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SIDS / LAPS Section
An Bord Pleanála
Marlborough Street
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30th April 2021

Re: ABP-309721 - Proposed extension to the existing Mahon Falls car park and additional road lay-bys

Dear Sir/Madam

Introduction and context

As the national representative body for hillwalkers and climbers on the island of Ireland, Mountaineering Ireland has a particular interest in the planning and management of outdoor recreation activities, and in the protection and sustainable use of Ireland's mountain landscapes.

Mountains and upland areas are very significant elements in Ireland's landscape, providing defining geographic features, some of our most beautiful scenery and our largest areas of relatively wild land. This is particularly the case with the Comeragh Mountains in Co. Waterford. Mountaineering Ireland's vision is "that Ireland's mountain landscapes will be valued and protected as environmental, cultural and recreational assets". Mountaineering Ireland acknowledges that most of Ireland's mountains and upland areas are privately-owned, either by individuals or jointly as commonage. Recreational enjoyment of these areas is due to the goodwill and tolerance of landowners.

The proposed development is to extend and resurface an existing informal car park in the Mahon Valley of the Comeragh Mountains (increasing capacity from 39 spaces to 85), and to make modifications to the road in the valley (providing additional lay-bys and modifying existing lay-bys). The proposed development site is within a Special Area of Conservation (the Comeragh Mountains SAC). The applicant is Waterford City & County Council (WCCC).

Mountaineering Ireland represents a community of interest in this application drawn from Co. Waterford and across the island of Ireland. This submission has been informed by consultation with Mountaineering Ireland clubs and individual members who regularly walk and climb in the Comeraghs. Mountaineering Ireland submits the following observations to assist the Board in its consideration of this application.

Directors: I. Buckley; N. Caffrey; P. Kellagher; C. Mahon; M. Maunsell;
G. McLaughlin; K. O'Callaghan; D. Pollard; G. Thomas.

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1. Implications of the proposed development, if carried out, for proper planning and sustainable development in the area or areas concerned

- The current car park is an informal parking area, spaces are not delineated in any way; better design and management of the existing car park would improve parking capacity as space is often wasted between vehicles. Whether re-designing the existing car park or expanding the parking area, the design and materials used should be appropriate to a natural setting (for example, the use of EcoGrid or another ground reinforcement system which would allow grass to grow within the parking area, combined with low-key delineation of parking spaces, would have a much less harsh landscape impact¹).
- It is likely that the extension of existing lay-bys would result in these areas being used for parking, meaning that at busy times they would not function as safe passing places for traffic. The Mahon Valley road requires passing places, with signage indicating that these are passing places, not for parking.
- As currently proposed, the further development of this scenic, natural landscape, will reduce the overall sense of wildness that is the one of the attractions of the Mahon valley.
- The Mahon Falls should not be treated as an isolated tourist attraction. The Mahon valley, its waterfall and cliffs are integral to the landscape and natural environment of the Comeragh Mountains. The Mahon Falls car park is a popular access for hillwalkers and climbers visiting the Comeragh Mountains for recreation. Mountaineering Ireland recommends:
 - a) Using the Comhairle na Tuaithe Mountain Access model² to look at how recreational access to the Comeraghs is managed, this approach would help spread the load by improving opportunities for recreation at other sites;
 - b) That an upland path condition survey is carried out to provide baseline information on the level of erosion on informal path lines that have evolved through increased footfall and guidance as to what intervention may be needed to address erosion and manage recreational activity in the area³;
 - c) That WCCC works in partnership with other stakeholders including landowners, local communities, recreation interests and other statutory bodies to develop an integrated management plan for the sustainable development and management of the Comeragh Mountains and that an upland partnership group is formed to implement the plan.

¹ This solution has recently been used in the extension of parking at Killykeegan Nature Reserve in Co. Fermanagh.

² The Mountain Access Project provides a model for the management of recreational access in upland areas on the basis of a voluntary agreement with all landowners in the area. The project was piloted in two areas, the MacGillycuddy Reeks in Co. Kerry and Binn Shleibhe near Clonbur, Co. Galway. The project is about to be reviewed by the Department of Rural & Community Development with a view towards extending this model to other upland areas. For more information see: https://www.mountaineering.ie/files/20191212172859_5c8dd6fa.pdf.

³ An upland path condition survey was done in the Galtee Mountains in 2015/2016 (see https://www.mountaineering.ie/files/2018322133043_3923b25d.pdf) and a similar survey is now underway in the Wicklow Mountains.

2. The likely effects on the environment, if carried out and on a European site (the Comeragh Mountains Special Area of Conservation)

- The direct impact on the Comeragh Mountains Special Area of Conservation (SAC) of extending the existing car park appears to be relatively small. The extended area is less than one quarter of a hectare, and the area that it is proposed to extend into mostly avoids the habitats for which the SAC has been designated.
- The indirect impacts are likely to be more significant. The applicant's Natura Impact Statement (section 2.5) mentions that "The proposed development will have a direct impact on a limited area of the natural environment but may have an indirect impact on a wider area.", however that indirect impact is not explained, neither is there any reference to how it can be mitigated.
- The increased availability of parking and passing places on the access road are likely to increase the volume of traffic into the valley. The fact that this is not acknowledged in the Natura Impact Statement (NIS) is a significant weakness in the assessment carried out for WCCC. It is difficult to accept the argument that the works are only about better serving the needs of the existing traffic volumes. We note also that no traffic data has been provided to justify the proposed development. The Mahon Falls will be promoted as an attraction and visitor numbers will increase, as will management issues⁴.
- One of the most significant indirect impacts is that greater numbers will lead to further trampling and erosion of sensitive habitats surrounding the site. Erosion is already evident on the steep slope beside the waterfall and on the south-eastern ridge of Comeragh Mountain.
- An increase in littering is another possible consequence of increased visitor numbers that is not addressed in the NIS. Based on experience from other upland sites, bins should not be placed in the car park, instead signage at the car park should encourage people to take responsibility for their litter. Dog control has previously caused concern for farmers in the Mahon Valley and is an issue in other upland areas that have experienced an increase in visitor numbers; education measures are needed to prevent this becoming an issue for local farmers and also for wildlife. Hen Harriers regularly hunt in the Mahon valley – the potential for disturbance to this rare, ground-nesting bird of prey should be considered.
- The access road to the Mahon Falls is narrow and there are houses and farms lower down which could be negatively impacted by increased traffic. The development of a car park with toilets and EV charging points at Mahon Bridge would be a more sustainable solution as this is where the Crough Wood trail starts, and there is also a café nearby. This should help improve local economic benefit from people visiting the Mahon Falls. Taking into account national targets to reduce carbon emissions from the transport sector, consideration should be given to a seasonal shuttle bus service.

⁴ The Cuilcagh Boardwalk in Co. Fermanagh provides a relevant example of a development that has had, and continues to have, unintended consequences in terms of visitor management issues and environmental damage in an SAC - https://www.mountaineering.ie/_files/2018125165027_89659124.pdf



Examples of such services can be seen in the Burren National Park and Glenveagh National Park. There could also be scope to link this service with the Greenway and with public transport.

3. Alternative options and other recommendations

- Educational signage should be included in the proposal, for example a sign where people cross the cattle grid on entering the valley indicating that you are entering a Special Area of Conservation, with additional low-level signage with information on the flora and fauna of the area such as those used on the Anne Valley walk (Dunhill, Co. Waterford).
- The safety of less experienced visitors is a concern, with people regularly observed on steep terrain in this area without appropriate footwear. Signage and online visitor information should make clear the nature of the terrain if one ventures beyond the managed trail between the car park and the Mahon Falls, and that people are expected to take responsibility for their own safety. Mountaineering Ireland recommends that the Visitor Safety Group approach to visitor risk management and overall site management be applied at this site (see www.visitorsafety.group).
- A 'Recreational area' is indicated in the plans beside the car park, it is not clear what that is. If it was to include picnic tables, there is a concern that would lead to further littering. Consideration should be given to including solar-powered CCTV for security in the car park.
- Mountaineering Ireland recommends that a consultant ecologist is appointed to oversee the works so that any damage to protected species or habitats is minimised during construction.

Conclusions

The Mahon Falls should not be treated as an isolated tourist attraction. The Mahon valley is integral to the Comeragh Mountains, and an iconic location within Co. Waterford and the south east region. It is important that public enjoyment of this special landscape is supported in a way that is responsible and sustainable. It is Mountaineering Ireland's position that to achieve this will require further consideration beyond what is included in the current application. We would be prepared to work with WCCC and others to address this.

Mountaineering Ireland trusts that you will take these views into account when deciding on this application.

Yours sincerely

Helen Lawless
Access & Conservation Officer

For queries or further information please email: helen@mountaineering.ie or phone: 01 6251115.