



**Draft Strategic Plans for Coillte's eight
Business Area Units (2016-2020)**

Response to Public Consultation from Mountaineering Ireland

November 2015

1. Introduction

Coillte's core purpose, as stated in its draft Strategic Plans, is to enrich lives locally, nationally and globally through the innovative and sustainable management of natural resources. As the national representative body for walkers and climbers, with 11,500 members, Mountaineering Ireland represents the largest recreation user group of Coillte forests. Our members' lives have certainly been enriched by enjoyment of the Coillte estate, and there is considerable potential to enhance that enjoyment in the period 2016-2020, and into the future.

Coillte is recognised as a pioneering organisation within the outdoor recreation sector in Ireland, and should be resourced to continue its work in this area. Mountaineering Ireland actively encourages responsible recreation and a sense of stewardship amongst members. It is our desire to work in partnership with Coillte to ensure greater public enjoyment of the important natural resources within Coillte's care.

Section 2 of this submission covers key points that refer to all Business Area Units (BAUs); Section 3 includes feedback that is specific to individual BAU plans.

2. Comments that apply to all areas

2.1 Compliance & monitoring

The Statement of Compliance with the Principles of Sustainable Forest Management (included in each draft plan) does not come across as a strong statement of compliance. The wording of the first sentence is awkward (land can't interact with people or landscape) and the commitment to the prevention of pollution at the end of that paragraph seems very specific in contrast with the general nature of the rest of the paragraph. The Statement of Compliance goes on to list a number of objectives; while all welcome, the statement would be much more convincing if it showed the outcome for each of these objectives, or at least made clear how compliance is being assessed. It is Mountaineering Ireland's recommendation that the Statement of Compliance is strengthened considerably in the final version of these plans; otherwise it undermines the credibility of the plan and its management, suggesting that the overall process may be weak on compliance assessment.

Mountaineering Ireland would like to see the process of compliance enhanced by each year presenting a completed Monitoring Form (Appendix IV) to the BAU Social & Environmental Panel so that it can be aired and discussed. The reporting of compliance could also be improved; having navigated through the most recent Sustainability Report available on www.coillte.ie (for 2013) it does not contain the detailed data that would be gathered through completion of the monitoring pro forma for each BAU. The completed Monitoring Report for each BAU should also be sent to registered stakeholders as soon as it is available; including figures for the previous year or two would add further to the value of this report as a tool for measuring compliance.

As stated in our April 2013 submission, Mountaineering Ireland is concerned that the Recreation Parameters included in the Monitoring Report rely almost entirely on the number of licences issued. This has limited value, as the main recreation activity – walking – is not licensed. To provide a valid

assessment of fulfilment of the plan the measures for monitoring delivery of the recreation parameters should relate to the Objectives in Section 3.4. In many cases the objectives are expressed in vague terms and therefore difficult to measure. Fulfilment of the plan is more easily assessed where there are clear targets.

Performance in the area of recreation could be monitored through measures such as the number of kilometres of trail on the Irish Trails Register, data from people counters on trails, the number of Mountain Access Routes in the BAU, actions taken to address unauthorised vehicular activity in the BAU and agreements with community or recreation groups to develop / maintain recreation facilities such as trails.

A similar cross-referencing between objectives and measures of success is required across all parameters in Appendix IV. For example, measurement of actions related to invasive species control and the number of Social & Environmental Panel meetings should be included. Monitoring Forms for each BAU should be included in Coillte's annual Sustainability Report, which should be published online and emailed to all stakeholders within six months of year-end.

2.2 Recreation

Mountaineering Ireland is concerned that the previous commitment to develop a recreation plan for each BAU is no longer included in the current draft plans. Coillte's first Recreation Policy 'Healthy Forests, Healthy Nation' published in 2005 was due to be updated in 2010. In light of Coillte's core purpose of enriching lives through the innovative and sustainable management of natural resources, a stronger national health agenda, and the growth and changes in outdoor recreation activity over the last 10 years, there is now clear need for Coillte to renew its recreation strategy.

Mountaineering Ireland is aware that staff capacity in the Recreation Team has been reduced; this situation needs to be redressed so that Coillte can unlock the huge potential its landholding offers to meet public demand for recreation opportunities and to contribute to national policy objectives in the area of health and well-being. There is a very strong argument to be made that the public goods value of Coillte's estate is far greater than its revenue earning potential through timber sales.

Along with CO₂ sequestration, the most important non-marketed asset in forests is generally considered to be their amenity value. Based on an estimate of 18 million visitors per annum, the economist Peter Bacon judged the amenity value of Coillte's estate in 2012 to be €78.6 million (Bacon, 2013). Recreation should be accorded a higher priority within Coillte, for reasons of social responsibility, and also because it is the point of public interface with the company and therefore vital in terms of maintaining a positive corporate image.

The value of recreation should be more strongly expressed in the final BAU strategic plans. Coillte is rightfully seen as a leader amongst statutory bodies in Ireland in terms of its recreation policy and recreation management. Investment in the recreation team is urgently required to maintain this status, and also to uphold the quality of the recreation infrastructure that is in place on Coillte lands. The BAU Strategic plans for 2016-2020 should include a commitment to review and renew Coillte's national recreation policy and to develop a recreation plan for each BAU before 2020.

Mountaineering Ireland appreciates that Coillte operates an open access policy for walkers and pedestrian users, however, as became evident in 2012-2013 when the Government was considering the sale of Coillte's harvesting rights, this does not provide the public with certainty of access to this land into the future. It is Mountaineering Ireland's objective to secure a right of public access to publicly owned lands for responsible recreation (MI, 2014). Mountaineering Ireland calls on Coillte when reviewing its recreation policy to ensure certainty of public access for responsible recreation to this important State-owned land.

A key concern for Mountaineering Ireland is that recreation planning should consider all Coillte lands, not just those identified as 'Recreation Areas'. Every hectare of Coillte forestry is used in some way for recreation, by specific interest groups such as hillwalkers, orienteers, runners and birdwatchers but, most importantly, by local people and family groups. There are also sections of long distance walking routes running through hundreds of Coillte properties that are not identified as recreation areas. The reference in Section 2.3 of the draft plans to the expansive nature of Coillte forests and the offering of multiple recreation activities should be developed further to make it explicit that there is recreation value right across the estate not just at designated recreation areas.

Other aspects of forest management also offer potential to add recreation value to the Coillte estate. For example, the requirement mentioned in Sections 2.8 and 4.2 to establish buffer zones for all watercourses, which is welcome in its own right, also offers the opportunity to provide informal Mountain Access Routes along streams. The planting of well-spaced native species in the buffer zone would enhance biodiversity, visual amenity and the experience of recreational users.

2.3 Local engagement and Social & Environmental panels

Coillte's willingness to engage with community groups is clearly expressed in the Vision and in Section 3.4 of the draft plans; however there would appear to be scope to improve coordination in this area.

There may be multiple community groups with an interest in a single forest, as well as a host of recreation groups (effectively communities of interest whose members aren't always resident in the immediate area). In addition, tourism groups, local authorities and local development companies administering the LEADER programme may all have plans for Coillte property. Currently there is no mechanism for these groups to share their plans with Coillte and with each other. An annual or biannual forum for registered stakeholders could ensure that these groups engage with Coillte at an early stage and that they better understand Coillte's management priorities. It should also help prevent conflicts arising between different user groups. The forum could be supplemented by email circulation of news and proposals.

The current BAUs are too large an area for such a forum to be effective, for example in South Munster (BAU 7) separate forums would be required for the Galtee Mountains, the Ballyhours, the Knockmealdowns and possibly other areas also. Due to its geographic spread and its relatively small number of members the Social and Environmental Panel is not sufficiently large or representative to be capable of dealing with local issues.

It may be possible to enhance stakeholder engagement by working through other structures, for example by establishing a social, environmental and recreation forum to feed into the Wicklow Outdoor Recreation Committee, or by working through the Wicklow Uplands Council. The Leitrim Recreation Forum and its sub-committees could provide an alternative model. Unfortunately these structures are not currently widely replicated. Structures which do exist in every county which could provide a vehicle for engagement include the Local Sports Partnerships and the newly established Public Participation Networks. The recent review of Comhairle na Tuaithe (Department of Environment, Community & Local Government, not yet published) highlighted the fragmentation in the sector and the need for a structure within each county to pursue local outdoor recreation development.

It should therefore be an objective within Coillte's Strategic Plans for 2016-2020 to improve engagement with recreation and community groups through a discussion forum for local stakeholders, or by linking in with existing structures.

Mountaineering Ireland is pleased to have a representative on six of Coillte's eight Social & Environmental Panels, and where we do not have we would be keen to be afforded the opportunity to nominate a representative. Mountaineering Ireland currently has 11,500 members, with the number of affiliated clubs growing steadily to reach 184 this year. For the past three years Mountaineering Ireland has co-ordinated the Get Ireland Walking programme and through that has registered a further 230 local walking groups, the vast majority of whom are regular users of Coillte property (www.getirelandwalking.ie).

With regard to the operation of the Social & Environmental Panels, most panels don't operate in a way that allows participants to add items for discussion to the agenda prior to meeting. It is the view of Mountaineering Ireland and its representatives that the panels could be made to work more effectively by greater communication between panel meetings, allowing members to propose agenda items, and most importantly by using the panel as a vehicle to report and discuss fulfilment of the Strategic Plan for the BAU through the Monitoring pro forma.

Until such time as more local engagement is enabled, the Social and Environmental Panel should be a vehicle for consultation regarding windfarm development and for working with local communities in recreation planning (e.g. the avoidance of conflict related to clear felling and the provision of appropriate and secure car parking facilities).

2.4 Renewable energy projects

Mountaineering Ireland is aware of the importance of renewable energy projects within Coillte's revenue stream and is supportive of the principle of sustainable, renewable energy developments within Ireland, however particular caution must be exercised with regard to proposals for windfarm development 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 causes disturbance to fragile upland habitats, wildlife, hydrology and traditional landscape patterns;

- The industrialisation of scenic rural landscapes through windfarm development detracts from the recreation experience, and in many cases windfarms do not allow public access;
- 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.

Coillte's response of October 2013 included a commitment to consult with Mountaineering Ireland regarding any renewable energy developments that lie over the 300m metre contour. Within the last year Mountaineering Ireland has become aware, through local members, of a number of windfarm developments that lie partly above the 300m contour which are of concern to walkers and climbers due to their impact on the surrounding landscape and the experience of recreational users.

Examples include the ABO Windfarm at Ballymanus Hill in Co. Wicklow, the Carrickaduff windfarm in south Donegal and the Glenahiry windfarm in the Ballymacarbry area of Co. Waterford. Coillte's commitment to consult with Mountaineering Ireland is welcome and we request that this is highlighted to BAU Managers and other relevant staff so that consultation improves under the next Strategic Plan.

2.5 Felling

The continued dominance of clear fell, the drastic change this makes to the landscape and its potential to impede recreational activity raise many concerns amongst Mountaineering Ireland members. While each draft plan refers to the introduction of Low Impact Silvicultural Systems (LISS) there are no targets included for the degree of increase between 2015 and 2020. The 2011-2015 strategic plan for South Munster (BAU 7) included a pie-chart (Figure 4) showing the different silvicultural systems used in the area, albeit with a relatively large wedge labelled as N/A. It also shows the very low level of systems such as continuous cover forestry and conversion to broadleaf.

Continuous cover forestry, widely practised elsewhere, has been shown to be feasible in Ireland, and while it requires more intensive management, the economic return compares favourably with plantation forestry (Magner, 2014). The benefits of continuous cover forestry include better soil protection, greater biodiversity, reduced landscape impact and enhanced recreational experiences. It is clearly consistent with Sustainable Forestry Management, therefore Mountaineering Ireland urges Coillte to make a meaningful commitment to this and other LISS by setting clear targets in all Strategic Plans for 2016-2020. It would be good to see current and target LISS included as pie-charts. Progress towards these targets should be measured through a more robust process of compliance assessment (as described in Section 2.1 above).

With regard to landscape impact of forestry, and clear fell in particular, Mountaineering Ireland draws Coillte's attention to the National Landscape Strategy published earlier this year by the Department of Arts, Heritage & Gaeltacht (DAHG, 2015). As Coillte manages almost 7% of Ireland's land area, the company has a vital role and an obligation to demonstrate best practice in the sustainable protection, management and planning of Ireland's landscapes. Mountaineering Ireland would like to see Coillte's responsibility and actions towards implementation of the National Landscape Strategy clearly included in the final version of the new BAU Strategic Plans.

When felling and replanting there is scope to enhance the amenity value of Coillte forests by leaving space around heritage features, summits, and above valleys and water bodies to regain important vistas. Active engagement with local communities and recreation groups, as described in Section 2.3 of this submission would be valuable in identifying where such action would make a positive impact. Managed natural regeneration or the designation of these areas for biodiversity would further enrich the visual and environmental value of these sites.

2.6 Invasive species

Mountaineering Ireland members have reported an increase in invasive species within Coillte forestry, examples include Rhododendron in the Deerpark and Hazelwood in Co. Sligo (BAU 1) and Japanese Knotweed in Aherlow in Co. Tipperary (BAU 7).

The BAU Strategic Plans should include data on the incidence of invasive species, perhaps expressed as the area covered in affected forests and the projected rate of spread if no corrective measures are taken over the duration of the plan.

The second aspect of this issue which would appear to need greater attention are the methods to tackle invasive species, each plan includes the following objective in Section 3.6.3:

‘Controlling invasive species (such as Rhododendron) on the Coillte estate, through planting of appropriate species.’

This perhaps does not do justice to the understanding of invasive species control within Coillte and the methods being employed to tackle this issue. The objective above does not give Mountaineering Ireland confidence in Coillte’s ability to deal effectively with this problem. Some of the draft plans note the cost of invasive species removal as an issue to be addressed. It is certainly costly and labour-intensive work, and to be effective it requires clear briefing of contractors and great care. The sharing of knowledge and experience between Coillte staff in different areas and with the National Parks and Wildlife Service are also important. The argument for funding for invasive species control should be clearly made in the BAU Strategic Plans, based on data on the extent of the problem. Control of invasive species should be measured through the compliance assessment process referred to in Section 2.1 of this submission and reported through Coillte’s annual Sustainability Report.

2.7 Off-road vehicle activity

Damage to fragile upland habitats from the irresponsible use of off-road vehicles continues to be an issue in many areas. In some places access to the open hillside is gained through Coillte property. Mountaineering Ireland acknowledges that Coillte has introduced a set of byelaws to assist in controlling these activities (as mentioned in Section 2.9 of the draft plans), but signage is not enough, what is being done to implement these byelaws? A strong commitment from Coillte to tackle the problem of illegal motorised vehicle use could be supported by Mountaineering Ireland

members on the ground reporting activity to Coillte staff. Such reports would soon indicate hotspots where resources could be directed to enforce the byelaws.

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. The locking of all Coillte barriers would also be helpful.

2.8 Habitat restoration, old woodland sites and archaeology

Coillte's management of land for biodiversity is a good news story that should be more widely shared. Mountaineering Ireland believes that the further development of public access for recreation and education at old woodland sites, in a way that is compatible with conservation objectives, would deliver substantial public benefit from these important natural resources and should be an objective in the BAU Strategic Plans.

Coillte's highly regarded bog and priority woodland habitat restoration projects under the EU LIFE programme warrant regular public awareness activity. This publicity should include social media activity to reach new audiences, noting biodiversity sightings, improvements in habitat status, and reminding people of the recreation opportunities these sites offer.

Likewise the high proportion* of Ireland's national monuments that are within the Coillte estate is something which Coillte should be proud of and should share with the public through social media, the annual Sustainability Report, www.coillteoutdoors.ie and other communications channels. The Cavan Burren forest park (BAU 3) and the Bonane Heritage Park near Kenmare (BAU 8) are excellent examples of how Coillte sites rich in history can, through partnership with an external body, be transformed from plantation forestry into a very valuable public amenity.

**Mountaineering Ireland has searched the Coillte website but been unable to identify an exact figure.*

2.9 Land sales

Mountaineering Ireland remains concerned at the gradual depletion of Coillte's property portfolio through land sales; this is after all publicly owned land.

Mountaineering Ireland notes that Coillte practice (as stated in your response of 4th October 2013) is to consult with those directly affected by sales, lease or developments. There is reference in the draft plans to consultation with local communities, but communities of interest in these lands should also be included. Coillte is therefore requested to consult with Mountaineering Ireland should there be any proposed sale affecting a site used by walkers or climbers (formally or informally), or where the plot being considered for sale is in excess of 50ha.

3. Comments that refer to specific areas

3.1 North West - BAU 1

As referred to in Section 2.6 above, a steady increase in the incidence of Rhododendron has been observed in forests in Sligo (Deerpark and Hazelwood in particular). Action is required to control the spread of invasive species, and mechanisms are needed to gauge progress (this should be included in the Monitoring pro forma - Appendix IV).

3.2 West - BAU 2

Wild Nephin

Mountaineering Ireland welcomes Coillte's leadership and commitment regarding the innovative Wild Nephin project which aims to provide an authentic wilderness experience. The preparation of a management plan for the wilderness area (which we understand is underway) should include consultation with relevant stakeholders including both the recreation community and the local community. With the transition to wilderness and the ongoing management of this area being such a long-term undertaking it is vital that the vision and objectives for the project, and guidelines for the management of the wilderness, are agreed and written down so that future changes in management or staffing do not undermine the project.

There is significant educational value arising from the Wild Nephin Wilderness area. It is important that people understand the rationale for the wilderness area and that young people have the opportunity to experience this untamed landscape. This should form a key strand within the Wild Nephin management plan.

It is Mountaineering Ireland's view that due to its scale and significance the Wild Nephin project merits a separate point within Key Objective 6 in the BAU Strategic Plan.

Clonbur / Cong Woods

Coillte is commended for its native woodland restoration work in Cong Woodland, as well as the looped trails that have been developed in the woods and the trail linking the villages of Clonbur and Cong. Mountaineering Ireland members in the area report that the number of users, both locals and visitors, has increased greatly with the improved trails. Biodiversity improvements have also been reported including an increase in red squirrels and sightings of otters.

Many of the new users of these woods are cyclists and unofficial mountain bike trails have grown around Cong. The provision of more sustainable and challenging trails for these users should be considered. Anecdotal evidence suggests that the number of cyclists in the Clonbur / Cong woodland is higher than in Derroura.

The fencing off of Ballykine Castle with 'no entry' signs seems unnecessary. People should be allowed to visit the ruins at their own risk; this also applies to the small cave beside the ruin which has been sealed off with concrete and a grid of metal bars. Similarly, the metal fencing added for

people's safety at the top of Guinness Tower near Cong detracts from the tower's beauty and should be removed as the hazard is obvious. Mountaineering Ireland is aware of the excellent work that Coillte has done in extending the Visitor Safety in the Countryside Group (VSCG) to Ireland. We would like to see Ballykine Castle assessed in accordance with the guiding principles in the recently published guide to Managing Visitor Safety in the Historic Built Environment (SCA, 2015).

The cutting of vegetation and spraying of chemicals on trail verges in Clonbur Wood seems both unnecessary and environmentally unsound as these verges are important for biodiversity.

Should it be possible to secure funding, connecting Big Island and White Island with a wire bridge would make an iconic project that would draw additional visitors to these woods.

Derroura

The Derroura mountain bike trail is a great amenity to have in the west, but the level of fitness and skill required to ascend to the top of the trail is quite high, yet the descent is very easy when the difficulties presented by the current condition of the boardwalk sections are excluded. It would be good to add more difficult descents added to the trail so as to get greater value from the investment already made in this facility.

Coolaney

Mountaineering Ireland members in the Coolaney area have reported local concerns about plans for the Coolaney National Mountain Bike Centre. Arranging and promoting a public meeting to provide an update on the proposals and the status of the project would help to allay concerns and build community support for the project. It might also stimulate local interest in the provision of services for cyclists (bike hire, cafes, accommodation etc) to support the centre and benefit the area should the development go ahead.

The Coolaney Hills are noted for their rich variety of wildlife, the area also includes an old famine village and other ruins. The potential impact of the proposed development on flora and fauna as well as built heritage features should be fully assessed.

3.3 Mid-West - BAU 3

Mountaineering Ireland doesn't currently have a representative on the Social & Environmental Panel for this BAU. We request to be advised when the panel is being re-formed so that we can identify and put forward a suitable candidate.

Slieve Aughty Hills

Mountaineering Ireland members in the Slieve Aughty area have expressed concern about the visual impact of extensive clear felling, as well as the implications this has for biodiversity, soil stability and recreational use of the area. As expressed in Section 2.5 above Mountaineering Ireland calls on Coillte to set targets for an increase in Low Impact Silvicultural Systems in this and other areas.

Given the extensive forestry in the Slieve Aughty area, and its accessible location within the country, this makes an excellent site for trialling different silvicultural systems. Suggestions for research from members in the area include:

- Species selection trials for commercial deciduous species in this site which has long been under coniferous species;
- Silvi-pastoral systems in edges/buffer zones bounding farms. The latter could perhaps be in collaboration with Teagasc which is currently looking at means to increase tree-growing on farms in the quest for on-farm carbon sequestration opportunities.

The Slieve Aughty Walking Club, which is affiliated to Mountaineering Ireland, has expressed interest in collaborating with Coillte and other stakeholders to develop a recreational trail in the Slieve Aughty area during the period 2016-2020. Mountaineering Ireland is supportive of this proposal and will provide guidance to the club.

3.4 South East - BAU 5

Lugduff

The visual impact of a fire-break and fence-line at a height of approximately 600m on the northern side of Mullacor Mountain generated heated debate during Mountaineering Ireland's Members' Forum in Glendalough in October 2015. The development, which was carried out in February – March 2015, has left an unnatural, obtrusive scar across the mountain. When this was queried in April 2015 with the local forest manager the response was that firebreaks are necessary, and that due to the steepness of the ground it was not possible to create the firebreak without causing a temporary visual impact. The firebreak is clearly visible from the upper part of the Glendalough valley, and will be for years to come, it is part of a landscape that was previously of exceptional scenic quality, and it is surrounded by Wicklow Mountains National Park (WMNP). From Mountaineering Ireland's perspective this is unacceptable and raises questions as to how landscape impact is factored into forest management decisions. Mountaineering Ireland would welcome Coillte's response to this question.

Looking at the Lugduff forest from a recreation perspective, this is a totally under-utilised resource given the strategic importance of its location in the Glendalough valley, which is reputed to attract over 1 million visitors annually. The Spinc Walk, which runs along the northern edge of the forest carries more than 60,000 people each year, a figure that has doubled since 2008. Due to its location and the recreation pressure in the Glendalough valley, the options for Lugduff forest to absorb some of the visitor pressure in the valley should be examined in conjunction with Wicklow Mountains National Park. The amenity value of Lugduff forest could also be enhanced when re-planting through sensitive landscaping and the use of some native broadleaves.

Glenmalure

The proposed extraction targets from Glenmalure forest over the period 2016-2020 seem high and with clear felling will impose a significant change to the landscape for years to come. Efforts should be made to mitigate adverse landscape impacts. Mountaineering Ireland's representative on the

BAU 5 Social & Environmental Panel would be willing to liaise with local management to discuss this concern.

Parking

The installation of more automatic forest gates at Coillte properties in the Dublin and Wicklow mountains would further enhance usability of these important recreation resources. The existing barriers at the Killakee/HellFire carpark and Barnaslingan seem to be working well. Mountaineering Ireland understands that funding is now in place for similar gates at Ticknock and Cruagh Wood carparks; these will be a valuable addition. The re-opening of one of the carparks on the Long Hill road between Enniskerry and Roundwood would offset the current dangerous practice of roadside parking. There is also serious need for a carpark in the vicinity of the Pier Gates, could this be developed in Ballinastoe Forest as we note clear felling is planned for the period ahead?

Mountaineering Ireland is aware that there is a cost associated with type of infrastructure, but experience in Britain, and a few locations in Ireland, has shown that walkers are prepared to pay a reasonable charge (c.€4 - €5) for parking facilities, particularly where there are cameras or other security features.

3.5 South Central - BAU 6

Galtees

The Mountain Meitheal South East (MMSE) group, which is affiliated to Mountaineering Ireland, started work repairing paths in the Galtees three years ago. Since then the volunteers have completed three sections of path on Coillte property. MMSE have said that Coillte personnel could not have been more supportive, providing the group with materials and being available at all times to discuss any issues.

Brandon Hill

There are seven sites on Brandon Hill listed under the 'Summary of Archaeological sites' (in reality one site with seven items or buildings). These are listed as items KK033 - 001 to 007 on the Survey Database (townland - Ballyogan). The site which is c. 60m x 25m is situated in dense woodland and difficult to find. It was badly damaged by planting operations in 1970s or 1980s but was cleared in the mid-1980s (at the behest of Tyndall Mountain Club members). It has become very overgrown, not just by bracken and undergrowth, but also about 12 self-seeded substantial trees. The trees should be removed (carefully) and the whole site cleared again. It would also benefit from discreet signage so it could be easily visited and kept clear. The site is the remains of a Norman era 'Long Hall' or Grange of Duiske Abbey, it is about 100m away from the 'Brandon Hill Loop' walk.

Woodstock

Reports have been received of the need for maintenance of the South Leinster Way within the Woodstock Estate. This route was closed for some time recently when there was delay in removing a tree that had fallen over the archway of the Mount Sandford Castle folly.

3.6 South Munster – BAU 7

Slievenamon

Apparently windblows (from February 2014) are making the path impassable in Kilcash woods. It would be appreciated if these could be cut and moved back or removed.

Galtees

There seems to be a tendency to leave forest barriers in the Galtees open, which is making it easier for off-road vehicles to gain access to the hills above. It is likely that this is also leading to dumping in the forest as it is possible for people to drive in and use the cover of the woodland to illegally dispose of their waste. Mountaineering Ireland appreciates that farmers and others legitimately use forest roads at times, however it should be practice to issue these parties with a key and to keep the barriers locked.

4 Further information

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

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5 References

Bacon (2013) *Assessment of the Consequences of the Proposed Sale of Coillte's Timber Harvesting Rights*, published by IMPACT, Dublin, available online: <http://www.impact.ie/wp-content/uploads/2013/01/ForestryFinalReport1.pdf>

DAHG (2015) *National Landscape Strategy for Ireland 2015-2025*, published by the Department of Arts, Heritage & the Gaeltacht, available online: <http://www.ahg.gov.ie/app/uploads/2015/07/N-Landscape-Strategy-english-Web.pdf>

Magner (2014) *Continuous cover forestry (CCF) – alternative forest management* by Donal Magner, published by Prosilva Ireland, <https://prosilvaireland.wordpress.com/2014/01/08/continuous-cover-forestry-ccf-alternative-forest-management/>

MI (2014) *Mountaineering Ireland Strategic Development Plan 2014-2017*, available online: http://www.mountaineering.ie/files/2014101410455_e78883fb.pdf

SCA (2015) *Minister Harris launches new visitor safety guidelines*, news release published by the State Claims Agency on 10th November 2015, available on: <http://stateclaims.ie/2015/11/minister-harris-launches-new-visitor-safety-guidelines/>