

Submission to Leitrim County Council on the Draft Leitrim County Development Plan 2023-2029

This Submission is confined to comments on Section 10.6 Forestry of the Draft Leitrim County Development Plan 2023-2029. I refer throughout to Leitrim County Council as LCC.

INTRODUCTION

Our county has swollen with conifer plantations during the period of the last CDP.

Under the control of the Forest Service of DAFM forestry development is piecemeal and lacks a planned approach.

There is a greater and greater level of resistance arising towards further unplanned forestry in Leitrim. How much forestry is enough and how can we find a way making what we have better? There is work going on looking at forestry policy at the national level, but this work can't address all the issues facing communities at the local level here in Leitrim and in other areas affected by an inappropriate and unsustainable forestry model.

Subsidiarity in decision making describes the principle that a central authority should have a subsidiarity function performing only the tasks that cannot be preformed at the local level. When initial afforestation was made an exempted development in 2011, the people of Leitrim lost the ability to plan for forestry land use at the local level. We lost the ability to consider if a proposal to plant trees in an area was consistent with other competing objectives (like keeping a school open) as set out in the county development plan.

The CDP needs to set out priorities and principles that LCC wants to see for forestry development at the local level. There is a need to make changes to how the Forest Service weighs the input from the local authority (and other Statutory consultees). Ultimately this will require a change in legislation, but until that can happen, LCC has to live within the framework of the current legal structure which has served to disempower it in terms of development control for new Afforestation and Forest Roads.

We need the LA to empower itself to the greatest extent possible through this CDP. In the CDP LCC should clearly state its priorities, policies and objectives around land use and forestry in a way that sends a message to the Forest Service (FS) that it needs to properly and fully consider these local views when making decisions. This is not currently the case where the Forest Service routinely ignores objections to new afforestation from the Council.

LCC must be prepared to stand up to the FS and challenge its decisions where the Council considers that they are in conflict with local priorities established through the democratic process.

ITEMS REMOVED FROM THE CURRENT CDP

I note that there are a number of items that have been omitted from the draft CDP 2023-2029 that are in the current CDP.

"Afforestation should be avoided on lands containing deep peat soils and where the land slope is steep, especially where the latter slopes towards a water body."

The Council should retain this statement and provide definitions as to what constitutes "deep peat", "steep slope" (state a gradient) and a "water body".

"Policy 64 It is the policy of the Council to require Forestry Management Plans where afforestation is subject to the planning control process. These management plans will, inter alia, identify haul routes for the extraction of timber."

"The Council will seek to recover the cost of damage to public roads from the developer, landowner, and/or the transport operator through available legal procedures."

Particular routes best suited to bearing the traffic generated by the industry may be agreed between the Council and the industry."

There is no mention in the current draft of opposing reforestation on peat or on sites where new afforestation would be discouraged.

There is no mention of protecting High Nature Value Farmland (HNVF).

There is no mention of the protection of the habitats of rare (Red Data Book) or protected species outside of designated areas.

There is no mention of EIA's for cumulative impact.

There is a lot of copy paste from the current CDP without any assessment as to what has happened in the intervening period.

Much of the data quoted is outdated and should be reviewed and updated before publication in the final CDP for 2023-2029.

GENERAL COMMENTS ON THE TEXT OF SECTION 10.6 OF THE DRAFT CDP 2023-2029

1. LCC refers to the National Policy on forestry, and in the second paragraph refers to *'new forests and woodlands'*.

In Section 10.6, LCC also refers to *'forestry'* in a number of paragraphs.

In Section 10.6.4, LCC refers (on five separate occasions) to *'plantations'*.

In Section 10.6.5, LCC reverts to *'forests and woodlands'*.

In no part of Section 10.6 does LCC define the above terms.

2. The Food and Agricultural Organisation of the United Nations ('FAO') recognises that the term 'forest' (or forestry) includes **different types of forests** as follows:

- a) naturally regenerating forest
- b) planted forest
- c) **plantation forest**

Plantation forest is defined by the FAO (<https://www.fao.org/3/I8661EN/i8661en.pdf>) as:
Planted forest that is intensively managed and meets all the following criteria at planting and stand maturity: one or two species, even age and regular spacing.

Explanatory notes add:

- i. Specifically includes: short rotation plantation for wood, fibre and energy
- ii. Specifically excludes: forest planted for protection or ecosystem restoration
- iii. Specifically excludes: forest established through planting or seeding which at stand maturity resemble or will resemble naturally regenerating forest.

3. **State of Europe's Forests 2020 Report** provides the following statistics:

Plantation forest cover in **Ireland** 2020 - **86.2%**

Average plantation forest cover in **Europe** 2020 - **3.9%**

These figures encapsulate the national forestry policy of the past three to four decades. The National Forestry Inventory ('NFI') 2017 records broadleaf cover of approximately 30% in Leitrim. However, the major part of this broadleaf forestry is **not** native woodland. Much is just a component of conifer plantations (generally planted on the fringes) and is therefore itself **plantation forestry**.

It should be noted that much of this fringe planting is ineffectual. Where a site is afforested with 85% Sitka Spruce with a predicted Yield Class of 24 and a 15% fringe of broadleaves with a predicted Yield Class of 8 the biomass of the plantation after 30 years will be 94.4% Sitka Spruce. This is practically monoculture and it is a commercial monoculture – there is no anticipated income from the non Spruce component.

4. I suggest that Section 10.6 is amended so as to clearly define what is meant by LCC in relation to the different types of forestry. For example, in 10.6.5 (6th paragraph), when LCC states:

'This is considered particularly important around the flanks of Dough, Boleybrack and Sliabh an Iarainn, where forestry is most intrusive'

I presume that LCC means **plantation forestry**. **On each occasion that LCC means plantation forestry, the word plantation should be used in the CDP.**

SPECIFIC COMMENTS ON THE TEXT OF SECTION 10.6 OF THE DRAFT CDP 2023-2029

5. 10.6.1 (paras 3 and 4) - LCC states:

'The Climate Action Plan [2019] seeks to increase afforestation rates from their current levels to an average of 8,000 ha per year, in order to reach our forestry land-cover target of 18% by the second half of this century.'

'While this will mostly yield benefits in the longer term, it will also contribute to our 2030 target through carbon sequestration and displaying other high carbon use of land.'

Afforestation *may* contribute to carbon sequestration. However, if LCC is going to include such a statement then further facts and scientific research should also be included.

6. In 2021, DAFM licensed:

4,246 ha afforestation

13,693 ha clearfell felling (91% by Coillte)

20,772 ha thinning felling (100% by private sector)

Given current afforestation levels the level of clearfelling is unsustainable if a key objective of the forestry programme is carbon sequestration. It should also be noted that the FS states that there is only approximately a 65% conversion rate from licenced afforestation to actual planting so the problem is even more acute. The FS does not appear to be prepared to restrict the issuing of felling licences despite inadequate afforestation rates. The amount of land licenced for felling should be commensurate with the amount licenced for afforestation.

7. Marc Kierans of DECC said at the Land Evidence Forum meeting on 17 November 2021:

'a lot of faith is put into tree planting as a climate action measure and it is important to have the balanced science to guide action in this domain'.

I suggest that LCC needs to receive and review the relevant science before commenting in the CDP on the climate action mitigation impacts of afforestation.

8. Research in 2016 by Kim Naudts et al reports that *'The political imperative to mitigate climate change through afforestation and forest management risks failure unless it is recognised that not all forestry contributes to climate change mitigation.'*

'Converting deciduous forests into coniferous forest resulted in changes in albedo, canopy roughness, and evapotranspiration from the land surface, which contributed to warming rather than mitigating it. Hence, any climate framework that includes land management as a pathway for climate mitigation should not only account for land-cover changes but should also equally address changes in forest management, because not all forest management contributes to climate change mitigation.'

The research can be accessed via the link below.

<https://www.science.org/doi/10.1126/science.aad7270#:~:text=References%20and%20Notes-Europe's%20managed%20forests%20contribute%20to%20warming,Naudts%20et%20al>

Afforestation does not take place on a blank canvas. Land which is afforested may already be serving a carbon sequestration function and it is the net figure of any sequestration from afforestation minus the existing sequestration minus the emissions that result from the afforestation works that should be attributed to afforestation.

9. Research in **2021** by Jovani-Sancho et al reports that *'drainage and conversion of natural peat to forestry increases soil CO2 emissions through decomposition of peat and modifies the quantity and quality of litter inputs and therefore the soil carbon balance.'*

Refer to: <https://onlinelibrary.wiley.com/doi/10.1111/gcb.15654>

10. Coillte reported in the 'EU LIFE Programme: 10 years of restoration works on Afforested Peatlands in Ireland' that the lands owned by Coillte include **232,000 hectares** of peatlands, mostly blanket bog – this represents **53%** of the Coillte estate.

The EU LIFE Programme report can be downloaded via the link below:

<https://peatlands.org/assets/uploads/2019/06/Delaney-296.pdf>

11. The Department of Culture, Heritage and the Gaeltacht reported on 1 May 2020 (in a Power Point presentation) that the following Irish peatlands are planted with conifers:

Raised bog - 70,330 – 95,500 hectares

Blanket bog – 205,700 – 232,000 hectares

Total – 276,030 – 327,500 hectares

12. This means that between **36% and 43%** of the national forestry estate is planted on peatlands (based on the total forestry estate of 770,020 hectares (NFI 2017)).

13. In **February 2022**, Teagasc updated its Manual of Drainage and Soil Management to remove references to environmentally harmful peat drainage. Teagasc now says farmers should **not** consider any fields with high organic content or peat soils for the implementation of land drainage works, as this would be contrary to the climate action goals for Ireland. In the Manual, Teagasc director, Prof Frank O'Mara, highlights that **science** [my emphasis] and policy have acknowledged that the role of land drainage needs to change.

14. 10.6.1 (para 4) - LCC states:

'Forestry plays an important role in ... the provision of renewal fuels.'

In **March 2021**, 59 scientists from around the world wrote an open letter to the President of the European Council, the President of the European Commission and the Vice President of the European Commission.

This open letter included the following paragraph:

'It is somewhat remarkable to see biomass industry proponents admitting that biomass may not convey carbon benefits for a century, given that many of them are still claiming burning trees for energy is "carbon neutral". Nonetheless, we urge you to follow the science, and exercise the precautionary principle in this matter. As the IPCC and climate scientists worldwide have shown, we need immediate reductions in atmospheric CO2 to avoid the most catastrophic effects of climate change. In other words, the EU needs to grow forests, not burn them for energy. This requires removing forest biomass from the Renewable Energy Directive, which will also help allocating more subsidies for true renewables.'

For a copy of the letter, please refer to the link below:

<https://forestdefenders.eu/wp-content/uploads/2021/03/Scientists-rebuttal-of-Hudson-letter-March-11-2021.pdf>

15. In February 2021, over 500 scientists from around the world wrote an open letter to the President of the USA and the President of the European Commission.

In this open letter, the scientists call on each administration to end the subsidy for the burning of wood since it is not carbon neutral. The scientists emphasise that numerous studies have shown that the burning of wood will increase warming for decades to centuries, even when the wood replaces coal, gas or natural gas. *'Overall, for each kilowatt of heat or electricity produced, using wood initially is likely to add two or three times as much carbon to the air as using fossil fuels.'*

A full copy of the letter can be accessed via the link below: <https://skyddaskogen.se/scientists-warn-the-eu-burning-trees-is-not-carbon-neutral-and-subsidies-must-end/?lang=en>

16. With regard to climate protection, Section 10.6.1 is out of date and does not have regard to the current science. I suggest that Section 10.6.1 be re-written having regard to the currently available science.

17. 10.6.1 (para 4) - LCC states:

*'Ireland is committed to the practice of Sustainable Forest Management which, under the Helsinki [1993] and Lisbon [1998] Agreements, mean 'the stewardship and use of the forests and forest lands in a way **and at a rate** [my emphasis] that maintains their biodiversity, productivity, regenerative capacity, vitality and their potential to fulfil now and in the future, relevant ecological, economic and social functions at local, national and global levels and that does not cause damage to other ecosystems.'*

I note from 10.6.4 that LCC is currently awaiting the revised Landscape Capacity Assessment regarding the ability of the Leitrim landscape to absorb further commercial plantation forestry. However, I would suggest that LCC comments and provides factual information in the CDP on the rate of afforestation in Leitrim.

18. If afforestation in Leitrim since the Lisbon Agreement (1998) is at a rate that has negatively affected social or biodiversity functions at a local level, then afforestation is **not** currently sustainable in County Leitrim.

On the basis of the planting figures in Forest Statistics 2000, I set out below the total forest cover in Leitrim (in hectares) for the period from 1987 to 2000:

1987 - 14,324

1988 - 14,999

1989 - 15,782

1990 - 16,126

1991 - 16,822

1992 - 17,669

1993 - 18,224

1994 - 18,431

1995 - 18,862

1996 - 19,780

1997 - 20,395

1998 - 20,986

1999 - 21,464

2000 - 22,152

Forest cover in Leitrim increased by nearly 50% in the 12-year period from 1988 to 2000 from **14,999 hectares** to **22,152 hectares**.

Since 2000, forest cover in Leitrim (in hectares), is as follows:

2000 – 22,152

2005 - 23,801

2010 - 25,152

2015 - 26,896

2017 - 30,060

2021 - 31,211

Forest cover (in hectares) in Leitrim has more than doubled since the Lisbon Agreement in 1988: from **14,999 hectares in 1988** to **31,211 hectares in 2021**. I would strongly argue that the effect of afforestation **at this rate** has been strongly negative on (amongst other things) social functions at a local level in Leitrim.

However, the concern in Leitrim is not only the rate of afforestation since 1988. It is the total afforestation now within the county.

The 'Review of Forest Policy for the Heritage Council' (May 2008 - Written by David Hickie, Dr Patrick Walsh and others) reviewed, inter alia, landscape issues with regard to forestry. The first recommendation of that 2008 report with regard to landscape aesthetics was:

'Research forest proportion cover among Irish people to determine the actual threshold beyond which the landscape is perceived to have too much forest. This should be carried out using modelled forest covers.'

Clearly, based on common sense and other factors, **there is a maximum threshold for forest cover**. This recommendation was made four years after the European Landscape Convention came into effect in Ireland (on 1 March 2004). Thirteen years after the report's publication, it is a recommendation that has **never** been implemented as part of forestry policy.

Using modelled forest covers LCC should commission a survey of the residents of Co. Leitrim to determine the threshold beyond which it is perceived that the County has too much forest cover. Any survey of the residents of Leitrim should clearly distinguish **within the survey** between:

a) naturally regenerating forest (Native woodland)

b) planted forest

c) **plantation forest (the predominant forestry in Leitrim – comprising both exotic and native species)**

19. The comments below are those relating to commercial forestry noted in the **2020 Report** for each of the 14 Landscape Character Areas ('LCA'). The comments below each in red are those in the comparable Leitrim Landscape Character Assessment Report dated 2002:

LCA 1 – Tullaghan Coast – Tracts of commercial forestry are a notable feature inland

a combination of coniferous and broadleaf woodland gives the appearance of a well wooded landscape

LCA 2 – Lough Melvin Lowlands – Frequent tracts of commercial forestry of varying size and scale

moderate scale coniferous forestry conspicuous on lough margins and covering undulating landform

LCA 3 – Lough Macnean Upper – Extensive areas of commercial coniferous forestry

No specific comment on commercial plantations

LCA 4 – Arroo & Mountain Outliers – Commercial forestry plantations dominate the land cover on Dough and Thur Mountains

Dominant land cover of forestry plantations on Dough and Thur Mountains

LCA 5 –Tievebaun Uplands – Tracts of commercial forestry on the lower slopes to north east

No specific comment on commercial plantations

LCA 6 – The Doons & Crockauns – Tracts of commercial forestry are located in the foothills, especially to the north of the Crockauns and Llean Mountain.

contrasting land uses including extensive grazing, coniferous plantations and areas of both upland and lowland peat bog

LCA 7 - Benbo – The lower slopes are fringed by marginal rushes and pastures largely enclosed by post and wire fences and coniferous forestry plantations.

The lower slopes are fringed by marginal, rushy pastures largely enclosed by post and wire fences and coniferous forestry plantations.

LCA 8 - Boleybrack Uplands – Extensive areas of commercial coniferous forestry at lower elevations

extensive areas of coniferous forestry

LCA9 – Northern Glens, Central Lowlands & Lough Allen – Extensive tracts of commercial forestry especially in the east-facing foothills of Corry Mountain and west facing foothills of the Boleybrack Mountains.

Small blocks of deciduous woodland and some coniferous plantations

LCA 10 – Sliabh Anierin – Extensive areas of commercial forestry in particular on the south and east facing slopes of Slieve Aneirin

extensive areas of coniferous forestry

LCA 11 – Corry Mountain – Extensive areas of commercial forestry which dominant the moorland hills and lower slopes

extensive areas of coniferous forestry

LCA 12 – Ballinamore Loughlands – Tracts of commercial forestry present in this LCA

relatively well-wooded landscape due to broadleaf and coniferous plantations and the network of hedgerows

LCA 13 – South Leitrim Drumlins & Shannon Basin – Commercial forestry plantations especially in the northern part of this LCA

relatively well-wooded landscape due to broadleaf and coniferous plantations and the network of hedgerows

LCA 14 – Corriga Uplands – Tracts of commercial forestry in the northern part of the LCA

No specific comment on commercial plantations

It is clear from the above that the extent of plantation forestry has increased significantly in most, if not all, areas of the county between 2002 and 2020.

20. The most recent National Forest Inventory was in 2017. LCC may already be aware that, between 2012 and 2017, afforestation in Leitrim increased by **13.4%**. The increase for Ireland as a whole in the same period was **5.2%**.

21. 10.6.2 (para 1) - Forestry in Leitrim

The Draft CDP refers to the forest cover in **2017**.

The forest cover in Leitrim in **2021** was 19.6%, based on the following figures:

Coillte – 14,935 hectares (See BAU 1 and BAU 3 Five Year Forest Plans 2021-2025)

Private forestry – 15,430 hectares (NFI 2017)

Afforestation 2018 – 299 hectares (Forest Statistics Ireland 2018)

Afforestation 2019 – 289 hectares (Forest Statistics Ireland 2019)

Afforestation 2020 – 160 hectares (Forest Statistics Ireland 2020)

Afforestation 2021 – 98 hectares (AIE request)

TOTAL – 31,211 hectares (19.6% of area of County Leitrim)

22. 10.6.2 (para 1) – Forestry in Leitrim

‘The soils in Co. Leitrim are well - suited to commercial forestry development as they are rich in mineral gley, surface water gley, peaty gley and brown podzolic soils. However, poor root penetration can often lead to windthrow’.

LCC should recognise and include in the CDP the fact that, having regard to current science, a proportion of the soils in Leitrim are **not** suitable for commercial plantation forestry.

Soil and climate conditions in Co. Leitrim can result in very rapid growth of exotic coniferous species such as Sitka Spruce leading them to be favoured for forestry development based on the volume of timber produced. However, the rapid growth rates are at the expense of timber quality and stability. To produce high quality timber coniferous species need to be slow grown with little space between the growth rings as is the case in Scandinavian countries. Windthrow is an extensive feature of plantations in Leitrim. Aside from the economic implications windthrow present significant risks to the aquatic environment and also has negative implications for carbon sequestration.

The Leitrim soils which produce timber quickly also result in a situation, combined with the relatively high rainfall of the County to make harvesting problematic in terms of complying with environmental regulations during harvesting with potential impacts on water quality and soil structure if felling and extraction are carried out on the frequently saturated soils. Felling operations during the traditionally drier months of the year introduces conflict with the period of breeding and rearing in the context of Article 5 of the Birds Directive.

The expression “*s suited to commercial forestry development*” is only considering the capacity to grow the trees, not for them to be harvested in an environmentally sustainable manner. CCF is not an option on many, if not the majority of sites in Leitrim due to the risk of windthrow and clear-felling as long-term management option is not supported by the EU Forest Strategy 2030. On this basis Leitrim is not suited to sustainable forestry development based on a clear-fell model of exotic conifers. That is the principle model for commercial forestry development in Ireland.

The section including the statement that "*all elements of the forestry value chain are present in Leitrim*" reflects a very limited view of the potential economic value that can be derived from forestry. It is restricted to the basic view that forests are a timber crop and that the only value of trees is when they are cut down and used. This view needs to be challenged.

Forests have much greater potential to contribute to the economy of the County than merely as tree farms.

Paragraph 10.6.2 should be amended to reflect the above.

23. Figure 10.2 Extent of forest cover in Co. Leitrim 2017

This map is out of date. A further **846 hectares** have been planted since 2017. I suggest that an updated map is included in the CDP.

24. 10.6.2 (para 2) – Forestry in Leitrim – LCC states:

‘The growth of trees in the county is high – for Sitka spruce in private stands, growth rates are estimated to be 20% higher than the national average.’

I suggest that a citation is provided so that there is full transparency regarding the source of this estimate.

Whether or not this estimate is correct, even if Leitrim produces relatively greater volumes of coniferous species such as Sitka spruce, this is at the expense of timber quality. To produce high quality timber, coniferous species need to be slow grown with little space between the growth rings. For balance, if LCC wishes to refer to quantity of timber then there should also be a reference to quality of timber.

25. 10.6.2 (para 2) – Forestry in Leitrim – LCC states:

‘Native species account for 30.7% of the forest area in the county which is slightly higher than the national figures of 26.6%.’

I suggest that there should be some clarification as to where these native species occur in order to avoid giving the impression that the planting of native species means that native woodland represents a significant proportion of the forested area of Leitrim.

Woodlands of Ireland estimates that native woodland (i.e. naturally regenerating forest, as defined in para 2 above) covers approximately 1.5% of the land mass of Ireland. If this figure of 1.5% applies in Leitrim, this means that the **native species** in Leitrim are apportioned approximately as follows:

Plantation forestry (native species) – 7,198 hectares (75%)

Naturally regenerating forestry (native woodland) -2,385 hectares (25%)

Total: 9,582 hectares (30.7% of 31,211 hectares)

Noting that plantation forestry dominates in Ireland (**86.2% cover in 2020** - see para 3 above), it would also be useful to note in the CDP that plantation forestry dominates in Leitrim with regard to native species (**75% approximately**) as well as conifer species.

It is my understanding that native woodland cover in County Leitrim is below the national average of 1.5% – but I stand to be corrected.

26. 10.6.2 (para 3) – Forestry in Leitrim – LCC states:

‘Figure 10.3 indicates a steady rise in the extent of land approved for planting by the Forest Service from 176 hectares in 2010 to 536 hectares in 2017.’

This statement is factually incorrect.

The figures quoted by LCC are figures for planting in the relevant year and **not** figures relating to licences (i.e. land approved for planting) in the relevant year. I do not have the relevant figures for 2010 to 2017, but I do have the relevant figures for 2019 to 2021 for Leitrim. These are:

Year	Licenced for afforestation	Planted
2021	236 hectares	98 hectares
2020	171 hectares	160 hectare (refer to Forest Statistics Ireland 2020)
2019	243 hectares	289 hectares (refer to Forest Statistics Ireland 2019)

The Licence holder has 3 years from the date of a licence to afforest - hence the situation where the planting in one year may exceed the licenced afforestation figure in that same year.

27. 10.6.2 (para 3) – Forestry in Leitrim – LCC states:

‘There has been a marked reduction in the number of applications approved since 2018, primarily as a result of the number of appeals brought against decisions.’

The statement that the number of applications approved since 2018 has reduced as a result of the number of appeals brought against decisions is conjecture and this statement should be removed from the Draft. The issue with forestry licencing is primarily due to a European Court ruling which indicated that the Forest Service were not operating in conformance with European Law in assessing licence applications in the context of the Habitats Directive. This required procedural changes and a significant increase in resources (especially ecologists). This is primarily what has created the backlog.

28. 10.6.2 (para 4) & Figure 10.4

I have not checked the accuracy of the raw data behind Figure 10.4. However, figure 10.4 refers to 58 farmer and 10 non-farmer applications in 2015 (with a total of 68 applications shown in Figure 10.3). Therefore, on the basis of application numbers, the statement in the draft CDP that non-farmers exceeded farmers in 2015 is incorrect. Non-farmer applications did exceed farmer applications in 2018 and 2019.

The Draft CDP should note that figures for the number for farmers will include non-Leitrim farmers who are planting as an investment or as a means of offsetting carbon from their main farming activities. If LCC has numbers in relation to non-Leitrim farmers, I suggest that the data is incorporated into the CDP.

The number of afforestation applications is one aspect. However, the size of the plantation that is the subject of the afforestation application is another aspect. The Socio-Economic Impact of Forestry in Co. Leitrim Report dated 2019, stated that the average size of an individual forest plot was **6.92** ha in Leitrim. Forests Statistics Ireland 2021 refers to an average size of forest of **6.2** ha for farmers across Ireland. However, significantly higher hectare figures apply to non-farmers in Leitrim.

Taking two non-farmers in Leitrim as an example and using data for their **certified forests only** (since this information has to be provided to any interested individual), the average size of a single forest plot in Leitrim is **22.62 ha** – more than three times the size of the average farmer forest plot size noted in NFI 2017.

The raw data is below:

Irish Forestry Unit Trust - 28 individual forest plots – 712.05 ha (this is only a proportion of their forestry holding in Leitrim)

Foraois Growth Limited – 24 individual forest plots – 464.08 ha.

Total – 52 individual forest plots – total 1,176.13 ha.

Average forest plot - 22.62 ha

There is therefore **over a three-fold difference** between the **average forest/plantation for farmers** (6.2 ha) and the figure of 22.62 ha for, by way of example, **Irish Forestry Unit Trust and Foraois Growth Limited**.

29. 10.6.2 (para 5) - Forestry in Leitrim – LCC states:

'It is important to recognise the value of forestry-related employment with 560 jobs associated directly and indirectly with forest/wood processing in Leitrim (2018).'

Forestry employment does not take place on a blank canvas. Forestry does not create jobs where previously jobs did not exist. Land use change results in changes in the nature of employment. The land that is creating the forestry jobs previously created employment in farming. The Socio-Economic Impact of Forestry in Co. Leitrim Report dated 2019 stated that, in total, 309.3 full-time jobs were associated with forestry/wood processing in Co. Leitrim in **2017**. The figure of 560 in the draft CDP would represent an **81%** increase in job numbers between 2017 and 2018, and therefore seems unlikely to be correct. I suggest that LCC reviews this data and reconciles it with the figure from The Socio-Economic Impact of Forestry in Co. Leitrim Report dated 2019.

Of the 309.3 full time jobs referred to in the 2019 Report, **only 41%** (127 full time jobs) relate to Leitrim residents working on Leitrim plantations.

The draft CDP also ignores the number of jobs displaced in Leitrim as a result of agricultural lands being afforested.

The data below is taken from the Census of Agriculture 2010 - Final results:

<https://www.cso.ie/en/media/csoie/releasespublications/documents/agriculture/2010/full2010.pdf>

- Average size of farm in Leitrim - 25.1 ha (Table 1)
- Total number of farms in Leitrim - 3,673 (Table 1)

Average labour input per Leitrim farm: 1.05 (Table 38) - Based on an Annual Work Unit ('AWU') (i.e. around 7 hours a day x 5 days a week) - which appears to be similar to the definition of Equivalent Full Time (EFT) job used in The Socio-Economic Impact of Forestry in Co. Leitrim 2019 Report.

31,000 ha of forestry is the equivalent of 1,235 Leitrim farms (on average).

Based on the 2010 figure of 1.05 AWU per Leitrim farm, this could be considered to equate to **1,297** Leitrim farm jobs lost to forestry (1,235 x 1.05).

The gain is 127 EFT forestry jobs for Leitrim people working on Leitrim plantations.

Therefore, the **total net loss** to Leitrim jobs (in Leitrim) by converting farmland to forestry is: 1,297 minus 127 = **1,170 jobs**.

I am informed that the Census of Agriculture 2020 - Final results should be available in a few months. The Census of Agriculture 2020 Final Report is not currently available.

30. 10.6.2 (para 5) – Forestry in Leitrim

Farming activity takes place on 365 days per year across the farms in Co. Leitrim. There are local economic activities and businesses in our towns and villages that are dependent on the farmers' euros being spent in town. I understand that research by the IFA and UCC has shown that the farmers' euro has a tenfold multiplier spending power in the local economy compared to the forestry euro.

The importance of retaining and maintaining active farmers and ensuring that the young farmers can become established and expand in Leitrim is vital for the small businesses in towns and villages across the county. Maintaining a valuable and sustainable rural population which is economically active **is vital for the future**.

Population is needed in order to retain services such as health, social care, education and the many community and social activities that keep Leitrim vibrant. Large-scale and the increasing scale of conifer plantations in Leitrim are increasingly reducing the number of active farmers and also reducing the level of economic activity in these areas. Much of the work on forestry activity is irregular, with large gaps over many years where there is no activity on the planted land. Much of the timber is hauled out of the county and there is limited added value in or for Leitrim from the timber grown in Leitrim.

As with carbon sequestration – it is the net figures that are important, not the gross figures. It is not just what is gained but what is lost that needs to be factored in to any assessment.

This impact of the loss of economic activity from farming, in comparison to that from forestry activities, should be rigorously examined and factored into the CDP.

31. 10.6.2 (para 6) – Forestry in Leitrim – LCC states:

'The harvesting of timber can put great stress on the road network, with minor roads bearing loads far beyond their design capacity.'

Local roads are not built structurally to withstand the loading of heavy forestry trucks at harvesting.

Haulage of stone to construct internal forest roads is even more damaging to local road networks than harvesting. Lorry loads of stone have a more compacted impact than timber trucks where the weight is distributed over a longer vehicle body. The continuous drawing of load after load of heavy stone causes the road to lose its elasticity and never regain its strength.

Also, Forest Road Upgrades are not automatically subject to development consent. Coillte would have a significant network of Forest Roads in Leitrim that pre-date the COFORD Forest Road Standard. It is highly probable that many of these roads will need to be upgraded before being suitable for future timber haulage.

In the planning system applicants are charged development charges for the up keep of the roads network based on the type of development for which permission is required, i.e charges for one off house is different to charge for a quarry.

Forestry haulage operates outside the planning system but is having a significant negative impact on local road infrastructure.

Whoever damages the public road should be held responsible for the repair costs – the polluter pays principle. Legally this is required Article 13 (10) of the Roads Act (1993) but local authorities find this legislation very difficult to police and enforce.

Externalizing environmental and social costs should not be considered to reflect sustainable practice.

The forest industry should not expect a free ride on this.

In addition, there are increased safety risks that result from the operation of these large and heavily-laden commercial vehicles on narrow county roads which are used by local people, including cyclists and pedestrians who are particularly vulnerable.

It should be an Objective of LCC to ensure that the polluter pays principle is applied to damage to public infrastructure.

32. 10.6.2 (para 7) – Forestry in Leitrim – LCC states:

'About 45-50 hectares of forests are clearfelled each year.'

These figures are wholly inaccurate. **Coillte alone** obtained licences in 2021 to clear-fell **over 620 hectares** of forestry in Co. Leitrim.

Clear-felling licences for the following approximate hectares were granted in Leitrim in 2021:

Coillte - 622 hectares

Private - 357 hectares

Total: 979 hectares licenced clear-felling

In addition, **239 hectares** (approx.) of licences were approved in 2021 in Leitrim for **clear-fell and thinning**, together with a further **219 hectares** (approx.) for **thinning**.

Although licences can be for up to a 10 year period most Coillte licences are only valid for 2 years.

For clear-felling figures nationally, refer to **paragraph 6 above**.

33. 10.6.2 (para 7) – Forestry in Leitrim

The figures produced for Forestry in the Good Energy Alliance Ireland ('GEAI') Report (2019) indicate that 81% of the carbon stored in forestlands is in the soil. The figures for carbon sequestration are **gross figures** and not **net figures**. Net figures would calculate the emissions that result from, inter alia, loss from soils at clear-felling, fossil fuel use for forestry machinery, emissions that result from materials used (e.g. fencing), fossil fuel use in haulage, fossil fuel use in processing and distribution of the products, emissions resulting from forest road construction and upgrading in order to facilitate felling etc. By way of example, the Good Energy Alliance Ireland ('GEAI') Report (2019) indicates that, on average, one goods vehicle alone emits 9.6 tonnes of CO₂ per annum.

Consider only forest roads from the above list of omitted emissions. In 2021, the Forest Service granted **30 separate forest road licences** approving **over 11 kilometres of new forests roads** throughout Co. Leitrim. There is no allowance in the GEAI report for the emissions in extracting the stone and other building material required for the forest road construction. There is no allowance for the emissions from the haulage of the road building materials to site (often with significant uphill pulls). There is no allowance for the emissions resulting from the actual road construction. There is no allowance for the emission in both felling trees in the path of the proposed forest road and for the removal of the timber from the site or the loss of sequestration potential of the area of land under road. This not a definitive list of the omitted emissions in relation to Forest Road Works required to facilitate clear-felling. These items are included by way of example to demonstrate the point regarding gross and net emissions and the importance of considering **all activities involved in the process** in order to obtain accurate net emissions figures. To refer only to the gross sequestration figure is to provide a misleading impression of the actual situation. Developers are required to provide details of emissions in applications for consented projects as part of the EIA screening process but this does not happen with Forest Roads.

LCC should seek details from the FS on all the projected emissions of any project that the FS refers to it.

Growing trees sequester carbon, but cutting them down, transporting and processing them causes emissions of carbon. Commercial forestry cannot claim the benefits of the carbon sequestration from trees without taking responsibility for the emissions that it causes. Clear-felling, in particular, results in significant carbon losses from the soil which is the main bank of carbon on forested land.

The figures in this report also include sequestration from non-commercial forested land, so some of the sequestration is from hedgerows and scrub on farmland and actually more correctly should be assessed as part of agriculture.

The GAEI Report section should be removed from the CDP as it is outdated, contains inaccurate data, is too limited in its scope and lacks balance for the reasons noted above.

34. 10.6.2 (para 7) – Forestry in Leitrim – LCC states:

'30% of the total tree volume is left on the forest floor after logging, 10% is used for wood fuel. The remainder, 60%, is processed, mainly for the construction industry.'

I refer to The Socio-Economic Impact of Forestry in Co. Leitrim Report dated 2019, written by Dr Aine Dhubhain, Ms Evelyn Stoettner, Dr Julia Ballweg and Dr Serge Garcia. Page 59 of this Report refers to the following national figures in relation to the end use of timber grown in Ireland:

52% - chips, sawdust and bark
12% - pallets
10.5% - fence posts
0.5% - other (including firewood)
25% - construction

The figures in the draft CDP are very different. As previously, LCC will need to be able to corroborate the figures in the draft CDP noting the disparity with the 2019 Report.

35. 10.6.3 – Afforestation and the Planning System - LLC states:

'Applications to the Forestry Service for planting or felling are referred to the Planning Authority for its observations...'

This is not strictly correct. As a LA LCC is considered as a prescribed body under the Forestry Regulation which means that the FS can make referrals. However, this does not put a legal obligation on the FS to make referrals. Referrals are made by the FS on the basis of a unilaterally developed protocol.

Table 30 (page 126) of the Forestry Standards and Procedures Manual dated January 2015 lists those instances where the Forest Service protocol results in referral.

The list for referral to a Local Authority is as follows:

- a) If the area is >10.0ha and within a catchment area of a Local Authority designated water scheme.
- b) If the area is within a pNHA, NHA, SAC, SPA or National Park.
- c) If the area contains an archaeological site or feature with intensive public usage.

- d) If the area is within a prime scenic area in the County Development Plan or there are other High Amenity landscape considerations.
- e) If the area is greater than 25.0 ha.

In relation **to felling applications**, there is no legal requirement for the Forest Service to contact Local Authorities prior to processing the application. However, the Forest Service does, on the basis of its own protocol, refer felling licence applications to Local Authorities (as prescribed bodies). There is **no** legal requirement for the Forest Service to implement any recommendations made by the prescribed body. This applies even if those comments are in the form of an objection because the forestry application fails to comply with elements of the Statutory County Development Plan ('CDP').

On the basis of AIE requests to DAFM, I am aware that, since 1 January 2020, DAFM has NEVER upheld and applied an objection from a Local Authority relating to, for example, a landscape issue. This is important for Co. Leitrim, since landscape protection is one of the objectives of the current Leitrim CDP. Further AIE requests for periods pre-dating 1 January 2020 have been submitted to DAFM. At the current time, replies to these AIE requests are awaited from DAFM.

LCC should seek to establish an agreed protocol for referrals from the FS.

I would strongly support the position that forestry plantations be brought under the control of the planning system. Technical input on silvicultural issues could and should be the remit of the Forest Service but in the context of overall development control the planning authority should be the consenting authority.

36. 10.6.4 – Afforestation and the Landscape - LCC states:

'Leitrim County Council are presently undertaking a landscape capacity assessment of the ability of the landscape to absorb further commercial forestry plantations. This may be finalised in time to inform the draft County Development Plan before it is finalised.'

The development plan is the most important public policy document shaped by the democratic process.

The Landscape Capacity Assessment is a very significant piece of work and needs to inform the CDP. It also needs to be subject to public scrutiny and capacity must be made for this Report to be considered by the public and comments made before the draft CDP is concluded.

I quote from the Landscape Assessment of Co. Leitrim Report dated **2002 (i.e. some 20 years ago)**:

'Landscape capacity to accommodate forestry should be a key consideration in deciding whether and where forestry expansion occurs. A good proportion of new woodlands within the County should be broadleaved.'

It should be noted that the Forestry and the Landscape Guidelines used by the FS date to July 2000. Not only are they almost 22 years old they pre-date the Florence Convention on the Landscape

(ratified by Ireland in 2004). The FS is seriously behind the curve (probably intentionally) on matters of landscape capacity and protection.

37. 10.6.5 – Forestry Policy Framework

LCC should support a balanced approach to tree cover, rather than one focused on economic activity, whilst seeking to protect the rural environment and landscape. A sound Forestry Policy would not require mitigation for forestry activity. **Why should we need to protect against the impacts of something that should be inherently good?**

LCC Forestry Policy should support a Just Transition away from the current damaging and unsustainable forestry model to one that is consistent with both climate change and biodiversity protection objectives, enhances community life and supports the local economy.

The Planning & Development Act provides an opportunity for a Local Authority to bring exempted development within planning control. This is from the Heritage Council's Landscape Character Assessment (LCA) in Ireland: Baseline Audit and Evaluation Report 2006.

The second category of special landscape is the **landscape conservation area** (LCA2) (Section 204):

“(1) A planning authority may, by order, for the purposes of the preservation of the landscape, designate any area or place within the functional area of the authority as a landscape conservation area”.

Within a landscape conservation area, (LCA)

‘2) exempted development may be brought within planning control. Under Section 4 of the Act, exempted development includes agricultural development; development by local authorities and statutory undertakers; woodland thinning, felling, replanting and infrastructure; and land reclamation.’

LCC should consider designating all lands over the 250m contour as Landscape Conservation Areas and also some lower elevation sites as well, including around Loughs. This would give a strong legal base for the Council to exercise a planning function in those areas at least.

LCC should consider trying to bring about the **de-stocking of forestry on upland deep peat / blanket bog sites** within planning control through landscape conservation. This could also apply to objecting to proposed afforestation on peat-based soils as well.

I don't know how this would work in practice given the Forest Service's consent role so it may involve a dual consent system between the FS and LCC in these areas.

38. LCC appealing to the Forestry Appeals Committee (FAC)

The CDP should refer to LCC's legal obligation under **Section 15 of the Planning and Development Act (2000)**, as amended (as noted below):

'Section 15(1): It shall be the duty of a planning authority to take such steps within its powers as may be necessary for securing the objectives of the development plan.'

Whilst it is important for LCC to defend the objectives of the CDP, there may also be other benefits.

The Department of Housing, Local Government and Heritage recognises the value of appeals to the Forestry Appeal Committee in terms of strengthening the protection of water from forestry-related activities - see the following quotation from page 63 of the Draft River Basin Management Plan for Ireland 2022-2027:

'As a result of legal rulings at a European and national level, and outcomes from the Forestry Appeals Committee process, these changes are having a significant overarching effect in terms of further strengthening the protection of water from forestry-related sources.'

Water protection in Leitrim is important. It is for this reason that, since 2014, LCC has served a number of Section 12 Water Pollution Notices related to forestry activities. Whilst LCC should be congratulated for being vigilant in this regard, if LCC were to appeal to the FAC on all relevant future forestry licences where water quality concerns have not been fully addressed, this could also serve to protect water in the county from forestry-related sources of degradation, in addition to defending the objectives of the CDP: Prevention being better than cure.

39. POLICIES

FOR POL 1 – *To encourage the development of sustainable forestry to a scale and in a manner which maximises its contribution to the economic and social wellbeing of the county and which is compatible with the protection of the environment including the avoidance of likely significant effects on European Sites (SACs and SPAs).*

I disagree with this policy. It is not sufficiently balanced and is restricted in its commitment to environmental protection. It does not recognise the inherent unsustainability of the main current forestry model.

It is my view that this policy should be amended:

To support the just transition to forestry and tree cover that contributes positively to the social, environmental and economic life of the County in a balanced and sustainable manner.

FOR POL 2 – *To encourage sustainable forestry development, which is planted, managed and harvested in accordance with the Forest Service Guidelines for landscape, forest harvesting, archaeology, biodiversity and water quality.*

I do not support the wording of this policy. Some of the Forest Service Guidelines are over 20 years old and are seriously out of date. They are not fit for purpose and should not be referred to.

This policy should require forestry development to be consistent with the law (both National law and EU law) and with Forest Service Standards (not Guidelines).

I suggest rewording:

To encourage sustainable forestry development, which is established, managed and harvested in compliance with European Law, National law and with Standards set by the Forest Service of DAFM. ('Established' could be planted or as a result of natural regeneration of native species).

FOR POL 3 – *To ensure forestry development is of appropriate scale and character whilst ensuring that the development does not have a negative visual impact on the countryside or cause pollution or degradation to wildlife habitats, natural waters or areas of ecological importance.*

I do not support this policy - forestry should be an enhancing development not something we have to protect against. If the proposed forestry is not an enhancing development it has no place in Co. Leitrim.

Suggest rewording

To resist any forestry development that LCC considers is not consistent with local priorities, in particular where this;

is not appropriate in terms of scale and character

will have a negative impact on the visual or cultural landscape

will have a negative impact on the sustainability of local communities

is contrary to the objectives of the Water Framework Directive

will have a negative impact on individual wildlife species and habitats, areas of ecological importance or the ecological integrity of the natural and semi-natural habitats of the County

This policy needs to be broad ranging.

FOR POL 4 – *To encourage the provision of public access in conjunction with relevant stakeholders to new and existing forests through walking and bridle paths, recreational areas and other similar facilities.*

How will this policy encourage the provision of public access to be achieved in practice?

Forest Roads which are financially supported under the Forest Roads Scheme include a licence condition that public access to the road should be permitted for recreational purposes. Access is sometimes denied because the forest road is not properly maintained and safety issues are not

addressed (especially windthrow). This policy could include a commitment to ensure that recreational access that should be provided

To maximise the extent to which recreational access is provided to State supported Forest Roads.

This would permit LCC to lobby for access to be provided to roads where access is currently denied.

FOR POL 5 – *To reply to referrals from the Forest Service (Department of Agriculture, Food and the Marine) on applications seeking to plant additional land for afforestation on the basis of the guidance provided Section 10.6.5 of the Draft Plan.*

This policy should be amended. LCC should not restrict itself solely to responding to referrals

Where appropriate LCC will make submission to the Forest Service (Department of Agriculture, Food and the Marine) on applications for development consent for forestry activities within the County; LCC interaction should be based on the following principles:

- 1) Seek details from the FS on all the projected emissions of the project.
- 2) Oppose the afforestation of land on peat-based soils and wetlands.
- 3) Oppose the conversion of native species areas to exotic species
- 4) Oppose the afforestation or re-Stocking of any land within a Landscape Conservation Area with exotic species.
- 5) At felling, seek a reduction of and restructuring of afforested lands on peat-based soils.
- 6) At felling, continue to seek deforestation or re-structuring of areas where forestry is in conflict with the landscape objectives of the CDP. Including the replacement of exotic species with native species.
- 7) Oppose the afforestation of HNVF (High Nature Value Farmland) (HNVF should encompass land defined as such in the Irish Semi-Natural Grassland, NPWS)
- 8) Oppose the drainage and afforestation of wetlands and lands in flood zones (consistent with FRM POL 4)
- 9) Protect habitats of rare (Red Data Book) and/or protected species outside of designated areas.
- 10) Oppose applications which negatively impact the ecological or cultural integrity of an area, including the loss of HNVF.
- 11) Request that an EIA is conducted for afforestation applications that result in contiguous or near contiguous areas of 50 ha dominated by exotic species, irrespective of location or ownership.

- 12) Request that an EIA is conducted for all afforestation that results in cumulative forest cover within a 3km radius of a site where there is in excess of 25% land cover dominated by exotic species.
- 13) Request that an EIA is conducted for any Forest Road Works application that results in a cumulative length of Forest Road exceeding 2km within a contiguous area of forest or within a defined Coillte Forest Property.
- 14) Request that an EIA is conducted for any Forest Road application that results in a cumulative length of Forest Road exceeding 2km within a 3km radius of the harvesting area that the Forest Road is intended to support.
- 15) Request that a bond is paid by the developer for any forestry activity which threatens the integrity of the local road infrastructure.
- 16) Written agreements should be in place for any haulage activity related to forestry licences prior to the commencement of works.

ADDITIONAL POLICIES

FOR POL 6 – LCC will seek to recover the cost of damage to public roads from the developer, landowner, and/or the transport operator through available legal procedures.

The adopted policies of the CDP should, in combination, provide a just transition away from the current damaging forestry model to one that is enhancing to the County as a whole. The policies should not support and/or increase the continued industrialisation of Leitrim's forests, a model that favours outside commercial interests at the expense of Leitrim's environment, biodiversity, landscape and its people.

FOR POL 7 – LCC will seek the inclusion of Forest Road Upgrades (as defined by COFORD) in the development consent process.

I can provide legal opinion which indicates that such works should probably be subject to EIA Screening and therefore development consent would be required.

FOR POL 8 – LCC will seek the removal of exotic tree species which have spread by natural regeneration into ecologically sensitive areas, Landscape Character Areas or on to private land

39. OBJECTIVES

FOR OBJ 1 – *To work in conjunction with the relevant key stakeholders to develop and expand suitable industries dependent on the considerable timber resource of the county such as fuel-wood production, sawmills and stake producing facilities.*

This objective is reinforcing the current forestry model and is not consistent with seeking a just transition to a more sustainable model. It is also restricted to seeing forests as being of value only when cut down. The CDP needs a broader vision of the economic potential of forests and woodlands based on sustainability and subsidiarity.

To support forestry related activities that are consistent with the principles of the Sustainable Development Goals and to resist those that are in conflict with Sustainable Development Goals.

FOR OBJ 2 – *To co-operate with the Forest Service of the Department of Agriculture, Food and the Marine to encourage and promote the preparation and implementation of an Indicative Forest Strategy for the county.*

This process should have full regard to the objectives of the CDP.

Add: **“consistent with the Objectives and Policies of the CDP”**.

FOR OBJ 3 – *To undertake and adopt a landscape capacity assessment of the county to determine the suitability of landscapes to accommodate further commercial forestry plantation*

The landscape capacity assessment needs to inform the CDP and not be an objective of it. I repeat the paragraph from the Landscape Assessment of Co. Leitrim Report dated **2002**:

*‘Landscape capacity to accommodate forestry should be **a key consideration in deciding whether and where forestry expansion occurs**. A good proportion of new woodlands within the County should be broadleaved.’*

It shall be an objective of the CDP for LCC to use whatever powers are within its scope to ensure that forestry development within the County is consistent with the recommendations of the (as yet unpublished) Landscape Capacity Assessment Report (dated)

FOR OBJ 4 – *To actively participate in any Regional Forums established by the North West Regional Assembly to ensure sustainable afforestation across the region.*

This objective should apply not just for sustainable afforestation but for sustainable land management of the forested area.

To actively participate in any Forums or process to ensure sustainable land management of the forested area of the region.

ADDITIONAL OBJECTIVES

LCC should also commit, consistent with Section 15 of the Planning and Development Act (2000)*, as amended, to pursue to appeal to the Forestry Appeals Committee ('FAC'), all forestry licences which fail to secure and/or protect the objectives of the CDP or are inconsistent with the Policies of the CDP. Where there is a material contravention of the CDP LCC should be prepared to take judicial review proceedings.

**15.— (1) It shall be the duty of a planning authority to take such steps within its powers as may be necessary for securing the objectives of the development plan.*

LCC is failing in its legal duty not to follow up with appeals to the FAC where it has objected to an application on the basis of a contravention of the CDP.

FOR OBJ 5 - To actively challenge, through all available appeal processes, any development consent that fails to secure and / or protect the objectives of this section of the CDP or is inconsistent with the Policies of the CDP.

FOR OBJ 6 - LCC commits to designate, under Section 204 of the Planning and Development Act (2000) as amended, a series of Landscape Conservation Areas for the purposes of the preservation of the landscape.

TREES AND HEDGEROWS

There should be an Objective to commit to repeat the 2006 County Hedgerow Survey and carry out an evaluation of the changes.

POLICIES

TREE POL 1 - *To require the submission of landscape plans, where appropriate, to accompany planning applications for rural development proposals prepared by competent professionals and to promote the use of native trees for boundary treatment and shelter belts.*

Better enforcement is needed of the conditions of planning consents as they relate to retention of trees / hedgerows and also the requirements for new planting. LCC should commit to developing a monitoring and enforcement protocol.

TREE POL 2 - *To retain and protect significant stands/lengths of existing trees/hedgerows/woodlands, and seek increased planting of native trees, where appropriate, in new developments.*

TREE POL 3 - *To protect and preserve existing hedgerows in new developments and where their removal is necessary to seek their replacement with new hedgerows of native species of native provenance indigenous to the area.*

OBJECTIVES

TREE OBJ 1 *To consider the use of Tree Preservation Orders for the preservation of any tree, trees or group of trees or woodland of special amenity or environmental value.*

Tree Preservation Orders should be considered to protect certain Townland Boundary Hedgerows

TREE OBJ 2 *To support the measures being undertaken by the Department of Agriculture, Food and the Marine, Teagasc, Council for Forest Research and Development (COFORD) dealing with the effects of Ash Dieback disease and in the development of an ash breeding programme identifying and planting species of ash that are tolerant to disease.*

I do not support this Objective. I think that it would be more prudent to identify individual trees and stands of ash which are unaffected or less affected by Ash Dieback disease.

Breeding programmes are likely to select for commercial qualities as well as disease resistance. Breeding programmes tend to limit genetic diversity and encouraging genetic diversity is likely the only way that Ash will survive this disease. It was commercial interests that brought the disease to Ireland, we should not leave them in charge of the solution. LCC should encourage the natural regeneration of Ash in the maximum number of suitable locations including plantations.

We should let nature find her own solution, not try to engineer one.

The ecological, safety and financial issues related to Ash Dieback need to be addressed in a co-ordinated manner.

SUMMARY

As had been expressed in the Draft CDP, LCC has been largely disempowered by national government in terms of its capacity to influence forestry development within the county. This is an undesirable reality and LCC should act to the fullest extent to challenge the impacts of that disempowerment and also to empower itself as much as it can do within the law and by associated actions. The CDP is a key vehicle for this

Unless the Policies and Objectives of this CDP are precise, robust, concrete and capable of being implemented there seems little point in having a Section 10.6 at all. Words are of little value in the CDP unless they empower and empowerment is worthless if it is not deployed.

If LCC is serious in its intent to challenge the development inequities inherent in the current forestry consent process and the dominant industrial tree plantation forestry model, it must be prepared to take a stand.

The Council must be prepared to back up any objection that it makes at the submission stage of the development consent process by submitting robust and detailed appeals to the FAC. LCC must be prepared to take judicial review proceedings against decisions that result in a material contravention of the Objectives of the CDP.

Leitrim is the canary in the coalmine in terms of the impacts of Ireland's land use change in terms of afforestation where industrial scale tree plantations dominate.

Liam Egan

25 April 2022