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An Bord Pleanála Reference: PL09. 317292

Description: Proposed development of an extension to the existing Drehid Waste Management Facility to provide for the acceptance of up to 440,00 TPA of non-hazardous waste material.

Development Address(es): Townlands of Timahoe West, Coolcarrigan, Killinagh Upper, Killinagh Lower, Drummond, Drehid, Kilkeaskin, Loughnacush, and Parsonstown, County Kildare.

A Chara,

I welcome the opportunity to engage in the public consultation on proposed development [1].

Contextual Realities

- It is over 32 years since the first major Intergovernmental Panel on Climate Change report in 1990 predicted the impacts of emissions are climate change.
- Annual Green House Gas (GHG) emissions have increased yearly to surpass a level that is 60% higher than in 1990.

1 <https://www.pleanala.ie/en-ie/case/317292>

- The direction of travel is along a trendline with a trajectory towards +3 °C to +4 °C warming by the end of the century. This is an equivalent difference in temperature between the last ice age and now. Instead of being across 5,000 years, the change will have occurred over 100 years. The physiology of larger animals did not survive the previous +4 °C warming in the longer timeframe.
- Notwithstanding efforts, the levels of environmental change necessary to stay within the +1.5 °C to +2 °C have not emerged from within governments, societies, and economies.
- While +3 °C to +4 °C warming is unprecedented in human history, the emissions will lock in average sea-level rises of 1 m to 2 m this century and 7 m to 8 m in the hundreds of years ahead. This presents the challenges of managed retreats and societal disruption for much of the population which lives within reach of coastal areas.
- Such scenarios require changes to food production and where it happens due to changes in weather patterns, pollinator populations, and ecosystem services.
- Green growth must displace GHG emissions to prevent atmospheric conditions from deteriorating further.
- Speculative reliance on future unproven technologies to remove billions of tonnes of GHGs from the atmosphere will burden descendent generations and relegate them to living through disastrous conditions.
- Notwithstanding the overwhelming challenges ahead, we can avoid failure, tackle the issue honestly and take different, meaningful, and relevant actions over the coming 30 years.
- Global responses around Covid and financial crises demonstrate the ability to make immediate and appropriate changes.
- In recent years, civil society has begun to respond to the climate change challenge and to drive towards the required changes:

"EPA survey shows climate change remains the most pressing environmental issue facing Ireland." [2]

"Education and information about the way the world's climate is being changed by carbon emissions from industrial, social and agricultural activity have already changed the global conversation and official policies; persuasion and evidence will work better than hectoring and compulsion." [3]

- President Michael D. Higgins issued a statement for urgent action following remarks by UN Secretary-General António Guterres on climate change [4]:

"It is time for us all, as leaders and global citizens, to assess how words are leading to actions, to increase the urgency of our response to what is an existential threat, and to achieve change. It is clear, as the Secretary General's powerful statement shows that we need to begin the work of reform in our international institutional architecture, such as UN reform at the highest level, including the Security Council, to achieve what the Secretary-General has suggested is the challenge to "turn a year of burning heat into a year of burning ambition"."

Ireland has obligations under international agreements and frameworks such as the Paris Agreement on Climate Change, the UN Sustainable Development Goals [5], and the European Green Deal. The UN, EU, and Irish Government policies address emissions reductions and adaption challenges towards the years 2030, 2050, and 2100.

2 <https://www.epa.ie/news-releases/news-releases-2022/epa-survey-shows-climate-change-remains-the-most-pressing-environmental-issue-facing-ireland>, 28 February 2022

3 <https://www.irishtimes.com/opinion/editorials/2023/06/16/the-irish-times-view-on-the-public-finances-the-people-are-ahead-of-the-politicians>, 16 June 2023

4 <https://president.ie/en/media-library/news-releases/statement-by-president-higgins-following-remarks-by-un-secretary-general-antonio-guterres-on-climate-change>

5 <https://www.un.org/sustainabledevelopment>

The UN Environment Programme published the Emissions Gap Report 2022 [6] on 27 October 2022 with a summary sub-headline that reads:

“The report finds that only an **urgent system-wide transformation can deliver the enormous cuts needed to limit greenhouse gas emissions by 2030**: 45 per cent compared with projections based on policies currently in place to get on track to 1.5 °C and 30 per cent for 2 °C. This report provides an in-depth exploration of how to deliver this transformation, looking at the required actions in the electricity supply, industry, transport and buildings sectors, and the food and financial systems.”

On incrementalism [7]:

“We **had our chance to make incremental changes**, but **that time is over**. Only a root-and-branch transformation of our economies and societies can save us from accelerating climate disaster.”

The report highlighted significant shortfalls in progress and called for more accelerated changes to mitigate increasingly dangerous levels of atmospheric GHGs.

On 2 November 2022, the World Meteorological Organization (WMO) reported [8] that:

“Temperatures in Europe have increased at more than twice the global average over the past 30 years – the highest of any continent in the world. As the warming trend continues, exceptional heat, wildfires, floods, and other climate change impacts will affect society, economies, and ecosystems ...”

6 <https://www.unep.org/resources/emissions-gap-report-2022>, 27 October 2022

7 <https://news.un.org/en/story/2022/10/1129912>

8 <https://public.wmo.int/en/media/press-release/temperatures-europe-increase-more-twice-global-average>

The temperature rises have been assessed at an average rate of about +0.5 °C per decade, arriving at a +1.5 °C average rise. Observations have a seasonal and regional pattern consistent with a projected precipitation increase in winter in Northern Europe. Extreme precipitation and pluvial flooding are projected to increase at global warming levels exceeding +1.5 °C in all regions except the Mediterranean. Recent UN and WMO climate reports chart long-term analysis and regular news reports [9] of flooding events are expressions of the rapidly changing environment and the need for accelerated systems and societal change to mitigate the worsening situation.

The IPCC published the "Climate Change 2023: Synthesis Report" on 20 March 2023, with Headline Statements [10, C.1]:

"Urgency of Near-Term Integrated Climate Action

Climate change is a threat to human well-being and planetary health (very high confidence). There is a **rapidly closing window of opportunity to secure a liveable and sustainable future for all** (very high confidence). Climate resilient development integrates adaptation and mitigation to advance sustainable development for all, and is enabled by increased international cooperation, including improved access to adequate financial resources, particularly for vulnerable regions, sectors and groups, and inclusive governance and coordinated policies (high confidence). The **choices and actions implemented in this decade will have impacts now and for thousands of years** (high confidence)."

The Guardian newspaper [11] profiled data from the US National Oceanic and Atmospheric Administration and quoted Professor Mike Meredith of the British Antarctic Survey:

9 <https://www.irishexaminer.com/search/?cosearch=climate>

10 <https://www.ipcc.ch/report/ar6/syr/resources/spm-headline-statements>

11 <https://www.theguardian.com/environment/2023/apr/26/accelerating-ocean-warming-earth-temperatures-climate-crisis>, 26 April 2023

"The rate [of temperature rise] is stronger than climate models would predict," he said. "The cause for concern is that if it carries on, this will be well ahead of the climate curve [predicted] for the ocean. But we don't know yet if that is going to happen."

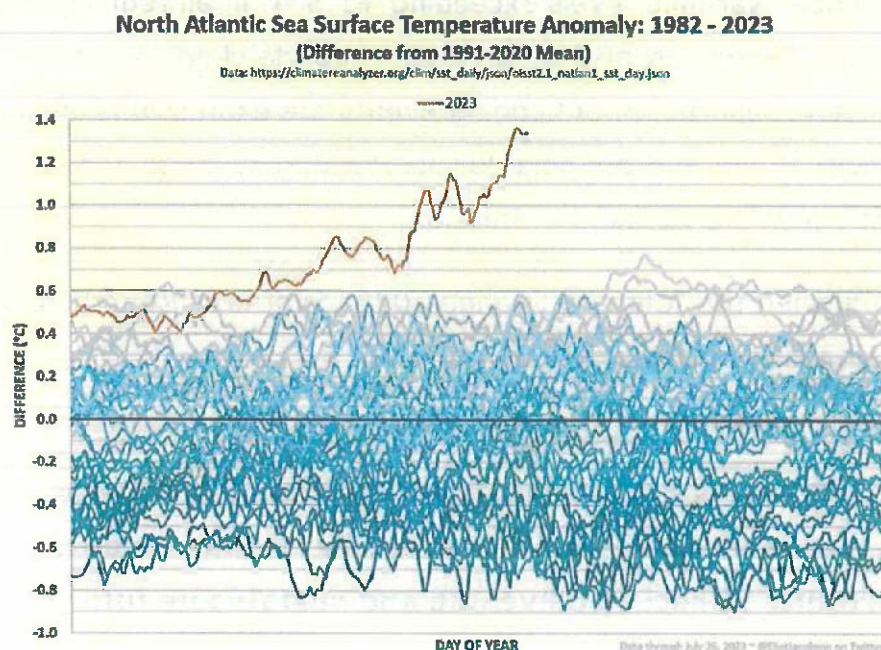


Figure 1 North Atlantic Daily Sea Surface Temperature Anomaly published by the University of Maine, USA, 26 July 2023 [12].

At the time of writing, temperature limit records continue to supersede previous records, with Irish media doing more to report and discuss it for mainstream understanding. Examples of increasingly accessible records include those published by the University of Maine.

12 <https://climatareanalyzer.org>

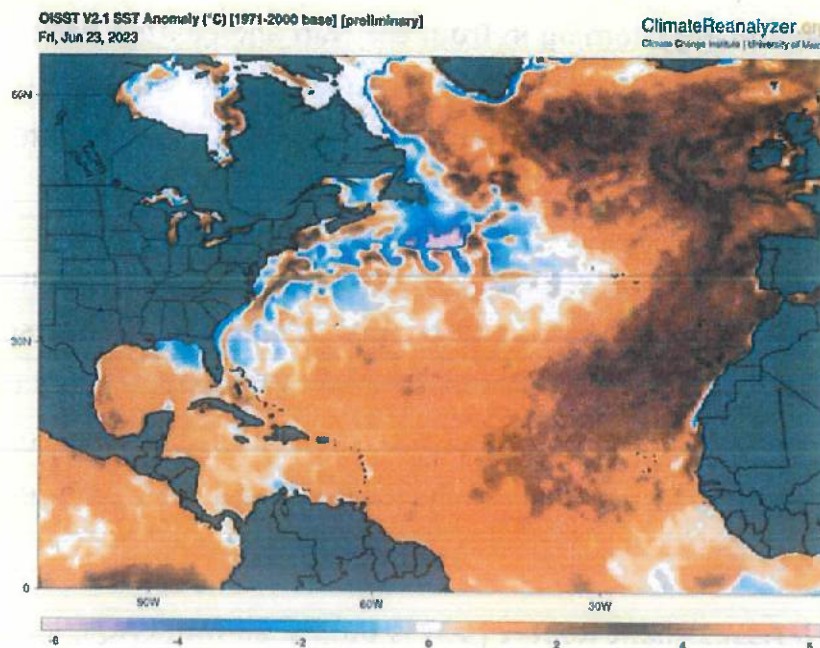


Figure 2 North Atlantic Daily Sea Surface Temperature Anomaly map published by the University of Maine, USA, 25 June 2023. Note the +4 °C temperatures compared with the 30-year average for 1971-2000 in coastal areas around Ireland, the UK, France, and Spain in the northeast map area [12].

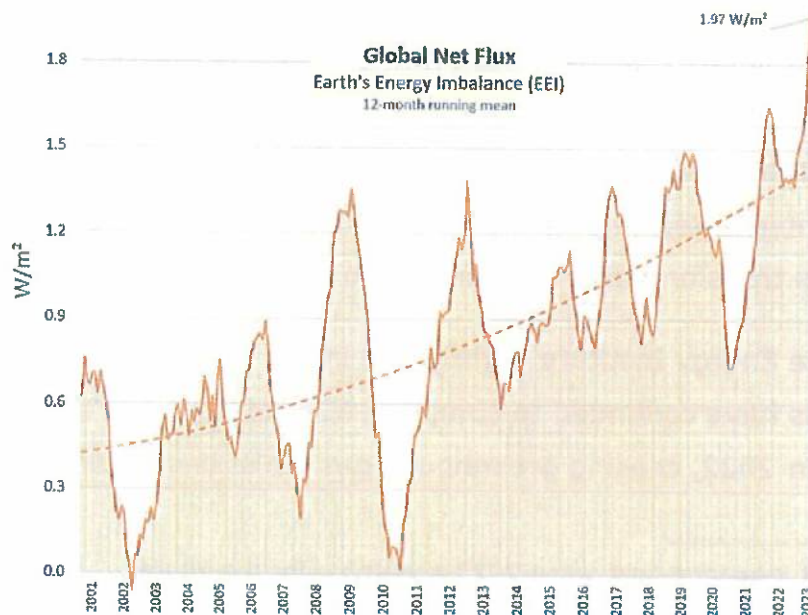


Figure 3 Earth's Energy Imbalance from NASA satellite data reached 1.97 W/m² (12-month mean) by July 2023. Key to a stable climate on Earth is the delicate

balance between energy coming in from the Sun and emitted back to space by the Earth. This balance has become disturbed in our present climate and may continue to grow. Prolonging this imbalance with heat-trapping GHG emissions would have major implications for the future climate of our Earth.

Met Éireann has updated its website to explain that the consequences of a marine heatwave are potentially wide-ranging, severe, and irreversible [13]. The impacts can include disruption and threats to ecology, species distribution, aquatic life, economics, and the climate feedback loop. Met Éireann confirmed the **warmest average temperature June** on record [14] and the **wettest July** on record at the time of writing [15].

The IPCC Sixth Assessment Report [16] is published with FAQs, including:

“What is Climate Resilient Development, and how do we pursue it?
... **Targeting a climate-resilient, sustainable world involves fundamental changes to how society functions, including changes to underlying values, worldviews, ideologies, social structures, political and economic systems, and power relationships.**”

In the UK, the Climate Change Committee produced a plausible scenario by which the UK could reach net zero by 2042 [17], given that California and Germany say that 2045 is their updated target timeline. The Covid-19 pandemic demonstrated what governments could do when the government and private sectors transformed to deliver solutions on an emergency footing.

A report by the Energy Institute highlighted in the Guardian newspaper finds that fossil fuels have continued to comprise 82% of the world’s total energy consumption in 2022, causing greenhouse gas emissions to climb by 0.8% as

13 <https://www.met.ie/marine-heat-wave-2023-a-warning-for-the-future>

14 <https://www.irishtimes.com/ireland/2023/06/30/ireland-records-hottest-ever-june-with-average-temperatures-of-over-16-degrees>

15 <https://www.rte.ie/news/weather/2023/0801/1397570-met-eireann-july/>

16 <https://www.ipcc.ch/report/ar6/wg2/about/frequently-asked-questions/keyfaq6>

17 <https://www.theguardian.com/environment/2023/jan/09/net-zero-possible-in-2040s-says-outgoing-uk-climate-business-expert-nigel-topping>

the world uses more energy [18]. The direction of travel remains perilous, threatening the planet's habitability.

The European Commission has told member countries that a joint EU exit from a controversial international energy treaty appears inevitable, according to a document titled "Next steps as regards the EU, Euratom and Member States' membership in the Energy Charter Treaty", with some of them already leaving the accord on climate concerns [19]. The 1998 Energy Charter Treaty was designed to protect companies in the energy industry by allowing them to sue governments on policies affecting their investments. This is no longer sustainable when risking the continued use of stranded assets in fossil fuel extraction and distribution systems.

The environmental group An Taisce released an analysis by climate experts Prof John Sweeney [20] of Maynooth University and Prof Barry McMullin [21] of DCU that highlights: "a rapidly widening gap between Irish climate ambition and Irish climate action" due to an overshoot of the legally binding 2021-2025 carbon budget adopted by the Oireachtas [22, 23].

"The EPA 2023 Greenhouse Gas Emission Projections report, released Friday, 2 June, states that Ireland's first two carbon budgets (2021-2030) are **projected to be exceeded by a significant margin of between 24% and 34%.**"

"In the EPA report, Budget 2 is exceeded by 125 MtCO₂eq for WEM and 80 MtCO₂eq for WAM. By contrast, in [An Taisce's] analysis correcting

18 <https://www.theguardian.com/business/2023/jun/26/greenhouse-gas-emissions-from-global-energy-industry-still-rising-report>

19 <https://www.euractiv.com/section/energy/news/exit-from-energy-charter-treaty-unavoidable-eu-commission-says>

20 <https://www.maynoothuniversity.ie/faculty-social-sciences/our-people/john-sweeney>

21 <http://www.eeng.dcu.ie/~mcmullin>

22 <https://docs.google.com/spreadsheets/d/1U4P9sCtZ2ncOXa4ICs8RIoWsCXQTKfrilqluyqJZmU4>

23 <https://www.irishtimes.com/environment/climate-crisis/2023/06/10/ireland-further-off-track-on-climate-targets-than-epa-calculations-experts-warn>

Budget 2 for prior overshoot, the exceedance is substantially greater: 170 MtCO₂eq or 110% for WEM; and 117 MtCO₂eq or 72%, for WAM.”

While 8% of the EU’s total emissions are attributed to aviation and shipping, their contributions are increasing. Projections point to an annual increase in aviation emissions at the global and EU levels by 53% to 2040, compared to 2017. To cut the EU’s emissions by 55% by 2030 and reach net zero by 2050, the EU is addressing Climate Action with a legislative package called “Fit for 55” to deliver the EU’s Green Deal objectives. The EU has taken steps to reduce aviation emissions through its Emissions Trading System (ETS). It applies cap and trade rules for the aviation sector, where airlines must surrender emissions allowances to cover flight emissions through the ETS within the European Economic Area. On 8 June 2022, the EU Parliament voted to revise the ETS for aviation [24] to phase out free allocations for aviation by 2026 and promote sustainable aviation fuels.

While the ETS is external to a national strategy, the public is aware of the conflict between the growth of aviation emissions and discommoding of existing systems and practices to reduce national emissions. Domestic airline companies that speak of flight growth are perceived as tone-deaf and leading in the wrong direction. Increasing discourse on flight distance quotas per person begins to unlock an equitable approach to aviation-related emissions.

In summary, the time lost to incrementalism leaves the +1.5 °C limit beyond attainment, and there is a need for more clarity around overshooting the short-term emissions reduction targets and the implications for recovering from possible negative emissions budgets post-2030.

State and private investments have timeframes that exceed the time horizons to 2030, 2050 and beyond 2100. The National Development Plan 2021 - 2030 (NDP) sets out the investment priorities that will underpin the implementation of Project Ireland 2040: National Planning Framework (NPF) through a total

24 <https://www.europarl.europa.eu/news/en/press-room/20220603IPR32156/urgent-action-needed-to-reduce-emissions-in-the-aviation-sector>

investment of approximately €165 billion. The NDP has been designed to ensure that it supports the government's climate ambitions. For the first time in Ireland, a climate and environmental assessment of the NDP measures has been undertaken, along with an evaluation of the alignment of the NDP with the principle of a green recovery [25, p.26].

The NPF is a long-term framework that sets out how Ireland can move away from the 'business as usual' development pattern, with a vision underpinned by evidence from the 2016 Census. The framework seeks to disrupt trends that have been apparent for the last fifty years and have accelerated over the past twenty.

Local and planning authorities have a pivotal role in the decarbonisation transition, including through spatial planning, the provision of public housing and transport infrastructure, and the maintenance of biodiversity [25, p.69]. The planning system depends on climate data informing choices and investment, and correlating projected GHG emissions from existing and future development patterns is an important consideration.

The NPF informs the Regional Spatial and Economic Strategy (RSES) by the Eastern and Midland Regional Assembly, published in 2019 [26]. Throughout the strategy, there are three cross-cutting key principles:

- **Healthy Placemaking** - To promote people's quality of life through the creation of healthy and attractive places to live, work, visit, invest and study in.
- **Climate Action** - The need to enhance climate resilience and accelerate a transition to a low-carbon society recognising the role of natural capital and ecosystem services in achieving this.
- **Economic Opportunity** - To create the right conditions and opportunities for the Region to realise sustainable economic growth and quality jobs that ensure a good living standard for all.

25 Climate Action Plan 2023, <https://assets.gov.ie/249626/1c20a481-bb51-42d6-9bb9-08b9f728e4b5.pdf>

26 https://emra.ie/dubh/wp-content/uploads/2020/05/EMRA_RSES_1.4.5web.pdf

With NPF now subject to a review and the updated Climate Action and Low Carbon Development Act (2021), the LECP policies should also be informed by the Climate Change Advisory Council's "Council Paper Working Series" [27].

Legislation

Climate Action and Low Carbon Development Act, 2015 (as amended) [28]

15. (1) A relevant body shall, in so far as practicable, **perform its functions** in a manner **consistent with—**

- (a) the most recent approved **climate action plan**,
- (b) the most recent approved **national long-term climate action strategy**,
- (c) the most recent approved **national adaptation framework** and approved **sectoral adaptation plans**,
- (d) the furtherance of the **national climate objective**, and
- (e) the objective of **mitigating greenhouse gas emissions** and **adapting to the effects of climate change** in the State.

Planning and waste authorities at national, regional and local levels are key to reducing waste and, as public bodies, will be essential in considering and planning for the implementation of climate mitigation and adaptation measures. In examining the EIAR, the climate assessment is produced in Chapter 12 Air Quality and Climate [29].

The transport sector has been the fastest-growing source of GHG emissions over the past three decades, showing a 112% increase between 1990 and 2021. Investment and business models must assess the induced trip to sites

27 <https://www.climatecouncil.ie/councilpublications/councilworkingpaperseries>

28 <https://revisedacts.lawreform.ie/eli/2015/act/46/revised/en/html>

29 <https://www.pleanala.ie/publicaccess/EIAR-NIS/317292/EIAR/Vol%202%20Main%20EIAR/Chapter%2012%20-%20Air%20Quality%20Climate.pdf>

based on planning proposals. In reading the environmental reports, it would be helpful to see how transport trips to the proposed development would compare with models and alternative scenarios for other waste facilities at the regional waste levels. While Kildare County Council's planning assessment report submitted to the Clane-Maynooth Municipal District for consideration covered a lot of relevant topics and went some way to assess the impact on the transport routes, it would have been helpful to see an assessment of the proposed development under the Climate Act. It is noted that Transport Actions in the CAP23 include:

- TR/23/13 Enhance transport appraisal guidance on spatial and land-use considerations in line with the NIFTI Implementation plan.
- TR/23/19 Publish National Demand Management Strategy.
- TR/23/61 Publish draft National Policy Framework on Alternative Fuels.

Significant sections within the haul routes are over peat foundations. The Climate Action Plan 2023 acknowledges in Box 22.1 – Potential Impacts of Climate Change in Ireland that precipitation extremes and flooding result in disruption of transport services, unsafe driving conditions and gradual deterioration of infrastructure. It should be noted that the Clane-Maynooth area office for the transport department is coordinating extensive repairs investment in similar roads, with Climate Change funding, to deal with increased hydrology ranges (dry to wet).

The EIAR references Table 12.14 as an assessment tool for the alignment of the proposed development with the sectoral emissions reductions. The extent to which the trajectory of GHG emissions from the project aligns with Ireland's GHG trajectory to net zero by 2050; and the level of mitigation taking place.

On page 12-57:

"Current operational data for 2021 indicates that 8301 GJ of diesel consumption is required for machines associated with operation. **A conservative estimate that a 50% increase in fuel would be required for the further development.** However future technology

changes may result in better fuel economy or electric options being developed over the operational lifespan. Embodied emissions associated with operational energy are estimated to be 20,391 tonnes CO₂eq over a 25-year period or 815 tonnes CO₂eq annual.”

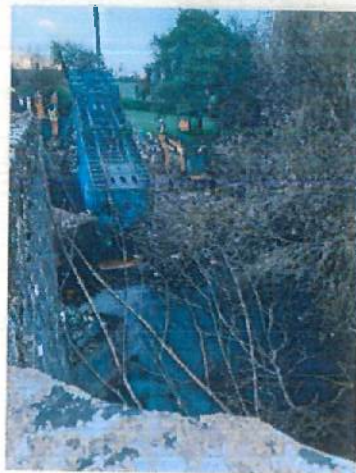
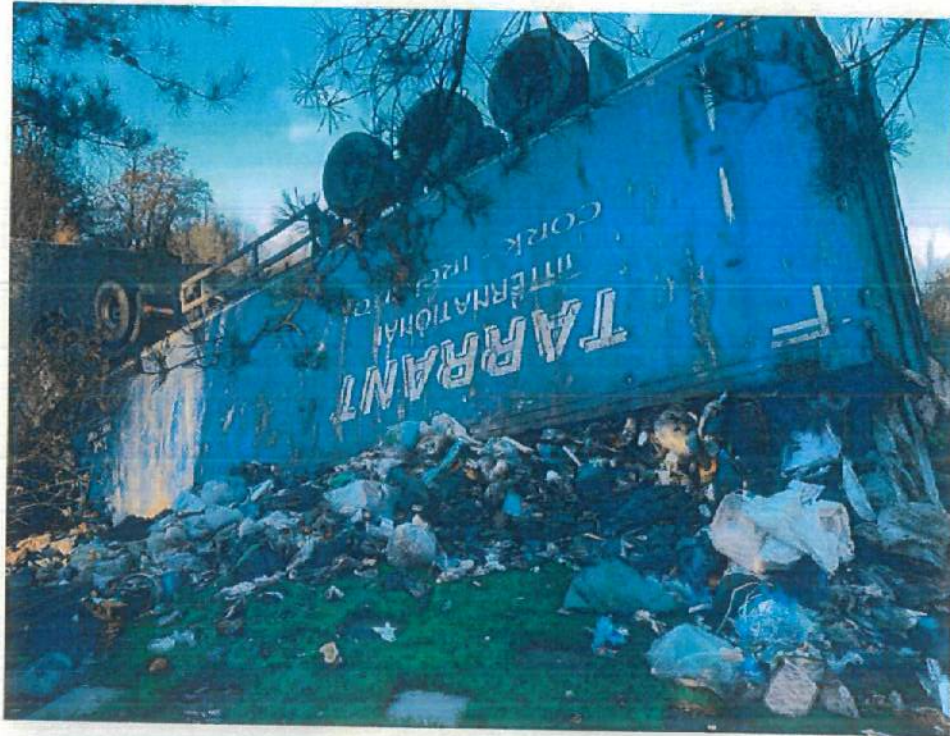
In attempting to assess any identified approaches to reduce transport emissions, other than speculative use of potential “future technology changes may result in better fuel economy or electric options”, it was not clear whether the development of the site would allow for specific planned reductions and mitigation of transport emissions, particularly from more distant sources of waste depot assembly.

The impact of road transport routes to the dump and on other road users has not been insignificant. The proposals to require the recording of GPS and dashcam footage by contractors allow for measures to assess compliance with routes and speeds on roads that are less than ideal for HGVs. Previous road edge strengthening on the haul routes has already failed.

The following photographs are to illustrate the risks associated with haul routes, where a haulage HGV came off the road at the Millicent Bridge L2002 in November 2022 [30]. They depict some of the aftermaths of damage and contamination risk from a crash by one of the vehicles on the route. Other impacts included knocking a tree by a haulage HGV which blocked the L2002 near W91 V2R4. It should be noted that other RTAs on the L2002 have nearby property owners and residents apprehensive about the speed and mass of HGVs travelling on deadlines to and from the proposed development site.

Given the complexity of the proposed development, an **Oral Hearing** would be a welcome part of making the assessment.

30 <https://www.kildarenow.com/news/home/968611/photos-waste-lorry-leaves-road-at-liffey-bridge-near-clane.html>



Conclusion

An Board Pleanála is asked to scrutinise the proposed development, given the impact on the roads, and to clarify if the GHG emissions identified in the application comply with requirements to be reduced, given the site location and the areas served by the proposed development.

Yours faithfully,

Pádraig McEvoy

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Member of Kildare County Council, Clane-Maynooth Municipal District.

Appendix

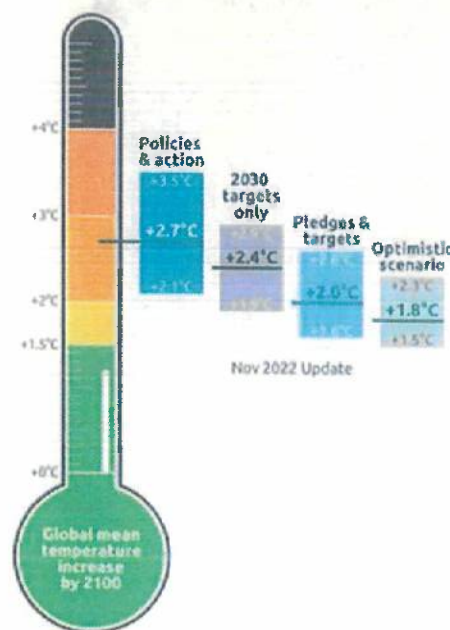


Figure 4 The Climate Action Tracker is an independent scientific project that tracks and measures government climate action against the globally agreed Paris Agreement aim of "holding warming well below 2 °C and pursuing efforts to limit warming to 1.5 °C [31].

31. <https://climateactiontracker.org>

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