

# Leitrim IFA

## Submission to

### **Leitrim Co. Council on the Draft Leitrim County Development Plan 2023-2029**

Leitrim IFA is pleased to make the following submissions to the County Council for consideration in the drafting of the County Development Plan. Leitrim IFA wishes to acknowledge its commitment to ensuring a sustainable high-quality Environment for food production and amenity use in Leitrim for all to enjoy and its willingness to work with the various local and national authorities to help ensure a high level of protection of the rural environment in the County.

## **Forestry**

Agriculture in Leitrim [supports](#) thousands of jobs in the rural economy, both directly in food & drink processing and also in the wider Agri industry, including input suppliers, agricultural contractors, jobs in auctioneering, transport and engineering and in accountancy, legal, veterinary and other advisory services.

- Number of Farms – 3,656
- Average Farm Size – 24.5 ha
- Land area farmed – 89,719 ha
- Numbers employed at farm level (FTE) – 3,864
- Stock on farm -

Number of dairy cows – 1,971

Number of other (beef) cows – 26,497

Number of ewes – 68,907

Forest cover in Ireland has grown from 1% in 1900 to 11.5% but it is likely to grow substantially in the near future in response to government afforestation targets as set out in the Climate Action Plan. In 2016, a third of the afforestation programme was [concentrated in Cavan, Leitrim, Mayo, Roscommon and Sligo](#). This severe concentration of forestry within certain counties is leading to negativity and is damaging the perception of forestry among farmers. It is not helped by the fact that over 36% of the planting is now undertaken by outside investors that do not live within the communities where the forests are planted. On a visit to Leitrim in 2018 the then president of the IFA [Joe Healy said](#);

“The level of afforestation within the county is disproportionate, particularly when you consider that the land area in Leitrim accounts for just 2.2% of the total land area in the country. The lack of balanced regional spread in the afforestation programme must be addressed”.

County Leitrim has swollen with conifer plantations and with forestry cover in Leitrim at around 20% there is a greater and greater level of resistance coming from Leitrim farmers towards further unplanned forestry. IFA members participated in an online consultation on project woodland and Leitrim farmers spoke to Jo O’Hara (former CEO Scottish Forestry. Jo has written a [report](#) advising the Minister on the implementation of the ‘ways forward’ proposed by Jim Mackinnon in his review of forestry licences

completed in November 2019. We emphasised the adverse impacts of over afforestation and the positive role the Local Authority could play in decision making on forestry. In her reply she talked about the importance of the local authority. [She said](#);

“..your point on Local Authorities and their engagement has been vital over here (Scotland). That regional level of engagement is hugely helpful. Trying to come up with a national solution to this that has local impact without going in at the regional level is really tricky so I haven’t included much about it in my report because it didn’t come up from John MacKinnan but it has been such a big part of the solution over here. Like you say getting that community voice heard and getting that social licence back”

While Jo O'Hara didn't refer to the need for a regional solution directly in her report as that was outside it's scope but she did put a statement in as an annex;

#### **Annex 4. Related and relevant issues raised but out of scope.**

1. There are clear parallels with the conditions in Scottish forestry between the 1990's and 2010's which present learning opportunities for Irish forestry. However there are significant differences – particularly in relation to land tenure, legislation and recent land use policies and practices. **At the most fundamental level, an issue common to Scotland, Ireland and elsewhere is the need for a societal 'licence to operate' for forestry to be sustained in the medium to long term.** This societal licence demands that the public benefits are clearly accepted as exceeding the public costs and risks associated with forestry operations. Without this, political, financial and legislative barriers will not be overcome. **The recommendations in the Mackinnon report go some way to addressing this, however additional work to improve local and regional community engagement with their local forests would help to mitigate the risk of similar issues arising in future.**

Leitrim people need to consider how much forestry is enough and how we can find a way of making what we have better? While the government's [Project Woodland](#) was established to reform the regulation and vision for forestry in Ireland this work can't address all of the issues facing communities affected by intense afforestation without a plan led input from the local authority and a decision making process that gives regional planning some weight.

We need to acknowledge that there's a sustained level of external pressure enabling foresters to get access to Leitrim's agricultural land, and that this land isn't unwanted land but actually land that is needed to sustain a rural farming population. This pressure to access land for forestry has moved through different phases over time going from state forestry to private forestry planting by non farmer investors.

In 2004 Niall OCarroll authored a book called "[Forestry in Ireland - A Concise History](#)". He traces the history of developments in forestry in Ireland. In the third chapter he describes that although the first unconditional planting grants were available in the 1930's there had been in place from the outset a policy **to exclude land of any agricultural utility from state afforestation.** *This was made clear in 1963 by Henry Gray. Assistant Secretary, Forest Service from 1967 to 1971, when he quoted from the annual report of the Minister for Agriculture for 1925-26;*

*“The Department do not desire to acquire for afforestation land fit for agricultural purposes which might be used to form new holdings or to enlarge existing ones. With a view, therefore, to prevent such land from being acquired for afforestation they have fixed a maximum price at such a figure as to render its sale to the Department for this purpose an uneconomic transaction.”*

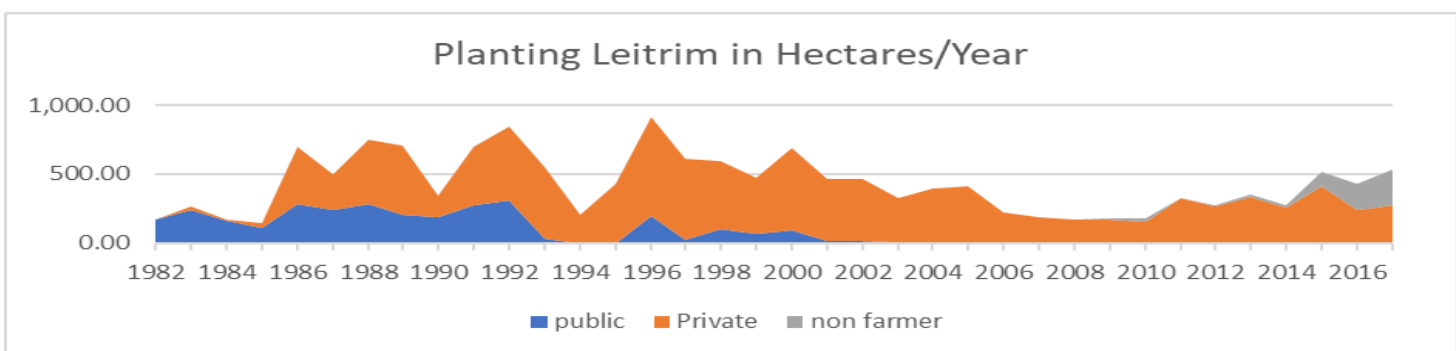
This policy that land of any agricultural utility should be kept out of state afforestation lasted until 1960's when a failed major forestry experiment at Knockboy, Connemara, planted in the 1890's existed as ready evidence against proposals to plant land only available because of its unsuitability for agricultural use. In 1950 the Irish government invited forestry adviser Mr Roy D. Cameron from the Food and Agriculture Organisation (FAO) of the United Nations to advise on its policy to plant 10,000 hectares annually over 40 years which would result in the planting of extensive areas of what were then used as 'rough mountain grazings. Cameron 'proposed to establish as a basic figure that 200,000 standards of sawn softwood per annum would meet any possible need of the population of the twenty-six counties now comprising the Republic of Ireland'. He recommended division of the afforestation programme;

'into two categories, a commercial forestry programme designed to meet minimum requirements for sawn softwood in times of emergency [estimated at 100,000 standards per annum] and a social forestry programme for soil conservation, stabilisation of employment in congested areas, and reclamation of idle lands'.

This may have marked a separation of policy objectives as from then on each year's Ministers report until the last year of operation of the Forest Service in 1988 reported the individual areas planted in counties Leitrim, Clare, Donegal, Galway, Kerry, Mayo, Roscommon and Sligo. The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. The plan acknowledges that;

As the quality of land is often a determining factor in the land-use decision-making process, lower quality land that currently presents challenges for economic agriculture may represent a resource that might be used for afforestation. It is likely that forest cover will continue to focus on suitable agricultural land which may be easier to convert to afforestation owing to more limited agricultural use.

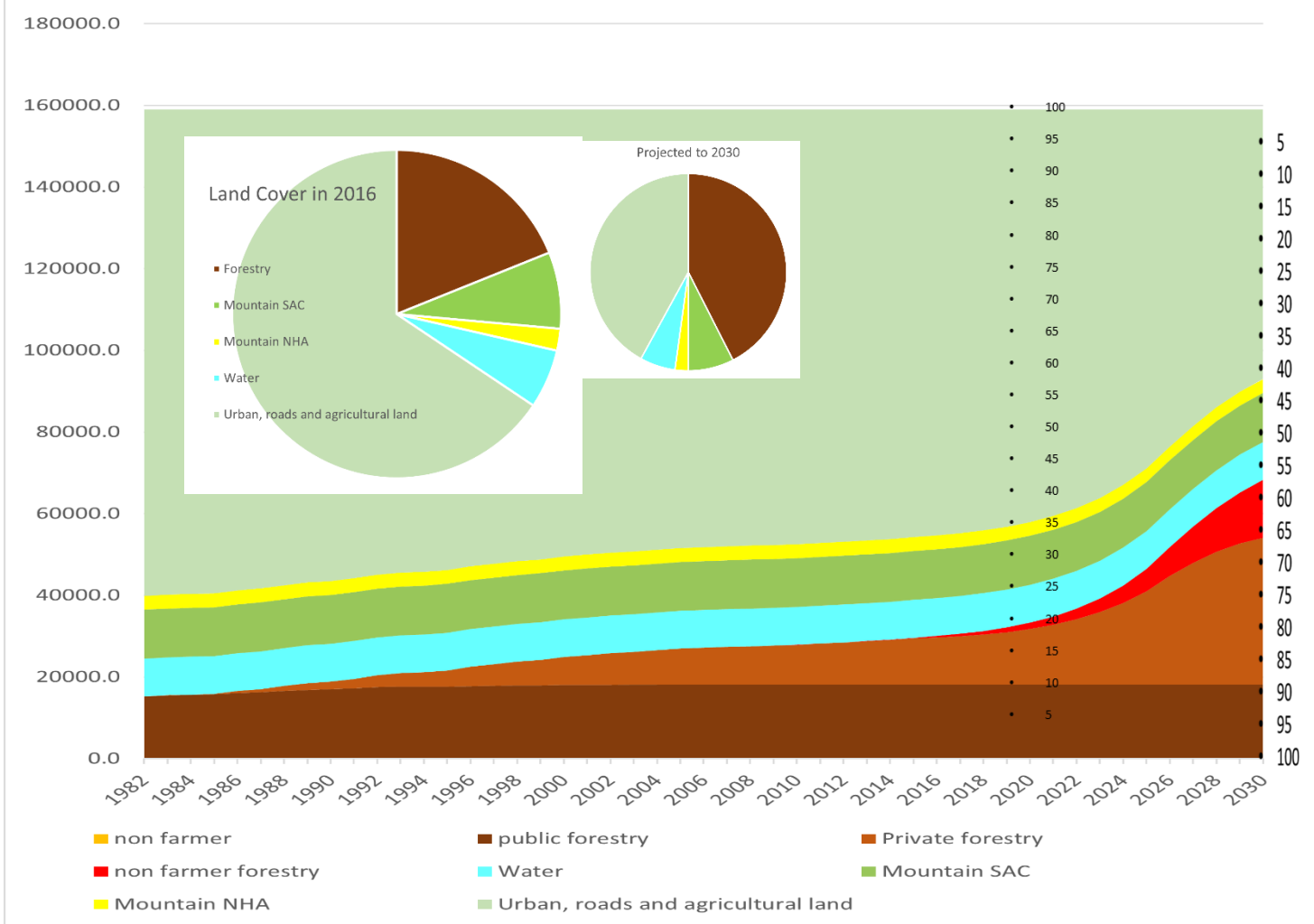
In the past, access to land required to sustain family farms in the west of Ireland was at least at some point partially protected by a policy to limit payments for such land. Any such protections have long been removed as pressure from the growing forestry industry now supported by private investors to access that same land in order to meet timber production requirements for sawn softwood initially and climate mitigation objectives now have been removed.



**Figure 1: The trend in planting shows a rapid increase in non-farmer planting since 2014, modelled from data published by the Department of Agriculture.**

Today the Irish forestry sector employs [12,000](#) people and every year it contributes €2.3 billion euro to the Irish economy, but the proceeds are not shared proportionally to the Local Leitrim economy. In order to demonstrate the [need for research](#) into the social and economic impacts of future forestry Leitrim IFA modelled a scenario in line with the Food Wise 2025 report

### Historical and Projected land use in Leitrim



**Figure 2: Historic and projected land use in Leitrim**

We were successful in getting the Minister Andrew Doyle to commission a study led by Dr Áine Ní Dhubháin, [U.C.D.](#) but the scope of the report was limited to only consider economic future benefits from forestry at the individual level. A great opportunity to look at the future cumulative impacts of forestry at the regional level in Leitrim was avoided. Some of the early growth projected in the Leitrim IFA model hasn't come to pass yet because of pressure from Leitrim people fighting almost all forestry applications in Leitrim at the individual level. However the Department has imposed significant additional costs on submissions and appeals designed to curb local participation in the appeals process. Áine Ní Dhubháin's U.C.D. Report did look directly at employment and economic activity associated with forestry and wood processing in Leitrim focusing on the year 2017. Economic activity of €25.6m was generated in that year and 127.3 full time equivalent jobs for Leitrim residents were maintained. We need to consider the socio-economic impact of forestry versus farming because forestry replaces agricultural activity permanently.

Table 18: Employment and economic activity associated with forestry and wood processing in Co. Leitrim

Activity	Forests in Leitrim		Economic activity (€)	Non-Leitrim forests
	Leitrim residents Employment (FTEs)	Non-Leitrim residents Employment (FTEs)		Leitrim residents Employment (FTEs)
<b>Forestry</b>				
Establishment	537 ha	8.8	2.2	1,481,452
Maintenance for afforestation	592 ha	9.4	2.4	474,985
Reforestation	257 ha	3.6	1.5	616,800
Maintenance of reforestation sites	257 ha	5.0	2.1	565,400
Roading (new roads, upgrade/repairs of roads)	22,726 m	2.5	1.0	357,040
Haulage	111,600 m <sup>3</sup>	9.2	1.0	1,116,000
Harvesting (thinning and clearfell)	111,600 m <sup>3</sup>	3.8	5.7	1,821,000
Management		8.0	9.0	680,000
<i>Sub-total</i>		50.3	25.0	7,112,677
<b>Income from forestry</b>				
Premiums				2,758,626
Sale of timber				5,151,614
<i>Sub-total</i>				7,910,240
<b>Processing</b>		77.0	78.0	11,555,000
<b>Total</b>		<b>127.3</b>	<b>103.0</b>	<b>26,577,917</b>

Figure 3. Source; [The Socio-Economic Impact of Forestry in Co. Leitrim](#)

There were 29.5 thousand hectares under forestry in 2017. This equates to the employment of about 1 person for every 232 hectares over the county as a whole. With an average farm size of 24.5 hectares, we have to acknowledge that that's one job in the forestry sector for the equivalent of 10 Leitrim farms on an area basis. Also considering Coillte's large share of the land ownership and the entry of commercial investors competing for land it becomes clear that any wealth created by forestry is not likely to circulate within the county. Rather planting land often signals the end of a farm contributing to value being created locally. There is likely be a tipping point beyond where rural communities cannot absorb more and more forestry without becoming unviable. The government has recently set new national forestry targets. To meet the required level of [emissions reduction](#), by 2030 they will reduce Ireland's net land use, land-use change and forestry (LULUCF) emissions by 4.6 MtCO<sub>2</sub>equivalent in 2030 against current projected emissions and consistent with achieving carbon neutrality no later than 2050. Minister of State at the Department of Agriculture, Food and the Marine (Senator Pippa Hackett) has stated that the Climate Action Plan 2021 sets an [afforestation target of 8,000 hectares per year](#);

“This target is ambitious when compared with recent afforestation rates and will be challenging to meet in the next decade. However, it is something we must achieve”

Without a balanced spread of forestry across the country these forestry ambitions are becoming an inequitable burden on counties already under pressure. We need to maintain a balance between continuing and developing sustainable farming with forestry planting that must not be allowed to become a driver of community decline. Figure 3 outlines the historical surface land use in Leitrim up until 2019 with a projected scenario until 2030. If government targets end up being met without a change in the way forestry is distributed, we could end up with farming communities having half the land in 2030 that they had available to them in 1982. That scenario is very serious for farmers in Leitrim and the communities they support.

[Planning](#) should be playing a critical balancing role as we try to resolve this conundrum between the national forestry policy and our local objectives as set out in our county development plan. However we [do not have access to a planning process](#) that relates to the permanent transfer of agricultural land to forestry use because the Planning and Development [Regulations 2001](#) were amended in September 2011 to provide that initial afforestation shall be exempted development, i.e. exempt from the requirement to obtain planning permission. Applications for forestry are subjected to a separate statutory development consent

system outside the county under the [Forestry Regulations 2017](#). This exemption from a formal planning process does not remove the responsibility of Leitrim County Council to engage with the Department of Agriculture to protect Leitrim's rural communities by participating in managing land use change with a planning-led approach.

Subsidiarity in decision making describes the principle that a central authority should have a subsidiarity function performing only the tasks that cannot be performed at the local level. Consideration should be given to finding a way of allowing the forestry service to continue to manage forestry licensing but while being made to incorporate regional objectives as set out by the local Authority. As part of an objective to ensure balanced regional development a proposal needs to be developed to further amend the Planning and Development Regulations 2001 to make provision so that whatever plans the Local Authority makes, get considered meaningfully by the Forestry service. The Leitrim County development plan could set out priorities and principles that it requires at the local level. Those legislative changes can be sought by a strong local and national campaign and be championed by local TDs. We need the local authority to state Leitrim's policies and objectives around land use and forestry in a way that will allow the forestry service to incorporate those local requirements into decision making, should those changes develop at the national level.

Leitrim County Council has a duty to ensure that the right development takes place in the right locations and at the right time. The planning system should provide the social, economic and physical infrastructure necessary to meet the needs of our people and in a way that protects the many qualities of our natural and built environment. The current draft of the county development plan acknowledges that there are extensive problems with forestry in Leitrim as it states;

The introduction of large-scale forestry into an area can have potentially negative impacts on visual, social and environmental grounds and thus must be appropriate in terms of their scale and location....

The Council generally favours deciduous over coniferous planting on the basis that native species of deciduous trees sit more comfortably in the Co. Leitrim landscape and also have more benefits for biodiversity. In certain Protected Landscapes, it would be the preference of this Local Authority if commercial planting was restricted or prohibited altogether. As Such commercial forestry is exempted development, there is frustration within the Local Authority that this express objective cannot be realised.

On steep slopes above the 300m contour line, new afforestation will be strongly discouraged in the response of the Local Authority to any application to the Forest Service for tree planting and tree felling and it would be the objective of this Local Authority if the existing area under forestry was reduced, restructured and/or redesigned following clearance.

Elsewhere, particular attention will be paid to retaining (or restoring) views to the water and valley approaches to the hills.....

Whilst the council does acknowledge some of the issues facing the county and it does reflect the threat that forestry is having on visual, social and environmental grounds etc, it's not demonstrating the serious threat that unplanned forestry clearly will have in removing farming and indigenous farming families from the Leitrim landscape. This refusal to deal with forestry as a land use that needs to be planned in a way that meets the needs of Leitrim residents at this time and also into the future reflects a silent national policy to sacrifice the region's farmers in order to promote access to land for commercial afforestation.

## IFA Recommendation

Leitrim IFA would recommend adding to policy 3 to insure that a plantation would not have an adverse socio- economic impact on a receiving community.

### FOR POL 3

**To ensure forestry development is of appropriate scale and character whilst ensuring that the development does not have an adverse socio-economic impact on a receiving community or a negative visual impact on the countryside or cause pollution or degradation to wildlife habitats, natural waters or areas of ecological importance.**

Add an additional policy 6 to commit the council to engaging in forestry applications beyond referrals from the Forest Service (Department of Agriculture, Food and the Marine). The council needs to be able to make submissions and challenge decisions where the forest service and the department makes decisions that contravene policies in the Leitrim County Development Plan.

### FOR POL 6

**To scrutinise, prepare and make submissions and contest Forest Service (Department of Agriculture, Food and the Marine) decisions where applications seeking to plant additional land for afforestation on the basis of the guidance provided Section 10.6.5 of the Draft Plan.**

Leitrim IFA would recommend adding an additional objective 5 so that the council can participate and engage with the Department that controls planning so that a planned approach to forestry can be incorporated into decision making on forestry.

### FOR OBJ 5

**To actively participate and engage with the Department of Housing, Local Government and Heritage to encourage and participate in the preparation of an amendment to the Planning and Development Act, 2000 so that the Forest Service (Department of Agriculture, Food and the Marine) will be obliged to give equitable and sensible weight to submissions on forestry applications to ensure that a planned approach to forestry can be incorporated into the forestry decision making process.**

## Rural Housing and Dwellers

Leitrim IFA oppose any increase in Development Charges for once off Rural Housing as rural dwellers cannot access the amenities and services of people living in urban areas. Leitrim IFA request that people who buy or build a house in the Countryside should agree to abide by a countryside lifestyle and not impede or object to normal farming practice carried out within the law and tradition.

## Planning Permission and Development Charges

Leitrim IFA would strongly argue that there should be **no difference taken into account between Full time or Part time farmers**, themselves or their family, seeking planning permission to build a house on their lands in line with normal planning requirements. Any Farmer, and especially those



engaging in the birthing and caring of young stock need to be on site to carry out their work to the best of their ability. Not being resident on these farms is and will be a major impediment to farmers in the County.

Farmers and Farming Couples are often farming alone, but those who have their successor working with them are equally anxious to have sons or daughters living close to the farmyard, so that they can be quickly available in emergencies, or anytime a few more hands are needed. Having a robust practical planning system that provides housing as part of a rural community enhancing regeneration of that same community and look after their elderly and isolated will enhance their community. IFA requests that landowners should retain the right to sell a site should they need/want to and request that more consultation should take place between the planning Officers and prospective applicants prior to application for planning permission. This consultation would provide for a more accurate and informed application and save both the planning Officers and the Applicant a considerable amount of time. Leitrim IFA insists that the current regime of charges apply in the new Development Plan for agricultural buildings.

Because Agriculture is one of the key pillars for our economy moving forward, development charges for farm buildings must be kept exempt.

## **Rural Infrastructure & Broadband**

Leitrim IFA suggest that the Local Authority complies with the National Broadband Plan and that broadband is made available to all Farmers and Rural Dwellers in the County. It is essential that this service is implemented as many of Leitrim Farms are heavily dependent on income supports which are applied for online. Many other state bodies have already moved to online communication with farming families. From living with Covid 19 for the last 18 months, we as a nation, have had to change the way we lived our lives to stay safe. Part of these changes was the requirement of people to work from home where possible. For those who had good broadband this led to huge quality of life and environmental benefits, eliminating work commutes for example. For rural Leitrim, this has offered an insight into how life can be post Covid with many advantages for family life, time with children and so on. Having adequate Broadband would greatly help to facilitate this and should be a priority of Leitrim County Council to bring whatever pressure to bear to make it happen. IFA requests that rural road networks should be maintained to an acceptable standard equitable to road standards in urban areas and that if a complaint is made to a Councilor /County Council Official in relation to road quality; a process to investigate the complaint should be put in place.

## **Water Abstraction**

Leitrim IFA requests the County Council to acknowledge that every farmer in the county has a right to bore a well on his land and source water for his family and Livestock.

## **Tourism & Greenways**

Any Greenway projects under development in the county should only be implemented after extensive consultation with landowners and adjoining landowners **without** the use of CPO.

## **Hedge Cutting**

Leitrim IFA requests that the annual start-up date for hedge cutting is moved to 1<sup>st</sup> August. This will provide a greater window of opportunity for farmers to maintain their hedgerows and alleviate any



health and safety issues for roadside hedges. All community funding for hedge cutting should be properly funded and adequately advertised among the farming community.

## Renewable Energy

Leitrim County Council should facilitate and encourage the micro generation of renewable energy. Exemption of development charges should be increased to 1 megawatt. Energy costs and the response to climate change are significant challenges, which face the agriculture sector. In the IFA policy document *Harnessing the Potential of Ireland's Agriculture & Forestry for Renewable Energy Production and Greenhouse Gas Emissions Reduction* the Association identifies Renewable Energy as an important tool to addressing escalating energy costs and the climate change challenge. Leitrim IFA supports the development of renewable energy initiatives, which can allow farmers reduce input costs while exporting energy to the national grid and at the same time reduce our dependence on fossil fuels and ask Leitrim Co Council to have a pro-active approach.

## Rural Enterprise & Business Start UPs

Farmers, who wish to start a Rural Business on their farms, should be looked at more favorable by the local Authority when planning issues arise. All businesses should not be in industrial estates on the outskirts of towns – another key reason while Rural Broadband is essential. New business start-ups should receive an exemption from local authority rates for the first three years of operation, to support local enterprise development in rural areas.

## Enhancement of local services

Local services in the community such as provision of supports to rural GPs, the rural post office network, rural schools and the local grocery/convenience shop should be seen as a key component of the character and life of any village in rural Ireland. Rural economies and communities need to be assisted in every way possible through a combination of diversification, entrepreneurship, food and drink networking, tourism, co-operation, renewables, communication structures, producer groups and financial instruments.

Signed

Desmond McHugh.

Des McHugh  
Chairman  
Leitrim IFA Executive

26<sup>th</sup> April, 2022