

## **Climate Action Plan Submission- Ballyshannon Action Group**

**November 01/11/2023**

Title: The need to increase monitoring and measurement of the extractive industry in Kildare to limit the impact of this carbon heavy industry on our climate action targets- Ballyshannon Action Group Submission.

Ballyshannon Action Group commends the overall ambition of Kildare County Council's Local Authority Climate Action Plan, however, we wish to outline a number of specific areas in which more detail from the onset, may improve the overall practical impact of the plan for the people of Kildare into the future.

The Ballyshannon Action Group notes that there is no specific reference within this Climate Action Plan to the Quarrying/Extractive Industry, which operates widely and in a concentrated manner throughout this county due to our soil makeup in Kildare.

We believe that this is a huge opportunity for Kildare County Council to have a major impact on Climate Action, not just for the people in this area, but throughout Ireland and the world- if the council takes this opportunity to lead in monitoring and measuring the impact/need for aggregates quarried here and to ensure change and innovation within the construction materials sector.

Currently as there is no direct monitoring of Kildare's active quarries by Kildare County Council, hence there is no way to possibly quantify the impact of this carbon heavy business on the county and the country's climate action targets.

What we do know, however, is that the concrete/cement industry is responsible for 8% of the world's Carbon emissions.

The programme for government, the Climate Act 2021, and Climate Action Plan, all place a responsibility on County Councils to prioritise longer life, lower carbon construction materials and say that alternative, lower carbon construction materials will be given preference over finite resources, in order to work towards more sustainable and environmentally-friendly construction solutions and we welcome commitments within this plan to implement these responsibilities.

While Kildare County Council is committing to move towards greener construction materials in council led projects such as public housing/infrastructure etc. the council must also encourage a move away from carbon heavy industries such as quarrying more generally, by denying permissions to companies to quarry on sites/allowing for numerous extensions, which have created a situation where long after the initial planning permissions have been exceeded, quarrying is still ongoing often decades thereafter.

All new applications for quarrying on greenfield sites must also be scrutinised first and foremost through this lens of climate action.

A quick glance at the websites and brochures of some of the biggest extractive companies operating within Kildare currently, show that the demand for their products is not being driven by the needs of this region, but rather their markets abroad. One such company states that they have '100+ years of aggregate in reserve' while they export thousands of tonnes to the UK each year and are openly expanding their UK operations, despite the fact that all of their quarries facilitating this demand are here in Ireland. This is the same company that seeks to open numerous quarries, while getting extensions on all of their other sites within an 8km radius area in Kildare.

In recent years, we have credible evidence of large amounts of agricultural land being bought up by large-scale quarry operators for possible future exploitation. This is having the effect of outbidding legitimate farmers and depriving them of the ability to acquire land affordably. It is also a cause of concern for neighbours of such lands in that they cannot now plan for the future as there is a big question mark over the future of the landscape.

We believe that the this local Authority Climate Action Plan, could have a major positive impact by limiting the potential destruction of thousands of acres of land in this county, by monitoring quarries here so that only what is necessary is being quarried and that this carbon heavy business is phased out over time in favour of greener and more innovative construction practices and products.

As currently there is no monitoring (so no quantifiable need for the amount of aggregates being quarried) we are in a situation where we are leaving it up to businesses to tell us what 'adequate supplies' our country needs. As a result quarrying/extractive companies are maintaining their status quo rather than being encouraged to come up with innovative ways to change the construction materials offering and in doing so, aid climate action.

We believe that monitoring of the quarrying industry in Kildare is integral to the success of the Kildare County Council Climate Action Plan and recommend the following be included to mitigate and measure the very specific impact of quarrying activities throughout Kildare on climate action:

- Kildare County Council will set up an enforcement taskforce to ensure that every quarry in the county is meeting required regulations and conditions to its operation. It must be an objective of the council to regulate quarries using robust and measurable metrics, so that policy regarding the environment, health and safety, public amenity and sustainable development can be implemented objectively. The following additional parameters are suggested:
  1. Maximum depth to which quarrying is permitted in the county is: to remain 1.5 meters above the water table (to protect groundwater aquifer together with private wells and water supply).
  2. Maximum duration of permission for any quarry development shall be 15 years in the case of a green field site with a maximum of 6 years for any subsequent applications for extensions.
  3. Set back of a quarry development from a public road shall be a minimum of 60 meters (in the interest of health and safety.)
  4. Set back of a quarry development from a salmonid watercourse or river containing trout shall be a minimum of 40 meters.
  5. There shall be a maximum permitted noise level of 50 dB(A).
  6. There shall be a maximum permitted dust level of 130mg/ m<sup>2</sup>/day
  7. There shall be a maximum permitted vibration level not to exceed a peak particle velocity of 12 mm/sec PPV, and air over-pressure values shall not exceed 125 dB (Lin) max peak, when measured at any noise sensitive location within the surrounding area.
  8. There shall be a maximum of one blast per month in any one area irrespective of the number of quarries in that area.
  9. All quarries shall be monitored for Dust, Air Overpressure, Water quality, Wells, etc by the authority or an independent 3rd party and conducted at a minimum of bi monthly intervals.

10. Truck movements shall be monitored at all quarries so that an exact log of truck movements is maintained.

- Direct monitoring of all active quarries by Kildare County Council regarding traffic movements to and from these sites, the use of approved routes only by both the quarry owners' own HGV fleet and any other HGV operated by other haulers accessing these sites. Currently HGVs can go by an unapproved routes, i.e. rogue operators. All vehicles using any quarry site be conditioned to have telematics tracking installed and that all vehicles entering and exiting quarry sites must be logged.
- Strict Carbon Budgets on every active quarry within the county: A strict quantum of extraction agreed with Kildare County Council on a yearly basis for each quarry site, monitoring of same and a strict reporting of the lifecycle emissions produced by this level of extraction each year to inform future planning decisions.
- A requirement for companies to give yearly figures on where the demand is coming from for extractive products taken from Kildare, in order to ensure a sustainable and circular approach to the use of Kildare's finite natural resources and inform future planning decisions by Kildare County Council.
- For Kildare County Council as a major client of the extractive industry to require greener, low carbon materials and credentials in all public contracts and to build carbon emissions budgets and criteria for contractors and subcontractors into the pre-qualification stage of all public works.
- A requirement for all new quarry planning applications on both greenfield sites and extensions to former or current extractive sites, to consider the existing density of quarrying within the vicinity e.g within a 20 Kilometre radius of the site. To avoid an oversaturation of both quarrying and quarry related HGV traffic activity in one highly concentrated area.
- A limit set on the amount of quarrying that happens in the county, so that residents are not unduly impacted by the huge demand for aggregates in the country coming from other areas of expansion. The rate at which a quarry is depleted must be managed so as to ensure fair use of shared resources in the county, such as roads surfaces and traffic endured by citizens. Use over this certain limit must be taxed so as to encourage an appropriate rate of drawdown of resources. Quarries must be taxed per tonne, so that the council has a way of reducing the amount of quarrying that takes place in Kildare at the expense of its citizens and resources.
- A requirement that all allegations of Unauthorised Development activities associated with the applicant extractive/quarrying company be provided to the planning department alongside any new applications from said company, so that future planning decisions may be made with full knowledge of the previous behaviour of the applicant before any further permissions are granted.
- Many modern quarry applications typically envisage leaving large water bodies/ lakes once extraction has ceased and have coined the term 'beneficial ecological after use' which we believe is an excuse to avoid reinstating to agricultural use. We would very much like to see the Climate Action Plan including specific parameters for such after use plans to better serve our ecology and biodiversity into the future.
- Protect Our Food Sources: Ballyshannon Action Group strongly contends that we must approach planning with climate change in mind and prioritise the protection our future food sources. Based on the Soils of Kildare handbook by the National Soil Survey of Ireland, the soils of Kildare are some of the best in Ireland. In Kildare they are best suited to Tillage. (Soils of County Kildare, National Soil Survey of Co. Kildare, 1970) The soil in Kildare is some of the

best in Ireland, and in particular south Kildare (The Fontstown Series) The land at Racefield, Ballyshannon, Co. Kildare for example, which will potentially be quarried (thanks to an An Bord Pleanála decision which is currently being challenged), has been used as tillage for generations. Yet, nothing will ever grow or graze there again once the land has been quarried. This is but one example of how an informed view of this case through the lens of climate action would prevent such issues into the future.