

# Ballyburn Sustainable Agri-Food Enterprise Hub



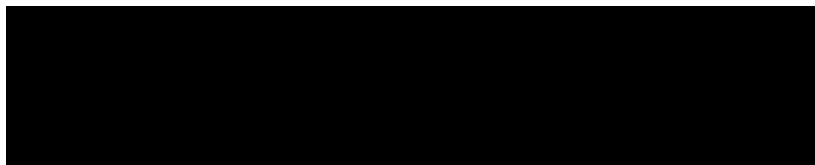
**BEET**

IRELAND



Kildare County Council  
**Kildare County Development Plan 2023-2029**  
Submission  
May 2022

**BEET IRELAND**



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## Introduction – Executive Summary of Submission

This proposal sets out the rationale for a targeted and specific local objective for lands at Ballyburn Upper, Castledermot with a view to developing a significant agri-food enterprise hub based on sustainable and green economy principles. The proposed ‘local objective’ forms part of a larger land holding with significant sand and gravel deposits that are currently being extracted, processed and marketed to the construction industry. The overall site represents a unique set of assets that support the vision for **the creation of a sustainable agri-food enterprise hub** in southern Kildare, a concept that would be the first of its type in Ireland. In addition a small ‘supporting’ residential cluster is proposed in the vicinity of the existing two houses on the site, that will complement the employment creation in the sustainable agri-food enterprise hub bringing employment and available residence closer together.

Climate change is setting the policy environment for Ireland and the world. Against this backdrop Irish businesses are seeking to innovate and create new sustainable opportunities that will make tangible contributions to the climate change targets that are set for 2030 and 2050. This proposal, not only seeks to play a significant role for renewable energy but also in value added agri-food and feed as well as regional development in South Kildare. In order to do so, a positive and supportive policy and planning framework must exist in order to deliver greener sustainable supply chains across the country.

Spatial Planning Policy needs to lead development in a planned manner and present and provide for plan-led opportunities to respond to current land use demands and needs, as meeting:

- Targeted opportunities in the rural enterprise sector,
- Transference to a more sustainable rural economy and supportive of developing technologies to create a more sustainable rural economy,
- Clustering of rural related enterprises as benefits economies of scale and opportunity, a regional approach, and
- Present an innovation-led agricultural sector as makes the best use of available lands.

In this regard we seek a Specific Local Objective to be aligned with the subject landholding to future proof the plan, the rural economy and the innovation led circular economy bringing significant learnings to the Irish Agricultural economy.

The following Site Specific Local Objective is presented on the subject lands as follows:

*The subject lands represent a valid proposition for an agri-enterprise development to create a new sustainable agri-food enterprise hub at Ballyburn Upper. Development proposals associated with the landholding will be expected to present and generate strong regional economic benefits for South Kildare and become a new driver for innovations in the arable sector.*

*The Council will favourably consider proposals for the development of a new sustainable agri-food enterprise hub as merits its well-connected rural location and where the subject site's specific location offers amenity, environmental and economic advantage. Any future proposals will be assessed taking account of:*

- *The contribution of the proposed development to the county's economy;*
- *The contribution of the proposed development to the county's environment and the principles of sustainable development;*
- *Assessment of any potential environmental effects; and*
- *National & Regional planning policy and objectives.*

*The Council will normally permit proposals for such employment generating and agri-technology innovation development where it can be demonstrated that the development complies with the relevant development standards and is not detrimental to residential amenity or to environmental quality.*

We note it is the Policy & Objective of the Council, as reflected clearly in the Draft Kildare Plan to:

#### **Resilient Economy & Job Creation**

**RE O29** Promote and facilitate an economy of smart specialisation around specific towns and regions within the county.

**RE O66** Support economic development, including business start-up companies, so as to maximise their business potential, and to promote a best practice enterprise culture that makes it easier to do business in Kildare.

**RE P13** Support and facilitate sustainable agriculture, horticulture, forestry and other rural enterprises at suitable locations in the County.

**RE O86** Promote the 'Smart Farming' initiative, the 'Kildare Climate Change Adaptation Strategy (2019)' and the 'National Climate Action Plan' to farmers across Kildare to inform them of environmental sustainability and resource management, so as to reduce CO2 production on farms in accordance with the National Climate Action Plan.

#### **Our Rural Economy**

**RD P1** Support and promote rural enterprises and encourage appropriate expansion and diversification in areas such as sustainable agriculture, forestry,

peatlands, food, crafts, renewable energy at suitable locations in the county, particularly where they contribute to a low carbon and resilient economy.

**RD O2** Facilitate agriculture, horticulture, forestry, tourism, energy production and rural resource-based enterprise within the rural settlements and in appropriate rural locations subject to relevant development management standards.

**RD O39** Ensure the satisfactory and sensitive re-instatement and/or re-use of disused quarries and extraction facilities, where active extraction use has ceased. Future uses should include amenity, recreation and biodiversity areas and shall be informed by an assessment of the specific site/lands. Proposals for future uses/infill of these areas should be agreed with the Planning Authority through the development management process.

Key Themes Considered as deliverables associated with the submission relate to:

- Food Security,
- Climate Change, and
- Innovation and Smart Technology (for Agriculture)



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**FIGURE 1 ENTRANCE ACCESS ROAD TO BALLYBURN SITE AND MORRISSEY SAND & GRAVEL BUSINESS**

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## BEET IRELAND – Who we are and what we do?

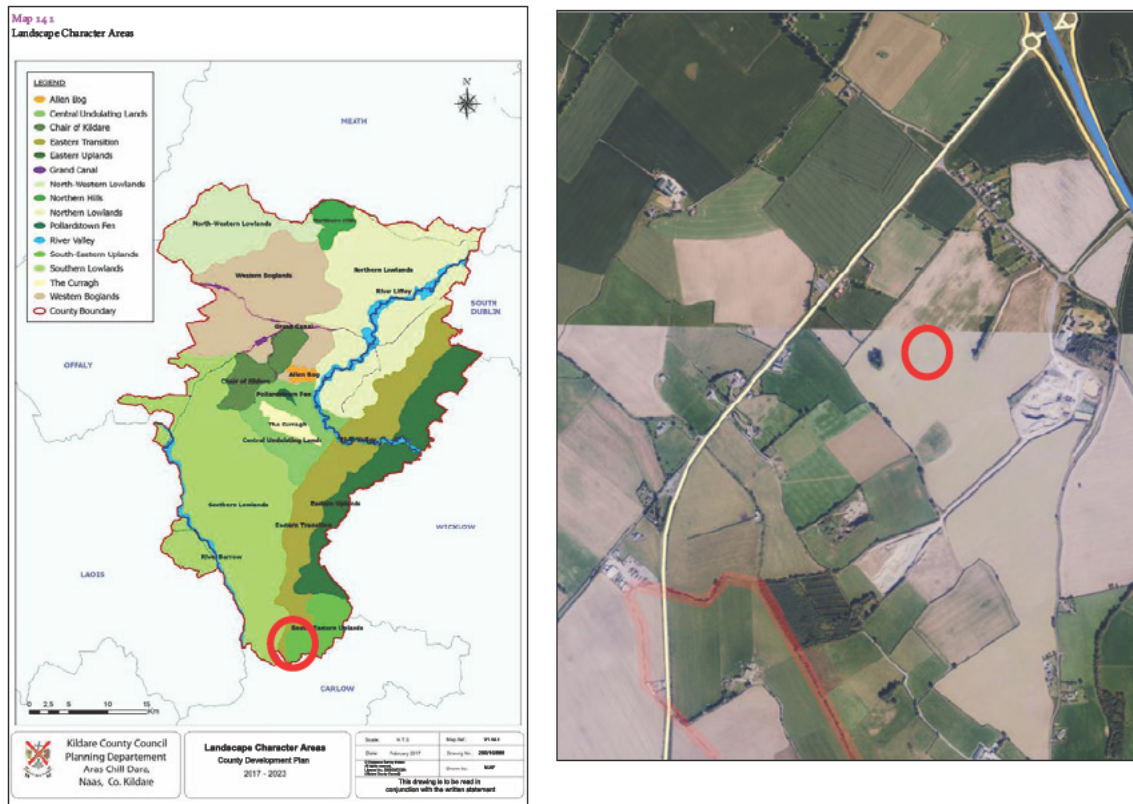
Sugar Beet Ireland DAC (BEET IRELAND) own an extensive site at Ballyburn Upper, Castledermot, Co. Kildare. An area of the site is currently the subject of extraction of sand and gravel and these lands will also revert to the ownership of BEET IRELAND following extraction works and land restoration.

The directors of BEET IRELAND have extensive experience in the agri-food and agri-engineering sectors in Ireland and they wish to create **a new sustainable agri-food enterprise hub** at Ballyburn Upper. It is expected that this development will generate **strong regional economic benefits** for South Kildare and become a new **driver for innovations in the arable sector** against the ongoing challenges and opportunities presented by the post Brexit market and climate change targets. The following report outlines the rationale underpinning this proposal.

## Current Ballyburn site

The Ballyburn Upper site is situated within the Eastern Transition Lands in South Kildare, close to the Carlow county boundary. The current KDP classifies these lands as Class 2 with Medium Sensitivity under the Landscape sensitivity Classification. This classification is noted to have *“the capacity to accommodate a range of uses without significant adverse effects on the appearance or character of the landscape having regards to localised sensitivity factors.”* Figure 2 illustrates the site location.

**FIGURE 2 BALLYBURN SITE LOCATION WITHIN EASTERN TRANSITION LANDS, SOUTH KILDARE**



A key feature of the overall site is the extensive sand and gravel deposits that are currently being extracted and processed by Dan Morrissey & Co. The sand and gravel is being processed on site and dispatched for use in the construction industry. Significant investment has been made in state of the art sand and gravel processing infrastructure by Dan Morrissey & Co. It is estimated that it will take up to 25 years to extract the sand and gravel resources from the overall site.

In line with the planning conditions for the sand and gravel works (Planning Ref. No. 052091) major public road upgrades have been completed while the site entrance and private access road are designed for the easy access and egress of HGV's. The road improvements have been made to Prumplestown Crossroads, the L4012-2 local road, to the entrance to the Ballyburn site as well as to the internal road serving the current sand and gravel operations in order to ensure the safe passage of vehicles to and from the site. The M9 motorway is situated to the east of the site and the nearby Junction 4 provides safe and efficient access to the local and national road network serving the Ballyburn Upper site.



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*FIGURE 3 SAND AND GRAVEL EXTRACTION AT BALLYBURN SITE BY DAN MORRISSEY & CO*

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The lands not currently being extracted for sand and gravel, consists of agricultural lands, wildlife lands, a farmyard and two residential houses.

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*FIGURE 4 ARABLE CROPS E.G. OILSEED RAPE BEING GROWN ON THE FARM*

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*FIGURE 5 WILDLIFE AREA SITUATED BETWEEN SAND AND GRAVEL PROCESSING AREA AND RESIDENTIAL UNITS*

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*FIGURE 6 BALLYBURN HOUSE*

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The northern side of the site consists of gently rolling agricultural lands as per Figure 7.

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*FIGURE 7 ARABLE FARMLAND ON THE NORTHERN SIDE OF THE SITE*

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## Ballyburn Site – Locational Advantages – Infrastructural Advantages

In summary the special characteristics of the site include:

1. Proximity to the M9 motorway for access to national transport routes.
2. The existing on-site sand and gravel extraction and processing facility providing a low carbon source of construction materials.
3. The opportunity to utilise the topsoil and subsoil from the Agri-Food Enterprise Hub in the restoration of the adjoining brownfield sand and gravel site, thus minimising the carbon footprint of the site and creating a circular economy within the overall site in line with Kildare Development Plan objectives.
4. The opportunity to develop new renewable energy sources on-site to power new sustainable agri-food enterprises.
5. The potential to create new Circular Economy business opportunities between farming, renewable energy and new value added agri-businesses.
6. The site is located within the heartland of the arable agricultural industry in Ireland, a sector with significant potential for carbon sequestration.
7. The site is currently being farmed with arable crops in harmony with the sand and gravel on site activities.
8. The application of best practice standards for new buildings in line with SEAI guidelines to address energy efficiency, water conservation, sustainable renewable energy opportunities in line with climate change challenges.
9. The site is currently being monitored with regard to air, noise, dust and water quality in line with the existing planning permission.
10. The existence of two residential units on the lands with the opportunity of creating a residential cluster to support future employment needs of the overall site.
11. Development of on-site renewable energy via solar PV, biomass and anaerobic digestion to service the agri-food enterprise hub needs.

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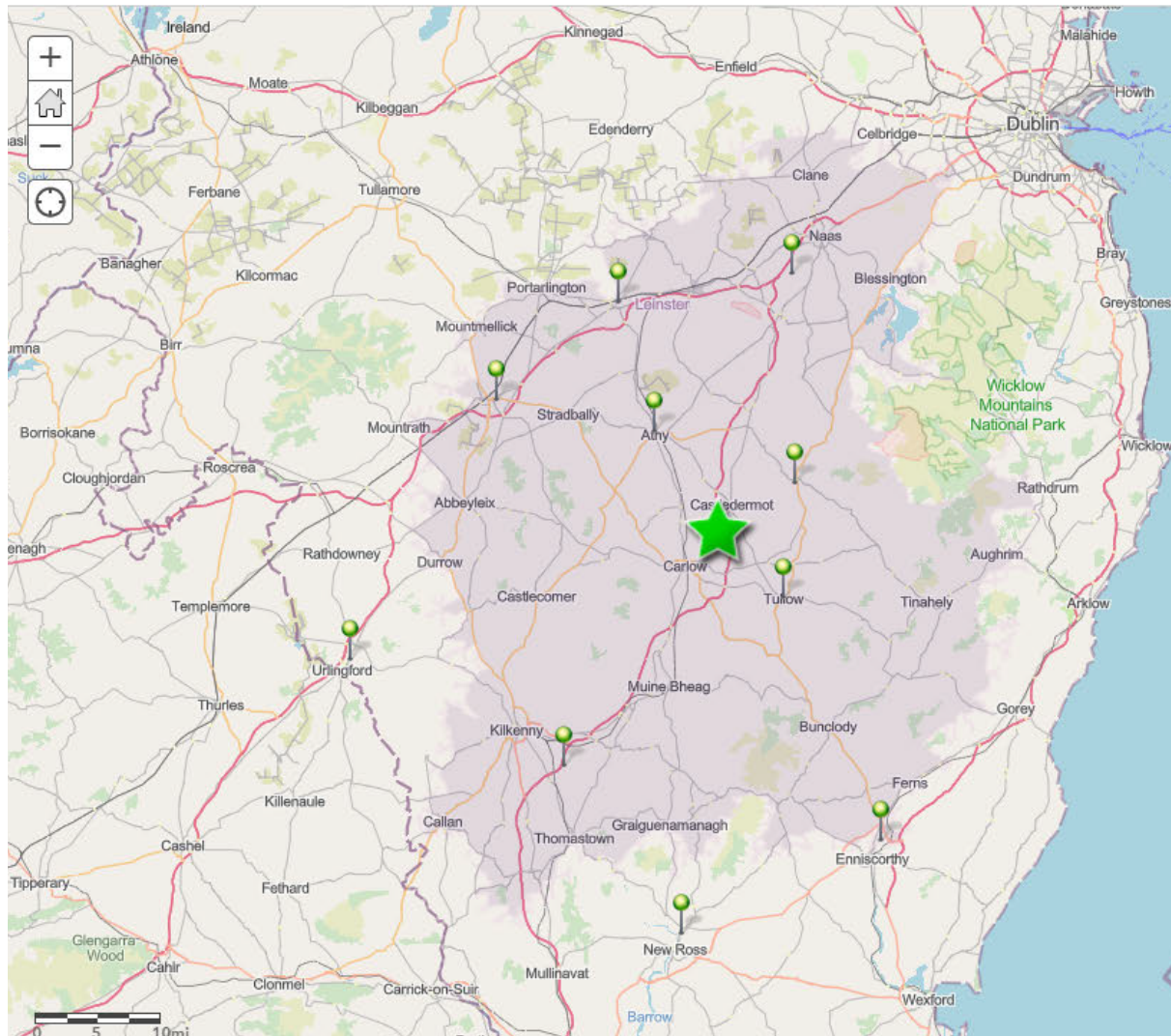
*FIGURE 8 SAND AND GRAVEL PROCESSING ON SITE*

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The strategic regional nature of the site is illustrated in Figure 9 vis a vis Rosslare Europort Renewable Energy Objectives as well as the existing cluster of cereal enterprises within a 60km radius of the Ballyburn site.

FIGURE 9 STRATEGIC REGIONAL LOCATION OF BALLYBURN



The above figure highlights the strategic location of the subject lands, its connectivity via the National and Regional Road Network and as presents a highlighted accessible 40 minute drive time from the majority of the proximate cereal enterprises and the associated import export routes via the sea ports.

## Kildare Draft Development Plan 2023-2029

The current Draft CDP details a range of objectives that are aligned with the Ballyburn Sustainable Agri-Food Enterprise Hub including the Rural Development Policy:

*RD P1 Support and promote rural enterprises and encourage appropriate expansion and diversification in areas such as sustainable agriculture, forestry, peatlands, food, crafts, renewable energy at suitable locations in the county, particularly where they contribute to a low carbon and resilient economy.*

## Athy Local Area Plan 2021-2027

Section 6.3.7 of the Athy Local Area Plan provides for a flagship Food, Drink and Skills Innovation Hub in the former Model School. It states that *“In establishing the Hub, Kildare County Council and County Kildare Community Network Co. Ltd with the support from Coca Cola will seek to fill the employment void in the town but also address the lack of food incubation space in the county. Accordingly, the project aims to develop an innovation-rich environment to accelerate job creation and enterprise development through investment in people, collaboration and clustering, thereby facilitating the development of scalable, sustainable and profitable food businesses across the region.”*

The Kildare Draft Development Plan sets the objective to *“Support the development of the Athy Food, Drink and Skills Innovation Hub and other appropriately located projects of this nature in the wider Athy Municipal District Area.”*

The current proposal for a Sustainable Agri-Food Hub at Ballyburn, Castledermot will complement the Athy Model School Innovation Hub by providing a suitable location for step-up agri-food enterprises that are seeking to relocate to new enterprise facilities which will enable expansion and value added agri-food capacity expansion.

The development of a Sustainable Agri-Food Hub at Ballyburn will also align with the Athy LAP objectives regarding Climate Change including:

- *Supporting the circular and bio-economy through achieving greater efficiency in land management by building at sustainable densities and prioritising brownfield development.*
- *Reducing Athy’s local carbon footprint caused by transport emissions by increasing connectivity and prioritising sustainable movement routes to key destinations within the town.*
- *Avoiding development at inappropriate locations by changing the zoning designation of flood prone land from Town Centre and New Residential uses to conservation or agricultural uses.*
- *Creating an integrated green infrastructure network to support urban biodiversity, water retention and flood alleviation, allowing for natural and unhindered inundation during flood events.*
- *Supporting and promoting the use of biodiversity techniques, such as green roofs and walls and the integration of Sustainable Drainage Systems (SuDS) into all new development schemes.*

## Kildare County Council Development Plan Framework

The current Kildare County Development Plan 2017-2023<sup>1</sup> provides a positive framework for the promotion of enterprise within the county. The proposal for a Sustainable Agri-Food Enterprise Hub covers a broad range of the current policies as referenced below:

a. Employment centres

Section 5 of the Development Plan profiles Economic Development Enterprise and Tourism in the county. It provides an economic development hierarchy in which “*Rural Employment Areas*” are situated within rural settlements, rural nodes and rural countryside such as Ballyburn. The sectoral strengths for such employment are noted as “*agriculture, horticulture, forestry, tourism, energy production and rural resource-based enterprises*” such as the existing sand and gravel processing business. The KDP specifies the following supportive objectives:

*ECD 4 Seek, in so far as is possible, to locate people intensive employment development close to the **strategic public transport** network for the region that is outlined in the Transport Strategy for the Greater Dublin Area 2016- 2035 and other Regional Plans.*

*ECD 5 (v) To promote rural economic development by adopting a policy framework that recognises the need to promote the long-term sustainable social and environmental development of rural areas, encourages economic diversification and facilitates the **growth of rural enterprises**.*

*ECD 6 Support and facilitate the development of an environment that fosters **innovation**, enterprise and entrepreneurship.*

*ECD 11 Encourage the provision of **live-work** units as part of mixed-use developments in appropriate locations (particularly at ground floor level) to provide accommodation for the creative sectors and small businesses and to facilitate home-working. Such development should be of suitable design so as to protect the amenity of adjacent residents.*

*ECD 12 Facilitate the development of **agriculture, bloodstock, horticultural** and rural related enterprises in the county.*

*ECD 13 Facilitate home-working and innovative forms of working which reduce the need to **travel**.*

*ECD 14 Encourage **mixed-use** settlement forms and sustainable centres, in which employment and residency are located in close proximity to each other and strategic multi-modal transport corridors, and to reduce long distance commuter trends and congestion.*

*ECD 15 Continue to develop, encourage and create an environment for innovation, **enterprise** and entrepreneurship within the county.*

*ECD 17 Identify and promote a range of locations within the county for **different types** of enterprise activity including international business and technology parks, small and medium enterprises (SME) and micro enterprise centres.*

*ECD 19 Ensure that zoning for employment uses will be carried out in a manner which **protects investment** in the national road network, in accordance with Chapter 2 of the DECLG guidelines on ‘Spatial Planning and National Roads’.*

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<sup>1</sup> Kildare County Development Plan 2017-2023, Kildare County Council 2017

Section 5.8 of the KDP notes that *“In terms of renewed policy focus on community and economic development in rural areas, further initiatives could be taken at sectoral level to explore employment opportunities in sectors that have a **natural fit with rural areas**. This could include business start-ups and job creation in sectors such as agri-business, renewable energy, rural tourism, and rural transport. One of the most fundamental challenges facing rural economies is the impact of restructuring in agriculture and traditional industry, and the associated need for **diversification** and employment creation in the non-farm rural economy.”*

Section 5.9 highlights *“Important areas for future development are the agri-food and horticulture sectors, both of which represent **higher value-added** activity than traditional agricultural enterprises.”*

While Section 5.10 notes that *“It is a priority of this Plan to support and capitalise on the employment and enterprise potential of the **green economy**. The plan also aims to support the development of a secure and affordable energy supply and renewable and efficient energy infrastructure (including buildings for business, public sector and the community) to improve competitiveness, security and reduce costs.”*

EO 32 objective seeks to *“Work with relevant stakeholders to understand the **potential of rural Kildare** to deliver services and employment to meet the county’s urban demands (e.g. energy, food, natural resources) in line with a local development strategy.”*

Policy ECD 27 for rural enterprise seeks to *“Support and facilitate **sustainable agriculture**, agri-food, horticulture, forestry, renewable energy and other rural enterprises at suitable locations in the county. “*

The vision for the Ballyburn Enterprise Park is to create a significant enterprise hub which will bring together key components of agri-food rural development with the complementary dimension of the green economy in line with the current and future policies of the Kildare County Development Plan.

Kildare Local Enterprise Office has developed a food strategy for the county which seeks to *“to create a road map for the food and beverage sector and raise the profile of Kildare grown and produced products at a national level.”<sup>2</sup>*

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<sup>2</sup> [www.localenterprise.ie](http://www.localenterprise.ie)



# Sustainable Green Supply Chains



## Kildare County Council Development Plan 2017-2023 Variation No. 1

The Variation no 1 document notes the following:

### *2.11.7 Rural Areas*

*Within the rural areas there are clear locational requirements for employment generating uses including, but not limited to, **green energy projects** such as renewable energies and resource recovery, but also food production, agri-business, quarrying, forestry, bloodstock, horticulture and rural based tourism.*

The Settlement Strategy policy notes:

*CS 3 Support rural communities through the identification of lower order centres including towns, villages and settlements to provide more **sustainable development centres** in the rural areas.*

The Economic Development policy notes:

*CS 6 Encourage and facilitate new employment opportunities which improve the **cluster-specific business** environment.*

- 5. CS 8 Address commuting patterns by building up the local economy to a more sustainable level by promoting **self-sustaining** employment-based development opportunities in settlements to provide for employment growth for the existing population in order to reverse commuting patterns.*

The National Climate Change Strategy policy notes:

*CS 16 Support the implementation of the National Climate Change Strategy and the National Climate Change Adaption Framework Building Resilience to Climate Change 2012 through the County Development Plan and through the implementation of the Climate Resilient Kildare: Climate Change Adaptation Strategy 2019 – 2024 in conjunction with all relevant stakeholders. Ensure that **climate action considerations are integrated into land use planning** and aid the transition to a climate resilient low carbon society, promoting and maximising the most efficient and sustainable use of land.*

## Regional Policy Framework

Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031

The EMRA strategy designates much of Kildare within the Core Region while the south west of Kildare forms part of Gateway Region with key rail and road links with Waterford. In this

context the Regional Spatial & Economic Strategy (RSES) sets out preferred scenarios as follows:

Selection of preferred scenarios for Eastern & Midland RSES	
TYPE	PREFERRED SCENARIO
1. Spatial Strategy	The optimum spatial strategy combines the growth of Dublin and regional centres with a selected number of large self-sustaining settlements that have the assets and capacity to grow in a sustainable manner while minimising impacts on the receiving environment. This option offers the best opportunity to <b>align services with population and economic growth</b> , promote compact growth in urban settlements and make the <b>best use of infrastructure</b> including public transport thereby <b>reducing transport emissions</b> and <b>improve regional accessibility</b> .
2. Climate and Biodiversity	Current trends indicate that implementation of existing national policies alone will not be sufficient to meet climate targets therefore additional measures are required. The preferred scenario combines this with complementary approaches including the development of a <b>regional Green Infrastructure</b> and <b>ecosystem services approach</b> together with <b>site-based alternatives</b> for <b>adaptation/mitigation of impacts</b> in strategic development locations.
3. Economic Strategy	The preferred Economic Strategy promotes <b>smart specialisation strategies</b> based on identified <b>strengths and competitive advantages</b> , combined with <b>cluster policies</b> that <b>promote economies of scale and network effects</b> in certain locations. The Strategy should also support <b>diversification of local economies</b> and <b>development of innovation and entrepreneurial ecosystems</b> for sustained national growth that can <b>withstand external shocks</b> .

The EMRA RSES identifies a range of growth enablers for the region including:

- *Promote balanced growth in a limited number of economically active settlements which have the **identified capacity and potential** for self-sustaining growth.*
- *Promote regeneration and revitalisation of small towns and villages and support local enterprise and employment opportunities to ensure their **viability as service centres** for their surrounding rural areas.*
- *Support rural areas by **harnessing natural resources** to develop renewables, recreation and tourism opportunities including green infrastructure planning and the development of an integrated network of greenways, blueways and peatways.*

Specific **growth enablers** for the Gateway Region include the following:

- *Regeneration of small towns and villages, with a focus on the identification of rural town, village and rural **regeneration** priorities to bring vibrancy to these areas.*
- ***Diversification** and growth of smart specialisation of local economies with a strong focus on clustering including sustainable farming and food production, tourism, marine, energy and renewables, bioeconomy and circular economy, with a focus on publicly owned peatlands in the midlands, to support a 'Just' transition and realise the benefits of green technologies.*
- ***Promote the Region** as a key destination for tourism, leisure and recreation activities and support the development of an integrated network of greenways, blueways and peatways while ensuring that high value assets and amenities are protected and enhanced.*

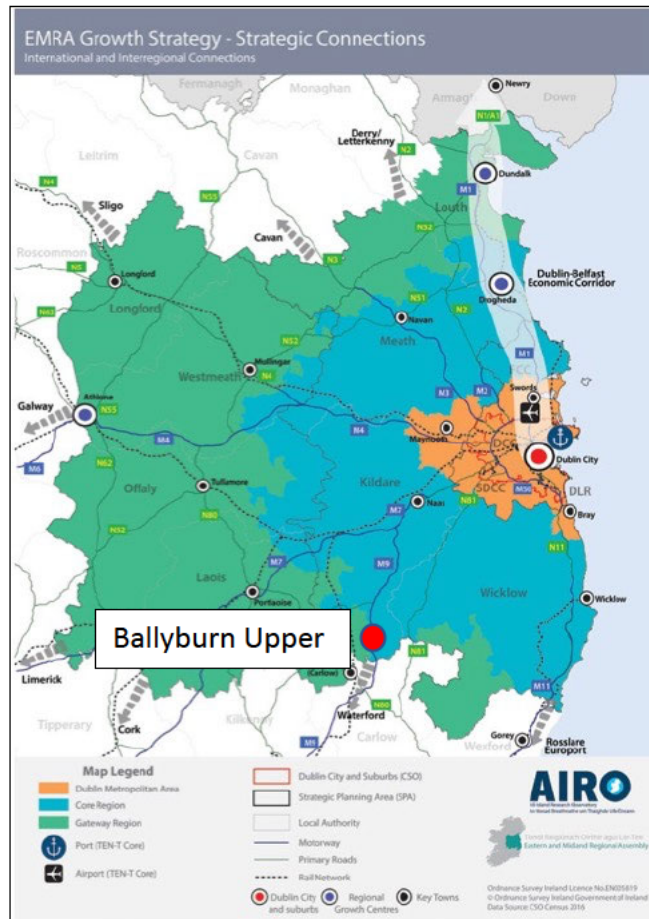


Ballyburn Upper is situated within the Gateway Region/Core Region boundary as illustrated below.

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*FIGURE 10 EASTERN & MIDLAND REGIONAL ASSEMBLY GROWTH STRATEGY ZONES*

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The EMRA notes that in applying the core strategies and settlement hierarchies, local authorities should consider the following growth enablers. The growth enablers with specific relevance to the proposed Sustainable Agri-Food Enterprise Hub are **bolded**.

- **Economic growth**
- **Align population, employment and housing growth**
- **Compact sustainable growth**
- **Regeneration and development**
- **Strategic connectivity**
- Dublin-Belfast Economic Corridor
- **Healthy placemaking**
- **Climate action**
- **Collaboration**

With regard to regional policy objectives (RPO) for rural areas, RPO 4.79 states:

*Local authorities shall identify and provide policies that recognise the contribution that small towns, villages and **rural areas contribute to social and economic wellbeing**. As part of this policy provision that seeks to **support and protect existing rural economies** such as valuable agricultural lands to **ensure sustainable food supply**, to protect the **value and character of open countryside** and to **support the diversification of rural economies to create additional jobs** and maximise opportunities in **emerging sectors**, such as **agri-business, renewable energy, tourism and forestry enterprise** is supported.*

It is clear from the above that the Regional Planning Framework policies are closely aligned with the principles underpinning the proposed Sustainable Agri-Food Enterprise Hub at Ballyburn Upper.

### ***Economy & Employment***

#### ***Unexpected Opportunities for Enterprise Development***

***RPO 6.2:*** Support local authorities to ensure their LECPs and city and county development plans are sufficiently agile to account for unexpected opportunities, to accommodate valid propositions for enterprise development that may emerge and for which there are strong locational drivers that do not apply to the same extent elsewhere.

***RPO 6.5:*** Local authorities shall explore projects in LECPs for the enhancement of the competitiveness of their rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability. Cross-boundary and inter-regional partnerships are encouraged and they will be supported.

### ***Agriculture***

***Agriculture is intrinsically linked to our national identity and the agri-food sector is one of Ireland's most important indigenous manufacturing sectors. The agri-food and drink sector in Ireland in 2016 generated 7% of gross value added (€13.9 billion), and accounts for almost 10% of employment when processing and marketing are included. Because agri-food companies source most of their raw materials and services from Irish suppliers, this sector produces a far bigger return than other traded sectors of the economy.***

*Agricultural production, sustainability, food security and health are closely linked and there is a growing recognition on the value of agricultural land, particularly in areas that are experiencing strong urbanisation pressures. There is a need to ensure both the protection of the agriculture industry and the rural landscape that supports it. This includes recognising the value of horticultural land, protecting the resource productivity of agricultural land and addressing development pressures and the potential impact that Brexit will have on agriculture and food exports throughout the region.*

*Agriculture is both highly exposed to and is a significant contributor of Climate Change, accounting for over a third of all national emissions. Current quantity and export driven Irish agriculture targets are set out in Food Harvest 2020 and Food Wise 2025. There is a need to align our climate targets and the future proofing of the agricultural economy and to establish sustainable farming practices and production methods. The*

*Smart Farming programme promotes the adoption of resource efficiency measures that demonstrate both cost savings and environmental benefits.*

### **Agriculture**

*RPO 6.24: Support the Departments of Agriculture, Food and the Marine, and Communications, Climate Action and Environment to enhance the competitiveness of the agriculture sector with an urgent need for mitigation as well as real and effective and adaptation mechanisms for the long-term sustainability of the agri-sector.*

## National Planning Framework 2040

The National Planning Framework is a strategic planning policy document prepared for the national tier of planning governance. The Planning Framework aims to improve the strategic planning of Ireland and its regions to improve economic performance and the quality of life of its citizens. The proposed Sustainable Agri-Food Enterprise Hub is in accordance with the following objectives set out in the **National Planning Framework 2040**:

**NPO 6:** *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

**NPO 10:** *Regional and Local Authorities to identify and quantify locations for strategic employment development, where suitable, in urban and rural areas generally.*

**NPO 21:** *Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability.*

**NPO 23:** *Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.*

**NPO 25:** *The Department of Rural and Community Development, the Department of Agriculture, Food and the Marine, and other relevant Departments and Agencies will continue to invest in rural Ireland, including through the Rural Regeneration and Development Fund, and will work together to establish a mechanism to coordinate structures for funding rural development to align with other national strategies.*

**NPO 55: Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.**

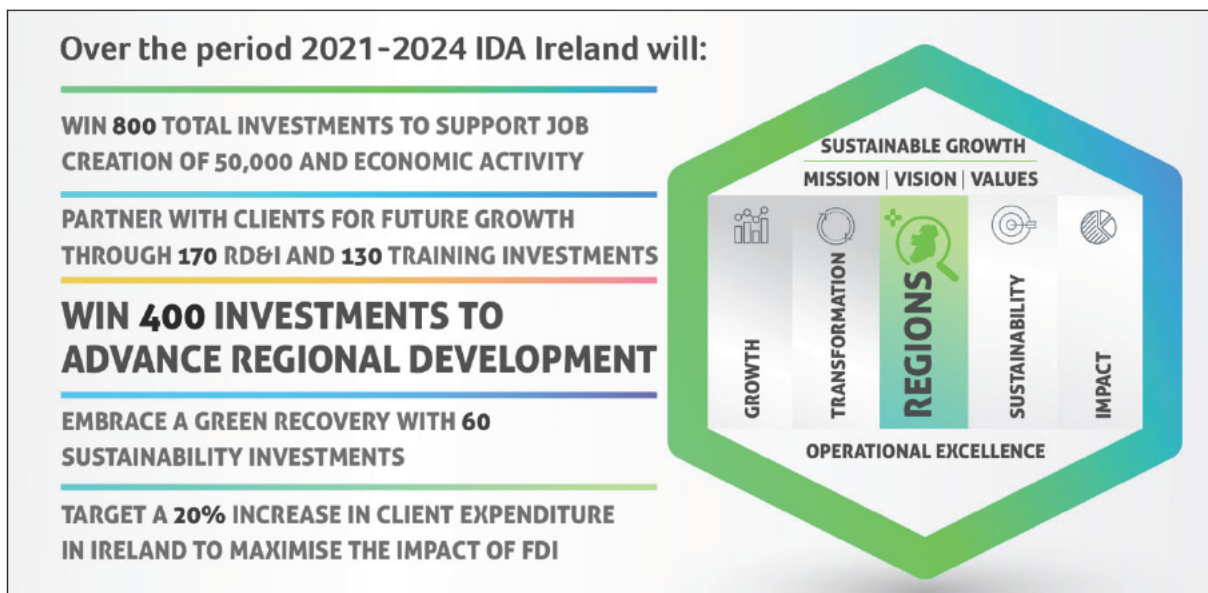
The proposed Sustainable Agri-Food Enterprise Hub is respectfully presented in accordance with the **National Planning Framework** objectives of achieving a large enterprise Agri-Food Hub in the rural area and ensuring that the natural environment is maintained. The proposal will also create new sustainable opportunities that will contribute to the climate change targets that are set for 2050 within the NPO 2040.

### IDA Regional Strategy 2021-2024

The IDA strategy for 2021-2024<sup>3</sup> places particular emphasis on the importance of regional investment based on sustainable growth. It notes that **“Regional development is at the centre of IDA’s new strategy. IDA is committed to the pursuit of more balanced, compact regional development which can deliver complementary efficiency and equity gains, with the overall impact of helping to advance national development”**.

The IDA is targeting 50% of their investments to be located in the regions. The importance of sustainability, new business models and supply chain reconfiguration are all recognised as emerging trends within the investment market. While renewable energy is identified as one of the areas of opportunity in line with the sustainability pillar, the IDA has also set a target of 60 sustainability investments. The five pillars underpinning the strategy are Growth, Transformation, Regions, Sustainability and Impact as illustrated below.

**FIGURE 11 IDA STRATEGY 2021-2024**



<sup>3</sup> Driving recovery & Sustainable Growth Strategy 2021-2024, IDA Ireland

## Government Policy Framework

### Food Vision 2030

A new Government agri-food policy was published in 2021 “Food Vision 2030”<sup>4</sup>. This policy provides a framework for the future priorities for the agri-food industry. It maps four high-level missions in order to create a **sustainable food system** that will deliver positive or neutral impact on the natural environment i.e. environmental sustainability:



In this regard it is clear that the global concerns regarding climate change are having direct impact on all Government policies and the agri-food industry must play its role in bringing about positive change.

A number of key takeout’s from the policy document include:

- The Strategy signals actions aimed at making the sector more diversified, resilient and based on **circular economy** principles. It proposes expansion in nature-based production systems (considered as carrying out farming activities designed to result in agricultural, ecological and climate benefits on the farm), tillage, horticulture, afforestation and organic production.
- The Strategy proposes **expansion** in tillage, horticulture, organic farming and agro-forestry, as well as a plan to reduce Ireland’s dependence on imported protein crops.
- The tillage and horticulture sectors are the most **carbon efficient sectors** of Irish agriculture and it is important that the area under cultivation in these sectors is at least retained, with an ambition to increase both.
- Growth **potential** is identified in 1) high value output (malting barley, wheat, oats and rye) to distilling and brewing; 2) high value food markets such as oats (particularly organic oats), oils and salad & chipping potatoes; 3) meeting domestic protein crop demand for livestock diets.

<sup>4</sup> Food Vision 2030, Department of Agriculture Food and the Marine, 2021.



- By adopting an **integrated food systems** approach, Ireland will seek to become a global leader of innovation for sustainable food and agriculture systems, producing safe, nutritious, and high-value food that tastes great, while protecting and enhancing our natural and cultural resources and contributing to vibrant rural and coastal communities and the national economy.
- Develop **value-added** functional foods and ingredient solutions with proven health benefits.
- Scale up **renewable energy** (RE) sources, especially anaerobic digestion, biorefining and biomass supply, and solar PV; focus on energy efficiency; and examine potential barriers to the roll-out of RE at farm level, including necessary support for microgeneration and access to the grid.
- Other strands of policy to achieve the sector’s climate neutrality objective are measures to increase its role in **carbon sequestration**, especially through forestry, and the scale-up of renewable energy sources, through anaerobic digestion, solar energy and greater energy efficiency.

### Ag Climatise - A Roadmap towards Climate Neutrality

The Ag Climatise Roadmap<sup>5</sup> was published in December 2020 following a consultation process by the Department of Agriculture Food and Marine. This roadmap is framed by Climate Action Amendment Bill 2020 which set the objective of achieving a “climate neutral economy” by 2050 and beyond. This overarching objective, is in line with international global commitments under the “Paris Agreement” and has far reaching implications for every sector of the Irish economy.

The role of agriculture is noted as “the single largest contributor to overall emissions at 35% (2019 Provisional EPA report) of the total. At the same time, the agriculture and land use sector (including forestry) has a key role to play in developing renewable energy systems and in sequestering carbon from the atmosphere.” In order to address this challenge the roadmap sets the following tasks:

1. *Reduce **GHG emissions** from the sector. Methane from enteric fermentation and nitrous oxide are the dominant GHGs from agriculture.*
2. *Increase the **carbon sequestration and carbon storage** potential of Ireland’s land use sector.*
3. *Reduce **nutrient loss** to the environment and contribute to improved water quality and biodiversity.*
4. *Meet our ammonia **emissions** reduction targets.*
5. *Build sustainable, **resilient food production** and land use management systems that meet these climate and environmental obligations, while also meeting market expectations.*
6. *Transparently communicate our progress; our **Origin Green** programme can play a key role in this regard.*

Significantly the policy notes that “The tillage and horticulture sectors are the most carbon efficient sectors of Irish agriculture, hence it is important that the area under cultivation in these sectors is retained, at a minimum, or indeed increased.” In this context the importance

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<sup>5</sup> A Roadmap towards Climate Neutrality, Department of Agriculture, Food and the Marine, December 2020

of promoting the development of a sustainable circular bioeconomy is a specific proposed action needed to deliver on the overall climate change targets (Action 12). Beyond the bioeconomy, the **roadmap** recognises that “the agriculture sector has a key role to play in helping Ireland meet its energy efficiency and renewable energy targets. In addition, adoption of energy efficiency and renewable technology generation can enhance the green image of the agri-food sector both nationally and globally.” Action 18 sets the following targets to “Generate at least a 20% reduction in agricultural energy use by 2030 across all farms. In addition, generate at least 20% deployment of renewable energy technologies focusing primarily on energy intensive farming systems.” In setting this target the Department of Agriculture Food and Marine is seeking to ensure that its various support programmes maximise the uptake of energy efficiency and renewable energy deployment at farm-level.

Minister Charlie McConalogue T.D. summarised the overall challenge as:

*“In the medium to longer term, a significant cut in biogenic methane emissions will be needed to negate the global warming impact of biogenic methane. Developments in technology (e.g. breeding and feed additives) can underpin this required reduction. Other agricultural emissions of nitrous oxide (including emissions from animals grazing at pasture, manure management and fertiliser application) will need to be offset by removals, and agriculture can also make a **substantial contribution to renewable energy.**”*

#### [Our Rural Future, Rural Development Policy 2021-2025](#)

Our Rural Future<sup>6</sup> policy document provides a comprehensive framework for development of Ireland’s rural economy and community. It notes that “The Green Economy presents significant potential for employment opportunities for rural areas as Ireland transitions to a low carbon, climate neutral future.” It maps out the opportunities presented for renewable energy and the bioeconomy and circular economy in Ireland. The following policy measures are specifically noted:

*21. Develop and implement a set of nine new Regional Enterprise Plans to support enterprise development and jobs **growth in the regions.***

*23. Deliver **ambitious job creation** and enterprise development targets for the indigenous sector in the strategies of Enterprise Ireland, Údarás na Gaeltachta and the Local Enterprise Offices to embed jobs growth more deeply within the regions.*

*25. Promote awareness and the use of remote **working hubs and enterprise centres** across the country to support remote working and encourage local enterprise start-ups*

*26. Maximise our resources and strengths in the **Green Economy** to support employment opportunities for rural communities in areas such as renewable energy, sustainable tourism, energy retrofitting, the Bioeconomy and the Circular Economy.*

*28. Develop an overarching **Clustering** Policy and Framework to advance strong and effective clustering and links between SMEs, multinational corporations and the third-level sector.*

The roadmap notes that “While Ireland faces unprecedented economic change over the next decade in the transition to a low carbon economy, rural areas can have a strong involvement

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<sup>6</sup> Our Rural Future Rural Development Policy 2021-2025, Department of Rural and Community Development, 2021

in this transition by building on their natural assets to contribute to renewable energy generation, carbon sequestration through afforestation and rewetting of bogs, sustainable land use, smart farming, and the creation of job opportunities in emerging sectors and green technologies.” In this context it sets the following policy measures:

*107. Enact and implement the Climate Action and Low Carbon Development (Amendment) Bill and set five-year carbon budgets to contribute to meeting Ireland’s target of **net zero** emissions by 2050.*

*110. Enable **community energy** to play a role in reaching the target of generating at least 70% of electricity through renewables by 2030, through supports such as a Community Benefit fund and a community category within the Renewable Electricity Support Scheme.*

*111. Prioritise the development of **microgeneration** of renewable electricity, allowing people sell excess power back to the grid, through the establishment of a Microgeneration Support Scheme.*

*112. Expand the **Sustainable Energy Communities** Network from 500 to 1,500 by 2030, to support local communities to be directly involved in energy projects*

It is noted with regard to climate change that “Society has a shared responsibility to realise this ambition and the Agriculture sector is committed to playing its part, while also taking advantage of the many sustainable opportunities that this transition can present.”

#### Whole of Government Circular Economy Strategy 2022-2023

The role of the circular economy in Ireland is being highlighted by Government in a new 2022-2023 strategy<sup>7</sup>. This policy document notes that “The circular economy is as much a social and economic agenda as it is an environmental one, and will enable us to turn our climate and environmental challenges into opportunities for all.

*Scaling the circular economy will create the opportunity for significant job creation and quality work at all skills levels for the citizens of the country, leading to reduced social inequity. It also presents an opportunity for financial savings and empowerment for consumers and will give a focus to inclusive, balanced and sustainable development, particularly in terms of regional and rural development.”*

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<sup>7</sup> Whole of Government Circular Economy Strategy 2022-2023, The Department of the Environment, Climate & Communications, December 2021



With regard to agriculture the document highlights that *“Increased circularity within the **Agricultural** sector can support lower farm costs and reduced climate and environmental footprints, through reduced use of external inputs, closing nutrient loops and minimising harmful environmental discharges. Agricultural wastes can also represent a valuable feedstock for the Bioeconomy as described previously. Further development of this Strategy should build on existing sectoral initiatives, such as the EPA/IFA’s Smart Farming programme and ensure consistency between national policy in relation to the circular economy, the bioeconomy and climate action.”*

One model referenced that can assist with expanding the circular economy is the DISRUPT model as set out below. It is intended that the DISRUPT principles would be used to underpin the design and development of the Ballyburn Sustainable Agri-Food Enterprise Hub.

<b>D</b>	<b>Design For the Future:</b> Adopt a systemic perspective during the design process, to employ the right materials for appropriate lifetime and extended future use.
<b>I</b>	<b>Incorporate Digital Technology:</b> Track and optimise resource use and strengthen connections between supply-chain actors through digital, online platforms and technologies.
<b>S</b>	<b>Sustain &amp; Preserve What’s Already There:</b> Maintain, repair and upgrade resources in use to maximise their lifetime and give them a second life through take-back strategies, where applicable.
<b>R</b>	<b>Rethink the Business Model:</b> Consider opportunities to create greater value and align incentives through business models that build on the interaction between products and services.
<b>U</b>	<b>Use Waste as a Resource:</b> Utilise waste streams as a source of secondary resources and recover waste for reuse and recycling.
<b>P</b>	<b>Prioritise Regenerative Resources:</b> Ensure renewable, reusable, non-toxic resources are utilised as materials and energy in an efficient way.
<b>T</b>	<b>Team Up to Create Joint Value:</b> Work together throughout the supply chain, internally within organisations and with the public sector to increase transparency and create shared value.

## Irish Grain Growers – Support for Agri Centres of Excellence

In addition to wider policy objectives in support of the intended valid proposition for an agri enterprise hub we also seek that Kildare (Co. Co.) Spatial Planning Unit respond to the calls from the Irish Grain Growers<sup>8</sup> to respond to the identified key themes:

- Food Security,
- Climate Change, and
- Innovation and Smart Technology (for Agriculture)

Key statements from the organisation cited as follows:

*As a representative voice for the arable growers of Ireland, we encourage and support the development of facilities and systems whereby farmers can be part of and take greater control of the end products from the raw material they grow.*

*The by-products from our arable crops can also be used as animal feed or bio-energy thus aiding a proper circular economy.*

*The region in the south east is the centre of the main arable area in the country, which is noticeable from the concentration of agricultural industry in the surrounding area. **Strategic locations for Centres of Excellence/Food Hubs will give easier access to the best land for growing crops.***

*Carbon /Ecology/ Climate Change / Water Quality /Soil Health /consumer knowledge of product, are the new driving forces for product production. **The Irish tillage sector can have a very positive role to play however without infrastructure being available we potentially will miss opportunity and negatively impact on our planet's state.***

## Ballyburn Specific Local Objective Proposal

### Sustainable Agri-Food Enterprise Hub

The vision for the Ballyburn site is to create a new Sustainable Agri-Food Enterprise Hub for the region in line with Government and Kildare County Council policies and objectives. Recognising that agricultural value added businesses typically require large sites, it is envisaged that the enterprise hub would consist of a cluster of value added agri-food and agri-engineering and renewable energy businesses that will benefit from the synergies of proximity to one another.

It is envisaged that the clustering of complementary businesses will:

- Create a new dynamic for the agri-food sector in the region
- Be a model for the development of the circular economy for the agri-food sector

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<sup>8</sup> Irish Grain Growers – May 2022 – “Food Hubs/Centres of Excellence - The Flexitarian Diet: becoming mainstream at a fast pace worldwide.”

- Create new key success drivers for the agri-food sector
- Drive new logistical competitiveness for the businesses
- Generate positive climate change benefits
- Drive new renewable energy projects to support the agri-food enterprise hub
- Support Kildare’s rural economy across the equine, agriculture, food and energy sectors
- Generate new employment opportunities
- Complement the creation of a new residential cluster on the site.

The need for value added opportunities has been identified by the Irish Grain Growers(IGG) (see Appendix 1) and it is intended to work closely with the IGG to commercialise these opportunities.

### Proposed Enterprise & Employment Sustainable Agri-Food Enterprise Hub - Site Specific Local Objective

The current Kildare Development Plan Policies and Objectives fully align with the proposed Sustainable Agri-Food Enterprise Hub, however we consider in this event that because the subject lands their location and extent and relationship with other rural and regional clustering the lands would benefit from a site specific objective to present wholly as a ‘plan-led’ development. The importance of a plan-led development cannot be underestimated in that it provides for certainty of delivery and investment. The nature of agri-food value added activities, i.e. storage , processing and logistics of agri-food products and agri-engineering manufacturing, is largescale. It is therefore proposed that the site specific local objective is the appropriate delivery mechanism.

#### ***Q2 To promote the development of a sustainable agri-food enterprise hub at Ballyburn Upper.***

The purpose of this local objective is to promote the development of a sustainable agri-food enterprise hub and local employment opportunities. Permissible uses may include agri-food value added activities, agri-engineering manufacturing, agri-food storage, processing, logistics and renewable energy enterprises.

The site currently contains two residential properties, Ballyburn House and Marbur Farm House close to the farmyard and wooded nature zone. These elements can provide for complementary uses associated with and not exclusive to office space or residential uses and provide for a residential cluster to support the principal employment activities .

This proposal would align with the “Sustainable Rural Housing – Guidelines for Planning Authorities” (2005) that include the following overarching objectives:

*(i) The importance of encouraging development needed to sustain and renew established rural communities in both smaller rural towns and villages and wider countryside areas,*

*(ii) The need to ensure that the planning system guides residential and other development to the right locations in rural areas in the interest of protecting natural and man-made assets in those areas, and*

*(iii) The need to analyse the different types of economic, social and physical circumstances of different types of rural areas and to tailor planning policies to respond to these differing local circumstances.*

It is envisaged that the 1.66 hectare site will accommodate a small number of residential units that will support the enterprise and employment zoning referenced above. This small area will facilitate persons employed full-time in rural-based activity such as farming, horticulture, forestry, bloodstock or other rural-based activity in the area subject to the necessary environmental considerations. The proximity of the rural cluster will ensure sustainable living and staffing supports for the agri-food enterprise hub.

This submission seeks recognition of the clear evidence base and policy objectives and support for such a proposition of Regional and National significance and we ultimately seek the following Site Specific Local Objective as can be presented on the subject lands as follows:

*The subject lands represent a valid proposition for an agri-enterprise development to create **a new sustainable agri-food enterprise hub** at Ballyburn Upper. Development proposals associated with the landholding will be expected to present and generate **strong regional economic benefits** for South Kildare and become a new **driver for innovations in the arable sector**.*

*The Council will favourably consider proposals for the development of **a new sustainable agri-food enterprise hub** as merits its well-connected rural location and where the subject site's specific location offers amenity, environmental and economic advantage. Any future proposals will be assessed taking account of:*

- The contribution of the proposed development to the county's economy;*
- The contribution of the proposed development to the county's environment and the principles of sustainable development;*
- Assessment of any potential environmental effects; and*
- National & Regional planning policy and objectives.*

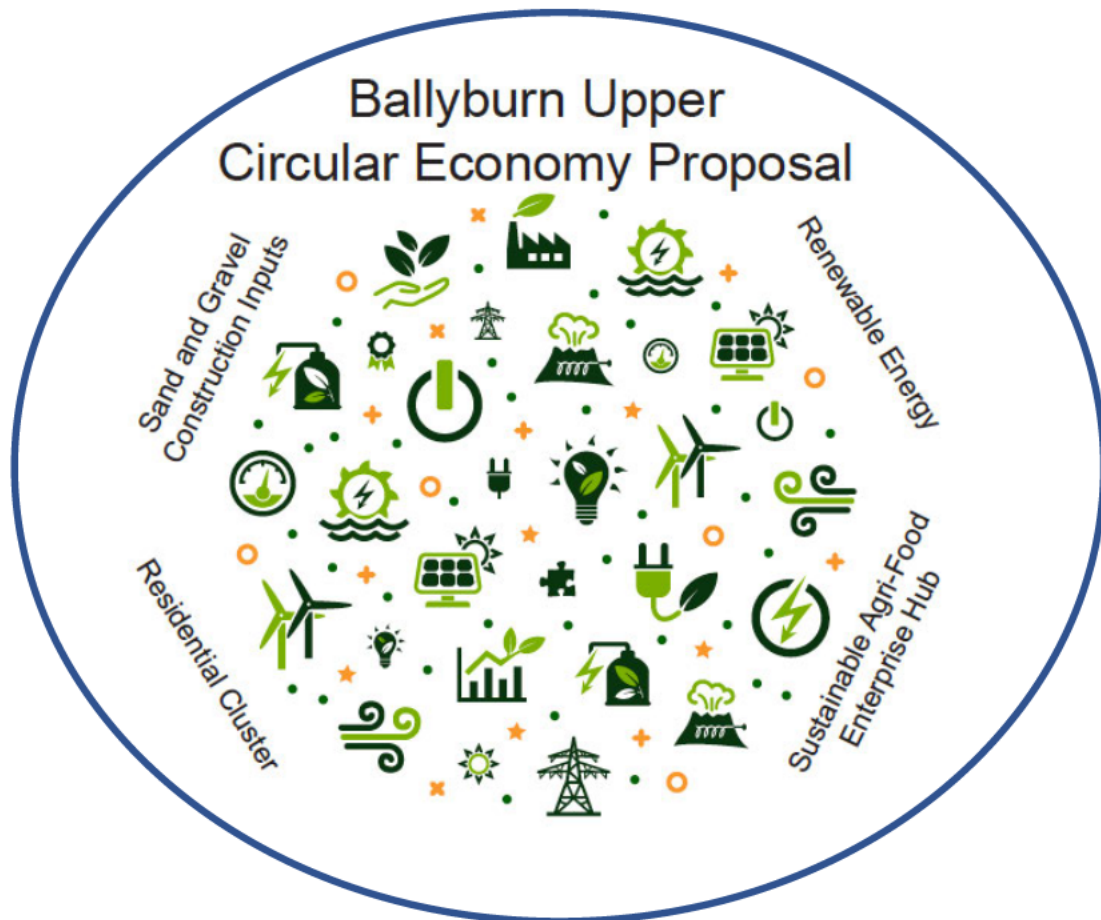
*The Council will normally permit proposals for such employment generating and agri-technology innovation development where it can be demonstrated that the development complies with the relevant development standards and is not detrimental to residential amenity or to environmental quality.*

The overall elements of the above proposal are illustrated in Figure 12.

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*FIGURE 12 BALLYBURN UPPER PROPOSAL WITH CIRCULAR ECONOMY BENEFITS*

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### **Food Hubs/Centres of Excellence**

#### **The Flexitarian Diet: becoming mainstream at a fast pace worldwide.**

As a representative voice for the arable growers of Ireland, we encourage and support the development of facilities and systems whereby farmers can be part of and take greater control of the end products from the raw material they grow. Given the complete dynamic change in the indigenous food and feed policies over the last couple of years, which has now been brought into even more focus with the brutal war in Ukraine, we as a country need to produce more indigenous food and be less reliant on imports for our staples. Of particular focus should be cereals, such as wheat, barley, Oats; plant oils such as rapeseed oil along with vegetables and legumes like beans and peas, all of which we rely heavily on imports to feed our population. The by-products from our arable crops can also be used as animal feed or bio-energy thus aiding a proper circular economy.

We have to achieve emissions targets under the Europe wide 'Green Deal'. The growing of these crops will have the lowest carbon footprint of any agricultural food producing sectors in Ireland. In many cases these crops potentially sequester more carbon than they emit.

Any development that focuses around adding value to arable crops will help Ireland achieve these Green House Gas emissions targets and thus must be encouraged. In doing so it also aids biodiversity as some of these crops are known as pollinator crops while tillage land provides over winter feed for many of our bird species. It is truly sustainable farming alongside helping to achieve national food security.

We as tillage farmers are more than willing to rise to challenges. We also need to be part of the story of the supply and manufacture of added value products to help secure our family farm futures. The region in the south east is the centre of the main arable area in the country, which is noticeable from the concentration of agricultural industry in the surrounding area. Strategic locations for Centres of Excellence/Food Hubs will give easier access to the best land for growing crops.

Recent surveys carried out by the likes of Bord Bia highlight the fast-growing Flexitarian diet which has plant-based food at its heart. It is now taken as fact that plant-based diets will figure strongly going forward. However, it is also recognised that Ireland has a severe deficit of processing facilities for same currently and efforts must be made to address this if we are to take advantage of the growing trend that is the plant-based diet.

Carbon /Ecology/ Climate Change / Water Quality /Soil Health /consumer knowledge of product, are the new driving forces for product production. The Irish tillage sector can have a very positive role to play however without infrastructure being available we potentially will miss opportunity and negatively impact on our planet's state.

**Bobby Miller**  
Chairman IGG

**Clive Carter**  
Secretary IGG