The Secretary An Bord Pleanala 64 Marlborough St Dublin 1

Dublin Mountains Visitor Centre-Strategic Development Initiative

Location: Hellfire Club/Montpelier Hill/Massey's Wood Planning Authority: South Dublin County Council

Ref: JA0040

3<sup>rd</sup> January 2018

Dear Sir.

Neither the Further Information Response nor the initial EIAR provide sufficient reassurance that the protected mammals and birds in this region will be adequately protected as deemed necessary under both the Wildlife Acts, the Habitat Directive and Birds Directive. The decision to remove conifers in an area that has a significant red squirrel population and to replace with broadleaved woodland seems in this case to be ill-judged. While increasing the biodiversity of our woodlands is welcome, it should be undertaken in areas where it is most appropriate.

The mitigation regarding the red squirrel requires much more detail and explanation. In particular the use of rope bridges to protect from both greater traffic and less tree cover across the road is inadequately explained. The effect of a predicted three fold increase in visitor numbers in an area that provides a natural habitat for protected species is not adequately considered. It is of particular concern that undertaking ongoing studies and assessments once the development has taken place is not adequate as it will most likely only identify problems once they have occurred. This is not adequate to protect species and as such does not seem to be in harmony with the spirit of both the legislation and directives.

The explanation as to why a Dublin Mountains Visitor Centre needs to be located at this site remains unconvincing. While the Hellfire Club trails and amenity could be developed and enhanced as an amenity for walkers, outdoor enthusiasts and nature lovers there is no strong case for the necessity of locating a Visitor Centre in this specific area. Other sites have been identified and should be considered again.

The proposers of the development have been given adequate opportunity to make their proposal and to further clarify their position. It is extremely important that an oral hearing is now called so that all parties have an opportunity to make their case.

Yours sincerely,

Deirdre Cronin 99 Ludford Road Ballinteer Dublin 16.

