



10 Greenlea Road
Terenure
Dublin 6W

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1.

08/01/2018

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

Further Information Provided by South Dublin Co Co

Dear Sir/Madam,

We were very disappointed at the timing chosen by South Dublin Co Co to make their submission of further information requested by An Bord Pleanála. All the family and work commitments of the Christmas Season made it impossible for us to fully study the submission. However, based on what we have been able to study we still firmly object to the above proposed development. In our opinion this proposal conflicts with sustainable development, is contrary to the principles of proper planning and also to the objectives and policies of the SDCC development plan. We saw nothing in the further information submitted by the SDCC that would change our minds.

The proposed development shows no regard for the biodiversity and archaeological heritage of the area, ignoring in some cases clear protections that exist in law. The Business Plan proposes the commercialisation of the area of great beauty and undermines the maintenance of access to the mountains for the general public.

BIODIVERSITY

7.1 OVERVIEW (Further Information Response)

“The multidisciplinary walkover survey was carried out over a two-day period by experienced, professional ecologists. This was sufficient time to walk the entire site and undertake the surveys. While records of transect routes were not kept, surveyors verified that all areas of the site were covered by the survey.”

We find it incredible to think that SDCC would consider a 2 day walkover survey satisfactory for a site with such biodiversity and repeat our original objection.

If this ill thought out development were to go ahead it would have a devastating effect on the flora and fauna of the area. The EIA Report Volume 1 does not appear to have considered the detrimental impact of the predicted 200,000 increase in footfall (within 10 years) on a very delicate environment. It acknowledges the presence of bats, otters, red squirrels, badgers and hen harriers in the area, due consideration has not been 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). On reading the Report we were shocked to find that the surveys carried out were completely inadequate. The Report itself acknowledges (pp75-76) that the Habitat Survey and Invasive Alien Plant Surveys were conducted outside of the optimal period (what was the point of that waste of money). It is clear 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. Studies of this nature in such a delicate environment should be carried out over at least a 12 month span, day and night, to produce adequate and accurate results.

The existence of legal protections to the mammals and birds mentioned above dictates that the disturbance of such species should be avoided other than where no alternatives exist. Numerous other alternatives have been suggested have been offered for this 'interpretive centre' - Orlagh Estate and Montpellier Hill Stewarts House to name just two - all of which would entail significantly less high impact on flora, fauna and wildlife in general.

The Proposed Development would 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. Their conclusion is based on insufficient information gathering on the bat population in the area. The surveying methods employed fail to meet those clearly outlined in the NPWS Bat Mitigation guidelines. Was the survey on these nocturnal animals carried out during daylight hours?

The **otter** is an Annex IV species under the Habitats Directive and as such is strictly protected wherever it occurs. It is therefore an offence to deliberately disturb the species or damage / 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 survey carried out is inadequate. There is baseline information on the size of the otter population in the area provided and the proposed mitigation measures as detailed in section 6.6.2.1 pg 102/103 are not inadequate. The species would be disturbed with resting and breeding places damaged by disturbance in direct contravention of the protection provided under the Directive.

The **Irish Red Squirrel** and other protected species like the **Badger** are to be sacrificed to make way for a commercial development. This level of destruction to make way for a coffee shop/restaurant and car parking is simply disproportionate and clearly a massive over-intensification of use which will also significantly impact on amenity.

It is extremely worrying that SDCC have no Biodiversity Plan in place and they have no dedicated Biodiversity Officer unlike other Dublin Local Authorities.

Business Plan

On reviewing the further submissions by SDCC we were unable to find a full and proper description of proposed development. There are no details of construction and operational phases. We could not see and information about the obvious impacts stuff like emissions and phases. Again we can just reiterate what we wrote in our original submission.

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 does not 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 a number of years. It is premised on attracting 40% of visitors to the restaurant and 15% to the bar. If the percentages outlined in the Business Plan are not achieved then it is clear that the project would not be financially viable. The need to promote such commercial enterprises conflicts with 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 Plan states that “educational events and facilities will be a significant source of revenue”. The retention of access to the mountains as a “public good” is undermined by this statement. Rather than providing improved free, public access to school children and schools, historical societies etc. the proposal is clear that it is a money making venture which will make the area accessible to those who can afford 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.

Archaeology

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.*” Are we to have another Wood Quay debacle? It is simply not acceptable for commercial developments like this to proceed when such rich and valuable archaeological and historical heritage will be subjected to disturbance and potential damage. In the report it is acknowledged that damage will be done to 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.

SDCC has consistently limited development in this area because of the limitations of the road infrastructure and the overall environment and now plans a threefold increase in footfall - most of which will be casual tourism with no real vision for real education and sustainable development. The Traffic Survey in the area was conducted on a bank holiday weekend so clearly does not reflect normal traffic volumes.

In our opinion it is very important that an Oral Hearing should take place on this very important issue. South Dublin Co. Co's timing in submitting Further Information was clearly done to coincide with the Christmas Season when everyone is very busy and was clearly an effort to subvert a democratic process.

Yours faithfully,

Eithne Brew &
Aoife Bell-Brew

