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An Bord Pleanála Reference Number 06S.JA0040

08 January 2018

To whom it may concern,

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AN BORD PLEANÁLA	
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I am writing to make a submission and observation on the significant further information furnished by the applicant, South Dublin County Council, in relation to the application for approval of the proposed 'Dublin Mountain Visitor Centre' (DMVC) development. As requested this letter is accompanied by a fee of £50.

By way of background and qualification I wish to state that I hold an adjunct position as a Professor of Archaeology in the UCD School of Archaeology. I have served three terms as Head of the UCD School of Archaeology, most recently 2014-2016. I am a member of the Royal Irish Academy and a Fellow of the Society of Antiquaries of London. I current serve as the chair of the Historic Monuments Council of Northern Ireland and I am a former member of the Heritage Council (2005-2015). I am a member of ICOMOS (International Council on Monuments and Sites) Ireland and an expert member of the ICOMOS International Committee on Archaeological Heritage Management. In the latter capacity over the last five years I have acted as the mission expert on technical field missions carried out at candidate World Heritage Sites in Europe and North America as part of the ICOMOS evaluation on behalf of UNESCO of sites nominated for inscription on the World Heritage List. My particular research focus as an archaeologist is the Neolithic period in Ireland and its wider European setting.

I wish to comment on two particular aspects of the Further Information Response (FIR):

1. The Operational Management Plan, noting that the revised Operational Plan replaces that submitted with the Environmental Impact Assessment Report (EIAR), see FIR, p.2.
2. Section 9 of the FIR on Archaeology, Architectural Heritage and Conservation, see FIR, pp 16-20. Since this section makes necessary reference to the EIAR this observation also similarly refers where appropriate to the EIAR, with specific reference to Chapter 11 Archaeology and Cultural Heritage of the EIAR.

My comments should be seen in the context of the objective of the applicant, South Dublin County Council, in seeking consent for the proposed development as set out in the FIR, p.2:

The exhibition, interpretation and educational facilities in conjunction with improved transportation/access options, improved trail network, improved management of the site's cultural and natural heritage assets and provision of basic facilities such as toilets, will create a heritage-based education resource of national significance.

Operational Management Plan (for the proposed Dublin Mountains Visitor Centre)

This is titled as the DMVC Operational Management Plan. For ease of reference it is referred to here as the OMP. The following statement is made on p.2 of the OMP:

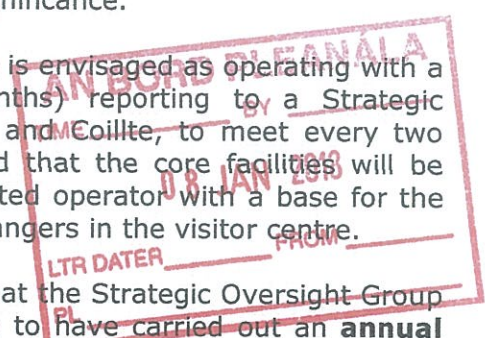
This report details how the facility will be operated and managed in the event of development consent by An Bord Pleanála (subject to any conditions of consent). It also addresses key commitments to the monitoring and management of the cultural heritage resources, natural heritage resources and the landscape surrounding the proposed DMVC facility, which have emerged from the EIA process.

Given the stated objective of the OMP to monitor and manage the cultural and natural heritage resources and landscape around the proposed facility there is little detail provided on how this is to be achieved. The proposed operational level of monitoring and management is simply inadequate for what is intended to be a heritage-based education resource of national significance.

As set out in the OMP the management structure is envisaged as operating with a Steering Committee (meeting every two months) reporting to a Strategic Oversight Group (South Dublin County Council and Coillte, to meet every two months initially). On the ground it is envisaged that the core facilities will be operated and managed by an externally contracted operator with a base for the Dublin Mountains Partnership (DMP) Volunteer Rangers in the visitor centre.

Sections 4 to 6 of the OMP state unequivocally that the Strategic Oversight Group will be responsible for carrying out or arranging to have carried out an **annual** inspection (and any required follow up actions) of the site trails, all architectural and archaeological features (visible on the ground) and all key ecological receptors.

There is no indication provided in the OMP there will be any professional archaeological or other staff employed or present on an ongoing basis in the proposed centre with expertise in the management and monitoring, interpretation and presentation to the public of cultural or natural resources or the landscape. Neither is there any indication of the employment of professional archaeological staff who will have sufficient authority within the management structure and supporting resources available to them to amend access routes, operational practices and/or to undertake any other archaeological mitigations as and when these are required. This would seem to be directly contrary to the overall objective of the proposal to create a heritage-based education resource of national significance.



Given the significant increase in visitor numbers to the site envisaged in the documentation accompanying the application the proposed **annual** inspection of the trails, architectural and archaeological features and key ecological receptors is inadequate. As a result of human and natural factors significant damage can occur over a twelve month period. International best practice as recommended (see *Management of Cultural World Heritage Sites*, UNESCO 2013) and observed on the ground is for such monitoring to occur on a monthly or at the minimum on a quarterly basis.

A number of the monuments, particularly DU025-021002 (enclosure), have already been considerably and detrimentally impacted on by forest plantation. Due to the ephemeral and vulnerable nature of a number of the monuments it will require ongoing expert archaeological assessment to monitor and mitigate impact. Without it, the planned development and significant extra footfall will potentially lead to further erosion and damage to vulnerable archaeological sites and the landscape.

I would draw attention to the statement of the applicant that part of the objective of the proposed development is the ***improved management of the site's cultural and natural heritage assets***. The reality however is that there are going to be no professional staff on site with expertise in the management of these heritage assets and the proposed regime of annual inspection cannot be seen as constituting an adequate, let alone improved management response, on behalf of South County Dublin County Council and Coillte.

Given that the aim is to create a heritage-based resource of national significance it should be noted that current international best practice, as represented by the UNESCO Operational Guidelines for World Heritage Sites and Global Geoparks recognises the distinction between a plan and an active, effective system of management. It should be noted that there is no reference in the OMP to either a Risk Assessment Plan, to assess the impact of the risks (such as climate change) that are likely to impact on the cultural and natural assets and landscape of the site or indeed to a Visitor Management Plan. Neither is there any Action Plan to demonstrate how the cycle of long-term and day to day actions will be combined to ensure the protection, conservation and presentation of the site.

It is my considered view for the reasons outlined above that the OMP as presented in the FIR does not constitute an effective management system or process.

Archaeology, Architectural Heritage and Conservation

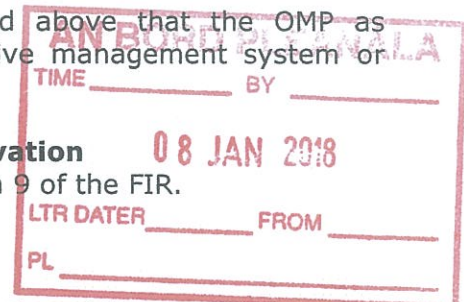
The comment is structured to replicate that of Section 9 of the FIR.

9.1 Location of Building

Location of the proposed visitors centre

The statement made on p.16 of the FIR that *'the location of the proposed visitors centre is downhill and away from known/recorded monuments'* is contentious. In Chapter 11 Archaeology and Cultural Heritage of the EIAR there is an understandable reliance on the work of Neil Jackman and the reports of the results of the Hell Fire Archaeological Research Project. Through survey and excavation this project, which is very much still at a data gathering stage, has revealed considerable new information about the range and significance of the archaeological features and archaeological potential of the landscape in the vicinity in the proposed development.

To date, the work of the Hellfire Club Archaeological Project has been focused on the summit of the hill, with the particular objective of developing an



understanding of the possible passage tombs DU025-001001 and DU025-001002. While the project and the excavation of 2016 in particular have revealed exciting new information about the nature of the monument DU025-001001, there is much more work to be done to better understand the broader archaeological and historical landscape of Montpelier Hill and to place these monuments in their wider context.

This is an important cultural landscape with a number of key periods represented. As well as being a significant place during the prehistoric past, Montpelier Hill is also of importance as it was developed into an eighteenth century deer park, with landscape features. To date this highly important cultural landscape has not been fully surveyed, documented and understood.

Before any development takes place, a full archaeological and historical landscape survey is required, by experts in both prehistoric and historic landscape survey using a variety of techniques. Not only would this ensure the protection of these important monuments and landscape features, it would also enable the accurate and appropriate interpretation of the historic landscape of the site.

It is relevant to note that in the assessment of Jackman's work in Chapter 11 of the EIAR (see EIAR pp. 210-11) there is acceptance of and agreement with all the results of the work on top of Montpelier Hill. It is also recognised that comparison with other megalithic complexes suggest the potential of other features in the landscape, including and critically in the areas proposed for the construction of physical structures and related services as well as those proposed for general landscaping such as tree planting.

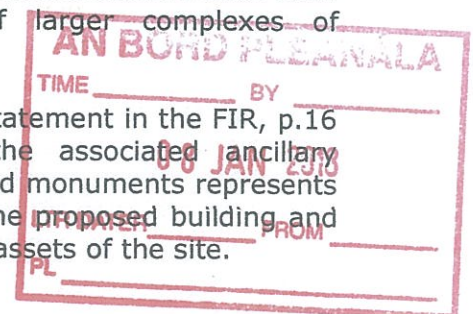
However, in discussion of Jackman's recognition of potential archaeological features in the vicinity of the proposed building from aerial photography (see EIAR, Fig.11.12), which is based on his established knowledge of the archaeology of the area and the wider Dublin/Wicklow Mountains, it is argued in the EIAR (p. 211) that these features '*may be the result of particular light or shadow or photographic variance*'. This would not seem to constitute a rigorous assessment of the only detailed archaeological work carried out to date in this area.

Jackman recognised a significant number of features in the vicinity of the proposed building that he thought to be of archaeological potential. In addition the known and protected RMP sites DU0025-021001 (standing stone) and DU0025-021002(enclosure) are located to the north-west of the proposed building. Archaeological excavations have demonstrated that enclosure sites such as DU0025-021002 can form an integral part of larger complexes of archaeological features.

Again this background it is my considered opinion that statement in the FIR, p.16 that the location of the proposed building, and the associated ancillary developments, is downhill and away from known/recorded monuments represents an inadequate assessment of the potential impact of the proposed building and associated ancillary developments on the archaeological assets of the site.

Field inspection and geophysical survey

It is stated in the FIR, p. 16 that field inspection was carried out during the preparation of the EIAR but that due to forest cover that '*it was not possible to conduct a geophysical survey or to gain much information from an aerial survey since both Montpelier and Massy's Wood lands are largely covered with trees*'. Fig.11.11 (p. 210) of the EIAR shows the results of the archaeological interpretation of geophysical survey of the top of Montpelier Hill against a background of LiDAR survey.



The latter technology (LiDAR) provides a detailed surface topographical model stripped of surface vegetation, hence highlighting potential archaeological features. The application of LiDAR survey is a widely used approach in mapping, identifying and assessing the impact of change on low-level archaeology features in forested and woodland environments. LiDAR coverage was clearly available for the top of Montpelier Hill. In both the EAIR and the FIR there appears to be a lack of any reference to the presence or absence of LiDAR for the rest of the site, or lack of consideration of commissioning a LiDAR survey if it was not already available.

Both LiDAR and the application of other remote sensing techniques, such as airborne ground penetrating radar and infra-red photography, are likely to have proved informative about the potential for and nature of any sub-surface archaeological remains surviving in the wooded portions of the site. In my view, in line with the developer's obligations under Article 5(3) of the EIA Directive it would be expected that such approaches would have been sourced or commissioned and submitted as part of the '*data required to identify and assess the main effects which the project is likely to have on the environment*'.

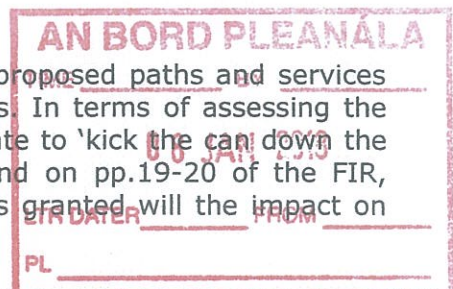
Given that engineering test pits were excavated to assess the geology of the site (see *Dublin Mountains Visitor Centre: Engineering Report for Planning, Appendix A- Trial Pit Location Plan*) it is equally surprising, and again deficient in my view, that limited archaeological test excavation was not conducted to supplement the aforementioned non-invasive surveys to inform the EIAR and the FIR.

It is my considered opinion that the failure to source or commission and submit these various strands of archaeological data in the EIAR or in the FIR constitutes a major deficiency in the assessment of the potential impacts of the proposed development on historic landscape features (archaeological and architectural) in the area. This renders that assessment, as presented by the developer (South Dublin County Council) via two bodies of information (the EIAR and the FIR) which the EIA Directive clearly requires An Bord Pleanála as the consenting authority to evaluate together as a whole and not sequentially, inadequate.

9.2 Proposed Development

The discussion on pp. 17-18 of the FIR make it clear that the preliminary results of the work of the Hellfire Club Archaeological Research Project will be used as the basis for making decisions about the potential impact of service trenches and paths as part of the proposed development. It is clear that the work of the Hellfire Club Archaeological Research Project was not related to the proposed development, therefore the extent and scope of this work cannot in anyway be taken as the only basis for the assessment of the potential impact of the proposed development and associated work.

No detail appears to be provided of the location of proposed paths and services and their potential impact on archaeological features. In terms of assessing the impact of the proposed development it is not adequate to 'kick the can down the road', as suggested in Section 11.6 of the EIAR and on pp.19-20 of the FIR, namely that only when consent for the application is granted will the impact on archaeological features be considered in detail.



9.3 Impact on the 6 Registered National Monument Sites and Potential Sites

In the EIAR there is no detailed or quantified assessment of the impact of the proposed development on these sites or recognition of the need to differentiate between the impact on sites of recognised national importance (those in the RMP) and other sites. It is standard practice in EIAs to employ a scale of impact which

is related both to the nature of the impact and the character and value of the asset, as for example set out in detail in the ICOMOS Heritage Impact Assessment guidance (2010). No such approach is employed in the EIAR or referred to in the FIR.

It is noted that there is no reference to DU025-021002 in Section 9.3 (p. 19) of the FIR. As indicated above this is the RMP site that appears to be most likely to be impacted on by the proposed development.

Much of the content of 9.3 refers to the recommendations of the Department of Culture, Heritage and the Gaeltacht. This section makes reference to the archaeological mitigation measures '*detailed in Section 11.6 of the Environmental Impact Assessment Report*'. Referring back to Section 11.6 of the EIAR (p. 219) this appears to consist of one paragraph with ten lines of text.

Against this background it is difficult to see evidence supporting the statement that RMP sites were assessed for potential impacts.

9.4 Monitoring of the site

Long term monitoring and maintenance

This section (p.20 of the FIR) states that '*as part of the long term maintenance and monitoring of the site, each of the sites (including the 6 recorded monuments and the architectural heritage in Massy's Wood) will be checked at regular intervals for wear and tear, the impacts will be measured and recorded and addressed accordingly*'.

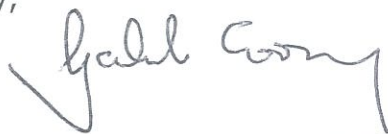
As noted above in discussion of the Operational Plan for the proposed DMVC it is proposed that the condition of archaeological and architectural features will only be inspected on an **annual** basis. This cannot be seen as constituting regular monitoring and checking of these features, which are a key asset of the site.

Concluding comment

I note the objective of South Dublin County Council to develop an Interpretation/Outdoor Pursuits Centre, however the current proposal is contradictory in that while the project is stated as being '*geared towards protecting the site and the public good and will highlight, interpret and facilitate access to the archaeology, architecture and folklore of the site and its significance within the wider Dublin Mountains region*' (EIAR, p.219) the potential significant impact of the proposed development on the assets of the site have not been fully addressed and the proposed management of the site is not adequate or in keeping with the objective of creating a heritage-based resource of national significance.

Based on the detailed discussion above of the two aspects of the FIR on which I consider myself qualified and competent to make a judgement it is my view that under the EIA Directive the EIAR and FIR fail to detail the environmental sensitivity of the area and to fully assess the potential effects of the proposed development.

Yours sincerely,



Professor Gabriel Cooney

APPROVED BY
DATE 08 JAN 2010
LTR DATER _____ FROM _____
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