



Irish Sport HQ  
National Sports Campus  
Blanchardstown  
Dublin 15

Planning Department  
Kerry County Council  
County Buildings  
Tralee  
Co. Kerry

30<sup>th</sup> July 2014

**Re: Planning application number 14401**

Retention of stock-proof fencing, hard-stand area, animal track and footbridge at  
Dunloe Upper, Beaufort, Co. Kerry

Dear Sir / Madam

Mountaineering Ireland\* wishes to submit a comment on the above planning application.

**1. Context**

Mountaineering Ireland, as the representative body for walkers and climbers in Ireland, has a particular interest in the upland environment - hills, mountains, forests, bogland, sea cliffs and associated areas. People are drawn to wild and beautiful landscapes as a counterbalance to everyday life, for contact with nature, and for a physical challenge. Ireland's upland areas deliver a host of recreation opportunities, with associated economic and well-being benefits.

Although limited in their extent, the uplands 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. We are making both large and small changes that cumulatively are impacting negatively on our wild landscapes, with the result that these areas are being lost at an alarming rate. It is Mountaineering Ireland's assertion that protecting the natural and undeveloped character of Ireland's upland environment should be a key concern within the planning process at both a national and a local level.

Directors: P. Barron, D. Batt, F. Bradley, N. Hore, U. MacPherson, M. McKeever, R. Millar, R. Ó Conchúir,  
P. O'Sullivan, I. Sorohan, D. Stelfox, U. Vejsbjerg, S. Walsh.

Mountaineering Ireland is a company limited by guarantee. Registered in Dublin, number 199053.  
Registered Office: Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15, Ireland.

Mountaineering Ireland recognises and appreciates the role that hill-farming has played in shaping Ireland's upland landscape and we are aware of the current challenges in this sector. Mountaineering Ireland believes that the best way to maintain the environmental quality of Ireland's upland areas is to do so in co-operation with the people who own and work the land. Over the past two years Mountaineering Ireland has spearheaded a campaign, supported by all the major farming representative bodies, for a national agri-environmental scheme with measures to support low intensity conservation farming in upland areas under the Rural Development Programme for 2014-2020.

## **2. Comments on the application**

### **2.1 Landscape impact**

Mountaineering Ireland acknowledges the right of farmers to erect fences for agricultural purposes, however our Environmental Policy states that fencing of traditionally open high areas of rough grazing detracts from the quality of the upland environment and should be kept to a minimum. The policy seeks to protect all Ireland's upland areas, not just those that are designated as Special Areas of Conservation or Special Protection Areas; however it should be considered that this application falls within a Special Area of Conservation.

The fence at Dunloe Upper runs along the roadside in the Gap of Dunloe, one of Ireland's most scenic landscapes, which is famous throughout the world. The fence also crosses the MacGillycuddy Reeks ridge at two points, detracting significantly from the vista in this previously open mountain landscape.

The Kerry County Development 2009-2015 recognises the quality of Kerry's scenic landscapes, and the importance of protecting these through zoning and development control. The development at Dunloe Upper is within an area zoned as Prime Special Amenity:

#### ***3.7.9 - Prime Special Amenity***

*This zoning constitutes the outstanding landscapes throughout the county. Rugged mountain ranges, spectacular coastal vistas and unspoilt wilderness areas are some of the features within this designation.*

*The County enjoys both a national and international reputation for its scenic beauty. It is imperative in order to maintain the natural beauty and character of the county, that these areas be protected.*

Protection of the landscape of County Kerry is also addressed through the following objective:

#### ***Objective ZL 12-1***

*Protect the landscape of the county as a major economic asset as well as for its invaluable amenity value and beauty.*

This fence makes a significant manmade intrusion into an otherwise natural landscape and Mountaineering Ireland is therefore of the strong opinion that retention of this fence (and its

associated developments) is undesirable from a visual point of view and is contrary to the proper planning and sustainable development of this special upland area.

## **2.2 Barrier to recreational enjoyment**

As Ireland's highest mountain range, the MacGillycuddy Reeks have for centuries been a magnet for walkers and climbers. The MacGillycuddy Reeks ridge from Kate Kearney's Cottage to Lough Acoose takes in nine summits over 900m in height and is acknowledged as one of Ireland's finest ridge walks.

The fence in question is slightly higher than the typical post and wire construction, and due to the absence of stiles to facilitate its crossing, presents a major physical barrier to walkers following the MacGillycuddy Reeks ridge. The fence has also caused confusion amongst some groups, particularly in conditions of poor visibility which are common at this height in the mountains. People have crossed the fence with difficulty, only to find a short time later that they need to cross the fence a second time as they exit the property. Although in theory one could walk around the fence, this is not obvious and requires an unnatural detour.

The importance of the MacGillycuddy Reeks for recreation is underlined by the selection of this range by the Rural Recreation Section within the Department of Environment, Community & Local Government as one of two pilot areas for a national Mountain Access Project. The MacGillycuddy Reeks Mountain Access Forum, which brings together a range of interested parties, was formed earlier in 2014 to protect, manage and develop this unique mountain range.

It is Mountaineering Ireland's view that the fencing between Struicín and Cnoc an Bhráca interferes with the enjoyment of this popular ridge walk and is therefore an inappropriate development given the acknowledged importance of the MacGillycuddy Reeks for both recreation and tourism.

## **2.3 Not necessary for agricultural reasons**

The applicants argue that the erection of stock-proof fencing on mountain land is the best approach to managing grazing so as to keep the land in Good Agricultural and Environmental Condition (GAEC). It should be noted that this is not a traditional hill-farming practice in the MacGillycuddy Reeks. If it was, the entire area would have been fenced previously. Appropriate stocking levels combined with traditional shepherding provide the most effective means to achieve optimal grazing conditions across a mountain area. While the labour requirement may be greater, it should be remembered that the fencing of mountain land is both expensive in the first instance and costly to maintain (due to remoteness and harsh weather conditions).

The need for stock-proof fencing to fulfil Department of Agriculture cross-compliance requirements no longer applies to all hill and mountain land. In December 2013 **Minister Simon Coveney** announced that fencing is not required on hill land which was previously unfenced and which continues to be actively farmed in the traditional manner (KildareStreet.com, 3<sup>rd</sup> December 2013).

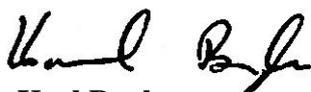
As this development is within the *Killarney National Park, MacGillycuddy's Reeks and Caragh Lake River Catchment* Special Area of Conservation its impact on habitats and wildlife must be taken into account. Regard should also be had to Strategy 1.3.1 of the Management Plan for Killarney National Park which states that permanent fencing will generally not be used as a means of controlling grazing in the uplands, and will not be undertaken prior to adequate impact assessments being carried out (NPWS, 2005, p.42).

In light of the above, Mountaineering Ireland argues that neither grazing management or Department of Agriculture requirements provide justification for retention of the fence at Dunloe Upper.

### 3. Closing remarks

As Ireland's highest mountains, the MacGillycuddy Reeks hold very special importance for walkers and climbers. The enjoyment of these mountains, whether directly, or as a scenic backdrop, adds considerable value to Kerry's tourism offering and therefore the local economy. It is essential that the relatively wild feel of these mountains is retained so that future generations can gain similar benefit.

Yours sincerely



**Karl Boyle**

**Chief Executive Officer**

**\*Mountaineering Ireland** is the representative body for walkers and climbers on the island of Ireland. Mountaineering Ireland's mission is to represent and support the walkers and climbers of Ireland and to be a voice for the sustainable use of Ireland's mountains and hills and all the places (coastline, crags, forests) we use.

Mountaineering Ireland is recognised as the National Governing Body for the sport of mountaineering by both the Irish Sports Council 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 11,500 members, comprising 161 clubs and approximately individual members (October 2013).

### References:

KildareStreet.com (2013) 'Agriculture Schemes Administration' *Written response from Minister Simon Coveney to Parliamentary Question 3<sup>rd</sup> December 2013*, available online at: <http://www.kildarestreet.com/wrans/?id=2013-12-03a.873>.

NPWS (2005) *Management Plan for Killarney National Park 2005-2009*, published by the National Parks & Wildlife Service, Department of the Environment, Heritage and Local Government.