



MOUNTAINEERING
IRELAND

PLANNING DEPARTMENT
GALWAY COUNTY COUNCIL
PROSPECT HILL
GALWAY

17 November 2025

Re: Planning reference 2561498 – Connemara National Park fencing

To whom it may concern,

Mountaineering Ireland,^{*i} the national representative body for hillwalkers, climbers and mountaineers, has serious concerns that the erection of approximately 6.23km of stockproof fencing with galvanised steel posts across a number of mountains in Connemara National Park (the proposed development) will significantly adversely impact on the visual quality of the landscape, the sense of wilderness, and the recreational experience of visitors, as well as having the high potential to fail to achieve its stated aims. As such we submit the following observations on the application by the National Parks & Wildlife Service (NPWS).

Context

The line of the proposed fence runs from the summit of Benbrack, over Muckanaght, Benfree and Benbaun, before descending to Maumina and westwards into the valley. These summits sit at the heart of the Twelve Bens range, forming an iconic mountain landscape characterised by dramatic rocky terrain, remoteness, and qualities of wildness that are not found in other mountain ranges.

Benbaun, the highest mountain in Co. Galway, along with Muckanaght and five neighbouring peaks are featured in Mountaineering Ireland's award-winning *Irish Peaks* book, a guide to Ireland's highest mountains. Hillwalkers from across Ireland, and further afield, have been drawn to these shapely quartzite mountains for decades, with many Mountaineering Ireland members identifying the Twelve Bens as their favourite mountains.

Hillwalking is about exploring open mountain landscapes, an experience epitomised in the Twelve Bens where the predominantly rocky terrain underfoot means that there are relatively few places with informal paths or erosion lines, and little or no built infrastructure.

Mountaineering Ireland understands that NPWS' objective in proposing to erect this fence is to bring habitats, especially peatland, within the park into better condition by excluding trespassing sheep.

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Mountaineering Ireland recognises that overgrazing is an issue in the Twelve Bens, within, and also outside the National Park, and we are supportive of measures to improve habitat condition. However, the overgrazing issue is complex and needs more than a singular solution.

While Mountaineering Ireland was disappointed that there was no prior consultation regarding this proposed development, we acknowledge the time the NPWS Regional Manager has afforded us, to discuss the application. We also appreciate the NPWS's willingness to engage with the hillwalking community regarding the location of stiles to enable people cross new fencing within the National Park. Nonetheless, Mountaineering Ireland has several serious concerns regarding the proposed development as set out below.

Overarching concerns

- Development such as this should take place within the framework of a **management plan**, underpinned by scientific evidence, with multiple measures to achieve habitat improvement. No such plan has been provided.
- The **landscape and visual impact** of the proposed fence on this undeveloped, unfenced, sensitive mountain landscape has not been properly considered (see Landscape and Visual Appraisal below).
- **No Environmental Impact Assessment (EIA)** screening was carried out. Consequently the impact of the proposed development on people, landscape and cultural heritage has not been considered.
- The proposed development is in conflict with the Landscape Conservation and Management Policy Objectives of the **Galway County Development Plan 2022-2028**.
- The impracticability of erecting a fence on **steep and remote mountains** has not been considered or recognised.
- There is a high risk that if the proposed fence goes ahead it **will not be successful** in keeping out trespassing sheep. In situations such as this, fences are susceptible to being breached and damaged. Fences on ridgelines are also more vulnerable to damage from wind, snow and storms.

Impact on Recreation experiences

- The quality of the environment and the quality of the recreational user's experience are **inextricably linked**, with undeveloped natural landscapes providing the highest quality experiences.

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- Built infrastructure on the hills detracts from the quality of people's recreation experiences. Fencing in this highly sensitive environment would **change the character of the landscape and people's perception of it**.
- Due to the linear nature of this development, and its proposed line, many hillwalkers on these mountains would be walking in **close proximity to an industrial-style fence for two to three hours**, a fundamentally different experience to what people currently enjoy.
- A fence is a **barrier to recreation**, even with stiles and without barbed wire it could prevent people moving off the ridgeline to get shelter in stormy conditions.

Landscape and Visual Appraisal

- Mountaineering Ireland is not against the principle of grazing control for biodiversity benefit. However, to run a fence through an 'iconic' highly sensitive landscape - largely following an administrative boundary - is a crude and arguably poorly considered approach. It would not only have **immediate impacts**, but potentially also result in some **longer term landscape impacts** that seem not to have been considered (note: this landscape is classified as 'iconic' in the Landscape Character Assessment for the current Galway County Development Plan).
- The conclusions of the **Landscape and Visual Appraisal (LVA)** cannot be considered relevant, as the only section of the fence that is fully considered and illustrated in the report is the Kylemore to Mweelin section that is not part of this application.
- It is important to note that the majority of people who would be in the vicinity of the proposed fence are hillwalkers. the LVA, notes on p7, that *'people engaged in outdoor recreation focused on the landscape (e.g. trail users), and visitors to heritage or other attractions'* are **most susceptible and sensitive to changes in the landscape**.
- The authors of the LVA have concluded that fences are 'not uncharacteristic' in the development landscape, this is illustrated by fences in the lower landscape that is not part of the landscape for this application. **The 6.23km route of the proposed development is open, unfenced landscape**. That conclusion of fences being 'not uncharacteristic' has been instrumental in the weighting the magnitude of change as 'Low to Negligible', which in turn has resulted in the **flawed conclusion** that the impacts would be no more than 'Low'.
- A further point to note in relation to 'not uncharacteristic' is that fencing with steel posts is a very recent addition to these mountains, where NPWS has used this style of fencing to replace old fencing. A Mountaineering Ireland member, having seen this new fencing in place, contacted us saying **"It is ugly, industrial style fencing"**.
- Using the consultants' own assessment criteria in landscape terms the magnitude of change within the development area resulting from the introduction of this fence must be considered High. Equally in visual terms, and again with reference to the consultants' assessment criteria

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the magnitude of change in these highly sensitive open upland areas will be High. This would result in landscape and visual impacts which are **High and therefore significant**.

- The conclusion under 'Level of Landscape Effect' that in time the proposed fence it likely to result in a beneficial effect on the landscape fabric, as the landscape re-generates and vegetative cover increases, could also have a negative consequence. The appraisal seems not to have considered that the difference in vegetation either side of the fence could create contrasting landscape cover and therefore **significantly altered landscape character could emerge over time, arising from the angular line of the proposed fence**. Altering the alignment of the fence to work with the landform rather than simply tracking the ownership boundary could ameliorate this.

Construction plans

- As the submission on behalf of Eamon and Sean Bodkin highlights, the Preliminary Construction and Environmental Management Plan accompanying the application is very poorly considered and seems to include some **generic sections that do not appear to be relevant** to this project.
- There is reference to portacabins being positioned on hardcore platforms made of broken stone and aggregate. As the proposed development site is a Special Area of Conservation (SAC) the **importation and removal of such material would be a complex and costly process**.
- As access to the site will be from the Mweelin trails (yet to be built) walking to the farther end of the work site would involve a hike of three hours or more, plus at least another two hours for the return trip, leaving a **very short working day**. Note: we have been advised that quad bikes will not be used to prevent environmental damage. We add that quads or other machines could not be safely used on the site due to the steepness of the mountain slopes.
- Significantly, the document **does not address the challenges of erecting fencing on very steep, rocky mountainsides** including associated safety issues.
- If there are breaks in the fence on steep ground, or if the start of the fence is not anchored to another fence, it is destined to fail in its aim of keeping out trespassing sheep.

Biodiversity considerations

- It is notable that the surveyors conducting the field survey for the Appropriate Assessment (AA) screening report, deemed the line of the fence on the southern side of Benbaun too steep and therefore **unsafe to follow the line over the summit**. It would appear that the field survey did not include Muckanaght, possibly for the same reason, which means the survey missed some of the most important areas of habitat in the proposed development site.

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- The route of the proposed fence goes through an **important botanical site on the northern slopes of Muckanaght**. Amongst the rare species found there are Purple saxifrage (*Saxifraga oppositifolia*), Roseroot (*Sedum roea*) and the Flora Protection Order liverwort, *Gymnomitrium concinnum*.
- The summary of habitats recorded on the survey includes **Raised Bog** which indicates that the surveyors may be unfamiliar with upland habitat types.
- As the proposed development site is all designated as an SAC, including a number of Annex 1 habitats, it is surprising that the AA screening report concludes '*In summary, **no direct impacts are predicted on any Annex I habitats, and the overall project is expected to contribute to the conservation objectives of this SAC.***'
- Experience elsewhere has shown that the installation of a fence results in a **concentration of human and animal footfall alongside the fence**, there is no indication that this impact was identified in the AA screening report or the Ecological Impact Assessment.

County Development Plan

- Mountaineering Ireland believes that the proposed development contravenes the objectives of the Galway County Development Plan 2022-2028, particularly the following:
 - **LCM2** – The landscape and Visual Impact Appraisal is not based on the proposed development site and not adequate to meet the aims of this objective.
 - **LCM4** – The policy objective is to preserve the status of traditionally open/unfenced landscape. The proposed development site is open, unfenced mountainscape, with the highest degree of sensitivity under the plan - Class 4 - Iconic: Unique Landscape with high sensitivity to change.

The overgrazing issue

Speaking recently on RTE Radioⁱⁱ, Christopher O'Sullivan TD, the Minister for State with responsibility for Nature, Heritage and Biodiversity highlighted the need for the Department of Agriculture to take a role in penalising farmers who persistently graze sheep on lands within Wild Nephin National Park without a right to do so. Overgrazing in upland areas is detrimental to habitat condition, as a result constraining the capacity of these areas to deliver a host of ecosystem services – including carbon storage, flood mitigation, biodiversity and recreation opportunities. Mountaineering Ireland believes that re-focusing farm payment schemes towards rewarding hill farmers for delivering a sustainably managed environment, on the basis of the public good this provides, has the potential to work for landowners, for

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nature and for society as a whole. This should be a priority for Ireland's next Common Agricultural Policy (CAP) Programme.

Conclusions

Mountaineering Ireland considers this application for galvanised steel fencing across a number of remote unfenced mountains to be unacceptable, due to its impact on the landscape and the experience of recreational users, and due to its impracticability.

As currently proposed, the delivery of this project would be enormously expensive and could result in negative publicity for the NPWS. Mountaineering Ireland urges full reconsideration of the proposed fence to address the concerns outlined above and to explore alternative options. There may be less costly and more acceptable ways to achieve the necessary habitat improvement, such as fencing around the peatland on the valley floor, rather than on the high ground above.

Mountaineering Ireland trusts that you will take these comments into account when deciding on this application and we would be glad to address any queries arising from this submission.

Yours sincerely,

Helen Lawless,
Access & Environment Manager

ⁱ **Mountaineering Ireland** is the national governing body for hillwalking, climbing and all aspects of mountaineering across the island of Ireland. Mountaineering Ireland has 16,500 members, the majority of whom are affiliated through 185 clubs. We champion personal responsibility, challenge, adventure and participation, while also caring for the places and environment in which we enjoy our activities and sports.

ⁱⁱ **Are We Doing Enough to Protect Our National Parks?** Padraic Fogarty, Ecologist and Author and Christopher O'Sullivan, Minister of State with responsibility for Nature, Heritage and Biodiversity on RTE Radio 1, 6th November 2025 - <https://www.rte.ie/radio/radio1/clips/22557508/>

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