



**Draft Strategic Plans for Coillte's eight
Business Area Units (2011-2015)**

Response to Public Consultation from Mountaineering Ireland

April 2013

Introduction

Mountaineering Ireland welcomes this opportunity to provide feedback on Coillte's reconfigured strategic plans for the period 2011-2015. As the national representative body for walkers and climbers, Mountaineering Ireland represents the largest recreation user group of Coillte forests. Mountaineering Ireland has been to the forefront of opposition to the proposed sale of harvesting rights to Coillte forests, mainly because of the potential for any change in the management of Coillte's estate to affect access for recreation. Given the current uncertainty over the future of the Coillte estate it is difficult to comment on the revised strategic plans. Consequently this is a generic submission that applies to all Business Area Units (BAU). As an organisation with members in every county, Mountaineering Ireland should be included on the list of stakeholders for each BAU.

Mountaineering Ireland believes that Coillte's core purpose of enriching lives locally, nationally and globally through innovative and sustainable management of natural resources is appropriate, particularly for a state-owned company that owns 7% of Ireland's landmass. While Mountaineering Ireland appreciates the reasons for the changes in Coillte's organisational structure it is our view that the title 'Business Area Unit' does not reflect Coillte's purpose, its contribution to national socio-economic well-being, or the fact that the estate is managed in accordance with Sustainable Forest Management principles.

Vision

Mountaineering Ireland is broadly supportive of the Vision in each of the strategic plans; however we are concerned that the only reference to recreation is in terms of recreational sites as part of tourism infrastructure. Significant health and well-being benefits flow to Ireland's population from the recreational enjoyment of the Coillte estate. A focus towards tourism benefit could result in investment in recreation infrastructure being weighted towards tourist areas and away from centres of greater population. Mountaineering Ireland would like to see the following added to the Vision:

'The public will gain health and well-being benefits from enjoying a range of recreation activities in the forests;'

Recreation

A key concern for Mountaineering Ireland is that recreation planning should consider all Coillte lands, not just those identified as 'Recreation Areas'. We were pleased to see the reference in section 2.3 of each plan to the expansive nature of recreation activity within the Coillte estate and the variety of recreation opportunities provided by Coillte.

Mountaineering Ireland welcomes the commitment to develop BAU recreation plans. As a recreation plan has been promised for a number of years for the E1 (South Dublin Wicklow) district, we ask that the plan for the South East Leinster BAU be prepared without further delay as a model for other BAUs. Due to the nature of this plan it will be important that Coillte engages in consultation with recreational users, local communities, Rural Recreation Officers and other bodies with a role in recreation in the BAU. Mountaineering Ireland looks forward to contributing to this process.

From a hillwalking point of view, the development of further mountain access routes is desirable and again Mountaineering Ireland, in conjunction with local members, would be keen to assist in identifying suitable routes and possibly liaising with adjoining landowners, or managing the route on an ongoing basis.

Coillte plays an important role in facilitating car parking for recreational users. Unfortunately some existing car parks near Enniskerry, Co. Wicklow were closed about six years ago. As a result people are parking on the roadside and exposed to danger. This isn't a satisfactory situation, not least in an area with very high levels of recreation activity. Where it isn't possible to reach agreement with a local person to open and close barriers, Mountaineering Ireland would like to see further automatic barriers introduced, as has been done recently in the Dublin Mountains. We are aware that there is a cost associated with this, but experience in Britain, and a few locations in Ireland, has shown that walkers are prepared to pay a reasonable charge (€2 to €3) for parking facilities, particularly where there are cameras or other security features. The provision of parking to meet recreational demand should be considered in the preparation of BAU recreation plans.

Coillte may at times receive requests for licences for events that extend onto adjoining land. With regard to events in upland areas, Mountaineering Ireland encourages Coillte to direct event organisers to Mountaineering Ireland's Policy and Guidelines on Organised Events in Ireland's Upland Areas. Due to poor route choice or large numbers involved, some events have resulted in negative impacts such as frustration for landowners, unnecessary risk to participants and damage to the mountain environment – which is in places very fragile and susceptible to damage from trampling. This document includes practical guidelines for event organisers, as well as links to further information. Overall the policy should help organisers deliver events that are positive for participants, the environment, and the local community (see <http://www.mountaineering.ie/documentbank/uploads/MI%20Events%20Policy%20-%20final%20-Mar%202012.pdf>).

Land sales

It is Mountaineering Ireland's view that should there be any sale of Coillte's harvesting rights, it must be a condition of sale that the new owners adhere to these strategic plans and that they maintain Coillte's open forest policy.

Mountaineering Ireland was very concerned to learn that a 450ha block of mature forest in Co. Donegal was offered for sale in late 2012 without even mentioning in the sale literature that this was Coillte property. The Coillte estate is publicly owned land and it should be managed for the benefit of current and future generations of Irish people. Mountaineering Ireland accepts that small scale land sales take place from time to time; however we request that all stakeholders the BAU should be consulted prior to the sale of any blocks exceeding 50ha.

Benefits of Coillte

The apathy surrounding the proposed sale of harvesting rights to the Coillte estate highlighted the poor public understanding and appreciation of the public good benefits delivered by Coillte. Mountaineering Ireland urges Coillte to do more to raise awareness of Sustainable Forest Management, the proportion of land managed that is not planted, the area managed for biodiversity, Coillte's open forest policy and other ecosystem services such as flood mitigation and carbon storage. These benefits are mentioned in Section 1.5 of the draft plans, but there appear to be no actions associated with raising public awareness on this. Some of this could be achieved through advertising, information on www.coillteoutdoors.ie, the use of social media, signage at Coillte forests, contributing articles to recreation magazines and community newsletters and generally emphasising these many benefits in any engagement with the general public, local communities, environmental organisations and recreation groups. This public support could be valuable if there are further attempts to dispose of Coillte's assets.

Renewable energy projects

Mountaineering Ireland is aware of the importance of renewable energy projects within Coillte's revenue stream and we are supportive of the principle of sustainable, renewable energy developments within Ireland, however particular caution must be exercised with regard to proposals for development in upland areas. Compared with neighbouring countries such as Wales and Scotland, Ireland has a limited amount of upland, and much less unspoilt and unaltered upland.

Mountaineering Ireland asks to be consulted with regard to any proposals for renewable energy developments that affect land over 300 metres. Mountaineering Ireland urges Coillte to exercise extreme caution in the consideration of possible wind farm developments in upland areas for the following reasons:

- Wind turbines are strikingly prominent in the landscape and on elevated sites they are visible over a broad area;
- Construction, operation and decommissioning would cause disturbance to fragile upland habitats, wildlife, hydrology and our traditional landscape pattern;

- The loss of wildness and scenic quality detracts from the recreation experience, and could discourage tourism resulting in loss of valuable income.
- Ireland's uplands are our largest areas of relatively wild land. These areas have an intrinsic value. The economic gain from locating wind-farms in remote areas may not offset the long-term cost in terms of loss of scenic quality and ecological damage.

Mountaineering Ireland would like to see the following two points added to the list of considerations in Section 1.2:

'Minimising the landscape impact of windfarms through careful siting and design.'

'Considering the impact on recreational users, and also the opportunity there may be when developing a wind farm to put in trails or other recreational facilities.'

Felling

Mountaineering Ireland has had feedback from members that warning signs associated with felling are not always removed when work is completed. Furthermore, as these signs are left up for the duration of work, people miss out on recreation opportunities on days when no forestry operations are taking place. Some people choose to ignore the warning signs and this has probably caused concern at times for Coillte staff and contractors. Mountaineering Ireland recommends that temporary signs are put in place when forestry operations are being carried out; this could be a simple sandwich board. Every effort should be made to remove all warning signs as soon as work is completed.

Mountaineering Ireland appreciates the change made to the strategic plans to regain vistas, by ensuring that re-planting does not encroach on mountain summits.

Forest management issues

There is continued damage to upland habitats from irresponsible use of off-road vehicles, with many vehicles gaining access to the hills through Coillte forestry. Coillte's use of boulders to block access by off-road vehicles is helping to reduce the amount of irresponsible motorised vehicle activity in some areas. These efforts should be continued.

Support from the recreation community

Recreational users that regularly use Coillte's forests are in a good position to support Coillte in addressing forest management issues. Mountaineering Ireland would be very happy to encourage members to report concerns such as dumping, fires, off-road vehicle damage and any damage to trails on Coillte property. Requests for support can be

communicated through Mountaineering Ireland representatives on Social & Environmental Panels, or direct to the Mountaineering Ireland office (01 6251115 / info@mountaineering.ie).

Monitoring

Section 4.7 refers to the publication of a Social and Environmental report on the Coillte website by the end of 2011. This should perhaps be updated to refer to annual publication of Coillte's Sustainability Report. Mountaineering Ireland would like to see a link to this report emailed to all stakeholders.

Based on Section 4.7 it appears that achievement of BAU objectives and targets is monitored through the pro forma included as an Appendix to the strategic plans. Looking at the pro forma it seems that achievements in the area of recreation are measured solely through the number of licences issued. This has limited value, as the main recreation activity – walking – is not licensed. Perhaps performance with regard to recreation could be monitored through the provision of recreation infrastructure, data from people counters on trails within the BAU, or consultation and communication with recreational users and other stakeholders? Mountaineering Ireland recommends that the measures for monitoring delivery of the recreation aspects of these plans should relate to the Objectives in Section 3.4.

Further information

MI would be happy to elaborate on, or discuss, any of the ideas contained in this submission.

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