

## Chapter 9: Our Rural Economy

### 9.1 Background

- Insert the following to qualify abbreviation:

*Urban generated pressures such as significant pressure for one off housing in the countryside; with increased commuter traffic on rural roads, exploitation of natural resources — ranging from extractive industry, quarrying, in-fill with **Construction & Demolition (C&D)** waste, concrete batching plants, diversification of uses on former cut-away bogs and energy production and distribution.*

- Insert the following:

*Traditional sectors such as agriculture, extractive industries, and forestry will be important in helping Kildare reach targets in relation to climate change and will play a vital role over the coming years and the period of this plan to help Ireland reach its climate targets particularly in relation to **food security**, carbon storage, provision of renewable energy, reducing emissions, protection of water bodies and increasing biodiversity.*

- Insert the following:

The agri-food, forestry, and tourism sectors play a significant role in Ireland’s rural economy. Kildare is well positioned as a gateway county to the Midland Peatlands and the West from Dublin, to contribute more to the tourism sector, with the development of Greenways, Blueways, Peatways and the potential of a National Peatlands Park on former industrial cutaway bog providing an alternative eco-tourism and activity-based experience.

~~to contribute more to the tourism sector with the development of greenways, blueways, and peatways providing an alternative visitor experience.~~

### 9.3 Rural Economy & Rural Enterprise

Insert the following in **RD P1**:

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

We draw your attention to **RD O6**:

**RD O6** - Encourage the conservation and promotion of biodiversity in all rural development activities whilst supporting the restoration, preservation, and enhancement of ecosystems dependent on agriculture and forestry.

This objective does not seem to align with the gravity of the biodiversity crisis.

- What is meant by 'biodiversity'? (Please refer to our comments in Chapter 12)
- What does supporting the restoration, preservation, and enhancement of ecosystems dependent on agriculture and forestry mean?

*This objective should be reworded to reflect the following:*

- *Actively enforce the protection and conservation of protected sites (SACs, SPAs, NHAs and pNHAs).*
- *Ensure the identification and protection of existing high nature value habitats in natural and semi-natural areas.*
- *Support the restoration of degraded agricultural and woodland ecosystems, through sound ecological practices.*
- *Any 'enhancements' of ecosystems will seek to protect existing native biodiversity by using locally sourced native planting material of native provenance and origin (please refer to our comments in Chapter 12)*

Insert the following in **RD 08**:

- **RD 08** - *Promote the provision of broadband and other communications infrastructure in rural areas of the county through supporting the continued roll out of the National Broadband Scheme and initiatives such as the EU Smart Villages Initiative.*

### **Table 9.1**

- Please insert the following in the **bullet-point list**:
  - The proposal shall include a comprehensive planting plan of native species, of native provenance and origin, to screen the development.
- in order to protect the genetic integrity of our native flora, and protect from importation of pests and diseases, particularly microorganisms (refer to our comments in Chapter 12) and see:
  - See O'Hanlon et. al. 2021 Catalogue of Pests and Pathogens of Trees on the Island of Ireland. Biology and Environment: Proceedings of the Royal Irish Academy
  - "In the last decade however, the greatest risk to trees and forests on the island of Ireland is the introduction of non-native pests and pathogens."
  - Additionally, see recommendations in Draft Kildare County Development Plan 2023-2029 - SEA Environmental Report:
  - <https://consult.kildarecoco.ie/en/system/files/materials/4060/Draft%20Kildare%20CDP-%20SEA%20Environmental%20Report%20Final%20Issue.pdf>

### 9.4.1. Agri Food Sector

We note the following introduction:

*The Irish agri-food sector is Ireland's oldest and largest indigenous industry. In 2020, the sector accounted for almost 7% of Gross National Income (GNI) and 10% of exports in value terms. The sector grew substantially over the past decade, with Irish food and drink exports increasing by 60% from €8.9 billion in 2010 to €14.2 billion in 2020.*

*The sector also employs approximately 164,400 people representing 7.1% of total employment. Outside of Dublin and the mid-east region, the sector provides between 10% and 14% of employment (Food Vision 2030). The sector plays an increasingly crucial role in the rural economy and in the development of the county in general.*

- Please note that the High Court has granted Friends of the Irish Environment leave to challenge the Government's Agriculture Strategy – **Food Vision 2030**. This legal challenge follows the withdrawal of the Environmental Pillar from the stakeholder group developing the strategy, due to its multiple, endemic shortcomings on climate, biodiversity, water and air quality. (<https://www.irishtimes.com/news/crime-and-law/courts/high-court/environmental-group-challenges-government-s-agri-food-strategy-1.4815328>)
- Additionally, the National Parks & Wildlife Service (NPWS) unambiguously warned before the approval of Food Vision 2030 that it was not possible to conclude with any certainty that this plan would not adversely affect legally protected European habitats or “urgently halt and reverse current trends in relation to emissions, biodiversity decline and water quality to which the agri-food sector is a major contributor”. (<https://assets.gov.ie/162857/1e411dc0-c565-4b56-8807-4a9040f035c1.pdf>)
- Additionally, the Environmental Protection Agency (EPA) has issued repeated clear warnings on agricultural intensification in Ireland, asserting that the continued expansion of the sector is unjustifiable if we are to meet our legally binding commitments under European law. (<https://www.independent.ie/business/farming/forestry-enviro/environment/we-cant-have-this-ongoing-growth-of-the-dairy-sector-laura-burke-40894479.html>)
- Additionally, in the most recent Article 17 report on the Status of EU Protected Habitats and Species in Ireland, only 15% of our EU protected habitats were found to be in a favourable condition. In this report it was recognised that over 70% of these protected habitats are impacted by pressures relating to agricultural practices. ([https://www.npws.ie/sites/default/files/publications/pdf/NPWS\\_2019\\_Vol1\\_Summary\\_Article17.pdf](https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf))

In light of our **dual Climate Change and Biodiversity Loss crises**, please revise **RD P2** as follows:

**RD P2** - *Support the future and continued development of agriculture and the agri-food sector in County Kildare.*

- **Revised RD P2** – Support sustainable agriculture and a sustainable agri-food sector in County Kildare.

And please reword **RD O9** as follows:

**RD O9** - Encourage the development of environmentally sustainable agricultural practices, to ensure that development does not impinge on the visual amenity of the countryside and that the quality of the natural environment (watercourses, wildlife habitats and areas of ecological importance) is maintained and protected from the threat of pollution to support the achievement of climate targets.

- **Revised RD O9** - Encourage the development of environmentally sustainable agricultural practices, to ensure that the quality of the natural environment (watercourses, wildlife habitats and high nature value habitats) are restored, maintained and protected from the threat of pollution and drainage, to support the conservation of native biodiversity and the achievement of climate targets.

**Additional objective** – Ensure that agricultural development does not impinge on the visual amenity of the countryside.

Please note the County Biodiversity Plan is out of date since 2014. Additionally, please note it is anticipated that a new National Biodiversity Action Plan will be published in 2022. In this light, please revise objective **RD O12** as follow (refer to our comments in Chapter 12):

**RD O12** - Support the implementation of the objectives identified in the County Biodiversity Plan 2009-2014 and any relevant local action plan.

- **Revised RD O12** – Implement the objectives identified in the County Biodiversity Plan (insert new dates), any relevant local action plans, and the Local Just Transition Plan 2022.

Additionally, please note the following from Teagasc:

*“The current EU goal is that 25% of agricultural land is organic by 2030. Currently only 8.5% of EU agriculture land is farmed organically. This leaves a huge target to be reached by 2030. At current rates of growth in the organic sector the EU looks likely to only achieve 15% to 18% of its 25% target.”* (<https://www.teagasc.ie/news--events/daily/farm-business/could-organic-farming-work-on-your-farm.php>)

In light of the EU goal that 25% of agricultural land is organic by 2030, we suggest inserting an additional objective, as follows:

**Additional objective** - Encourage the development of organic agriculture in County Kildare to achieve the EU goal that 25% of agricultural land is organic by 2030.

## 9.6 Horticulture

We note increased consolidation in the Horticulture Industry in Ireland, including both the Nursery Stock Industry and the Food Output Sector as outlined in the introduction here:

*While there has been a continual reduction in the number of produce growers over the past two decades those remaining in production have broadly maintained the same level of output.*

We also note that given that green infrastructure and nature-based solutions (SuDs, peatlands, hedgerows, trees etc.) are central to the formulation of this Development Plan, this potentially places the horticulture industry at the centre of many of these themes.

Additionally, given increased consolidation within the horticulture industry nationally in recent years, and the increasing demand for the planting of native plants, this provides the Council with an ideal opportunity to actively support an indigenous, locally-based horticulture sector, providing for local employment and employing best-practices with respect to climate change and biodiversity loss.

Acknowledgement must also be made here of the severe challenges faced by the horticulture sector in Ireland in relation to peat availability. See:

- <https://assets.gov.ie/213283/b110a6f6-bebf-4496-9c76-92f3cf0faf35.pdf>
- <https://www.gov.ie/en/publication/39315-working-paper-to-address-challenges-related-to-peat-supply-in-the-horticulture-sector/>

We note and welcome **RD O18** and **RD O19**.

To actively support and promote a local indigenous horticulture sector, we suggest the following additional actions be inserted:

- **Additional Action:** To provide support for an indigenous nursery stock sector through actively seeking partners for the establishment of grant funding by the end of 2023, for the production of bare root tree/shrub stock of local provenance and origin.
- **Additional Action:** To require that any native plantings planted through Council funded planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).
- **Additional Action:** To require that any native plantings for green infrastructure or nature-based solution planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).

- **Additional Action:** To require that any native planting for biodiversity initiatives be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).
- **Additional Action:** To actively support research, along with stakeholder, for example NUIM, for alternatives to horticultural peat.
  - <https://www.iucn-uk-peatlandprogramme.org/news/peat-free-horticulture-reality-and-opportunity>
- **Additional Action:** To ban the use of peat-based horticulture products in Council funded planting schemes by the end of this Development plan.

With respect to **horticultural food output** (fruit, vegetables and mushrooms), recent developments have highlighted issues concerning the increased globalization and consolidation of the food industry, along with food security and fossil fuel costs associated with production and transport.

This Development plan provides the ideal opportunity to actively support locally-based horticultural food outputs, and to capitalize on the experience and knowledge of resident expertise. For example:

- <https://www.independent.ie/business/farming/agri-business/innovations-mark-kildare-farm-out-as-one-of-irelands-most-progressive-organic-holdings-38248456.html>
- **Additional objective:** To support and encourage local Horticultural Food Producers, with a particular emphasis on supplying local markets with organically produced food.

## 9.7 Forestry

With respect to Forestry, best-practices must ensure protection of our designated habitats and species, the genetic integrity of our native plants, and minimization of the risk of importation of pests and diseases, particularly harmful microorganisms.

- See O’Hanlon et. al. 2021 Catalogue of Pests and Pathogens of Trees on the Island of Ireland. Biology and Environment: Proceedings of the Royal Irish Academy
- *“In the last decade however, the greatest risk to trees and forests on the island of Ireland is the introduction of non-native pests and pathogens.”*

Please insert the following in objectives **RD O20** and **RD O22**:

- **RD O20** - Encourage public and private owners to allow / provide public access to forests for recreational and amenity use e.g., walking, biking and equine trails to enhance health and wellbeing with due consideration to sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation.
- **RD O22** - Facilitate tourism infrastructure and visitor services including tourism accommodation at appropriate locations in forest estates with due consideration to

sensitive areas for wildlife conservation and subject to compliance with the relevant environmental legislation.

Given our forestry targets for 2030, this places the Nursery Stock Industry at the centre of achieving this level of planting.

We suggest the following actions to support the Kildare Nursery Stock sector.

- **Additional Action:** To provide support for an indigenous nursery stock sector through actively seeking partners for the establishment of grant funding by the end of 2023, for the production of bare root tree/shrub stock of native provenance and origin.
- **Additional Action:** To require that any native tree plantings planted through Council funded Woodland planting schemes be of native provenance and origin by 2024 (and preferably local provenance and origin by 2027).

## 9.8 Bogs and Peatlands

Please note: Fens (along with raised bogs and blanket bogs) are also peatland systems. These are unique habitats which, like our bogs, have been significantly impacted by drainage in recent years. We note that there is no reference to these peatland systems in this section of the chapter. (See: <https://www.greatfen.org.uk/big-ideas/capturing-carbon>)

We suggest insertion of additional paragraphs after this paragraph, as follows:

- *Peatlands form a distinctive aspect of Kildare's Landscape. They represent some of the counties last areas of wilderness. The former Bog of Allen is the largest raised peat bog in Ireland. At over 950 square kilometres, it spreads across nine counties, including Kildare, and is the source of the River Boyne. Contained within this bogland in Kildare are a number of protected sites, the former boglands of Bord Na Móna and a number of visitor attraction centres around the bogland heritage such as Lullymore. The National Peatland Strategy 2014 which set targets for the re-use of cutaway bogs in terms of environmental protection, forestry, energy production and recognises the importance of this peatland landscape and promotes the concept of a National Peatland Park to explore the rich natural, archaeological, and cultural heritage of this unique landscape.*
- The National Peatlands Park and development of the Blueway demonstrates great potential to tangibly assist a Just Transition for local communities, leading to successful economic regeneration and a sustainable local economy.
- The Council (together with Failte Ireland and other stakeholders) will actively support community-led tourism initiatives encompassing the Blueway and peatland areas to the west as part of a National Peatlands Park. This has the unique potential to offer the visitor a relaxed "wilderness" environment.
- The Council recognises that the development of a range of outdoor activities based around our natural amenities of bogs, canals and rivers and the discovery of the area's

natural and built heritage could significantly support the future growth of tourism in Kildare and the midlands.

We suggest amending **RD P7** as follows, and insertion of **two additional policy statements**:

- **RD P7** - *Support the appropriate and sensitive diversification of former cutaway and degraded peatlands, whilst ensuring the protection of their ecological, archaeological, cultural, and educational significance in line with the National Peatlands Strategy (DAHG 2015) and the Peatlands & Climate Change Action Plan 2030.*
- **Additional Policy**: Conserve and protect, where possible, all intact peatlands (bogs and fens), and encourage ecologically informed restoration where appropriate on damaged peatlands.
- **Additional Policy** - To support sustainable tourism and infrastructure for peatland communities.

Please note: objective **RD O28** lacks clarity and should be deleted or rewritten:

**RD O28** - *Work with all relevant stakeholders including Bord na Móna to support the sustainable re-use of circa 30-50% of cutaway boglands for economical purposes.*

- What does economic purposes mean?
- What is the basis of a 30-50% sustainable re-use of cutaway boglands?
- Surely, all re-use development of cutaway boglands should be sustainable?

Please note: objective **RD O29** lacks clarity and should be replaced with more specific objectives.

**RD O29** - *Support the development of renewable energy (wind and solar) on a percentage/no more than 50% of former industrial peatlands/cutaway*

- Does the 50% refer to all industrial peatland or within each industrial peatland site?
- This figure is arbitrary and should be revised down or deleted.
- It is also inconsistent with the policy for other extractive industries, such as mining and quarrying.
- How does this tie in with overall landscape scale objectives (Chapter 13)?
- Are there designated sites within the industrial peatlands area that will be rewetted, rewilded?
- Alternatively, the objective should be qualified by including an objective to conserve the landscape area of continuous boglands such as the Allen-Lullymore Bog group and other areas of continuous bogland.
- Additionally, renewable technologies should also be investigated and supported outside these peatland areas.

- **Revised RD O29** - Consider the development of renewable energy (wind and solar) on an area no more than 10% of total peatlands, subject to the conservation of landscape scale continuous boglands such as the Allen-Lullymore Bog group.

We suggest the following amendment to objective **RD O31**:

- **RD O31** – Support the development of a Peatland National Park in co-operation with Bord Na Mona, NPWS, local community groups and other relevant stakeholders as per recommendation 9 of the BOGLAND Report from the EPA in 2011 and action A28 of the National Peatland Strategy 2014.

Given the acknowledged Biodiversity Crisis and a shortage of experienced field biologists nationally, we suggest addition of the following to **RD O34**:

**RD O34** - Require applications for mineral or other extraction to include (but not limited to):

- An Appropriate Assessment under Article 6 of the Habitats Directive where any quarry / sand and gravel extraction are likely to have an impact on a Natura 2000 site (see Chapter 12).
- An Environmental Impact Assessment Report (EIAR).
- An Ecological Impact Assessment may also be required for sub- threshold developments to evaluate the existence of any protected species / habitats on site.
- A detailed landscaping plan to be submitted indicating proposed screening for the operational life of the site. The predominant use of native plant species of native provenance and origin in the proposed landscaping plan will be expected.
- Detailed landscaping and quarry restoration plans. Habitats and species surveying shall be carried out by a suitably experienced botanist/ecologist and shall influence the restoration plan for the site.
- Comprehensive Site Restoration Plan and/or After-Use Strategy having regard to the principles of 'Rehabilitation Ecology'
- Transport Impact Assessment

We are very happy to see the approach taken to post-industrial site remediation/re-instatement in objectives **RD O39** (with a minor addition) and **RD O40**. We hope that these will become guiding objectives for all post-industrial sites of extractive industries, including peatlands.

We suggest the following insertion in **RD O39**:

- **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. These assessments will include the expertise of a suitably qualified and experienced botanist/ecologist. Proposals for future uses/infill of these areas should be agreed with the Planning Authority through the development management process.

## **Additional Comments**

### **Wool industry**

In Budget 2021, €100,000 was secured for a feasibility study aimed at developing Ireland's struggling Wool Industry. Sheep's wool is a sustainable, organic, renewable natural material which can be used in a wide range of products such as textiles, fertilisers, insulation and packaging".

Irish wools have been renowned for their unique properties which allow them to be used in carpets, textiles and construction materials. Increasingly, the value of wool as an insulation material is being recognised. Please see:

- <https://www.teagasc.ie/publications/2021/irish-wool-is-at-a-crossroads.php>
- <https://www.independent.ie/business/farming/sheep/sheep-farmers-back-major-wool-study-to-develop-struggling-industry-40187632.html>
- <https://www.heritage-house.org/stuff-about-old-buildings/insulation/sheepswool-its-green-clean-and-breathable.html>

We believe that there is a wealth of uses for wool, and these uses span across a whole range of sectors, and that wool has a tangible value and is not simply a waste product.

We would like to see KCC acknowledging this in the Plan, and engaging with and supporting local farmers to develop their product in a sustainable way, by getting involved with the research currently happening here in Ireland,.