

The Impact of the Proposed Dublin Mountains Visitor Centre  
on the Archaeological Landscape of Montpelier Hill

Application PL06S.JA0040  
Ref-JA0040 9625

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I would like to make the following points relating to the impact of the proposed Visitor Centre for proper planning and development in the area concerned, and the likely effects of the proposed development on the archaeological landscape.

Section 1: Potential violation of the Roads Act, 1993

According to the EIA, the Dublin Mountains Project would involve direct access to and from the R115. As defined in Part IV, Sections 43 & 45 of the Roads Act, the R115 is a protected public road.

43.—(1) A motorway means a public road or proposed public road specified to be a motorway in a motorway scheme approved by the Minister under section 49.

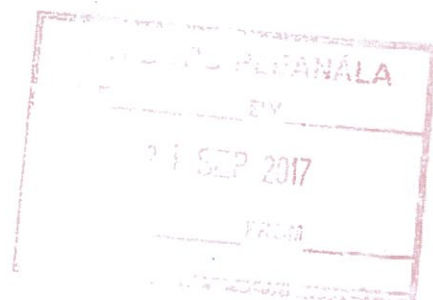
(2) A person shall not have or be entitled to direct access from any land adjoining a motorway to the motorway, or from the motorway to such land, nor shall a right to such direct access be granted at any time.

45.—(1) A protected road means a public road or proposed public road specified to be a protected road in a protected road scheme approved by the Minister under section 49.

46.—(1) Notwithstanding anything contained in any other enactment, neither a planning authority nor An Bord Pleanála shall decide to grant, or grant, planning permission, nor shall a decision by a planning authority to grant any planning permission be regarded as having been given under section 26 (4) of the Act of 1963—

(a) for any development of land which would permit or involve direct access to or from a motorway or a busway or which would contravene the provisions of a protected road scheme approved by the Minister under section 49 relating to direct access to or from a protected road.

(4) Save as is provided for in section 54, no person shall undertake any development of land which would permit or involve direct access to or from a motorway or a busway or which would contravene the provisions of an approved protected road scheme relating to direct access to or from a protected road.



(6) (a) Any person who constructs or provides or attempts to construct or provide a means of direct access to or from a motorway or a busway in contravention of section 43 (2) or section 44 (2) shall be guilty of an offence.

(b) Any person who contravenes subsection (4) shall be guilty of an offence.

(c) Any person who constructs, provides or retains or attempts to construct, provide or retain a means of direct access which contravenes a protected road scheme approved by the Minister under section 49 shall be guilty of an offence.

## Section 2: Preparation of the Environmental Impact Assessment

Though the EIA discusses the 'cultural, historical and archaeological heritage' of the site, it fails on three levels. 1) The section was not prepared by a 'qualified' individual. 2) No 'Statutory Consultees' were engaged in its preparation. 3) It failed to adequately address the impact on the six registered sites and numerous 'potential sites' identified in the EIA.

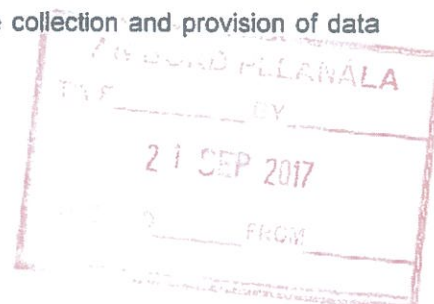
While the individual who prepared the archaeology section of the EIA, is a "qualified archaeologist", they do not meet 4 of the 5 necessary criteria, in particular 'a thorough knowledge of archaeological legislation, standards and guidelines'.

In its publication, 'Guidelines for the Assessment of Archaeological Heritage Impacts of National Road Schemes', the National Roads Authority defines a 'qualified consultant' as someone with:

- A proven background working on archaeological reports.
- A thorough knowledge of archaeological legislation, standards and guidelines.
- An understanding of the criteria for evaluation and classification of significance of impacts.
- An ability to understand and communicate to the Project Design Team how archaeological issues may affect the preconstruction and construction phases and programme of a proposed road development.
- A capability to produce accurate, focused and comprehensive research findings.

With respect to 'Statutory Consultees', the NRA guidelines state:

Consultees in the EIA process include authorities or agencies with statutory responsibilities for the protection of archaeological heritage, including the collection and provision of data





and information, and those who should be informed of the heritage aspects of the proposed road development. For archaeological heritage the Statutory Consultees are:

- The relevant Planning Authority [1]
- Department of Arts, Heritage and the Gaeltacht (National Monuments Section) [1]
- The Heritage Council [1]
- An Taisce [1]
- Fáilte Ireland [1]
- The Arts Council (An Chomhairle Ealaíon)

### Section 3: Potential violations of the National Monuments Act 2004

Prohibition of injury to national monuments, etc.

14.—(1) In respect of a national monument of which the Minister or a local authority are the owners or the guardians or in respect of which a preservation order is in force, it shall not be lawful for any person to do any of the following things in relation to such national monument:

(a) to demolish or remove it wholly or in part or to disfigure, deface, alter, or in any manner injure or interfere with it, or

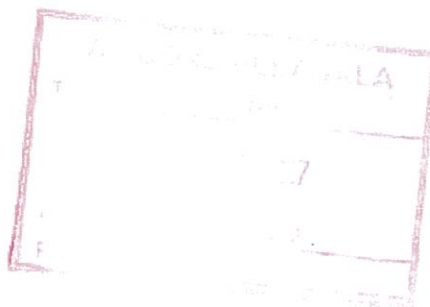
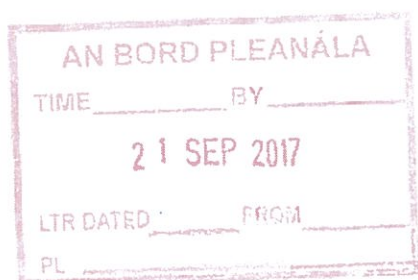
(b) to excavate, dig, plough or otherwise disturb the ground within, around, or in proximity to it, or... without the consent referred to in subsection (2) of this section or otherwise than in accordance with such consent.

(2) (a) In respect of a national monument to which subsection (1) relates and at the discretion of the Minister, the Minister may grant consent in writing to the doing to such monument of one or more of the matters specified in paragraphs (a) to (d) of subsection (1) of this section (in this subsection referred to as the 'carrying out of works').

(c) A consent granted under paragraph (a) of this subsection to the carrying out of works shall be subject to such conditions and restrictions as the Minister may determine and specify in the consent.

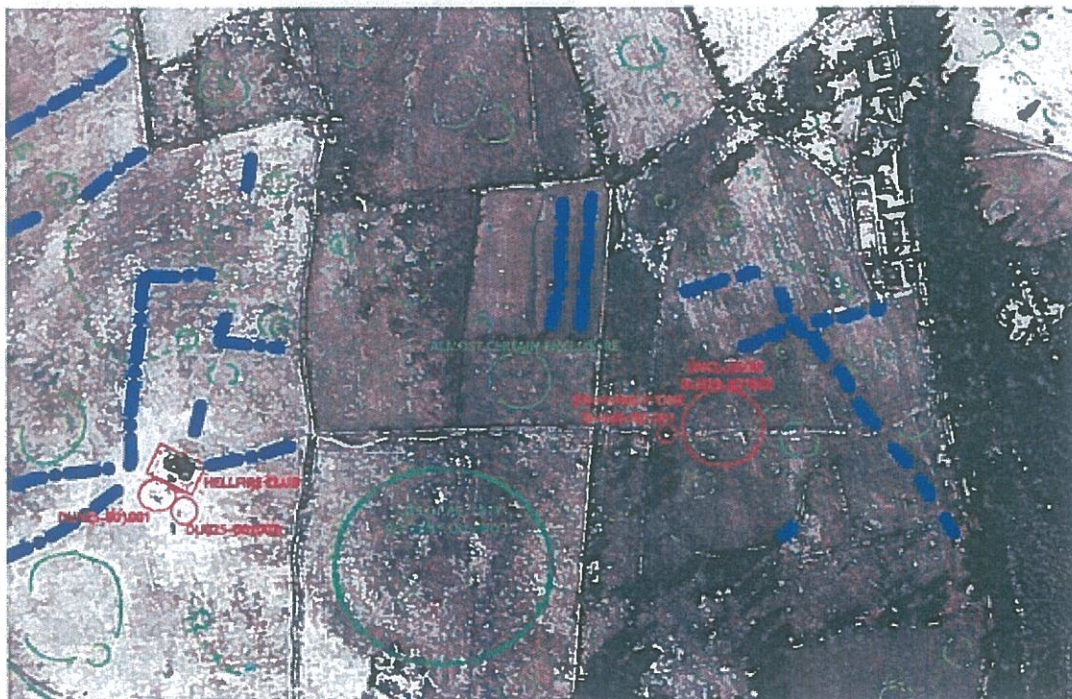
(5) A person who contravenes subsection (1) of this section is guilty of an offence...

In its order, dated May 9, 2017, An Bord Pleanála expressed its concern in regards to the effects the project in question will have on the archaeological landscape of Montpelier Hill. In view of that order, and the NRA Guidelines, one would expect that a comprehensive research



study of both the known and potential monuments would have been undertaken, over an extended period of time, prior to any plans for the Visitor Centre and car park even being drawn up, however, it is painfully obvious that is not the case. While page after page of the EIA describes the known monuments, the folklore surrounding them; all of which was no doubt simply culled from hundreds of sources on the internet, and comparisons to other sites in Ireland, only one (1) page discusses the potential impact on the site, and the remedial measures to be taken to protect it.

The EIA states, "the project is geared towards protecting the site...". However, none of the twenty-four hectares of land that the proposed project will encompass, has been field inspected, aerially photographed, with the exception of one c. 1950s, geophysically surveyed; save for the two tombs atop the hill and their immediate environs, nor any test trenches dug in the areas of the potential sites (green) identified by Neil Jackman. (see Vol. 1, p. 211)





2017. While not conclusive evidence, it is sufficient enough to have warranted further investigation, ahead of the SDCC submitting its plans to this board.



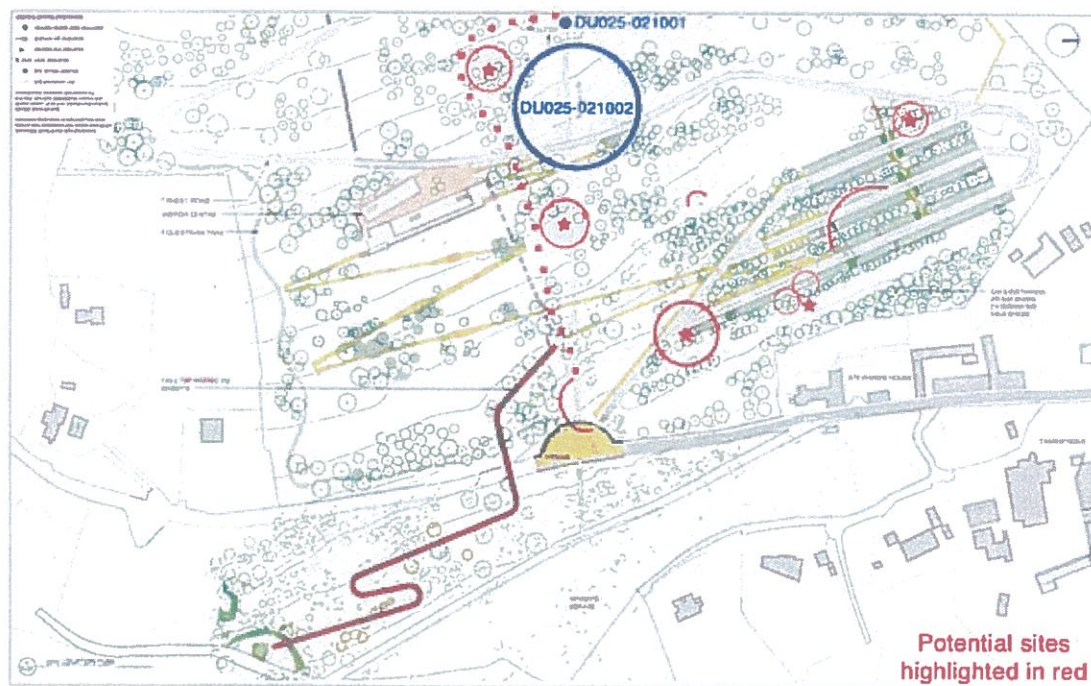
Aerial showing 'ancient pathway' & the two potential sites

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In stark contrast to the proposed Dublin Mountains Project, the entire route of the M3 Motorway was field inspected, aerial photographed, geo-physically surveyed, and where necessary excavated, as in the case of the Lismullin Henge, prior to approval of the Minister, and more importantly prior to beginning construction, as the minister of the DoAHG, now known as the DoCHG, could have at any point issued a preservation order, pursuant to Section 8 of the National Monuments Act, 1930, which states:

8.—(1) Where it appears to the Minister, on a report made by the Advisory Council or otherwise, that a monument which in his opinion is a national monument is in danger of being or is actually being destroyed, injured, or removed, or is falling into decay through neglect, the Minister may by order (in this Act referred to as a preservation order) entrust the preservation of such monument to the Commissioners”.

It should be noted that this author filed five (5) 'Monument Report Forms' with the minister of the DoCHG and the National Monuments Service on August 31, 2017, regarding the 'potential sites' that appear to be in the most imminent danger of being destroyed. (copies available upon request)



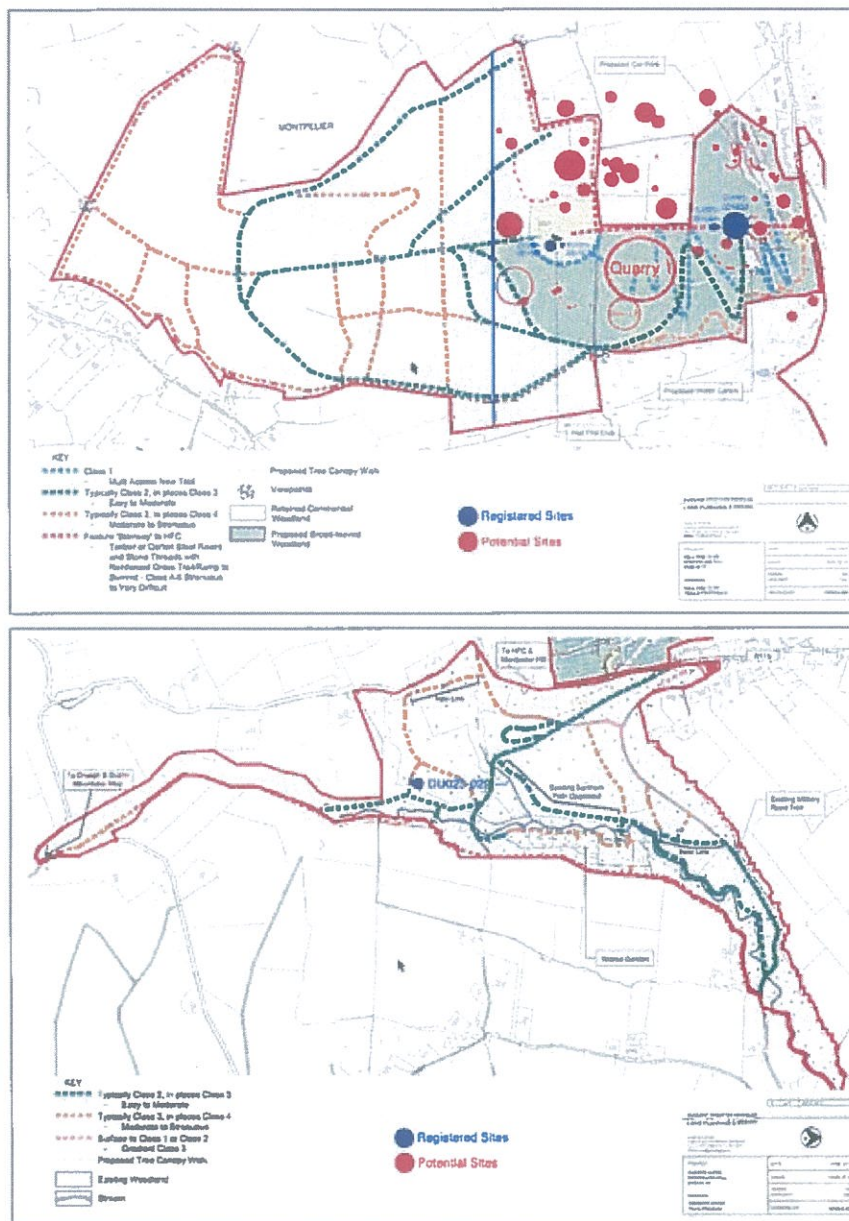
Plan showing the five (5) sites reported to the DoCHG & NMS

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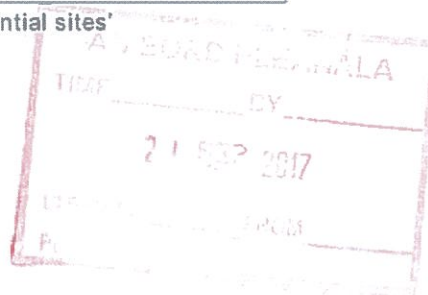
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Projecting the 'potential sites' onto the plan of the project, it is quite obvious the Visitor Centre and car park will further damage those sites, and in some cases completely erase them from the landscape. It should be noted that none of the area to the left of the blue line, nor the Massy's Woods section, as seen in the plans below, has ever been aerial photographed, so it is unknown at this point just how many additional 'potential sites' exist within those areas.

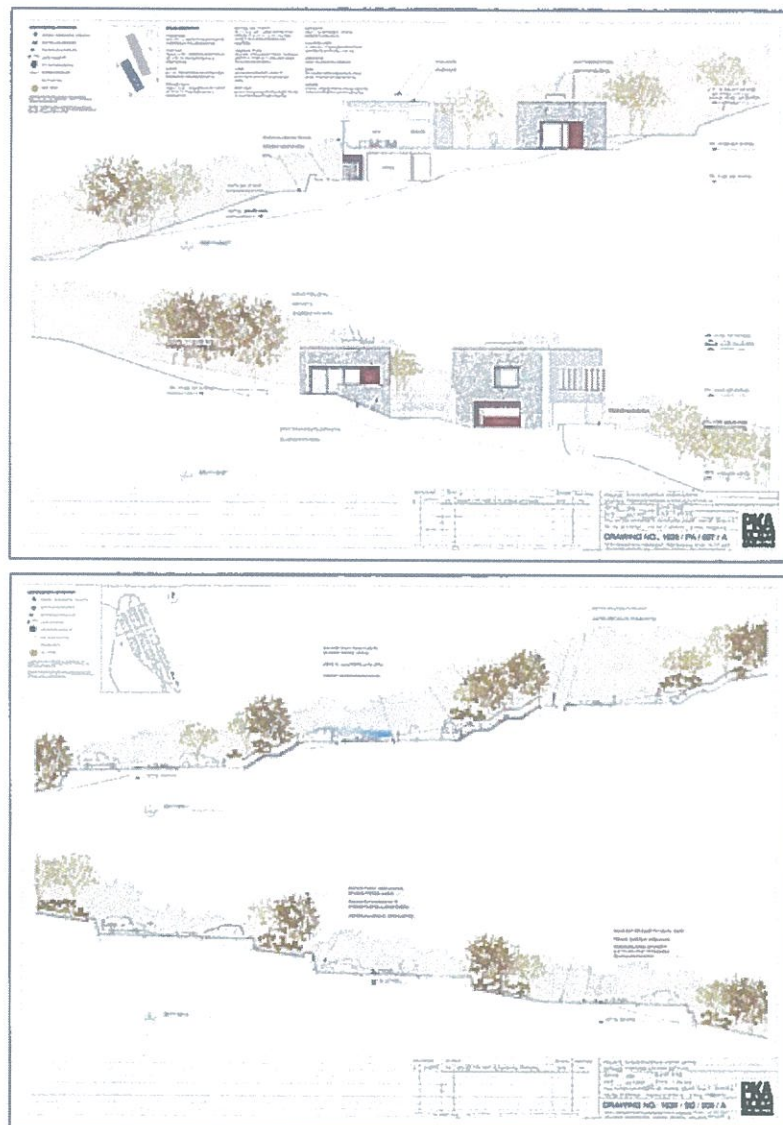


Plans showing location of 'potential sites'

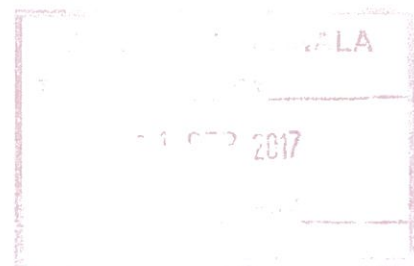


With regards to the known and potential sites on the eastern slope of the hill, the EIA (Vol. 1, p. 219) states:

"Levelling works associated with the proposed centre, car park, and access road, are to be undertaken to meet a safe gradient will involve excavation as will the laying of services. The proposed centre, car park and the access road into the site are located in areas where there may be archaeological features which may be directly impacted during the construction phase through levelling works or laying services".



Elevation plans of Visitor Centre & car park





The EIA (Vol. 1, p. 219) also states:

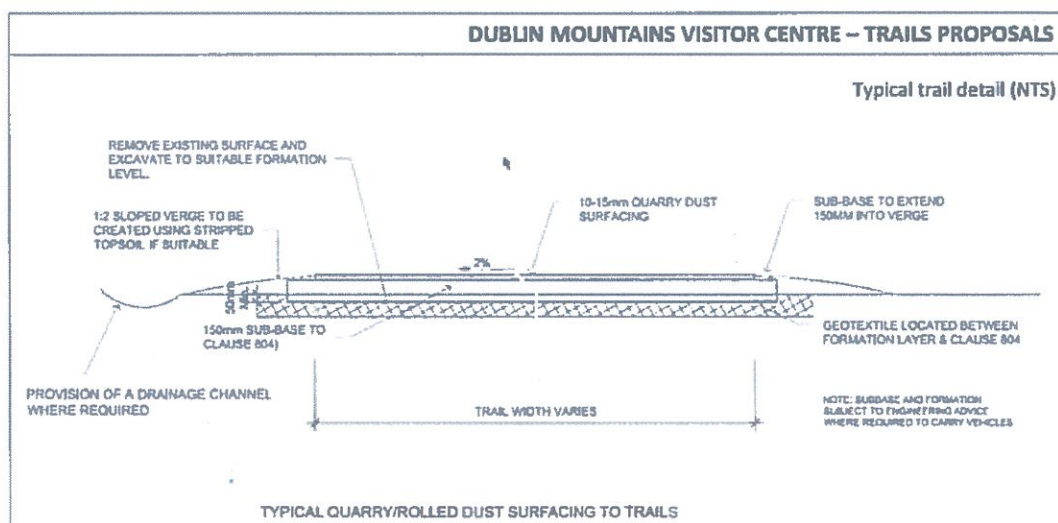
"The existing trails up to the Hell Fire Club traverse the enclosure (DU025-021002) and pass the Standing Stone (DU025-021001). The proposed landscaping on the slopes Montpelier Hill and the upgrade or laying of trail paths may impact on known and potential archaeological features during the construction".

"The removal of and replacement of trees also has the potential to disturb underlying archaeological features".

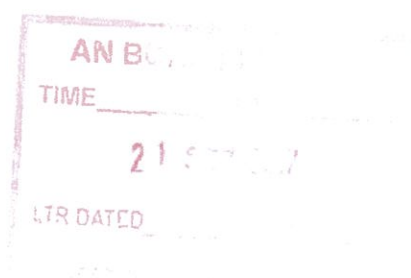
"Upgraded to services during the operational phase where they necessitate excavation will also potentially impact on underlying archaeological features".

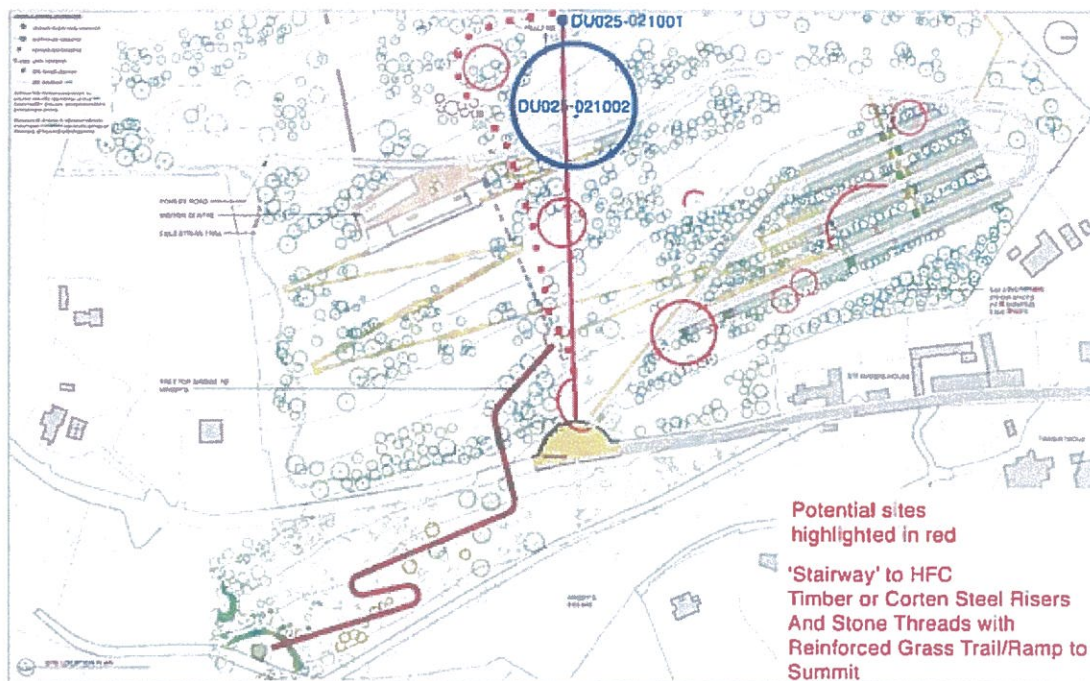
In view of the "leveling works" necessary to "meet a safe gradient", as well as the removal of trees and laying of the paths, to state construction 'may' or 'potentially' have an impact on the sites, is an understatement.

As for the numerous trails to be constructed, those too are going to involve the removal of earth, at a minimum 50mm. In the case of the trails that "traverse the enclosure (DU025-021002) and pass the Standing Stone (DU025-021001)", that is going to mean digging trenches to lay the Corten Steel Risers. That being said, it is going to require teams of archaeologists to be present every step of the way, to insure that no 'potential sites' are being disturbed, which gets back to Section 14 (a) & (b) of the National Monuments Act, 2004.



Cross-section plan of trails





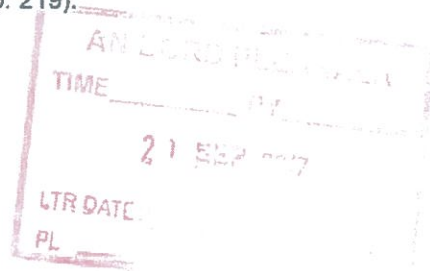
Plan showing trail to the Hell Fire Club

At two points in Vol. 1, the EIA discusses an "initial reparation programme".

"An initial reparation programme is proposed, and thereafter regular monitoring of the effects of increased use of the site on these features, with mitigation measures to be put in place if necessary. These resources are predicted to be better managed (and in better condition) as a result of the development over time". (Vol. 1, pp. xxiv & 219)

Ignoring for the moment that no "reparation programme" is outlined in the EIA, it goes on to state:

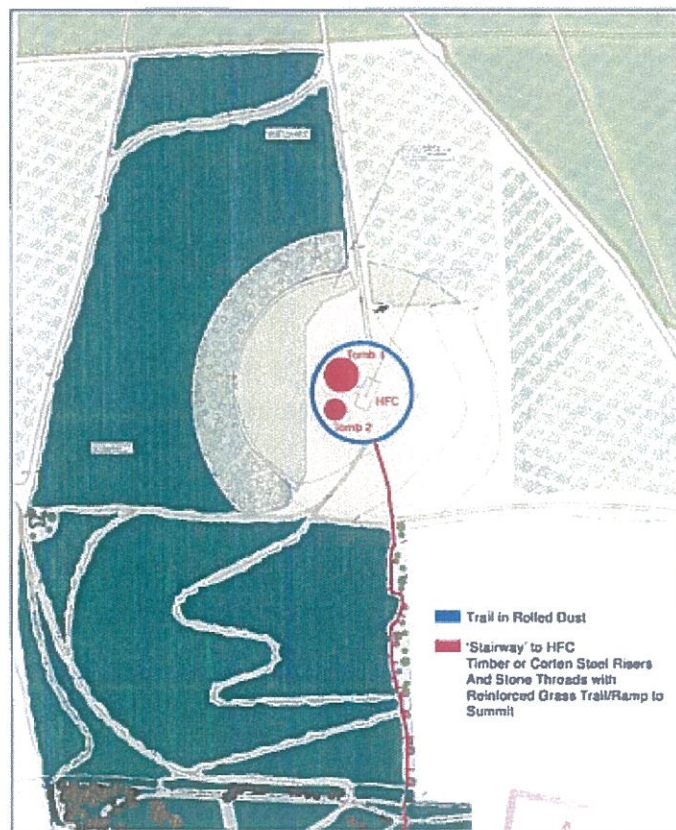
"As with the architectural heritage on site a minimal intervention approach has been adopted in relation to the archaeology on site. It is not proposed to restore any of the monuments. However where archaeological features or potential archaeological features are likely to be impacted archaeological monitoring and test excavations will be carried out by a licenced archaeologist, subject to the requisite ministerial consent and permissions, particularly in the areas of the proposed car park, visitor's centre and where service runs and trails are to be routed before or during the construction phase" (Vol. 1, p. 219).





Either the foregoing is an oversight, or the individual who prepared the archaeology section of the EIA, does not know the meaning of the word 'reparation', i.e., 'repair' or 'restore'. As for any monitoring of the 'potential sites' that will be impacted, given the leveling works etc., there will in some cases be little if anything left to monitor.

With regards to the proposed walkway around the Hell Fire Club itself, and the adjoining tombs, the outer limits of the tombs is unknown, which gets back to Section 14(b) of the NMA, 2004, as cited earlier. "The proposed circular walk and signage around the Hell Fire Club and passage tombs forms part of the interpretation of the site. The circular walk though located close to the southern our south-eastern perimeters of the passage tombs (DU025-001001 and DU025-001002) has been designed and set back from the monuments so that it will not directly impact on the underlying archaeology. Test excavations in the area in 2015 did not reveal archaeological features but the possibility of archaeological features being impacted during the construction phase should not be ruled out" (Vol. 1, p. 219).



Plan showing walkway around the Hell Fire Club



#### Section 4: Additional potential violations of the National Monuments Act 2004

The EIA, on seven (7) occasions discusses the "widening of the R115" (Vol. 1, pp. xxv, 36, 261-263, 291 & 304). Even though the widening is limited to 1.2m of approx. 1.5km of roadway, given the sensitive archaeological nature of the site, the Department of Culture, Heritage and the Gaeltacht (National Monuments Section) as well as the Department of Transport, Tourism and Sport, by law should have been engaged in the preparation of the EIA.

In the EIA, (Vol. 1, p. 36) Section 3.11, Modifications to R115 and R113, it states with respect to 'road development':

It is proposed to modify the roads connecting the site to the South Dublin urban area. The proposals affect the following sections of road:

- the R115 Stocking Lane between its junction with Stocking Avenue and its junction with the R113 Mount Venus Road; [15]
- the R113 Mount Venus Road between its junction with Stocking Avenue and the R115 Stocking Lane/Killakee Road; [16]
- the R115 Killakee Road between its junction with the R113 Mount Venus Road and the Hell Fire site entrance. These stretches of road in combination constitute the direct road connections between the site and the South Dublin urban area. The proposed modifications to the roads include: [17]
  - a) the provision of a footpath on one side of the road, of 1.5m width or wider (depending on the distance between the adjacent property boundaries) separated from the carriageway by a kerb; [18]
  - b) the provision of an advisory cycle lane on one side of the road (generally the opposite side to the footpath), of 1.5m width, indicated by road markings on the carriageway; [19]
  - c) The provision of two-way carriageway of 5-6m width for the majority of the road, and the provision of single lane carriageway for one stretch of c. 90m where a single lane traffic shuttle would operate governed by yield signs at each end.

That being the case, with regards to the Environmental Impact Statement (EIS) and Environmental Impact Assessment (EIA):





EIS 50.—(1) (a) A road authority shall prepare a statement of the likely effects on the environment (hereinafter referred to as an “environmental impact statement”) of any proposed road development consisting of:

- (iii) any prescribed type of proposed road development consisting of the construction of a proposed public road or the improvement of an existing public road.

EIA 51.—(1) A proposed road development shall not be carried out unless the Minister has approved it or approved it with modifications.

(2) A road authority shall apply to the Minister for the approval referred to in subsection (1) in relation to a proposed road development and shall submit to the Minister the environmental impact statement prepared in respect of such development.

Supplementary provisions to Section 14 and road development.

14A.—(1) The consent of the Minister under section 14 of this Act and any further consent or licence under any other provision of the National Monuments Acts 1930 to 2004 shall not be required where the works involved are connected with an approved road development.

(2) Any works of an archaeological nature that are carried out in respect of an approved road development shall be carried out in accordance with the directions of the Minister, which directions shall be issued following consultation by the Minister with the Director of the National Museum of Ireland.

(3) Subsection (4) applies where, in respect of a national monument—

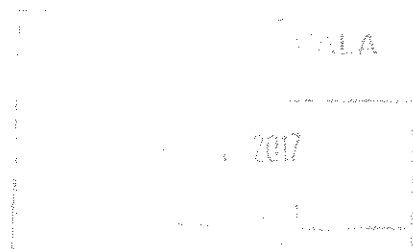
(a) it is discovered during the carrying out of a road development to which subsection (1) of this section applies, and

(b) neither the approval under section 51 of the Roads Act 1993 nor the environmental impact statement to which the approval relates deal with it.

(4) Where a national monument has been discovered to which subsection (3) of this section relates, then—

(a) the road authority carrying out the road development shall report the discovery to the Minister,

(b) subject to subsection (7) of this section, and pending any directions by the Minister under paragraph (d) of this subsection, no works which would interfere with the monument shall be



carried out, except works urgently required to secure its preservation carried out in accordance with such measures as may be specified by the Minister,

(c) the consent of the Minister under section 14 of this Act and

(i) any further consent under any other provision of the National Monuments Acts 1930 to 2004, or

(ii) a licence under any provision of the National Monuments Acts 1930 to 2004 other than a licence under section 25 (as amended by the National Monuments (Amendment) Act 1994 ), is not required,

(d) the Minister may, at his discretion, issue directions to the road authority concerned for the doing to such monument of one or more of the following matters:

(i) preserve it;

(ii) renovate or restore it;

(iii) excavate, dig, plough or otherwise disturb the ground within, around, or in proximity to it;

(iv) make a record of it;

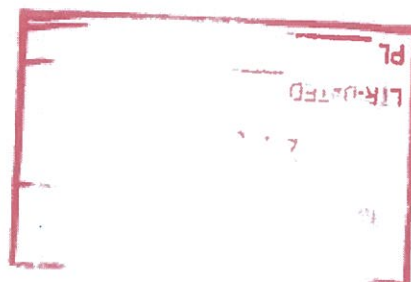
(v) demolish or remove it wholly or in part or to disfigure, deface, alter, or in any manner injure or interfere with it,

and the road authority shall, except where section 14B(8)(a) (iii) of this Act applies, comply with such directions.

The EIA (Vol. 1, p. xiii) states under the heading 'The Do Nothing Scenario':

"If the proposed development is not granted planning permission, the current use of the site will continue in the absence of a formal management regime". "The archaeological and architectural heritage assets of the site will not be routinely monitored, protected, managed and repaired where needed".

Given the overriding argument as to the historical significance of the site, the foregoing comments clearly demonstrate an indifference on the part of the SDCC with respect to the archaeological heritage of the site.





In view of the National Monuments Act, 2004, absent written consent from the Minister, it is beyond the purview of An Bord Pleanála to decide to grant, or grant, permission for the Dublin Mountains Project.

#### Section 5: Potential violations of the European Convention on the Protection of the Archaeological Heritage

The foregoing potential violations aside, there is the following:

##### Article 4

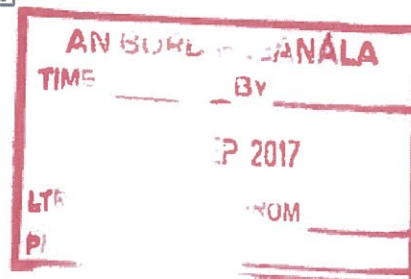
Each Party undertakes to implement measures for the physical protection of the archaeological heritage, making provision, as circumstances demand:

- i) for the acquisition or protection by other appropriate means by the authorities of areas intended to constitute archaeological reserves; [19]
- ii) for the conservation and maintenance of the archaeological heritage, preferably in situ; [20]

##### Article 5

Each Party undertakes:

- i) to seek to reconcile and combine the respective requirements of archaeology and development plans by ensuring that archaeologists participate:
  - a) in planning policies designed to ensure well-balanced strategies for the protection, conservation and enhancement of sites of archaeological interest; [21]
  - b) in the various stages of development schemes; [22]
- ii) to ensure that archaeologists, town and regional planners systematically consult one another in order to permit: [23]
  - a) the modification of development plans likely to have adverse effects on the archaeological heritage
  - b) the allocation of sufficient time and resources for an appropriate scientific study to be made of the site and for its findings to be published
- iii) to ensure that environmental impact assessments and the resulting decisions involve full consideration of archaeological sites and their settings; [24]



iv) to make provision, when elements of the archaeological heritage have been found during development work, for their conservation in situ when feasible; [13]

v) to ensure that the opening of archaeological sites to the public, especially any structural arrangements necessary for the reception of large numbers of visitors, does not adversely affect the archaeological and scientific character of such sites and their surroundings. [14]

## Section 6: Potential violations of the Convention for the Protection of the Architectural Heritage of Europe

### Identification of properties to be protected

#### Article 2

For the purpose of precise identification of the monuments, groups of buildings and sites to be protected, each Party undertakes to maintain inventories and in the event of threats to the properties concerned, to prepare appropriate documentation at the earliest opportunity.

Given the fact that the DCHG has not been afforded the opportunity to field inspect, aerially photograph, geophysically survey or excavate any of the twenty-four (24) hectares the project will encompass, to approve the project would be a violation of the Convention.

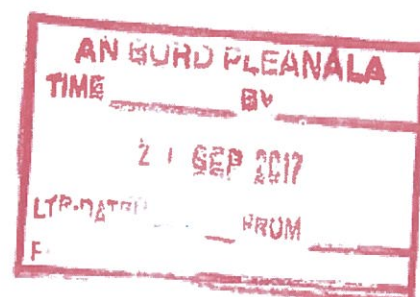
### Statutory protection procedures

#### Article 3) Each Party undertakes:

- 1) to take statutory measures to protect the architectural heritage; [15]
- 2) within the framework of such measures and by means specific to each State or region, to make provision for the protection of monuments, groups of buildings and sites.

#### Article 4) Each Party undertakes: [16]

- 1) to implement appropriate supervision and authorisation procedures as required by the legal protection of the properties in question; [17]
- 2 to prevent the disfigurement, dilapidation or demolition of protected properties. To this end, each Party undertakes to introduce, if it has not already done so, legislation which:
- requires the submission to a competent authority of any scheme for the demolition or alteration of monuments which are already protected, or in respect of which protection proceedings have been instituted, as well as any scheme affecting their surroundings; [18]





Article 5) Each Party undertakes:

- to prohibit the removal, in whole or in part, of any protected monument, except where the material safeguarding of such monuments makes removal imperative. In these circumstances the competent authority shall take the necessary precautions for its dismantling, transfer and reinstatement at a suitable location.

#### Section 7: Final excavation report not included in the EIA

Throughout the EIA, the two ancient sites atop Montpelier Hill are repeatedly referred to as being 'passage tombs'. However, as the 'Final Report' from the October 2016 excavation, which is currently under review by archaeologists at University College Dublin, that argument is nothing more than speculation, based on folklore and the misinterpretation of the word 'cairn'. Absent the 'Final Report', one cannot properly address that aspect of the EIA.

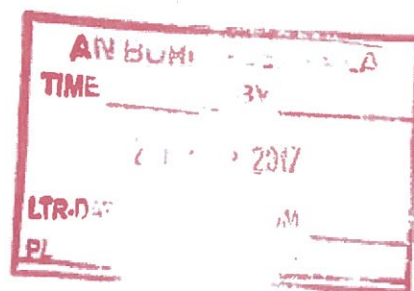
Based on both the circumstantial and physical evidence, discussed at length in this author's paper, 'The Purported Passage Tombs on Montpelier Hill, South County Dublin, Ireland', the two sites are simply common ring-barrows which, based on the stratigraphy of the remaining sections of the tombs, can be restored.

[https://www.academia.edu/32228477/The\\_Purported\\_Passage\\_Tombs\\_on\\_Montpelier\\_Hill\\_South\\_County\\_Dublin\\_Ireland](https://www.academia.edu/32228477/The_Purported_Passage_Tombs_on_Montpelier_Hill_South_County_Dublin_Ireland)

#### Section 8: Overstatements of the facts in the EIA

According to the EIA, "A preliminary program prepared by Paul Keogh Architects identified six National Monuments within Coillte's Massy's Wood, and Hell Fire Club land holdings which are protected under the National Monuments Acts 1930-2004 and which are included in the Sites and Monuments Record (SMR)" (Vol. 1, p. 195).

In the list of 'National Monuments in State Care: Ownership & Guardianship', dated March 4, 2009, none of the six (6) monuments discussed in the EIA are listed as 'National Monuments'. While the amendment of section 14 of the Irish Land Act, 1903, does state "the expression "ancient monument" shall have the same meaning as the expression "national monument" has in this Act", that does not confer upon a site 'National Monument' status.



Part 1, Section 2, of the National Monuments Act 1930 states:

"the expression "national monument" means a monument or the remains of a monument the preservation of which is a matter of national importance by reason of the historical, architectural, traditional, artistic, or archaeological interest attaching thereto and also includes (but not so as to limit, extend or otherwise influence the construction of the foregoing general definition) every monument in Saorstát Eireann to which the Ancient Monuments Protection Act, 1882, applied immediately before the passing of this Act, and the said expression shall be construed as including, in addition to the monument itself, the site of the monument and the means of access thereto and also such portion of land adjoining such site as may be required to fence, cover in, or otherwise preserve from injury the monument or to preserve the amenities thereof..."

Whether the label 'National Monument' was merely a misinterpretation of the facts by Paul Keogh Architects or the individual who prepared the EIA, it gets to the issue discussed earlier regarding 'qualified' consultants. Though this error may seem innocuous, given that the EIA argues the site is of a similar level of importance to say that of the Boyne WHS, it could be viewed as an intentional overstatement of the facts, as there is no evidence whatsoever to support such a speculation.

"The distribution of megalithic tombs suggests a strong similarity with other well-known complexes such as those at Brú na Boinne in the Boyne Valley, county Meath and Carrowkeel and Keshcorran in Sligo, which are of international significance" (Vol. 1, p. xix).

"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" (Vol. 1, p. 200)

"The site has strong similarities with archaeological sites such as the megalithic cemeteries in the Boyne Valley and Carrowkeel, Keshcorran and Knocknarea in Sligo..." (Vol. 1, p. 219).





In the case of the Bend of the Boyne World Heritage Site and the Hill of Tara, which are surrounded in myths and legends, there are countless references in the ancient texts. In the Rennes and Metrical Dindshenchas for example, numerous pages describe, in detail, the monuments that existed at Tara, to whom they belonged and their location on the hill.

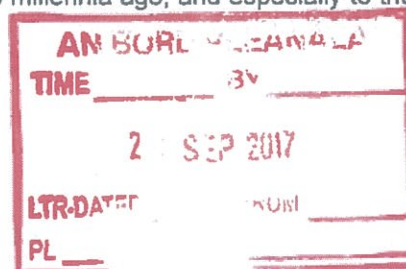
In stark contrast, there are only a few minor references to the area of South Dublin County in the 'Onomasticon Goedelicum: An Index to Irish Names of Places and Tribes' (Hogan, 1910). According to O'Foghludha, "Ui Cheallaigh, meaning O'Kelly's Fair Territory, [was] a widespread division covering the present Terenure, Templeogue, Rathronan, Tymon, Tallaght, Brittas, Kilsanctan, Cunard, Castle Kelly (S. of the Waterworks), Kelly's Glen (at Tibradden), O'Kelly's Seat or Look-out, now nicknamed Mount Pelier, as well as dozens of other places throughout the present Co. Dublin. The name Suidi Celi is found in the Crede Mihi of the XII century, representing Suidhe Ui Cheallaigh, so O'Kelly's Finure was, 750 years ago, a well-known territory...".

In short, the only similarity between the Montpelier site and the Boyne, Tara etc., is that it is an ancient cemetery, of which thousands like it dot the Irish landscape. To argue otherwise, as it is in the EIA, is absurd in view of the fact that only .0275% of the 24 hectares (240,000 sq. meters) has ever been excavated (66 sq. meters), approx. 25% geophysically surveyed and approx. 33% aerially photographed.

#### Section 9: Scope of project

Taking into consideration that the ancient monuments on Montpelier Hill are not 'national monuments' in the capital sense, the two tombs atop the hill not passage tombs, and the site not remotely on par with the Boyne or Tara, the vast scale of the project is not warranted, especially given the minor stature of the site.

In the case of the Boyne World Heritage Site, which encompasses 780 hectares, and comprised of over ninety (90) known monuments; most notably the massive passage tombs of Knowth, Newgrange and Dowth, the Visitor Centre is located off-site, on the opposite side of the River Boyne, and was designed to blend in as much as possible with surrounding landscape. The proposed Dublin Mountains Project, on the other hand, amounts to a Disneyfication of the site, and is an insult to those who constructed the monuments millennia ago, and especially to those whose remains they enshrine.



The EIA (Vol. 1, p. 219) states, "There are an estimated 100,000 visitors to the site annually. It is estimated that the proposed development will bring 225,000 visitors, possibly increasing to 300,000 over ten years". To put this in perspective, for the years 2014 and 2015, Fáilte Ireland reported that the Boyne and Tara, both of which are 'National Monuments'; the Boyne also being a World Heritage Site, with both being renowned worldwide, had 150,000 visitors each per year, 300,000 per year collectively. In the case of the Dublin Mountains Project, that amounts to 821 visitors per day. Factoring in the weather, and the fluctuation in tourism during the course of the year, it is more likely that it would mean the average number of visitors per day would have to be approx. 1,500, which is to say the least unrealistic.

#### Conclusion

Assuming for the purposes of argument that this board has the right to "decide to grant, or grant, planning permission", based on the potential violations of both Ireland's Statutes and European Conventions, as well as the incalculable and irreparable damage this project would have on the natural and built environment, the 'Dublin Mountains Project' should be rejected.

Respectfully,

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