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Planning Department,
Galway County Council
Aras an Chontae
Prospect Hill
Galway

6th July 2020

Re: planning application number 20676 – Connemara National Park

Dear Sir/Madam

As the national representative body for hillwalkers and climbers on the island of Ireland, Mountaineering Ireland* has a particular interest in ensuring the sustainable use of Ireland's upland areas, incorporating mountains, hills, bogland, forests, cliffs and coastline. Mountaineering Ireland therefore represents a community of interest in this application drawn from County Galway and also a much wider geographic area.

Mountaineering Ireland's sees Ireland's national parks as important natural landscapes and very significant national assets. They should be managed accordingly. The long-term under-resourcing of the National Parks & Wildlife Service (NPWS) has diminished the quality of Ireland's premier nature conservation sites and limited the effectiveness of NPWS in building understanding and appreciation of Ireland's natural environment.

Mountaineering Ireland wishes to make clear that we are supportive of NPWS, and that we have high regard for the passion and commitment of those working within the service. This submission is made from the perspective of providing observations to assist NPWS in addressing the challenges faced in Connemara National Park and fulfilling its responsibilities.

Context and rationale for the development

- a. Mountaineering Ireland notes that 'the proposed development is a joint initiative between the NPWS and Fáilte Ireland working in strategic partnership to further develop and expand, upgrade and enhance the existing trail system within the Connemara National Park'.
- b. It appears there is no management plan in place for Connemara National Park (or for Ireland's five other national parks). Without such plans it is very difficult to make appropriate and consistent decisions on proposed developments such as this. There is a real risk that the conservation objectives for Connemara National Park will become secondary to those of tourism.
- c. Mountaineering Ireland notes that the primary aims of Wicklow Mountains National Park's Management Plan for the 2005-2009 period were 'to develop and maintain the highest standards of conservation management and development, and to facilitate appropriate educational, recreational

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and community interests and activities, consistent with the conservation imperative'. This is the only plan we were able to access, however it provides a useful indication of what the aims of Connemara National Park might be. This is supported by the applicant's Natura Impact Statement (section 7.0) which mentions that 'the primary function of Connemara National Park is one of conservation'.

- d. The Statement of Justification for Works (Section 6.0 of Architectural Heritage Impact Assessment) includes: alleviating pressure on existing infrastructure; improving the overall visitor experience; catering for a wider audience, particularly families; and encouraging people to stay longer in the area, bringing more business into local communities. It makes no reference to the primary purpose of a National Park – conservation, reinforcing Mountaineering Ireland's concern that conservation objectives have been made secondary to tourism.
- e. There seems to have been little consultation on these proposals with the local community, Mountaineering Ireland was not consulted, neither were local walking clubs, this is disappointing, given that Connemara National Park is publicly-owned land with which so many people have a strong connection. We appreciate that public meetings have not been possible in recent months, however information could still have been made available to interested parties. The planning application and supporting documentation information available online in relation to this application was not easy to digest and has left many people with questions and concerns about the proposals

Trails

- f. Mountaineering Ireland welcomes the expansion of the trail network at Connemara National Park; there is increasing demand for additional low-level trails such as these.
- g. A key concern for Mountaineering Ireland members is that there should be a connection between the Mweelin trails and the Letterfrack trails. Without this there will be pressure to provide additional facilities and services at Mweelin. Historic maps (on www.osi.ie) show an old route running along the boundary of the national park north of Diamond Hill. A short connection would allow this to link in with the Diamond Hill trail. We understand that plans for a connecting trail may be under consideration and we urge NPWS to redouble its efforts to achieve this.
- h. The design of the Mweelin trails in particular may require further consideration. The link trail from the carpark is 1,350m long; users of the other routes all have to pass in and out along this section which could result in congestion, not least because the proposal includes five play equipment sites along the link trail. That congestion will likely lead to off-trail walking and consequent erosion.
- i. Care should be taken in the design of the proposed viewing area at the top of the old quarry on the Lime Kiln trail. With the Mweelin proposal not including picnic tables there is a risk that the viewing area will become a picnic site resulting in loss of vegetation and soil erosion as well as littering and congestion. Would it be possible to create a loop walk for the descent, to encourage a continuous flow of visitors?
- j. It is positive that the park wants to improve attraction to families, however it is notable that the application includes play facilities, but makes no reference to leveraging the educational potential of the expanded trail network. There are many features of interest within the Mweelin site in particular. With imaginative interpretation there is scope for building people's appreciation and understanding

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of the biodiversity and historical value of this landscape. This is expected of any community group developing a trail and should be central to any development proposals within a national park.

- k. In relation to the Archaeological Impact Assessment we note that this is based on a desk study. Given the number of recorded monuments in the Mweelin site an on-site inspection would seem appropriate, otherwise there is the risk of plans having to be abandoned should something emerge when work is underway. Mitigations to protect the archaeological monuments seem very high level – particularly at the Mweelin site, where the trails seem to pass very closely to the graveyard, holy well and dolmen. Should more detail be sought in terms of specific mitigations to protect these monuments during construction work, and/or to ensure the trails are located sufficiently back to avoid any damage? Also, what controls are being put in place to protect these monuments once access is opened up to them?
- l. Bringing so many people into the Mweelin part of Connemara National Park could have a knock-on impact on the mountains above Mweelin. Increased footfall on these mountains could lead to erosion problems, as well as walkers getting lost or injured on steep and rugged terrain. Diamond Hill is a stand-alone mountain, whereas Mweelin is at the start of a steep mountain climb and a ridge that leads onwards to other mountains.
- m. Section 3.1.3 of the Appropriate Assessment Screening report and the Natura Impact Statement refer to five path proposed designs for footpaths. The legend for the drawings indicate six footpath types, it is not clear what path type 6 is.
- n. Detailed specifications should be developed for all path types. With type 1 and type 2, effort should be made to avoid straight lines and hard edges, so that the paths look more natural and fit in with the texture of the local landscape. In relation to type 4 (stone-pitched path) and type 5 (surface dressing with edging stones), Mountaineering Ireland recommends that NPWS base its detailed specifications on the techniques in the Upland Pathwork Construction Standards for Scotland, published by Scottish Natural Heritage, which are increasingly becoming recognised as the standard for best practice on the island of Ireland (see <https://www.nature.scot/upland-path-management-standards-delivering-path-projects-scotlands-mountains>).
- o. Experience from Diamond Hill shows the need for ongoing maintenance of paths, especially where there is heavy usage or any gradient above 10 degrees.
- p. Section 3.1.3.2 refers to the use of path type 5 on a summit ridge – it is not clear what location this refers to as the proposals do not seem to include any summit areas.

Car park and toilets

- q. There is need for parking in the vicinity of Mweelin as hillwalkers accessing the mountains of Benbaun (Maolan), Benbrack and Knockbrack are currently discouraged from using the Kylemore Abbey car park. Toilets are also welcome as there are few public toilets in the area.
- r. While there had been concern at the possible loss of blanket bog habitat for development of the car park, when there would appear to be more suitable land in the vicinity, it seems that the site proposed for the car park may not be of high ecological value.
- s. A major concern remains in relation to the carpark, and that is its scale – with capacity for 144 cars, plus significant bus parking, there could be up to 1,000 people in the Mweelin site at one time. This

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would undoubtedly lead to congestion, particularly on the link trail, resulting in off-trail walking, as well as overloading of the toilet facilities. Justification should be provided for the scale of the car and bus parking proposed, as well as the selection of the site of the parking area.

- t. Mountaineering Ireland appreciates that overcrowding at the Letterfrack centre has been an issue, especially over the last two summers, but there may be other solutions, such as pre-booking (as used at the Cliffs of Moher). There could also be scope for increasing parking provision within the village of Letterfrack and operating a shuttle bus between Letterfrack and Kylemore/Mweelin. This would improve the local economic benefit from the national park.
- u. The design of the car park also presents a concern. While the use of Grasscrete is mentioned in the application, the regular layout of the car park has an urban feel, which does not fit with the rural character of the area; a more informal or organic approach towards the layout of the carpark should be considered.
- v. The provision of the five play stations located immediately south of the proposed carpark within close proximity of each other and located alongside the pathway seems an overdevelopment of the area and may prove somewhat difficult to manage. A single carefully selected area of a suitable scale, or the provision of play facilities in the village of Letterfrack, may be more appropriate.
- w. It is not clear if the carpark will be manned (although the plans do not seem to include any building for staff), if there will be a charge for use of the carpark or toilets and what controls will be in place around access to the carpark (e.g. opening/closing times).
- x. Having regard to the relatively small rainwater collection area available, the capacity and suitability of the water harvesting unit to serve peak visitor numbers, particularly during periods of low rainfall; it is considered that this approach may need to be reviewed.
- y. The provision of wastewater storage and the use of water harvesting to serve the proposed toilet block located in the carpark may give rise to the risk of pollution and a risk to public health. It is not clear from the documents submitted whether the water harvesting unit is to be located above or below ground level. Any proposal to locate a wastewater storage unit in close proximity to an underground water harvesting unit should be carefully assessed.
- z. The presence of rhododendron in the proposed carpark area, and across the development site in general, highlights the need for great care, and rigorous supervision of contractors when work is taking place, so as to prevent the spread of this invasive species. We understand that the works will incorporate rhododendron treatment and that is welcomed.

Conclusions

Mountaineering Ireland acknowledges that Connemara National Park is facing challenges from increased visitor numbers, challenges that arise in part from historic under-investment, we recognise too that there are constraints, not least in relation to the extent of designated land in the National Park and on adjoining lands.

It is our position that more amenities could be provided in the village of Letterfrack to meet the growing tourism demand without 'using up' our very small area of national park lands in a way that could generate management issues and pressure for further development. Overall a lighter touch development approach

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should be used where possible. Mountaineering Ireland is supportive of unobtrusive, proportionate development with minimal damage to the natural environment.

Mountaineering Ireland trusts that you will take these views into consideration when deciding on this application and we would be willing to address any queries arising from these observations.

Yours sincerely



Helen Lawless
Access & Conservation Officer

*Mountaineering Ireland is the representative body for hillwalkers and climbers on the island of Ireland. Mountaineering Ireland's purpose is to represent and support hillwalking and climbing and to be a voice for the protection of mountain landscapes.

Mountaineering Ireland is recognised as the National Governing Body for the sport of mountaineering by both Sport Ireland and Sport Northern Ireland. The term mountaineering refers to a wide spectrum of activities that includes walking, rambling, hillwalking, rock and ice-climbing, bouldering and alpinism. Mountaineering Ireland has over 14,000 members, comprising 191 clubs and approximately 1,770 individual members (as at 31st October 2019).