Observations on a Strategic Infrastructure Development Application

Case Reference: 324055

Derrynadarragh wind farm comprising of 9 no. wind turbines, onsite 110KV substation, turbine delivery route and a grid connection route.

OBSERVERS' DETAILS

Observers' names: William and Suzanne Blackley

Observers' postal address: Derrylea, Monasterevin, Co. Kildare W34 T952

Case Ref: 324055

Description: 10 year permission for Derrynadarragh wind farm comprising of 9 no. wind turbines, onsite 110kV substation, turbine delivery route and a grid connection route

Location of proposed development: Located across various townlands in County Kildare, Offaly and Laois.

INTRODUCTION

We, the residents of one of the houses at Derrylea closest to Turbine 1, submit these observations regarding the proposed **Derrynadarragh Wind Farm (Case Reference: 324055)**, comprising nine wind turbines, an onsite 110kV substation, and associated infrastructure, including underground high voltage power cables. While we support Ireland's transition to renewable energy, we have serious concerns about the irreversible damage this development may cause to our local environment, heritage, and quality of life.

Our primary objection focuses on the proposed routing of underground high voltage cables along a historically significant, narrow tree-lined avenue, which is a cherished local amenity and a remnant of Derrylea House (demolished circa 1942). This avenue, lined with mature chestnut and lime trees dating back at least 150 years, is widely used by the community for walking, jogging, cycling, and recreational activities. The trenching required for cable installation poses a substantial risk to the root systems and long-term viability of these trees, as confirmed by an independent report from Independent Tree Surveys Ltd.

Additionally, we are deeply concerned about the disruption and lack of access impact of routing cables along the flood-prone L70481 Derrylea Road, which serves as the sole exit route for residents of the nine homes at Derrylea, our long-established horticultural business, and farmers tending their agricultural land along the laneway to Derrylea Bog. The road's narrowness, combined with its overhead arch of mature trees, make it unsuitable for heavy construction traffic and prolonged closure.

While we acknowledge the need for renewable energy, we believe alternative routing and mitigation measures must be explored to protect this unique landscape and a beloved amenity in our community. Our detailed observations below address these issues, supported by expert evidence and firsthand experience.

LOCAL AMENITY, RECREATION AND HERITAGE LANDSCAPE IMPACT

Under 6.2 Population in the Non-Technical Summary of the planning application, Dara Energy Ltd states:

"One of the principal concerns in the development process is that individuals or communities should experience no significant diminution in their quality of life from the direct, indirect or cumulative effects arising from the construction, operation and decommissioning of a development."

Potential irreversible damage to mature tree-lined avenue: Our main concern as a resident at Derrylea is that the development will affect us and the other local residents because the proposed development involves the underground installation of high voltage power cables along a historically significant, narrow, tree-lined avenue, posing a substantial risk to the root systems and long-term viability of mature chestnut and lime trees dating back at least 150 years.

It is a cherished local amenity, widely utilized by families and those with children in the community for walking, jogging and running, cycling and other recreational activities such as exercising our dogs. It adds greatly to our environment, and its loss or degradation would diminish both the cultural heritage and recreational value of the area. (See Figure 1, Figure 2, and Figure 3 below)

Historical Background: This avenue was formerly the principal avenue to an old house built circa the early 1800s, named Derrylea House. The house was demolished around the year 1942, and the avenue of lime and chestnut trees is all that remains. (We include a historic map of Derrylea in Figure 4 below).

The avenue of trees is made up of a large number of specimens of high value, which would normally constitute a significant constraint to development works (see report below by Independent Tree Surveys Ltd.) Two lines of trees are set approximately 7m apart and the severance of roots at around 3m from a mature tree is likely to have a significant negative impact on their physiological and structural condition. The loss of root mass could allow the entry of decay fungi into the trees, cause a loss of anchorage and stability, leading to the premature decline and death of the tree. This could create a serious health and safety risk to users of the avenue, as well as affecting the conservation value of a much-loved local amenity.

Independent Tree Survey: To substantiate our concerns about the danger of irreversible damage to the historic tree-lined avenue, we include a detailed report by a qualified tree surgeon, John Morgan of Independent Tree Surveys Ltd. (See Figure 7. 'Preliminary Tree Report' below)

In this report, John Morgan states that our primary concern as residents is *"the trenching works to facilitate the new connection as this could sever roots from the avenue trees,*

leading to injury, loss of anchorage, fungal infection and potentially severe impacts on the trees, which are held in high regard locally."

Financial Tree Bond: As well as detailed advice regarding tree protection in his report, Mr Morgan also suggests that, if the wind farm development goes ahead, the planners should specify that the project company submit a substantial financial tree bond prior to commencing works. This Financial Tree Bond could be refunded following full compliance with the tree protection conditions.

It has been suggested that all the mature limes and chestnuts which are classed as Category A or Category B should have an average financial tree bond of around 5,000 euros each.

IMPACT ON THE ENVIRONMENT

Protection of Wild Life: We have a variety of wildlife in our area and would hope that Dara Energy Ltd, if the wind farm goes ahead, would put in place protection for migrating birds such as the whooper swans, which have been sighted on Derrylea Bog. We have seen resident birds such as barn owls around Derrylea and on Derrylea Road, and bats. We have had bats nesting in our shed and frequently see them flying at night.

TRAFFIC AND TRANSPORTATION ISSUES

Dara Energy Ltd states in its planning application that the underground cabling will traverse the following roads: L70481 (Derrylea Road); L71764; L7050; L7051; L7176; L71761; R424; and R420 (Lea Road).

We will be badly affected by the inevitable closure of the Derrylea Avenue/Road (L70481). This narrow avenue, with its overhanging arch of old trees is not, in our opinion, suitable for heavy goods vehicles and machinery. Damage to tree branches could also occur, and the road will be unusable for walking, running, cycling, and other activities during the installation.

Dara Energy Ltd states: *"The use of heavy goods vehicles, light goods vehicles and the transport of materials will be involved with the grid connection works. The grid connection construction works will require temporary road/lane closures along the proposed route with traffic management measures such as stop/go systems."*

We are very concerned about the use of the narrow Derrylea Road, the L-70481, for the laying of the high voltage underground cable because this is our only exit from our house at Derrylea. The trenching for electric cables along the L-71764 and L-71765 will cause significant disruption to the local community. The residents of Derrylea and the surrounding locality use these roads for travelling to work and taking children to and from school. As it is, the Derrylea road is so narrow that cars often have to pull in to allow others to pass, as is also the case on parts of the roads towards Monasterevin and Ullard.

Derrylea Trees: Our horticulture & nursery business - Our horticulture business is situated at Derrylea and Ullard/Controversy Land. We have had a horticultural nursery

business at Derrylea since 1990 and also have nurseries at Ullard, so we will be affected by the road trenching and cable laying as follows: (See the *Derrynadarragh Wind Farm Map Ref: Figure_14.5 Traffic Management Plan Grid Route Overview OSM 07Jan26.pdf*. We enclose a copy of this map with the routes highlighted that will affect our business in Figure 5.)

D – E L-71761

E – F L-7176 Our main tree nursery is on this road (Ullard, Controversy Land) so we will require access to it during working hours Monday to Saturday inclusive. We have marked on the map with an X in Figure 5 where our nursery is situated.

F – G: L-71764 and L-7050

G – H: L-71764 or L-71765

H – I: L-71764

I – J: L-70481 Our main office and another nursery are situated at Derrylea with our only access along the L-70481. We have marked with a circle on the map in Figure 5 where this is. We will require access for our vehicles and staff during working hours from Monday to Saturday inclusive.

Please note that this is also where our home is situated and we have marked this on the map with an H. We are one of the closest houses in Derrylea, if not the closest, to Turbine 1, which is, we believe, approximately 800 metres away from the back of our house facing north.

Our only access to the roads to the local towns of Monasterevin or Portarlington is via the avenue at Derrylea (L-70481, Derrylea Road). To reiterate, road trenching for cables and diversions will inevitably cause lengthy delays for us and for our staff because there is no other way out of Derrylea, nor for the residents of the other eight houses here. We have no option but to use the tree-lined avenue. We feel this will create difficulties for our day-to-day trade. Our vehicles range in size from cars to a lorry and we frequently tow trailers of trees either behind a jeep or behind the lorry. It is vital that any partial road closure or stop-go set up has enough room for our vehicles to exit to the local towns or Monasterevin and Portarlington.

For verification of our long-established horticulture business at Derrylea, please visit our websites at https://www.hedgingireland.com/ and https://www.semimaturetreesireland.com/

Part of the River Barrow floodplain: The avenue leading to the cluster of houses at Derrylea has had several serious flooding incidents over the 35 years we have lived here. While Dara Energy Ltd states it will take precautions against flooding in other areas of the development by installing drainage, it might prove more difficult to create drainage for a sporadic flash flood that occurs when a major river, such as the Barrow, overflows its banks to cover farmland, public roads and the Derrylea Road. (See Figure 6 of flooding at Derrylea and on L-71764). On occasion, these roads have been impassable by car.

DARA ENERGY LTD'S COMMUNITY BENEFIT PACKAGE

While we acknowledge Dara Energy Ltd's offer of financial benefits to local communities, we believe that the car parking and picnic bench offered in the Community Benefit Package proposed by Dara Energy is inferior to what we already have and what we might potentially lose if the avenue of trees at Derrylea is damaged, or the trees die as a result of this development.

Dara Energy states the following: *"As part of this Development Proposal, an amenity space is being proposed to be located to the south of the wind farm site. This amenity space will include a grassed area with picnic benches, and 2 no. dedicated car parking spaces for visitors. The Applicant will set up a community benefit fund which will allocate funds from the Proposed Development to community groups in the area…"*

We, the residents of a house at Derrylea, do not consider this amenity space offered by Dara Energy to be necessary and believe it might even take away from the unspoilt landscape of Derrylea Bog and attract undesirable visitors after dark. With our avenue of historic trees and the natural turf bog, owned by Bord na Mona, accessed by the Derrylea Road past our house, we have no need for two car parking spaces with picnic benches. There is plenty of room for cars to park already, if people wish to do so.

AIR QUALITY AND CLIMATE

Dara Energy Ltd mentions in its planning application that residents they spoke to suggested solar energy instead, but the company maintains that it would take more land acreage to provide the equivalent energy from the proposed wind farm.

Under the heading of Air Quality and Climate, Dara Energy Ltd states:

"Should the proposed development not be developed, fossil fuel power stations will likely be the primary alternative to provide the required quantities of electricity. This will further contribute to greenhouse gas and other air pollutant emissions, as well as hindering Ireland in its commitment to meet its target to increase electricity production from renewable sources and to reduce greenhouse gas emissions."

We would not agree with this statement if it is applied to the local community because more and more of the residents in the area are interested in creating their own electricity using solar energy. We have ourselves recently signed up with Activ8/Airtricity for 18 solar panels to be placed on our hay barn roof in order to provide electricity for our home.

CONCLUSION

We wish to reiterate our support for renewable energy and recognize its critical role in Ireland's sustainable future. Our recent investment in 18 solar panels for our home underscores our commitment to this transition. However, the proposed Derrynadarragh Wind Farm development raises significant concerns that must be addressed to protect our horticulture business, local heritage, environment, and community well-being.

The underground installation of high voltage cables along the historic tree-lined avenue poses an unacceptable risk of irreversible damage to mature chestnut and lime trees, which are not only a cherished local amenity but also a vital part of our cultural landscape. The potential for root damage, fungal decay, and tree loss creates serious health and safety risks for residents into the future, while the prolonged disruption to the narrow L70481 road, which is our sole access route, and to the other L-roads during the installation period would severely impact our business (Derrylea Trees), daily life, and our family's access to our home.

In light of these concerns, we respectfully ask An Bord Pleanála to require Dara Energy Ltd. to re-route the grid connection away from the mature tree-lined avenue and narrow L-roads leading to the Bracklone sub-station. An alternative approach would preserve a valuable heritage asset, minimize community disruption, and align with the principle of ensuring no significant diminution in the quality of life for local residents, as stated in the planning application itself.

We believe that, with careful planning, renewable energy projects can co-exist with the protection of our natural and cultural heritage.

PHOTOGRAPHS, MAPS (2) and TREE SURVEY REPORT

Figure 1. The L-70481 - Derrylea Road or Avenue in summer

Figure 2. The L-70481 Derrylea Road/Avenue as an amenity for residents of Derrylea and for the local community

Figure 3. The L-70481 Derrylea Road in autumn.

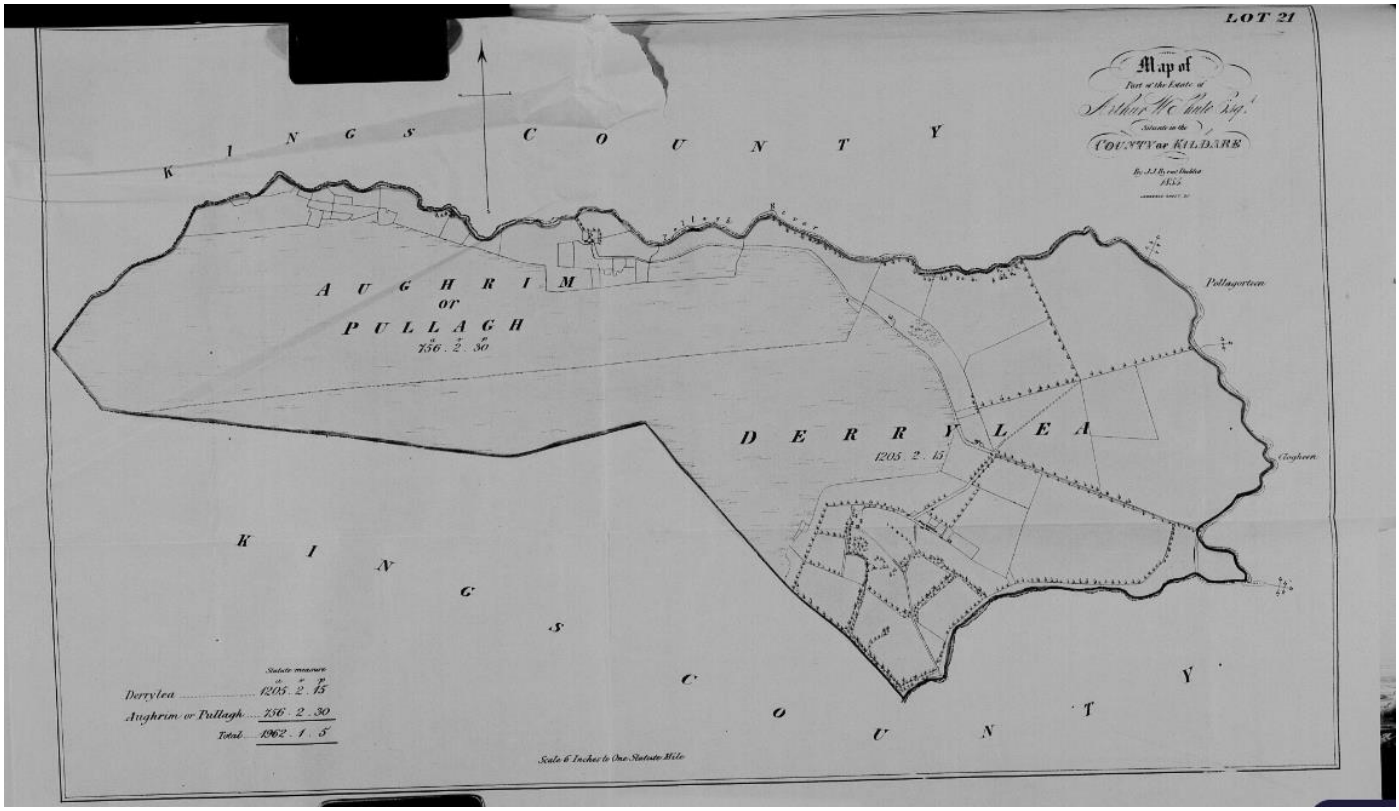

Figure 4. Historic map of Derrylea Estate & tree-lined avenue in 1855

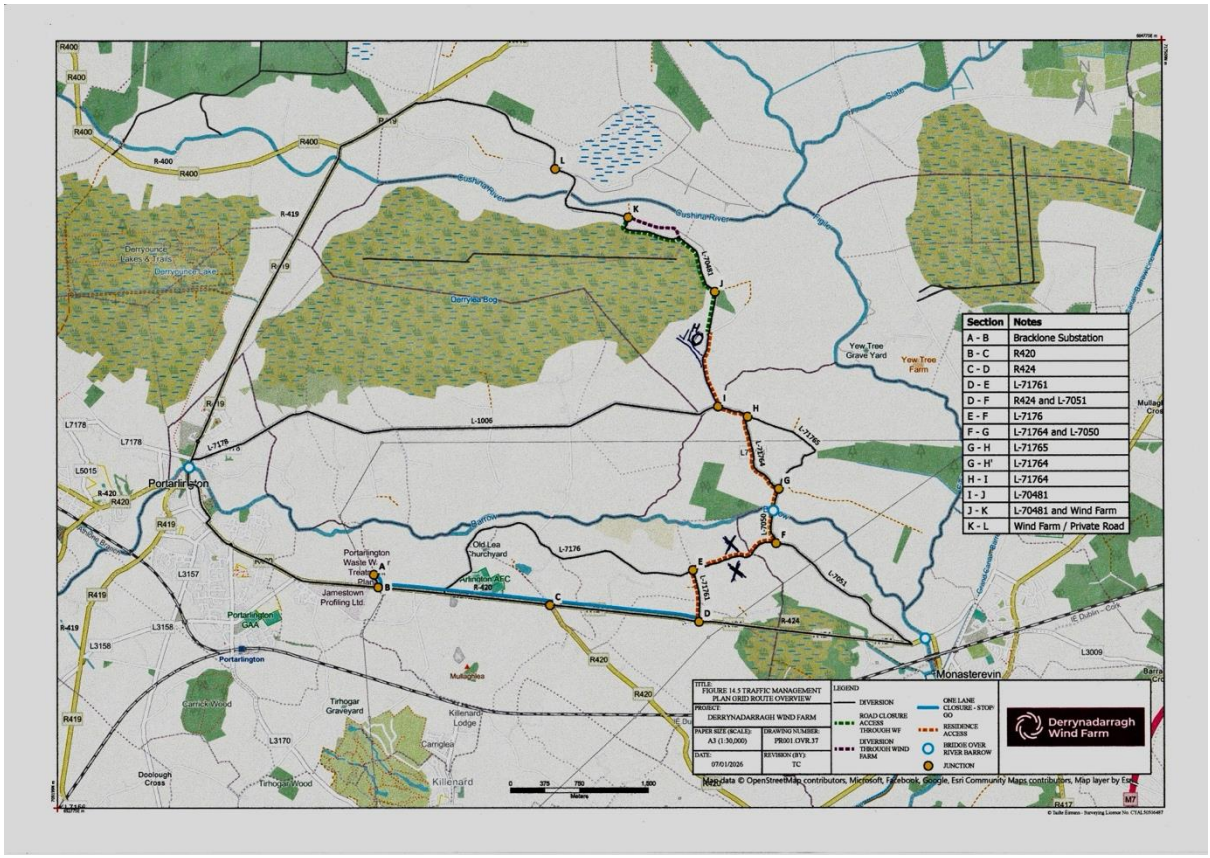

Figure 5. Derrynadarragh Wind Farm Ref: Figure_14.5 Traffic Management Plan Grid Route Overview OSM 07Jan26

x= Derrylea Trees horticulture nurseries at Ullard; H= Our house at Derrylea; O= Derrylea Trees horticulture nursery at Derrylea

Figure 6. Derrylea flooding from River Barrow on L-71764

Figure 7:

Preliminary Tree Report – by Independent Tree Surveys Ltd

Preliminary Tree Report: Derrylea, Monasterevin, Co. Kildare

February 2026

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Preliminary Tree Report – Derrylea, Co. Kildare February 2026

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1.0 Introduction

Local residents have concerns that infrastructure works to connect the proposed Derrynadarragh Wind Farm could negatively impact the trees making up the Derrylea tree avenue in Derrylea, Monasterevin, Co. Kildare (location shown on the aerial image below). The project includes proposals to run a new underground service connection under the existing road into Derrylea from the L7178 public road to the south. The primary concern of the residents is that trenching works to facilitate the new connection could sever roots from the avenue trees, leading to injury, loss of anchorage, fungal infection and potentially severe impacts on the trees, which are held in high regard locally.

This report has been prepared to make a preliminary arboricultural appraisal of the trees and to assess any potential impact on the health and condition of the trees from the proposed works.

The trees were initially evaluated for condition and quality and then measured to evaluate the likely root spread out under the proposed work zone. The collection of the essential data was collected in accordance with BS5837: Trees in relation to design, demolition and construction (2012).

1. *Location of the Avenue of trees at Derrylea, Monasterevin, Co. Kildare*

2.0 Report Limitations

• The inspection has been carried out from ground level using visual observation

methods only.

• Trees are living organisms whose health and condition can change rapidly. Trees should be checked on a regular basis, preferably once a year. The conclusions and recommendations of this report are valid for one year.

• The fruiting bodies of some important species of decay fungi only emerge at certain times of the year and may not have been visible during this inspection.

• There is no such thing as a 100% safe tree in all conditions, since even perfectly healthy trees may fall or suffer branch break.

• Climbing plants and dense undergrowth can obscure structural defects and some symptoms of disease, where such plants prevent a thorough examination of a tree it is recommended that the vegetation be cleared and the tree re-inspected.

• The survey is for planning purposes only; it is not a detailed health and safety survey of all of the trees on the site.

• Where trees were inaccessible due to undergrowth, fencing, road safety etc. assessment of tree condition and tree stem/crown dimensions were made based on what parts of the trees were visible to the surveyor and should be regarded as preliminary.

• Whilst every effort is made to ensure an accurate assessment of the trees condition is made during the survey, no responsibility can be taken for resultant damage or injury occurred by a failing tree. The survey only gives a snapshot of what is visible, not obscured or accessible on the day of survey.

3.0 Survey Methodology

The significant mature trees growing along either side of the avenue road were subject to a preliminary inspection and collective assessment from ground level using Visual Tree Assessment (VTA) techniques and relevant observations and findings were recorded in compliance with the industry standard document BS5837: Trees in relation to design, demolition and construction (2012).

3.1 Survey Key

Tree Species

Common and botanical names of the tree species were recorded.

Tree Crown Dimensions

Tree height (Ht) and crown-spread (NESW cardinal points) measurements are in metres and are estimated.

Stem Diameter (Dbh)

Measurements are in millimetres and taken at 1.5m from ground level, multiple stems (St) are recorded as a function of the BS:5837 RPA formulae described below.

Measurements were estimated where trees were inaccessible.

Tree age classes

Y: Young Recently planted (with 5 years or so)

SM: Semi-Mature Well established young tree

EM: Early Mature Established tree not yet fully grown

M: Mature Full or near full grown tree

LM: Late Mature Older specimen in full maturity

OM: Over Mature Reached full maturity now declining

Vet: Veteran Notable due to large size, old age, ecological importance

Tree Physiological (Phys Cond) and Structural (Struct Cond) Condition

Good: No obvious defects visible, vigour and form of tree good.

Fair: Tree in average condition for its age and the environment.

Poor: Tree shows signs of ill health/structural defect

Bad: Tree in seriously bad health/major structural problem

Dead: Tree now dead

3.2 Tree Retention Category (Cat) (BS5837: 2012 Trees in relation to design, demolition and construction – Recommendations)

The tree retention category system grades a tree's suitability for retention within a

development:

A: Indicates a tree of high quality and value. These are trees that are particularly good examples of their species, which also provide landscape value. These trees are in such a condition as to be able to make a substantial contribution.

(A minimum of 40 years is suggested)

B: Indicates a tree of moderate quality and value. Trees that might be included in the high category but are downgraded because of impaired condition. These trees are in such a condition as to make a significant contribution. (A minimum of 20 years is suggested)

C: Indicates a tree of relatively low quality and value - trees with an estimated remaining life expectancy of at least 10 years, or trees with a stem diameter of below 150mm and/or <10m in height. Category C includes smaller trees that could be readily replaced by new planting in the context of development mitigation.

U: Trees that are in such a condition that they cannot realistically be retained as standing trees in the context of the current land use for longer than 10 years.

Subcategories

Tree categories may be further categorised using the following sub-categories (e.g.

C1, C2 or C3) - 1 mainly Arboricultural qualities, 2 mainly landscape qualities, 3 mainly

cultural values.

3.3 Root Protection Area

The Root Protection Area (RPA) is the minimum area around individual trees to be protected from disturbance during construction works; RPA is recorded as a radius in metres measured from the tree stem and is shown on the tree survey/constraints drawing as a circle with the tree stem in the centre.

For single stem trees, the root protection area (RPA) should be calculated as an area equivalent to a circle with a radius 12 times the stem diameter.

For trees with more than one stem, one of the two calculation methods below should be used.

The calculated RPA for each tree should be capped to 707 m2.

a) For trees with two to five stems, the combined stem diameter should be calculated

as follows:

√ ((stem diameter 1)2 + (stem diameter 2)2 ... + (stem diameter 5)2)

b) For trees with more than five stems, the combined stem diameter should be calculated as follows:

√ ((mean stem diameter)2 × number of stems)

4.0 Findings

The trees were assessed during a site visit on the 11th of November 2025. The trees extend for around 280m and are growing in a double row along the verges side of the single-track roadway around 5m wide. The tree stem bases are set back from the road surface edge by around 1m, with the two rows of trees being approximately 7m apart.

The stems are set at around 10m spacings along the verge. Together the rows of mature trees create a very attractive and distinctive landscape feature of high amenity value.

Tree Species

The dominant species making up the avenue are Common Lime (Tilia x europaea) and Horse Chestnut (Aesculus hippocastanum). Other trees are present including Ash

(Fraxinus excelsior), Beech (Fagus sylvatica), Wych Elm (Ulmus glabra), Sycamore (Acer

pseudoplatanus). Mixed bushes (Hazel, Hawthorn etc.) make up the understorey.

Age Class

The specimen trees making up the avenue are all in the mature phase of their life span.

Other trees and bushes are also mature and early mature or semi-mature in age.

Tree Height and Spread

The Avenue trees are mostly between 12-18m in height with branch spread of 5-7m.

Stem Diameter

The specimen Lime and Horse Chestnut trees are mostly between 600-1000mm stem

diameter at 1.5m from ground level.

BS5837:2012 Tree Category

The mature Lime and Horse Chestnut trees were graded mostly as either category A

(high value) or category B (moderate value). The other trees present included

categories U (unsuited to long term retention), C (low value), and B.

Tree Condition

The Lime and Horse Chestnut trees appeared to be in mostly good or fair overall

condition. Some of the other Ash and Elm trees were noted to be in poor condition

due to disease.

5.0 Comments

The avenue of trees is comprised of a large number of specimen trees of high value. Trees of category A and B should normally constitute a significant constraint to development works.

The root protection area (RPA) radiuses of the trees range between 7.2-12m from the tree stem. The root protection area (RPA) is the minimum extent of rooting recommended to sustain the retained tree.

The trees are set approximately 7m apart, which means that in practice the entire roadway is in a collective RPA as it passes through the avenue.

Any linear trench dug along the avenue road will be well within the RPAs of the trees and would be a maximum of 3m or so from the base of a mature specimen tree even if positioned down the centre of the road carriageway.

The actual extent of root spread from the trees out under the road surface is unknown until the underlying soil is investigated by careful excavation or the use of ground penetrating radar (GPR), however, in my view it is highly likely that there is considerable root mass from the trees present under the full extent of the road.

The roots from the trees are likely to be in the upper soil profile just below the road surfacing and sub-base, probably concentrated in the upper 600-700mm of soil. The roots will thus be very vulnerable to severance from open trench excavation works which typically will require a depth below that of the roots.

The severance of roots at around 3m from a mature tree is likely to have a significant negative impact on the physiological and structural condition of the affected tree. The loss of root mass could allow the entry of decay fungi into the trees, cause a loss of anchorage, reduce and disrupt the transport of water, nutrients and energy within the trees transport system and lead to the premature decline and death of the tree.

Widespread dieback, windthrow and collapse of the trees along the Derrylea avenue caused by root severance from open trenching would be a significant health and safety risk to road users and would be a hugely damaging blow to the amenity and conservation value of the much-loved landscape feature.

6.0 Recommendations

Should the wind farm project proceed, an alternative route that avoids the Derrylea Avenue should be sought for the new underground service connections. If the new connection must be located under the road surface of Derrylea Avenue, the underground services must be installed using methodology that does not negatively impact on the mature trees forming the distinctive tree avenue.

The project tree report refers to root friendly service installation methods for this part of the project but does not specify which methodology will be used. Any specification for the works will have to allow for the retention of undamaged tree roots in the soil above the new service ducting. The utility company responsible for the new cables will have to permit the retention of roots over the top of the new ducting. If this root retention above the new services is not allowed, then the Derrylea Avenue cable route is clearly unsuitable and should be replaced with an alternative.

Where the retention of tree roots in the soil profile above the new cables is allowable, then the cables should be installed with a methodology that effectively leaves the existing root spread intact. Trenchless or mole-digging methodology may be a suitable technique for the job; if used at a depth below 1m or so this would avoid any disturbance of the road or root-bearing soil alongside the trees.

If trenchless methods are not a practical option and an open trench must be used, then the roots crossing the trench line must be carefully exposed and left intact, before the new cable is installed underneath the roots, and the trench is then backfilled. The two main methods for this method are the vacuum excavator truck (Vac-ex) and compressed air lance (Airspade) methods. The long length of the Derrylea connection means that the Vac-ex is probably the most practical option to use.

If a Vac-ex truck is used, the machine should be operated by an experienced crew (not

a single operator) using plastic tube ends rather than the more damaging metal

options.

The road surfaces and sub-base etc. should be removed with great care prior to the vac-excavation starting. Exposed roots should be protected from desiccation with wet hessian. Backfill should be of a suitable structural soil that can be compacted without losing structure.

Works in areas adjacent to the avenue trees should be carried out in accordance with the recommendations made in BS5837 (2012) Trees in relation to design, demolition and construction – Recommendations BSI Standards Limited 2012.

All of the excavation and installation works should be overseen by a qualified arborist, who shall submit a written certificate of compliance when the works are successfully completed.

The planners should specify that the project company submit a substantial financial tree bond prior to commencing works; this can be refunded following full compliance with the tree protection conditions.

7.0 Site Photographs

1. View looking north through the Derrylea Avenue; the road surface is approx. 5m wide

2. View up along the avenue; the base of the Horse Chestnut tree on the left is <1m from the edge of the road surface

Independent Tree Surveys Ltd