**Save Leitrim Submission August 12th 2020**

As the most rural County in Ireland with high level of rurality over 90% of our people living in the electoral areas of less than 1,500 people, Leitrim people often express concern about over-afforestation, particularly conifer plantations which encroach on our rural communities. Many small family farms provide an important economic base for our rural economy feeding into and sustaining our small villages and towns.

Current Government agriculture policy written following the financial crisis focused on supporting intensive farming to increase food production when the country needed exports. The Dairy industry in the south and east of the country has expanded very quickly raising concerns about increases in greenhouse gas emissions and significant impacts on water quality and biodiversity. These emissions can be offset by carbon sequestration within the agriculture and forestry sector including by planting forests. This has led to aggressive government financial support for plantation forestry. In Leitrim some trees are planted by people who remain locally but at least 44% of premiums paid on Leitrim forestry are now paid to people living outside the county. Leitrim people are also concerned that much of the standing forestry is owned by companies and investors from outside the county and even outside the country and will therefore provide benefits to areas outside of Leitrim rather than contributing to our local economy. This is driving and accelerating rural decline in Leitrim. Recent research by Save Leitrim in Cloone and Aughavas highlights these issues and the changing land ownership profiles etc.

Leitrim County council and the county development plan must incorporate ethical concerns which must be central to climate action and national policy initiatives and must not allow Leitrim to become a sacrifice zone for increased and aggressive plantation to mitigate inaction and in other counties and areas. It’s not fair that people living in Leitrim should be asked to shoulder a disproportionate responsibility for offsetting greenhouse gas emissions generated in other more prosperous regions in Ireland. The rural population of Leitrim did not contribute or benefit from the intensification of agriculture in the South and East of Ireland. Our small, low income family holdings practice environmentally sustainable farming and protects a very valuable High Nature Value (HNV) farmland with biodiversity and in many cases, which is also a high-quality carbon sink. <https://www.teagasc.ie/media/website/publications/2016/6414-Technology-Update-IDEALHNV-John-Finn.pdf>

In 2017, 5,536 hectares of new forestry land were planted nationally, well short of the 15,000 hectares/year target the government had planned. The need to drive very strong growth in the forestry sector has led to the government introducing non-farmer investors into the market by providing tax-free income incentives along with very high premiums and grants for fencing and planting. This is impacting counties like Leitrim that have low land purchase costs set by a low capacity for intensive agriculture. 536 hectares were planted in Leitrim in 2017. This included 266 hectares (almost half) planted by non-farmers. Given the current stresses on our rural Leitrim communities with forestry cover already at 19.2% in 2019 a tripling of forestry planting targets will have a devastating impact on our county if allowed to proceed unprotected. If planting rates grow in line with current government policy and no regional or county level protections are facilitated, we will quickly lose more and more land to market led monoculture plantations.

Local Government involvement in strategic forestry planning and management and in developing a land use strategy for Leitrim can help protect areas and people in the county affected by over afforestation. This could be started through a broad and representative county stakeholder forum.

Commercial forestry has developed rapidly over the last 30 years in Leitrim. To date almost 20% of the total surface area of Leitrim is planted, making it Ireland's most heavily forested county. Nothing alters a landscape, a community and the demographics and population levels of a rural area more radically than large scale monoculture afforestation. The impacts of this are obvious in that the areas with the highest proportion and pressures from plantation forestry are those areas where the population decline has been highest and most noticeable in the recent census. The Planning and Development Regulations 2001 were amended in September 2011 to provide that initial afforestation be exempted development thus subjecting applications for forestry to a separate statutory development consent system outside the county under the Forestry Regulations 20172. National forestry policy described in the Food Wise 2025 policy document targeted a tripling from current planting rates of afforestation by 2021. Given the current stresses on our population, on state and community services and on maintaining economic activity in our rural communities in Leitrim this could have a devastating local impact if unchallenged. This presents the people and communities of Leitrim and Leitrim County Council with significant land use planning challenges. Forestry land use policy in Leitrim must be laid down in the County Development Plan. Leitrim County Council through the county development plan has a responsibility to protect people, biodiversity and environment in the way it manages and influences the plantation of forestry at the county level. Under the existing forestry management policy Leitrim County Council require strict adherence by developers to the ‘Fisheries’, ‘Archaeology’, ‘Biodiversity’, ‘Water Quality’, ‘Landscape’, ‘Harvesting & Environmental’ and ‘Protection’ guidelines published by the Forest Service but don’t have any role in monitoring compliance. This needs to change. Leitrim County Council must develop and publish guidance at the county level to indicate where and how plantation is suitable, restricted and not allowed. The environmental and biodiversity impacts from 30,000 HA of planted forestry needs to be assessed in the development of this plan. Out of this robust and clear direction must be shown to the industry and to communities that the County Council nd the County Development Plan is serious about setting boundaries on what can happen when, where, by whom and how in relation to plantations / forestry developments and activities.

The landscape character plan for Co. Leitrim has already defined areas where planting should not occur por which are more or less suitable for forestry. This landscape character plan should be reviewed. Many areas of Leitrim are highly attractive to tourists and particularly for “slow tourism” which relies on a natural unspoilt environment and landscapes. The industrialisation of the landscape with plantation forestry can and will impact on the attractiveness of the county for this important economic activity. Access routes for cyclists, driving tourists, walkers and other recreational tourists are impacted with the heavy processes of thinning and clear fell harvesting and haulage. Forestry activities such as clear fell also leave a high level of environmental destruction and scaring on the landscape. Soil runoff during these activities is also a problem for angling activities and the waterways. The process of completing The County Development plan must assess and designate those areas routes, landscapes, natural assets and other features which need to be retained and maintained in a natural state to support this developing tourist sector. These areas / items need to be protected from plantation development and forestry activity impacts.

Farming activity takes place 365 days per year across the farms in our county. There is a lot of local economic activities and businesses in our towns and villages which are very dependent on the “farmer’s Euro” being spent in town. Research by the IFA and UCC have shown that the farmers Euro has a tenfold multiplier / spending power in the local economy over the “forestry Euro”. The importance of retaining and maintaining active farmers and ensuring the young farmers can become established and expand in Leitrim is vital for the small businesses in our many towns and villages across the county. Maintaining a viable and sustainable rural population which is economically active is vital for the future. This population is needed in order to retain services such as health, social care, education and the many community and social activities which keep Leitrim vibrant. Large scale and increasing scale in the plantations in the county are increasingly reducing the numbers of active farmers and also reducing the level of economic activity in these areas. Forestry does not replace this activity €uro for €uro nor does it leave as many long-term jobs. Much of the work on forestry activity is only irregular and with large gaps over many years with no activity on that land or in that area. Much of the timber is hauled out of the county and there is very limited added value in of for Leitrim from the timber grown here. This impact of the loss of economic activity from farming in comparison to that from forestry activities must be examined and factored into the County Development Plan. There are alternatives for many of our farmers if the value of the land for carbon storage, sequestration, for maintaining biodiversity and providing other vital environmental good and for tourism / recreational services is recognised and funded properly through government policy. The Teagasc mapping of HNV lands <http://www.high-nature-value-farmland.ie/socioeconomics/> should be considered an important aspect for the future land use and biodiversity protection in the county and also influence a land use policy in the CDP. It should also help to identify areas where plantation forestry could be minimised to balance biodiversity conservation and protection. The areas around lough Allen are identified in the current programme for Government as a biosphere for protection of biodiversity and water quality.

These should be incorporated into the CDP. The findings of the consultation on forestry activity in the county carried out through the Public Participation Network should be examined and incorporated into the CDP.

The new revised CDP offers the council and the public an opportunity to balance local objectives and needs with the public interest and wider policy consideration. This plan must develop and document a clear policy direction of forestry and sustainable land use in Leitrim. It must

• determine and define the maximum allowable commercial afforestation level in any and all areas and to determine a rate increase over the period of the plan in order to protect rural communities and population against the negative impacts over afforestation.

• protect and strengthen biodiversity levels by providing guidance on the location of where invasive monoculture tree species can or cannot be planted within the county so that forestry activity can be aligned with local landscape character, High nature value lands, and other community objectives such as retaining and maintain population and statutory / community services and infrastructure. Many other environmental considerations such as protecting and conserving bird populations, many other habitats, wetlands, peats, water quality etc. must be included in the assessment.

• protect Leitrim’s soil carbon stocks by preventing the plantation of forestry on existing carbon sinks where significant carbon stocks situated in these soils are likely to be released as a result of the plantation development activity.

The Forestry requirements for licensing (by DAFM) requires developers to complete an EIA if more than 50Ha are to be planted. No such EIA has ever been conducted in Leitrim despite the fact there is 30,000Ha planted in the county. In many cases there are now continuous cumulative blocks of several hundred Hectares but which have been planted at different times. This cumulative planting is having an impact on biodiversity, water quality, and on public infrastructure (such as roads, bridges) particularly at harvesting stages. There is also significant fire risk associated with these blocks of plantations which are likely to demand increasing resources and planning from the fire services. Access routes, escape routes fire breaks must be defined and planned in the county development plan and the industry / sector must contribute to this and the costs of this to protect the local residents / citizens businesses etc. Serious consideration must be given in the environmental assessment of the County Development plan to this situation.

The county development plan must take account of these issue and address the cumulative impacts of these large areas of plantation. Limits and restrictions must be developed in the plan to ensure that a sustainable and viable communities with diverse economic opportunities can co-exist alongside the very high level of planation forestry already in place in the county.