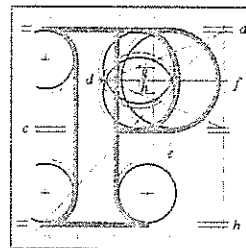


Our Ref: 06S.JA0040
P.A.Reg.Ref:

Your Ref:



An
Bord
Pleanála

Frank Doyle
Montpelier Farm
Killakee Road
Rathfarnham
Dublin 16

10th January 2018

Re: Dublin Mountain Visitors Centre and all associated works
in the:
Townlands of Mountpelier, Killakee and Jamestown in South Dublin.

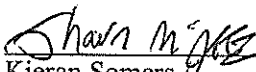
Dear Sir,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it or approved it with conditions.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

PP

Kieran Somers
Executive Officer
Direct Line: 01-8737107

EI02

The Secretary
An Bord Pleanála
64 Marlborough
Dublin 1

6/1/18

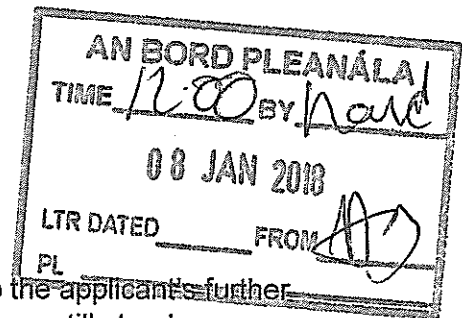
Location: Hellfire Club / Montpelier Hill / Massy's ("Massey's") Wood, Dublin 16.

Applicant: South Dublin County Council.

Reference No: JA0040.

Observer: Frank Doyle

Observer Address: Montpelier Farm, Killakee, Dublin 16.



Dear Sir/Madam,

Further to my previous submission in 2017 and in response to the applicant's further information (FI) document I submit that my previous observations still stand.

The FI document and their overall EIAR failed to address what is required under EU habitats directive and the local South County Dublin and Dun Laoghaire Rathdown County Councils' development plans (zoned for the protection of rural amenity and the promotion of agriculture), which are well-documented in the planning decisions of both local authorities with regard to the applications for one-off rural housing. These guidelines are strictly enforced to prevent suburbanisation of receiving landscape. It failed to address any of the points I have raised in my original submission in regard to my family farm. i.e. fencing, walkways parallel to farm fence lines, trespass, littering, antisocial behaviour, my farm road crossing-point on the R115, the increase in traffic and the added danger to my family and animals, zoning in high amenity area, dog attacks on animals etc.

The applicant has essentially dismissed all of the environmental concerns I raised in my last submission as being of no importance.

On p XI of the applicant's original proposal, the applicant notes "it is possible that increased use of the site will result in an increase in nuisance and impact to neighbouring landowners, farmers etc., trespass and littering on their properties and disturbance of animals.

All these issues need to be addressed and I would respectfully suggest that bringing 300,000 visitors to a site via a substandard road network will not in any shape or form solve these ever-increasing problems.

The two day poorly-recorded multi-disciplinary walkover surveys that were conducted by ROD on behalf of South Dublin County Council (SDCC) are totally inadequate. So many receptors were missed, overlooked, dismissed out of hand or deemed not to be important.

For example [7.1.3.] Seasonality of Surveys: "While the habitats recorded within the footprint of the proposed development. i.e. conifer plantation, recently-felled woodland and beech woodland provide habitat for a range of protected species, they are not important,

rare or protected habitats and it is considered that surveys of these habitats, while not within the preferred survey season, provide an accurate and adequate description of thereof'.

What they are saying here is, in their considered opinion, the habitats recorded within the footprint of the development are not important. How can this not be important habitat if it contains (as they say) habitat for a range of protected species. What they are saying in essence is that the development footprint is more important than the rare species within that footprint.

The big picture here is environment, ecology, biodiversity, proper planning practice vs development, roads, buildings, car parks and increased footfall (tourists).

Squeezed in between the Featherbed Mountains National Park and the urban environment we have a (lets call it) green belt corridor for all receptors (wild and agricultural) to travel through and live in. In my estimation it ranges from 0km at Ballymount Green new development where it meets the foothill of Montpelier (Hellfire Club) and 2km at the half-way point across the mountains at Ballyboden/Edmondstown and again back to 0km at the foothills of Three Rock Mountain. This belt is approximately 4-5km long. Within this green belt there is a community of farmers (landowners) who look after that environment and all within it. It is fragile enough as it is but at least still exists and contains a huge range of biodiversity such as rivers, streams, marshland, woodland, animals (wild and agricultural), plants and hedgerows.

This belt is unique in that nothing similar exists in any location around Dublin or indeed most capital cities in Europe. It should be treated with the utmost respect and held in trust for future generations. I would respectfully submit that this will require a planning rethink of the whole of the Dublin mountains as a unified integrated area rather than one broken apart by insensitive overscaled development.

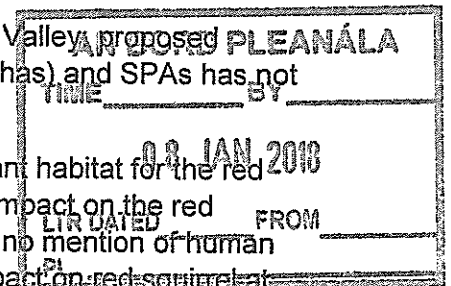
This will require input from SDCC, Dun Laoghaire Rathdown County Council, Coillte, Wicklow National Park and above all the farming community that has managed that environment for generations.

This green belt is bisected by a line with one part being under SDCC and the remainder under Dun Laoghaire Rathdown County Council who appear not to communicate i.e. they have no joined-up, cooperative management plan for the entire belt. The farmers participate in the GLAS scheme (formerly REPS) in direct contract with the Dept of Agriculture, Forestry and the Marine (DAFM). The aim is to protect the biodiversity within that environment in a farm-friendly way, which is an example of joined-up thinking.

I would respectfully submit that there is a statutory obligation by both authorities to protect and promote environmentally friendly agriculture within that green belt. This is in the County Development Plans of both local authorities. This obligation is being ignored by the applicant.

The eventual impact on nearby SACs, proposed SACs (Glenasmole Valley proposed PLEANÁLA candidate Special Area of Conservation Ref side code 001209 - Duchas) and SPAs has not been assessed.

As SDCC has stated in their FI report the woodlands provide important habitat for the red squirrel and also state that the development will have medium term impact on the red squirrel as a result of tree felling and vegetation clearance. There is no mention of human disturbance in the overall footprint, which would be the long-term impact on red squirrel at



Massy's and Hellfire Club. SDCC has stated that the red squirrel is of county importance. I would suggest it is of national importance.

The Council hopes to attract 300,000 visitors per year. That is an astonishing number of people to have walking on the mountain and it will have an irreversible impact on red squirrel and its habitat, as well as on all other receptors. I feel strongly that SDCC has strongly underestimated the effect that this development will have on the existing fragile ecosystem, especially in Massy's Wood.

SDCC do not have a biodiversity officer (the only council not to have one?) whose job it would be to map and document the area and give guidance on the effects of such a huge development and the fallout from the huge numbers of people on the landscape.

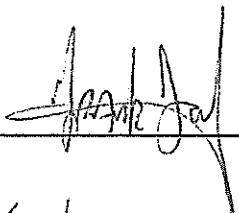
Furthermore (and unfortunately) Coillte have no proper broadleaf management skills or staff, which is evident if you look at the non-existent management of Massy's Wood, especially over the last couple of years. Their skills are in commercial forestry i.e. conifers, which is a quick rotation crop.

Given the track record of non-management by SDCC and Coillte, how can we expect that management standards at these locations will be any different if the proposed development goes ahead.

Massy's Wood has been classified by Cunnane Stratton Reynolds as being of high sensitivity, and should be treated and managed as such.

The above are just some of the grave concerns I have about the proposed development. I and my family object in the strongest possible terms and ask you to please reject this planning application.

Yours faithfully



Frank Doyle
Frank Doyle

