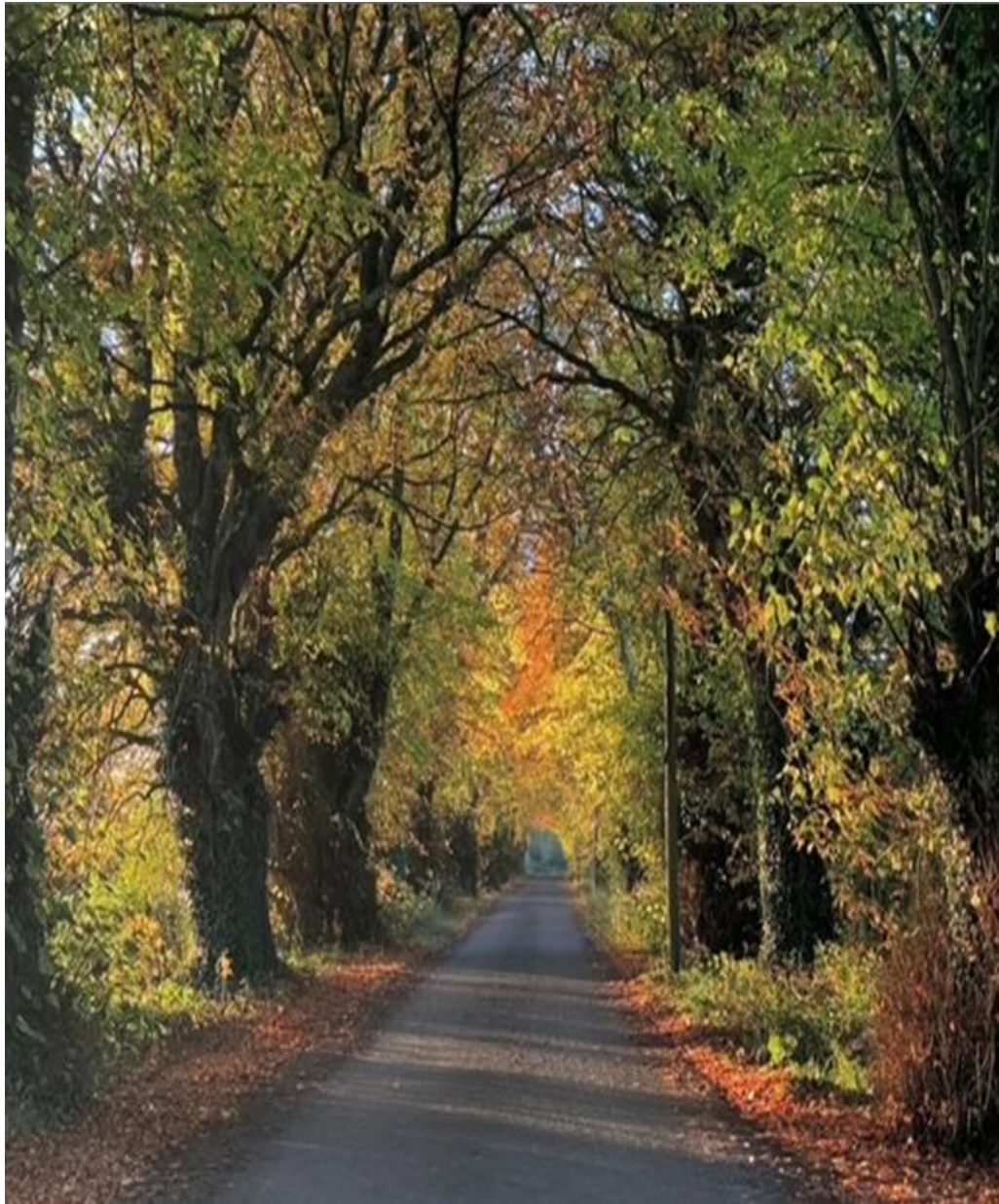
5. Grounds



5. Grounds



5. Grounds



Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request.

Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observations.

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes