

The Secretary  
An Bord Pleanála  
64 Marlborough St  
Dublin 1

AN BORD PLEANÁLA	
TIME <u>15-19</u>	BY <u>Hand</u>
22 SEP 2017	
LTR DATED _____	FROM <u>Sm</u>

Dublin Mountains Visitor Centre Strategic Development Initiative  
Location: Hellfire Club/Montpelier Hill/Massey's Wood  
Planning Authority: South Dublin County Council  
Ref: JA0040

AN BORD PLEANÁLA	
Received: <u>22nd September 2017</u>	
Fee: <u>€50-cash</u>	
Receipt No: <u>B140847</u>	
20 <sup>th</sup> September 2017	

Dear Sir,

We object to the proposed Dublin Mountains Visitor Centre- Strategic Development Initiative (JA0040) as it is contrary to sustainable development, and is contrary to the principles of proper planning and to the objectives and policies of the South Dublin County Council Development Plan.

We object to the proposal on the following three grounds:

The plan shows a flagrant disregard for the biodiversity of the area, ignoring in some cases the clear protections that exist in law.

The proposed building and development will seriously impair and possibly destroy the archaeological heritage of the area  
the commercialisation of the area undermines maintenance of access to the mountains as a public good

#### **Biodiversity**

The EIA Report Volume 1 fails to consider the impact of the predicted 200,000 increase in footfall (within 10 years) on a very delicate environment.

Despite acknowledging the presence of bats, otters, red squirrels, badgers and hen harriers in the area, due consideration is not given to the protection afforded to these birds and mammals under the EU Habitats Directive (1992), the Wildlife Acts (1976 & 2000) and the Birds Directive (1979).

The surveying conducted is inadequate. The report itself acknowledges (pp75-76) that the Habitat Survey and Invasive Alien Plant Surveys were conducted outside of the optimal period. It is also evident that the badger survey was only partially conducted in the optimal period and all other surveying of the birds/mammals mentioned above was inadequate. In particular, the time frames dedicated to studying movement, feeding grounds, nesting etc were completely insufficient.

The existence of legal protections to the mammals and birds mentioned above dictates that the disturbance of such species should be avoided save where no alternatives exist to the development. Numerous other alternatives have been suggested - including Orleigh Estate- all of which would entail significantly less high impact on flora, fauna and wildlife in general.

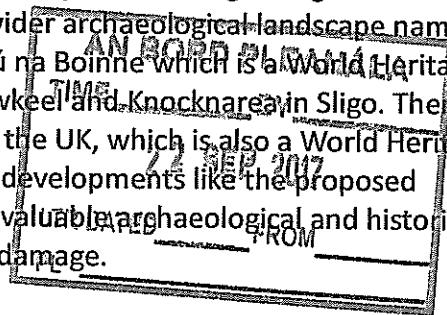
The proposals will disturb bats and interfere with their breeding and resting places. It seems that this disturbance is considered in the EIA to be on an insufficient scale to threaten their survival. This viewpoint is based on insufficient information on the bat population in the area. The surveying

methods employed fail to meet those clearly outlined in the NPWS Bat Mitigation guidelines.

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 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) are completely inadequate. The species would be disturbed with resting and breeding places damaged by disturbance in direct contravention of the protection provided under the Directive.

### **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 Knocknaree 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.

### **Business Plan**

The business plan (page 1) is clear on the purpose of the DMVC "The development of the Dublin Mountain Visitor Centre (DMVC) is intended to serve as a gateway to the wider leisure and tourism opportunities available in the Dublin Mountains."

The submission fails to make a convincing case as to the importance of locating the centre in a high amenity, agriculturally zoned area of such high archaeological value and of such considerable ecological importance.

The proposed DMVC is a large commercial development in a sensitive natural heritage location. The business plan is based on growing visitor numbers by 25,000 pa over an extended period of time. It is premised on attracting 40% of visitors to the restaurant and 15% to the bar. Without achieving such percentages the business plan is clear that the financial viability of the project

would be called into question. The need to promote such commercial enterprises stands in contradiction of the acknowledgement that "the principal tourism asset of interest to visitors remains the Dublin Mountains themselves, their landscape and heritage, as well as the immediate area around the development site incorporating Massey Wood, the Hellfire Club and Montpelier Hill (Business Plan, p 19).

The retention of access to the mountains as a "public good" is undermined by the assertion that educational events and facilities will be a significant source of revenue. Rather than providing improved free, public access to school children and schools, historical societies etc the proposal is clear that henceforth access to the enhanced facilities will be linked to ability to pay.

The provision of a restaurant, bar, shop and a visitor centre orientated on both the tourism market and corporate events would be more suitably located in Rathfarnham, Ballyroan or Tallaght supported by easy access to the unspoilt beauty of the Dublin Mountains, not in the heart of the mountains themselves.

We request an oral hearing.

Yours sincerely,

Richard Boyd Barrett, TD  
Gino Kenny, TD  
Brid Smith, TD  
People Before Profit,  
Dail Eireann,  
Leinster House,  
Dublin 2.

