

Submission from Save Leitrim

Forestry is a serious problem in Leitrim and for people and communities in Leitrim. There is simply too much of it and it is unplanned and locally we have little or no say on where it is, where it shouldn't be, what kind of forestry or afforestation is and how much more of there might be. This draft county development plan allows all of us including Leitrim county council to say stop and to set out a planned way forward which is in the interest of our people, our communities our environment and our economy and which delivers on national policies also. Many of the solutions can come from Leitrim as we know what is best for us and how it fits so we ask that Leitrim County Council to put objectives and policies in place and in this plan to achieve this and to develop solutions for this problem,

"With respect to **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*

It is Save Leitrim's position that the landscape capacity assessment needs to inform the County Development Plan, and the level of afforestation which are allowed, not be an objective of it. We reserve the right to make additional submission once the landscape capacity assessment, which has already been commissioned, is in the public domain."

There is no countywide land use plan for Leitrim which defines the blend or mix of land use for the county and which could help to multiple and sustainable land use allocations for different areas of the county and also help prevent over afforestation of certain communities and areas. Different land uses would be expected to include farming/ agriculture, landscape, tourism recreation, biodiversity, water quality, flood management, built environment, towns and villages, forestry and woodlands, SACs NHAs and other zoned and designated areas. There is absolutely no control or democratic process whereby the use of the county for afforestation can be or is managed or planned locally or through the planning process. This is failure of Government policy and is damaging to our county. There must be an objective in this plan to use all of the powers and mechanisms (political and legal) to the local authority to address this deficit to ensure the equal focus on all the objectives of this proposed county development plan and that some objectives should not be sacrificed due to national forestry policy. Demographic stability and sustainability in some of our rural communities is now a real problem for the future of this county and its people and this should be addressed.

Section 10.6

Not only should afforestation of deep peats cease it should be an objective of Leitrim County development plan that reforestation (following clearfell) of degraded deep peats should also not be allowed in this county development plan. The objective must be to rewet restore and rewild these areas of co Leitrim so that they are restored to sequester and store carbon and contribute as natural areas to the conservation management and enhancement of biodiversity in Leitrim in these wild places.

Much of the farmland of Leitrim is defined as High Nature value farmland so there must be an objective to support this and to retain this designation and also to ensure that farmers are properly supported to manage this and conserve it for future generations and to avoid any further damage to

biodiversity in Leitrim. An objective to have a solid land use plan to protect HNV land in Leitrim is a necessity in the County development Plan.

The draft plan has some statistics and information about afforestation which is vague and possibly misleading on the impact of forestry in the county. We propose that there should be an objective in this Plan for the next 5 years to research and understand more fully the social, demographic and community impacts from the high cumulative levels of afforestation in many areas of the county. This will also for better “rural proofing” of the afforestation policy and practices which are changing our landscape, our settlement patterns and the demographics when combined with the planning issues for once off housing. It is in our view leading to a decline in many community service such as schools health services, post offices garda stations, transport services and of the county will give a change the

There is a net loss of jobs and consequent economic activity in our communities/ villages and towns by displacement of farming through the afforestation of land in Leitrim. There is also a decline in the number of new entrants to farming and land management as land become scare and prices are inflated by the grants, subsidies and tax breaks available for plantations by investors. The objectives of the Plan should be to retain a sustainable agriculture / environmental sector in the county to help keep our villages and towns sustainable both economically (shops and small businesses) and demographically a diverse population which is not in decline or dependant.

Because afforestation has an impact across many of the other objectives of this proposed County development plan including agriculture, environment, biodiversity, water quality. There has never been an EIA for any afforestation in Leitrim and there are now numerous and also some very large area of contagious plantation in the county beyond that which trigger an EIA under the European directive.

The objective of LCC in policy 5 to respond to referrals from the forest service is no longer enough for LCC who should be maintaining and ensuring the delivery of those many other objectives proposed in this plan. We propose that 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 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 / biodiversity / water quality objectives of the CDP. Including the replacement of exotic species with native species.

- 7) Oppose the afforestation of HNMF (High Nature Value Farmland) (HNMF 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 HNMF.
- 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 and which will also have soil and demographic impacts over time by closing down large area of the county for other activities for 70 80 years at least.
- 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 contractor / haulier/ forest owners.

Conclusion

Our communities and land are very valuable in many ways they have tremendous heritage both culturally and naturally. Our citizens have to be far more resourceful to sustain their communities, their own families and lives, their farms, the environment and businesses than in other parts of Ireland and but this is not recognised at national level or in national policy where they seem to think that Leitrim land and communities are dispensable and poor and can be parted wholesale to satisfy global ambitions and targets for tree planting.

This plan is very important is how it decides and sets objective to manage this locally in Leitrim to counter this. Our council executive and elected members must be serious in its intent to challenge the development inequities inherent in the current forestry policy and licensing processes and the dominant industrial tree plantation forestry model. The objectives of this county development plan must make it clear that LCC is prepared to take a stand.

The Council must be prepared to back up any objection that it makes at the submission stage of the licensing process by proactively making observations and appeals to the FAC. LCC must also be prepared to take judicial review proceeding against decisions that result in a material contravention of the many and other Objectives of this new county development plan.

We in Save Leitrim will work with all stakeholder in the county in finalising this draft plan to do this and also in the next number of years to ensure that those objectives are met.

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