

Dublin Mountains Visitor Centre- Strategic Development Initiative

Location: Hellfire Club/Montpelier Hill/Massey's Wood

Planning Authority: South Dublin County Council

Ref: JA0040

22/09/2017

AN BORD PLEANÁLA	
TIME <u>12:54</u>	BY <u>Hand</u>
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To whom it may concern,

AN BORD PLEANÁLA	
Received: <u>25/9/2017</u>	
Fee: <u>€ 80 P.O</u>	
Receipt No: <u>13140548</u>	

I am submitting this objection to the proposed development at the Hellfire Club/ Montpelier Hill/ Masseys Wood submitted by South County Dublin and known as the Dublin Mountains Visitor- Strategic Development initiative.

I am objecting to the development on the following three issues:

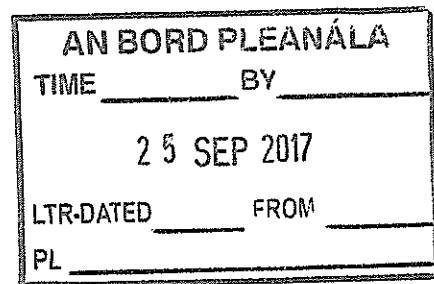
Biodiversity,

Archaeological Heritage

The privatisation of the natural environment.

It is my opinion, that the Environmental Impact Statement was poorly conducted without due scientific consideration given to the ecosystem and wildlife in the proposed site area and the surrounding environs which are the Dublin and Wicklow mountains and the surrounding rivers and valleys below. I would go further to say that the Environmental Impact Statement shows a blatant disregard for these considerations This unscientific assessment is evidenced in that only two days was dedicated to assess the environment and wildlife in the proposed site and surrounding environs, the first day in the spring and the second day in

the autumn period. I would contest that in order to establish the life cycle and the breeding conditions of the wildlife and fauna a year, long investigation should have taken place. Much of the report is vacuous and repetitive and it would appear there was a complete disregard to ensuring that an accurate assessment of the ecology of the area took place. The existence of EU legal protections to the mammals identified in the report; bats, the red squirrel, badgers, indigenous and migratory birds and dictates that the disturbance of such species should be avoided save where no alternatives exist to the development. Numerous other alternatives have been suggested - Orlagh Estate, Stewarts House etc- all of which would entail significantly have less high impact on flora, fauna and wildlife in general.



Biodiversity

The EIA Report has acknowledged that several species indigenous to Ireland are present in the Mountpelier and Massey Wood. These include bats, otters, red squirrels, badgers and hen harriers and other indigenous and migratory birds. The report also notes birds, fauna and wildlife in the surrounding area. These mammals, birds, fauna and waterways are protected under EU legislation; the Habitats Directive 1992, the Birds Directive 2009/147/ EC, The Wildlife Acts (1976 and 2000 and the Birds Directive 1979, European Communities (Birds and natural habitats) regulations 2011, NPWS Bat Mitigation guidelines.

Notice was also given in the report to the fauna on the proposed site and the surrounding areas acknowledging SPA's and SAC's in close proximity to the site. These areas are protected under the European

habitats Directive and National Heritage Areas designated under the Wildlife amendment Act 2000. The European Commission

Waterways

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It is proposed in the strategic plans, that there is to be a collection of rain water from the proposed three hundred car and coach parking area, serving the proposed site . The rainwater will contain the settled carbon emissions from these vehicles. The strategic plan is directing this rainwater to an underground drain, from which the water will flow into the natural streams that feed the Dodder river which is a natural heritage with its own important biodiversity of insects, fauna fish , otters,insects and birds breeding and living in the area . On 09,06, 2015 Minister Alan Kelly published a national strategy to reduce exposure to lead in the drinking water in consultation with the Department of Health, Irish water and the EPA, the imperative that introduced this strategy should also be applied to the protection of the natural habitat and the wildlife therein.

The otter is an Annex IV species under the Habitats Directive, and as such is strictly protected wherever it occurs, making it an offence to deliberately disturb the species or damage or destroy its breeding or resting place. Otters are identified in the EIA as a key ecological receptor but the detail provided in relation to the otter surveys out is inadequate. No baseline information on the size of the otter population in the area is provided and the proposed mitigation measures as detailed in section 6.6.2.1 pg 102/103 is completely inadequate. The species would be disturbed with resting and breeding places damaged by disturbance in direct contravention of the protection provided under the Directiv

Air

The proposed development includes planning permission for the aforesaid three hundred cars and coaches.

The WHO organisation has published several documents (Please see references below) which outline the environmental damage caused by fuel emissions to human health as non -communicable diseases . Not only are fuel emissions known to be hazardous to human health but it also follows that it causes environmental damage to eco systems wildlife, insects, mammals and birds . (Please see references to documents below)

I have also offered a link to a talk given by Ian Angus a renowned, environmental scientist at the Marxism conference 2017 His lecture concerns the present ecology of the planet which is now called the Antropocene epoc, which has been formally acknowledged by earth system scientists, geologists, environmental scientists etc since the year 2000. There are now over 100 books 1,300 papers which have been cited 12,000 times ,4 academic journals, websites, newspapers, discussing the calamitous Antropocene epoc for the planet and human life and the term Anthropocene is now in the Oxford English dictionary . Given this undisputed fact, it is alarming to see that South County Dublin would propose such a development on an environmental ecosystem that has thrived in the natural environment and which is appreciated and respected by the Dublin population. The EIA Report Volume 1 also fails to consider the impact of the predicted 200,000 increase in footfall (within 10 years) on a very delicately balanced ecosystem.

As you can see below from this one extract alone the environmental impact on human life is catastrophic.

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World Health Organization: Outdoor Air Pollution Causes Cancer

Oct 17, 2013

The International Agency for Research on Cancer (IARC) has classified outdoor air pollution as a cancer-causing agent (carcinogen). The IARC is part of the World Health Organization, and is one of the primary sources for information on cancer-causing substances for the American Cancer Society and other organizations. In its evaluation, the IARC concluded that outdoor air pollution causes lung cancer and is also linked to an increased risk for bladder cancer.

The IARC has previously classified many components of outdoor air pollution as carcinogens, including diesel engine exhaust, solvents, metals, and dust. But this is the first time it has classified outdoor air pollution – as a whole – as a carcinogen. It also classified another major component of outdoor air pollution – called particulate matter – as a carcinogen on its own. Particulate matter is a combination of extremely small solid particles and liquid droplets that are found in the air. Particulate matter can include things like dust or smoke, as well as chemicals. The IARC evaluation showed an increasing risk of lung cancer with increasing levels of exposure to outdoor air pollution and particulate matter.

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“The air we breathe is filled with cancer-causing substances,” said Kurt Straif, PhD, head of the IARC Monographs Section. “Outdoor air pollution is not only a major environmental risk to health in general, it is the most important environmental cancer killer due to the large number of people exposed.”

Air pollution is already known to increase risks for other diseases, especially respiratory and heart diseases. Studies show that levels of exposure to air pollution have increased significantly in some parts of the world, mostly in rapidly industrializing countries with large populations. The most recent data from the Global Burden of Disease Project indicate that in 2010, 3.2 million deaths worldwide resulted from air pollution, including 223,000 from lung cancer.

The risk of lung cancer associated with air pollution is lower in the US, according to Elizabeth Ward, PhD, American Cancer Society National Vice President, Intramural Research, but should not be ignored. “Even though the lung cancer risk associated with air pollution for an individual in the US is relatively low, even a low risk can be important for a large population where many people are exposed. As with many other

environmental exposures with a relatively small individual risk, large numbers of people exposed to air pollution may result in a significant number of lung cancers.”

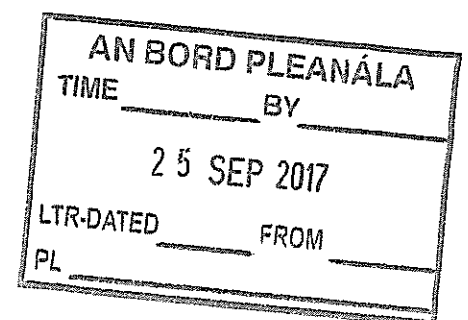
Ward credits policies in the US for helping to lower the levels of exposure. “Air pollution levels in most US cities used to be much higher than they are now, but scientific research and effective policies to reduce pollution levels have made the air safer and continue to be important to protect public health. High levels of air pollution in other parts of the world may present more significant health hazards.”

The IARC based its report on a review of more than 1,000 scientific papers from studies on 5 continents. The studies analyzed the cancer risk caused by various pollutants present in outdoor air pollution, especially particulate matter and transportation-related pollution. The findings came from large epidemiologic studies that included millions of people living in Europe, North and South America, and Asia.

According to the IARC, the predominant artificial sources of outdoor air pollution are transportation, stationary power generation, industrial and agricultural emissions, and residential heating and cooking.

“Classifying outdoor air pollution as carcinogenic to humans is an important step,” said IARC Director Christopher Wild, PhD. “Given the scale of the exposure, it sends a strong signal that it is vital to implement efficient policies to reduce exposure to pollution

IARC Scientific publications no 161 air pollution and cancer 2013



Archaeology and cultural heritage

As acknowledged in Section 11.3.1.1 page 200 “Recent excavations by the Hell Fire Club Archaeological

Research Project suggest that the site is of high archaeological significance. Both this passage tomb and the adjoining one are part of a wider archaeological landscape namely a megalithic cemetery. There are strong similarities to Brú na Boinne which is a World Heritage Site, Tara and Lough Crew in Meath and Carrowmore, Carrowkeel and Knocknarea in Sligo. There are also similarities to the landscape around Stonehenge in the UK, which is also a World Heritage Site.” In this context it is not acceptable for commercial developments like the proposed restaurant, car parks etc to proceed when such rich and valuable archaeological and historical heritage will be subjected to disturbance and potential damage.

It is clearly acknowledged that damage may be done at this site. As detailed on page 219 “The proposed landscaping on the slopes Montpelier Hill and the upgrade or laying of trail paths may impact on known and potential archaeological features during the construction. ...The removal of and replacement of trees also has the potential to disturb underlying archaeological features.

Upgraded (sic) to services during the operational phase where they necessitate excavation will also potentially impact on underlying archaeological features.”

As such it is vitally important that this development, which has the serious potential to threaten valuable archaeological and cultural heritage, not be allowed to proceed. The site is clearly not suitable for the use proposed in the project-namely the building of a visitor centre, the location of a restaurant and the proposed corporate events (possibly team building and outdoor adventure activity in the vicinity) that are identified in the operation management plan as a key source of income and therefore constitute a key element of the commercial overdevelopment of the site.

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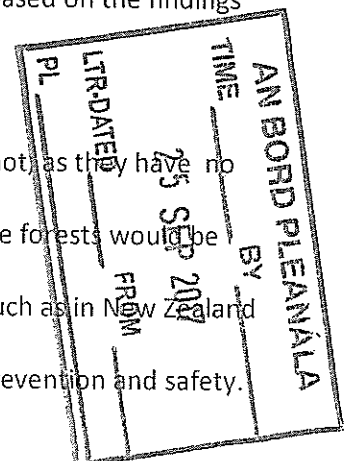
The privatisation of publically funded semi-state Coilte lands

Montpelier and Massey Woods are within the domain of the semi-state body Coilte which is funded by

public taxes and serves the interest of the Irish public and the Irish economy. Its website states :
 'Coillte manages on behalf of the Irish public 7% of Ireland's land.440,000 hectares. Over the last 30 years, its aim has been to maximise the financial and social potential of these natural resources in a sustainable way. Forestry in Ireland has a history which stretches back almost 100 years but its development has accelerated since Coillte was established in 1989, when the company left the Civil Service and became a commercial semi state. Today the forestry sector employs 12,000 people and every year it contributes €2.3 billion euro to the Irish economy.'

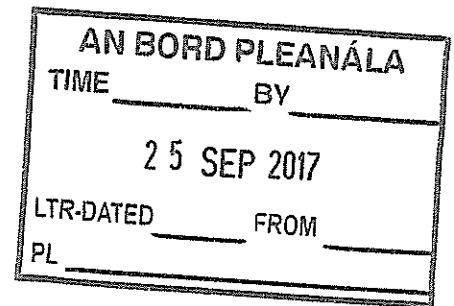
However, there is an international movement to sell off forests and land to private enterprise and since 2001 this global sell off had reached proportions equivalent to the size of western Europe. It is alarming that this privatization of land and forest is now firmly established in Ireland, as evidenced in the International Forestry Fund- a joint venture between the Swiss financial company Helevitia Wealth, the IFS, a Dublin based forestry assets management company whose chairman is Bertie Ahern The South Dublin Plan for Mountpelier Hill and Massey wood is located on Coillte land, the proposal is a business plan where people are charged to visit the centre, restaurant and facilities .The area has been historically and is presently freely accessible and enjoyed by all Dublin people and visitors . This enterprise would set a precedent to the development for private businesses interests to develop the land and forests in the Dublin mountains and the surrounding areas. A sell off the national assets presently owned by Coillte which have been paid for and provided by public taxes, that is profitable and provides employment ,is to be condemned as an Irish citizen, proud of our national natural, archeological and national heritage. Is this the sell - off of Ireland to foreign businesses interests to the detriment of Irish citizens and the island of Ireland, I wonder? . Certainly the demand by Troika to sell off 5 billion of Irish assets based on the findings of the Colm Mc Carthy report would appear to indicate that this is the case..

Furthermore Coillte currently operates an open access policy ,private enterprises do not, as they have no tradition of right of way, the over 18 million forest visits by the people of Ireland to the forests would be put in danger. Globally, private enterprises that has bought these forests and lands, such as in New Zealand ,have been allowed to set their own guidelines on restrictions for conservation, fire prevention and safety.



A dangerous development that is endangering the inherent ecosystems, when you consider that we are now experiencing global climate and environmental catastrophe . It is imperative that those who are in positions of power and influence to be informed and acknowledge this global situation ,for are not all the winds, air, seas, and rivers, in one whole planetary ecosystem . In order for authorities to be responsible to the present and future sustainable development of the planet and humankind ,they should act locally, nationally and think globally, in order to defend and protect the planet.

Should the proposed development plan be allowed to go ahead , it will significantly affect the pleasure , enjoyment and appreciation that Dublin people have historically and presently enjoy of their free access to the Dublin mountains and nature and undermine and possibly destroy the biodiversity of the area and surrounding areas and our historic archaeological and tribal history. As you can see I am co concerned and alarmed by this development that I am calling for an Oral hearing.



Submitted by Fiona Boyd

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Carrickmines
Dublin 18

Fiona Boyd

25th Sept 2017

REFERENCES AND RELEVANT ENVIRONMENTAL LEGISLATION

HEALTH

<http://www.who.int/mediacentre/news/releases/2017/ncds-progress-report/en/>

<http://www.who.int/mediacentre/factsheets/fs355/en/>

WHO report Global status report on noncommunicable diseases 2014

WHO1) Projections of global mortality and burden of disease from 2002 to 2030.

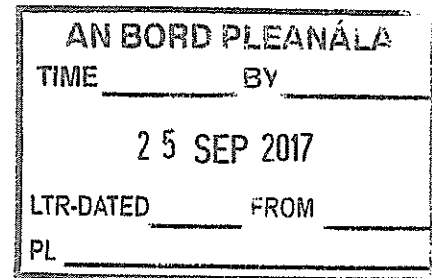
Mathers CD, Loncar D. PLoS Med, 2006, 3(11):e44

IARC Scientific publications no 161 air pollution and cancer 2013

- [WHO launches new NCDs Progress Monitor](#)

18 September 2017 – Governments must step up efforts to control non-communicable diseases (NCDs) to meet globally agreed targets, including preventing the premature deaths of millions of people from these conditions, according to a new WHO report released today.

<http://www.who.int/mediacentre/news/en/>



EU AND INTERNATIONAL LEGISLATION on the ENVIRONMENT

Environmental protection of nature and biodiversity Directive 2009/147/EC AMENDED Directive 79/409/EEC in April 1979.

Species protection under the Birds Directive

The 500 wild bird species naturally occurring in the European Union are protected in various ways:

- **Annex 1:** 194 species and sub-species are particularly threatened. Member States must designate Special Protection Areas (SPAs) for their survival and all migratory bird species.
- **Annex 2:** 82 bird species can be hunted. However, the hunting periods are limited and hunting is forbidden when birds are at their most vulnerable: during their return migration to nesting areas, reproduction and the raising of their chicks.
- **Annex 3:** overall, activities that directly threaten birds, such as their deliberate killing, capture or trade, or the destruction of their nests, are banned. With certain restrictions, Member States can allow some of these activities for 26 species listed here.
- **Annex 4:** the directive provides for the sustainable management of hunting but Member States must outlaw all forms of non-selective and large scale killing of birds, especially the methods listed in this annex.

- **Annex 5:** the directive promotes research to underpin the protection, management and use of all species of birds covered by the Directive, which are listed in this annex.

The Commission provides guidance on hunting practices, some of the key concepts of the Birds Directive and on the sustainable management of cormorant populations. The EU first sustainable hunting initiative was launched in 2001. The Commission also aims to eradicate the illegal killing, trapping and trade of birds in the European Union.

All Member States have to submit reporting on the status and trend in bird populations (article 12) as well as on derogations (article 9) they may apply to the directive's obligations

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Learn more about the EU's 500 wild bird species, the threatened bird species listed in the directive's annex 1, which ones are a priority for LIFE funding or benefit from a Species Action Plans.

The annexes of the Birds Directive have been adapted each time new countries joined the European Union. Find out more about the impact of enlargement on nature law.

Natura 2000 is a network of sites selected to ensure the **long-term survival of Europe's most valuable and threatened species and habitats**. How a site is chosen depends on what it aims to protect.

Under the Habitats Directive (Art. 3 and 4), Member States designate Special Areas of Conservation (SACs) to ensure the favourable conservation status of each habitat type and species throughout their range in the EU. Under the Birds Directive(Art. 4), the network must include Special Protection Areas (SPAs) designated for 194 particularly threatened species and all migratory bird species.

The Habitats Directive was adopted in 1992 to help maintain biodiversity. It protects over 1000 animals and plant species and over 200 types of habitat. It also established the EU-wide Natura 2000 network of protected areas.

More recently, new legislation has been developed. In 1999, the EU reinforced the role of zoos in the conservation of biodiversity and, in the wake of the EU Biodiversity Strategy to 2020, committed to protect native biodiversity and ecosystem services against invasive alien species. We also have legislation regulating certain aspects of wildlife trade.

We also provide more information on the impact of the various enlargements on the Birds and Habitats Directives and about the current fitness check of the nature legislation.

The Habitats Directive (Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna) provides for the creation of a network of protected sites known as Natura 2000

Green Infrastructure

The European Commission has developed a **Green Infrastructure Strategy**. This strategy aims to ensure that the protection, restoration, creation and enhancement of green infrastructure become an integral part of spatial planning and territorial development whenever it offers a better alternative, or is complementary, to standard grey choices.

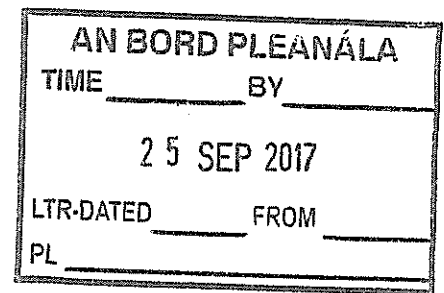
<http://www.irishstatutebook.ie/1976/en/act/pub/0039/index.html>

<http://www.irishstatutebook.ie/2000/en/act/pub/0038/index.html>

<http://www.irishstatutebook.ie/2000/en/act/pub/0038/index.html>

<http://www.irishstatutebook.ie/2000/en/act/pub/0038/index.html>

<http://www.cbd.int/>



The EU is also linked to the Convention on migratory species (Bonn Convention),

the Convention on the conservation of European Wildlife and habitats (Berne Convention)

and the Agreement on the conservation of African-Eurasian Migratory Waterbirds (AEWA).

GLOBAL ENVIRONMENT AND CLIMATE CHANGE

Page edited: 24 May 2016

<https://climate.nasa.gov/scientific-consensus/>

<http://www.un.org/climatechange/the-science/>

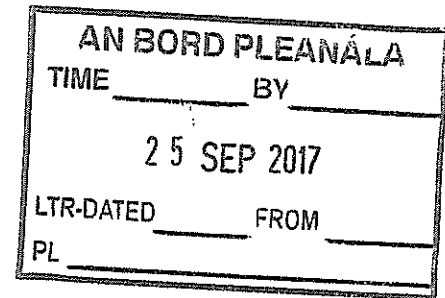
PROTECTION OF POLLINATORS

<https://www.britishbeecoalition.org/about/>

www.buglife.org.uk

<http://www.butterfly-conservation.org/>

<http://www.butterfly-conservation.org/>



The European Commission initiated a process to assess the status of bees, the result of which was published in spring 2015 as the European Red List of Bees. Red lists of endangered species identify species that are threatened with extinction at the European level – so that appropriate conservation action can be taken. Moreover, The Life (the Financial Instrument for the Environment) can be used for benefits of wild bees.

PROTECTION OF RIVER FISH

http://www.fingalbiodiversity.ie/resources/biodiversity_guidelines/Protection%20of%20Fish%20Habitat.pdf

The Fisheries (Consolidation) Act 1959 (as amended).

The Fisheries (Amendment) Act 1999 (No. 35 of 1999).

The Freshwater Fish Directive – Council Directive on the quality of fresh waters needing protection or improvement in order to support fish life (78/659/EC) as transposed into Irish law under the E.C. (Quality of Salmonid Waters) Regulations 1988 (S.I. No. 293 of 1988).

The Habitats Directive – Council Directive on the conservation of the natural habitats of wild fauna and flora (92/43/EEC) as transposed into Irish law under the E. C. (Natural Habitats Regulations 1997 (S.I. No. 94 of 1997).

- The Local Government (Water Pollution) Act 1977 (as amended).

The Local Government (Planning and Development) Act 2000 (No. 30 of 2000)

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