



Submission in response to the Mourne Gateway Proposal

6th April 2023

1. Introduction and context

Mountaineering Ireland is the representative body for hillwalkers and climbers on the island of Ireland. It is recognised as the National Governing Body for mountaineering, hillwalking, rambling and climbing by both Sport Ireland and Sport Northern Ireland. Mountaineering Ireland currently has over 15,000 members, as individuals or through one of our 190 affiliated clubs. Our members are out on a daily basis in the Mournes, both local residents and visitors from all over Ireland. Mountaineering Ireland's Youth Development Officer is based at Tollymore Mountain Centre which is also the home of our 'Hotrock' climbing wall.

As the representative body for hillwalkers and climbers on the island of Ireland, Mountaineering Ireland has a particular concern for ensuring the sustainable use of Northern Ireland's upland areas. The Mourne Mountains are a hugely significant element in Northern Ireland's landscape, providing defining geographic features, beautiful scenery and one of our largest area of relatively wild land; all factors in the designation of this as an Area of Outstanding Natural Beauty (AONB).

Over the last 20 years, Mountaineering Ireland has consistently been a voice for the protection and care for the landscape and natural environment of the Mourne Mountains, including making a submission in 2012 to the draft South East Coast Masterplan. In that submission we articulated our concern that the proposed gondola would detract significantly from the scenic quality of the area and urged consideration of alternative options that are consonant with the strengths of the area. Mountaineering Ireland participated in Mourne Mountains Gateway Project consultation workshops in 2017 at which a wide range of alternative suggestions emerged that would be more environmentally and financially sustainable and would improve the appeal of the Newcastle and Mourne area for visitors. Latterly, local Mountaineering Ireland representatives were engaged with the recent Department of Finance Innovation Lab initiative, advocating long-term investment to protect the special qualities of Mourne.

Mountaineering Ireland continues to oppose the gondola proposal as ill-conceived and damaging to the special Mourne habitat. We are however in favour of sensitive visitor management measures to improve access and mitigate impacts on the environment.

Our position on the current gondola project is set out below finishing with some proposals as to how we believe a more acceptable, shared vision of a Mourne Gateway project could be achieved.

2. The current proposal

The recently released images give some detail on the concept proposal which raises more questions than answers. The core of the proposal seems to be a large visitor centre situated above the tree line in Thomas Mountain quarry containing a café, interpretative exhibition, viewing galleries, toilets and an 'event space'. The drawings are not scaled but it is around four storeys in height with a substantial floor area. It is accessed by a gondola system from Donard Park, approximately 1km away, following a line cut through the forest with intermediate pylons. The only proposed infrastructure in Donard Park seems to be the gondola base station.

Conflicting statements have been made in relation to the impact of the gondola installation – on one hand suggesting it will be set below the tree canopy level and so have minimal visual impact, on the other hand that no trees will need to be felled. Both statements can not be correct. It must be pointed out that although there are extensive coniferous plantations in Donard forest, there is also substantial historic woodland dating from the historic Annesley Park, within which many trees are now recorded on the Woodland Trust's register of Ancient, Veteran and Notable trees.

The gondola line from the base station to the quarry goes through the area of greatest concentration of these important trees on the banks of the Glen River. It threatens both the habitat and the natural ambience of this popular and picturesque walking trail which is the main route to Slieve Donard and one of the most frequented footpaths in the Mourne. The very existence of the gondola with associated visual and noise impacts will inevitably negatively impact on the quiet natural experience of those enjoying the existing trail network.

There is confusion as to whether visitors will be allowed out of the visitor centre, with some conflicting statements. In response to concerns about the environmental impact of a large number of people gaining easy access to a protected upland habitat that currently sees relatively few visitors, the Council had indicated that people would not be allowed out of the building, later amending that to managed groups. Attractions that rely on good weather to allow 'the view' are notoriously difficult to manage and make economically viable given the significant fluctuations in demand. This would all create a real management issue for the operator and be likely to lead to either reductions in users or pressure to change the visitor offering. In effect the location of the visitor centre creates a significant environmental issue where none exists at the moment. There would be little harm in people using the established trails down through Donard forest but how would you stop people accessing the mountain terrain above the quarry to prevent habitat damage? The potential of that also raises mountain safety concerns as well as environmental damage given the nature of the terrain. The location of the quarry is also at some distance from the main Glen River path so there is not going to be any time advantage to people wanting to follow it to Slieve Donard. Instead, there would be a temptation to create new desire lines across what are currently relatively unfrequented areas of hillside. It is likely that a similar problem would be created to that on Cuilcagh in Fermanagh where the development of the 'Stairway to Heaven' continues to cause significant environmental damage to the fragile plateau habitats. It is now proving difficult and expensive to mitigate that damage, and to address the other substantial visitor management issues, not least the probable reduction in the quality of the visitor experience.

The business case for the current proposal seems to be based on achieving 365,000 annual visitors by year 5. There are a number of implications of this figure. If the visitor centre is to have the capacity for peak time numbers likely with such an annual figure it needs to cater for over 3,000 people on peak days and over 1,000 at any one time, based on industry-tested visitor patterns. These peak figures could be even higher given the weather-dependent nature of the 'attraction'. That would lead to a building in the range of 30-40,000sq ft – a very substantial structure. The daily servicing for meals, waste, staff etc is also substantial and it is not clear if all that would be possible via the gondola or by bringing vehicles up the forest roads. Questions have also been raised about how human waste will be dealt with in such a sensitive environment a long distance from main sewers.

3. Visitors

So, who are these 365,000 people and is that number realistic?

It seems clear this is not aimed at the large numbers who already come to the Mourne for walking, running, cycling or climbing on a regular basis. It is envisaged as a tourist attraction to complement Titanic Belfast, Hillsborough Castle and Giant's Causeway aimed at the Irish, GB and overseas markets who will plan their visit around a series of 'must see' experiences – half or full day, most likely staying in Belfast or on their cruise ships. The experience will be a five-minute gondola ride, a look at the view on days the centre is not enveloped in cloud or rain, half an hour or so in the interpretative exhibition, then coffee or lunch and back down in the gondola again. 365,000 visitors to a paid visitor attraction is, by NI standards, highly ambitious – significantly higher than Hillsborough Castle, Mount Stewart, Castle Ward etc. all of which offer a much

longer visitor journey and stay and have an indoor offering so are not completely weather dependent. The closest comparisons in GB are the Nevis Range Cable car (~200,000 annual users) and the Cairngorm Funicular (~150,000 annual users), both of which serve winter skiing as well as summer walking and cycling and are considerably more extensive. Both also, although privately run, have required substantial and repeated government investment to keep running. This all raises a number of questions:

- Is the figure of 365,000 realistic or the number required to make the business plan work?
- If the bulk of the visitors are 'new' then how will the road access and car parking infrastructure cope given the existing traffic congestion issues?
- Will some of the City Deal money be allocated to the proposals in the Council's Active Travel Plan and are they sufficient to deal with congestion if the new visitor numbers are realised?
- Is the visitor centre to be built to the scale required for these numbers?
If so, it is a very substantial building. A Council-released photo included the former quarry workers' shed that sat on the site – no longer there, but obviously intended to imply that the new visitor centre would be replacing an old structure. However the visitor centre proposed is many times larger and taller – four storeys high with around 30-40,000 sq ft of floor area.

4. Planning

There are many relevant planning policies including the Regional Development Strategy and in particular PPS2 Nature Conservation and PPS16 Tourism Development. The area has multiple designations including AONB, SAC and ASSI. The Special Area of Conservation (SAC) and Area of Special Scientific Interest (ASSI) have particularly onerous connotations. The quarry site is within the SAC and the ASSI, whilst the forest is not. The Regional Development Strategy (RDS) states that 'tourism development' needs to be appropriate to its location and ensure natural assets are protected and enhanced – a high bar for any development, and of course it refers to not just the footprint of the building itself but any area that might be impacted on by the development. As pointed out above the installation of the gondola looks likely to have a negative impact on historic woodland with its important biodiverse habitats.

We understand that environmental impact assessments (EIA) have not yet been carried out but given the choice of a highly visible site, above the tree line, in an SAC and ASSI for a very large visitor centre, it seems very unlikely an independent EIA would be able to objectively conclude that it will protect and enhance the natural assets of the area.

Other options (such as having the visitor centre in Donard Park with just the viewpoint in the quarry) or alternative access options (such as electric shuttle buses up the forest road rather than a gondola) do not seem to have been considered or at least made public. An objective review of options is a fundamental part of any environmental impact statement, or SEA, (Strategic Environmental Assessment), or Natura Impact Statement (NIS) – none of which seems to have happened.

It is recommended good practice that these assessments are not thought of as a 'tick box' exercise to justify a pre-determined outcome but that the very nature of the proposal is genuinely shaped and amended by the outcomes of truly independent environmental assessments.

5. Precedents

There are some instructive British and Irish precedents when considering building visitor centres in the uplands.

The National Trust for Scotland (NTS) built a visitor centre on the lower slopes of Ben Lawers in 1970 to support visitors coming to see its important habitat for alpine plants. When numbers were low this was fine but by the 1990s the numbers had increased to the extent that damage was being done to those habitats –

the existence of the visitor centre was creating the problem. NTS closed the centre in 2009 and it was demolished in 2012.

The Glencoe Visitor Centre was built in the 1970s in the floor of the glen but in a very visually prominent location. By the 1990s it and the surrounding car park had expanded to meet demand and was considered visually intrusive in the natural landscape, so in 2002 a new centre and car park were built in the forest lower down the valley close to Glencoe village and the old one was demolished.

In Ireland, the Office of Public Works decided to build a visitor centre at an upland site near Luggala in the Wicklow mountains in 1991. As a state body they believed they did not require planning permission and were supported by the then Bord Fáilte. A large number of objectors – landowners, farmers, recreation bodies (including Mountaineering Ireland) and environmentalists initiated court proceedings which found that planning permission was required. When it became clear such permission would not be granted for that site, OPW were obliged to reinstate the ground to its natural state. A similar situation arose at Mullaghmore in the Burren where a proposed OPW visitor centre was eventually stopped in 2000 after many years of argument. These cases helped establish the now widely accepted principle of locating visitor facilities at the low level ‘gateways’ rather than in the sensitive environments themselves allowing for visitor management to protect the habitats and special qualities of designated areas.

6. The wider perspective

Perhaps the most disappointing aspect of the current Gateway project is its singular focus on a ‘tourist attraction’ in Newcastle and a lack of consideration of either the wider visitor and community needs, or the overall care of the receiving environment – the very asset of the Mourne landscape on which it all depends. This is in contrast to the 2013 SE Area Masterplan prepared for the Department of Communities which set out a more holistic vision for tourism, community and economic development. While this plan introduced the concept of a gondola from Donard Park, it was but part of a Gateway centre which included a swimming pool and leisure facilities, combined with other tourism and economic developments in the town and the wider area. In the intervening 10 years much has changed, not least the significant increase in those using the Mournes for active leisure and greater awareness of our impact on the environment both at a macro level with emission-induced climate change and at a more local scale impacts on habitat from fires and trampling erosion. Given the extent of change and threat to the natural environment it is essential that any proposals are reviewed to ensure they do no harm and where possible enhance the quality of the receiving environment on which tourism, in the long term, depends. In essence any developments should be nature positive, climate positive and health positive.

There is good work going on by the Mourne Partnership (National Trust, Mourne Heritage Trust, NI Water and Woodland Trust) and the Department of Finance Innovation Lab initiated by former Minister Conor Murphy, looking at the long-term issues, need for investment in conservation, land management, visitor infrastructure, community empowerment and the whole range of factors that need to be considered in achieving sustainable communities and tourism. Given the substantial investment being allocated through the Gateway project (£30m from City Deal and £14m from Newry, Mourne and Down District Council) it is surely essential that it is spent in a way that contributes positively to the overall community and visitor infrastructure and not in isolation from it.

7. The way forward

Mountaineering Ireland urges a step back from the current proposal which is being put forward as an ‘all or nothing’ fait accompli with people having to choose if they are for or against it. Our suggested ‘reset’ would include bringing together all the voices from the three current initiatives; Gateway (Council and Tourism NI), Mourne Partnership (National Trust, Mourne Heritage Trust, NI Water and Woodland Trust) and Innovation Lab (Dept of Finance) to scope out the wider vision, to commission an independent Options Appraisal for the Gateway project, to set out an integrated plan for visitor infrastructure in the Mournes and carry out a meaningful community consultation. Such a process would avoid the inevitable confrontation which will happen if there is an attempt to simply push through the current proposal which could well result in the loss

of the investment. In particular the landowners of the Quarry – the National Trust, the landowner of the forest – Forest Service/DAERA, and the landowner of Donard Park – the Council, need to come together, with the support and involvement of the others, to develop a vision for the Mourne Gateway project and the wider area that everyone can support.

8. Potential elements of a sustainable tourism project

Mountaineering Ireland believes that the type of tourism for those interested in nature and wild spaces is changing. Increasing awareness of climate change impacts of travel on habitats, erosion caused by excessive concentrated use and the loss of biodiversity are all leading people to question previous travel habits. Visitors want to tread more lightly on the earth, to avoid habitat loss and to give something back to the landscapes and environment they hold dear. Tourism has the potential to evolve from a quick voyeuristic experience into a more empathetic immersion in a community and environment.

The Global Sustainable Tourism Council (GSTC) sets out standards and principles by which sustainable tourism can be accredited, based on three core principles – nature-based, environmentally educated and sustainably managed. We believe the Mourne visitor experience should be based on those principles and the Mourne Gateway project should be a beacon for that.

The components of this could be....

The Mourne Gateway

A visitor and community Hub building located in Donard Park with visitor services linked to leisure facilities such as an indoor pool as envisaged in the SE Masterplan and an Interpretative exhibition with a focus on 'Wild Mourne'. The Hub would be an eco-tourism training base offering access to opportunities for a wide range of experience-based activities – guided walks and cycle experiences, traditional rural crafts and skills, path repairs, habitat regeneration and rewilding, foraging, red squirrel and bird watching, mountain safety, forestry and landscape management, heritage tours etc., delivered in partnership with local providers, National Trust, Mourne Heritage Trust etc. There could be training facilities within the buildings – the pool for example would be an ideal safe introductory training area for water sports such as kayaking and stand-up paddle boarding for use by outdoor activity providers - and throughout Donard Park. There is the potential for residential accommodation links with YMCA Greenhill and local hotels etc. Other facilities such as lockers for leaving baggage or a change of clothes, combined with shower and changing rooms would support visitors using public transport in particular. There could also be bike hire (trail, e-bikes, trikes etc) combined with bike training courses and guided experiences.

It is probably best to think of the Hub not as a large single building but as a series of buildings, structures and information panels or screens arranged around an informal courtyard through which everyone passes on their route from car parking and bus drop-off points to the forest and the mountains – the 'Gateway'. This allows for relevant mountain safety, weather and environmental good practice information to be displayed and a point of contact with visitors. It would also create an events space for engagement initiatives with a presence of National Trust and Mourne Heritage Trust engagement rangers. The Mourne Mountain Rescue Team could also find it a useful contact point for both safety awareness initiatives and fundraising. Needless to say, the whole complex would be designed to carbon neutral or carbon negative standards as an exemplar of good practice. The concept of a series of buildings should also help with different funding sources and timescales.

Connections

There is a need for the linking of Murlough, Castlewellan, Tollymore and Donard Park with a park-and-ride system using electric or hydrogen buses on a circular route. This will relieve traffic pressures in Newcastle, open up different recreation opportunities and encourage longer stays in the area so bringing greater economic benefit.

This could also be coordinated with the public and private sector Mournes shuttle buses with drop-offs at upland access points to reduce traffic congestion and irresponsible parking on narrow mountain roads.

If the proposals in the Council's Active Travel Plan for Newcastle were implemented that would mean that Main Street and Central Promenade would be for access only car traffic and buses. That would support the idea of a shuttle bus stop and tourist information point at the historic railway station linking with the Translink bus station, making it more attractive for people to come by public transport or use the park-and-ride facility. A low-speed hop-on hop-off shuttle bus would take people around the town. This all reduces traffic congestion and increases footfall in Newcastle which makes it more attractive for local people and visitors with greater economic benefits for business.

Other elements of connectivity could be the Dundrum to Newcastle Greenway along the old railway track, eventually all the way to Downpatrick, and the Mourne Aqueduct trail from Donard Forest to Bloody Bridge and on to Annalong Wood and Silent Valley.

There is also merit in developing a Mourne Coastal Greenway from say Bloody Bridge to Kilkeel, Greencastle, Rostrevor and Warrenpoint, linking to the Carlingford Greenway and the Newry Canal Way. This is not without its challenges but looking at the investment of Welsh Tourism and Fáilte Ireland in the Welsh Coastal Trail and the off-road Wild Atlantic Way respectively, shows where those bodies believe investment is worthwhile.

Donard Forest

We propose the Introduction of a green transport mechanism around Donard Forest using existing forest roads, linking together a number of viewpoints – eg at north western edge/Shepherds cottage with new walking/cycle path link to Tollymore; at Drinahilly with interpretation of Mourne aqueduct; at Thomas Mountain quarry viewpoint and quarry museum exhibits and link to an upgraded Granite Trail extending it to include other quarries in and around Millstone Mountain. The transport would be deliberately slow speed and accessible, not offering a time advantage to people capable of walking but there to make a range of viewpoints accessible for those unable to walk that distance. There could be a number of options considered – eg Toyota now make electric Land Cruisers for enhanced safari experiences and Glenveagh National Park in Donegal have recently introduced electric shuttle buses. Local company Wrightbus are leaders in new hydrogen buses and would be capable of making a bespoke design for Donard Park.

Mountaineering Ireland shares the aspiration of the Council to make access to outdoor experiences easier for a greater range of people but would suggest there are better and more cost-effective ways of doing this than the gondola concept. These include further development of the Silent Valley - where the shuttle bus to Ben Crom takes you much more into the 'heart of the Mournes' than Thomas Mountain quarry ever would; opening up access to the top of Spelga Dam where a viewing platform suspended over the dam wall would provide an accessible and dramatic viewpoint and use of the existing road in Annalong Woods to provide easy access to the Binnian Tunnel where a great interpretative story could be told in a beautiful location amidst a regenerated native forest.

Donard Forest should be managed over the long term for nature and leisure rather than as a commercial forest, linked to some of the active experience programmes set out above. There are opportunities for adventure play facilities such as ropes courses, zip lines and tree house playgrounds. Designated mountain bike trails could be developed as part of an overall cycling masterplan for the area including Tollymore, Castlewellan, Moneyscalp and linking greenways. Cycle uplift could be provided by the green transport loop.

There would also be development of an interpreted heritage trail network linking together the surviving heritage features with new eco-designed landscaped features in key locations – a contemporary interpretation of the concept of the 'sublime' and the transition from designed landscape to the wild mountain above. A review of historic maps shows that Donard Park had a spa house and well, a hermitage

and other landscape features. The 'visitors dining room' gothic folly still exists as does the ice house and historic bridges, and probably still beneath the grown-over rubble are the cellars of Donard Lodge which had an elegant conservatory overlooking the town.

The 'Wild Realms' relandscaping of Westport House estate currently being supported by Fáilte Ireland is an example of where the quality of the designed landscape can be an international standard visitor attraction. Managing forests for nature is also proving to be a great way to involve schools and the wider local community in caring for and enhancing their local environment.

Experience elsewhere has shown that all these activities can be designed to co-exist with the sharing of core facilities and we believe a Donard Park Gateway Hub can be an internationally significant and sustainable tourist attraction as well as a community resource to be proud of. With careful co-design there is no reason why a reconfigured Gateway project fit for the challenges of the next 50 years should not also meet the exacting criteria of the City Deal and the needs and expectations of the Newry and Mourne ratepayers. The respected international tourism consultant Terry Stevens, speaking recently at a Tourism conference in Belfast, stated that it was important not to look around the world and copy what others have done in the past but at what they are planning to do in the future and to understand the desires and aspirations of young people today as they will be the tourists of the future. We believe such a study indicates a trend to more immersive experiences in the environment, treading lightly, doing no harm and investing in the care and protection of nature, backed up by high-quality food and accommodation experiences in the cities, towns and villages. That should be where our ambitions lie, not in diminishing nature with mechanical intrusion, eroding the very asset on which future tourism will depend.

Mountaineering Ireland staff and members have huge experience and passion which we will willingly give to finding the right development of visitor facilities in the Mourne and we are ready to play our part in an open and constructive process for the benefit of the whole local community and visitors.

For further information contact:

Helen Lawless
Acting CEO / Access & Conservation Officer
Mountaineering Ireland

helen@mountaineering.ie / 00 353 1 6251115