Kieran Somers,
Executive Officer, An Bord Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902.

September 12th 2018

Ref. 1639/LTR/009

Re: Dublin Mountains Visitor Centre and all associated works in the Townlands of Mountpelier, Killakee and Jamestown in South Dublin, reference: **06S.JA0040.**

Dear Kieran,

We refer to your initial letter of 7th February seeking further bird surveys to enable the Board to carry out a screening for Appropriate Assessment and clarity on clear felling and your subsequent letter of 7th March 2018 indicating that we had until 30th September to do so.

PAUL KEOGH ARCHITECTS

ARCHITECTURE
INTERIORS
URBAN DESIGN

CATHEDRAL COURT
NEW STREET
DUBLIN 8

T: +353 (0)1 679 1551
F: +353 (0)1 679 3476

45 WYLE COP
SHREWSBURY
SY1 1XJ

T: +44 (0)1 743 245040
F: +44 (0)1 743 343740

PAUL KEOGH
B ARCH MA RCA RIBA FRIAI

RACHAEL CHIDLOW
BA MA RCA MIDI

PATRICK GILSENAN
B ARCH BSC MRIAI

E: INFO@PKA.IE
W: WWW.PKA.IE

Bird survey

In your letter of 7th February you point out that a bird survey is required to be carried out with particular reference to the birds that are features of interest in the Wicklow Mountains Special Protection Area (SPA) (site code 004040).

The Board has determined that bird surveys should be undertaken to prove beyond reasonable scientific doubt that the proposed development would not lead to likely significant effects on the Qualifying Interests of the Wicklow Mountains SPA. The attached bird survey and report undertaken by Roughan O'Donovan (ROD) indicates that the Wicklow Mountains SPA is designated for two species namely Peregrine Falcon and Merlin. The purpose of the attached survey was to confirm if Merlin and/or Peregrine Falcon are breeding within the site of the proposed development and to ascertain what impacts, if any, the proposed development would have on these potential populations within the SPA.

Section 1.1 of the ROD report indicates that Peregrine Falcon nests on coastal and inland cliffs. These habitats do not occur within 500m of the application site and therefore the chances of this species breeding were very low and this is recognised in the attached report (although a Peregrine Falcon as observed flying across the application site). The focus of the ROD survey therefore was on Merlin.

No Merlin were recorded during the 2018 breeding season. The surveys found no evidence of Merlin breeding on Montpelier Hill, the site of the proposed Dublin Visitor

Centre. This conclusion has been reached on the basis that no confirmed Merlin plucking posts or suitable nests were identified during the walkover surveys and no Merlin were recorded during the vantage point surveys. A range of other species was present on site which could have triggered a mobbing response from Merlin but did not. The surveys conclude that Merlin do not breed within the site of the proposed Dublin Mountains Visitor Centre.

Four other species of raptor were recorded during surveys. These species are relatively widespread and common in Ireland, even in suburban and urban areas and there was no evidence of these species breeding within the site.

The Site Synopsis for the Wicklow Mountains SPA notes two other species of interest at the Site, although not Qualifying Interests. These are Ring Ouzel (Turdus torquatus) and Red Grouse (Lagopus lagopus scoticus). Neither of these species were recorded and would not have been expected in the area due to their breeding habitats of scree slopes and extensive areas of heather such as blanket bog. These two species are referred to by the Department of Culture, Heritage and the Gaeltacht (The National Parks and Wildlife Service) in their most recent submission of January this year on FI submitted by the applicant.

Clear felling

The Board's letter of 7th February 2018 also requests clarity on the extent of clear felling proposed and requires an assessment of ecological impact where this is envisaged particularly in regard to the likely impact on red squirrel as expressed in the most recent submission by the Department of Culture, Heritage and the Gaeltacht (The National Parks and Wildlife Service).

Under the Forestry Act 2014 – a tree felling licence will be required for tree removal as part of the project. This may relate to individual trees, areas of trees and/or exemptions as provided for by the Act. A Felling Licence Application has not been prepared at this early stage in the project.

Clear felling and potential impact on Red Squirrels

The implications of the development on Red Squirrels has been addressed by the EIAR and the Red Squirrel Management Plan. Nonetheless the Department of Culture, Heritage and the Gaeltacht states the need to avoid any impact on the Red Squirrels – short, medium and long term. The following summarises the challenge:

1. The habitat of Red Squirrel is both Coniferous and Broadleaved Woodland.
2. Where Red Squirrels compete with non-native Grey Squirrels, Coniferous Woodland is not attractive to Grey Squirrels thus giving Red Squirrels a

competitive advantage in a Coniferous Woodland.

3. No Grey Squirrels have been identified in Hell Fire Wood although they are likely to coexist with Red Squirrels in the adjacent Masseys Wood.
4. The impact on the Red Squirrel habitat at Hell Fire Wood is potentially arising from two proposals:
    a) The removal of mixed coniferous woodland to accommodate the proposed parking area as this could potentially sever tree cover habitat links between the rest of Montpelier Hill and Masseys Wood and
    b) The long-term management plan to convert forest areas the north and east facing slopes of Montpelier Hill from almost entirely coniferous crop species to permanent predominantly native broadleaved woodland with its higher overall biodiversity and landscape value, thus potentially favouring competition from the Grey Squirrel.

Clear felling of conifers is the normal form of harvesting areas of mature plantation forestry and this has recently occurred west of and above the existing forest road. Over time the conifers on the entire site will be clear-felled at some point with consequential and sudden impacts on the Red Squirrel population. The current proposals, which aim to maintain continuous cover forest (CCF) long term, are less severe than such clear fell operations.

The site masterplan requires the over-mature plantation west of the existing carpark to be felled to allow for new car parking spaces. These trees have been left in place long past normal harvesting time for amenity purposes and, as the arboriculture and forestry reports indicate, are now at risk of wind throw – which is already happening. The nature of plantation forestry as it was planted in the 1940/50/60s is that it reaches an optimum point for harvesting and beyond that, cannot remain standing indefinitely. It becomes over-mature and is exposed to wind-throw risk, which if ignored, results in full failure (catastrophic wind-throw) of the crop in high-winds. The decision to locate the carpark here is partly influenced by this requirement and ease of access adjacent the site entrance. In other words, irrespective of the proposals in this project some interventions and clearance here would prove inevitable in the short to medium term. However not all of these trees are within the footprint of the carpark and Drawing Number 16508/2/101 proposes for the remaining areas “Selective removal of conifers…. replant 10-15% per annum over 10 years retaining continuous tree cover”.

The landscape strategy sets out a number of long term aims to:

- Enhance the landscape and visitor experience
- Integrate the new site infrastructure

- Implement a long term and sustainable Landscape Management Regime with a focus on amenity, biodiversity and heritage.

The overall landscape management intention is the conversion over time of the north and east slopes of Montpelier to “a new permanent mixed woodland of predominantly native and some naturalised species”.

Whilst the diversification of conifer woodlands would generally be regarded as positive in terms of biodiversity and landscape amenity, the potential negative impact on some species that benefit from conifer plantations needs careful consideration, management, application of mitigation techniques and, where feasible, the adaptation of objectives and proposals to achieve the optimum outcomes.

The Red Squirrel Management Plan prepared by the applicant addresses many actions to support the Red Squirrel and in practice, the control of the grey squirrel numbers is the most effective approach. The landscape proposals are flexible and are designed to allow responses to localised conditions and changing objectives over time within an overall concept. The proposals include for a number of landscape types and species mixes within the new woodland landscape including Historic Beech woods restoration, Oak Woodland, open areas with scrub, coppiced areas as well as retained selected specimen conifer groups and areas of continuous cover forestry. Where some proposals may be more favourable to the Red Squirrel these proposals can be enhanced such as:

- Increasing the proportion of conifers in the new woodland area – Pinus sylvestris (Scots Pine) is included at 10% of tree species, this can be increased and concentrated in corridors to create routes for red squirrels.
- Increase the proportion of Corylus avellana (Hazel), a favourite food of Red Squirrels, currently included at 20% of edge and shrub species.
- Retain conifers that do not need removal to facilitate development or for other immediate reasons, as features and Red Squirrel corridors to avoid habitat severance. See Figure 1 below showing the retention of some of the mixed confer woodland adjacent to but not required for the proposed car-park. Such retention is dependent on the stability of retaining smaller groups of trees which will be more exposed to wind and will require careful monitoring whilst alternate woodland areas develop.

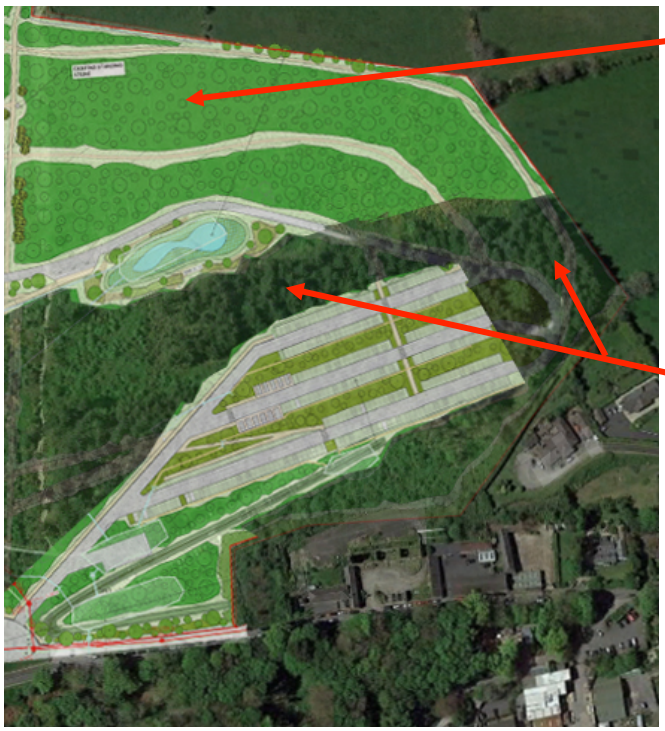

Figure 1; Car park and adjacent woodland

In summary, the existing landscape proposals of mixed broadleaved native woodland will create an ideal habitat for Red Squirrel. Unfortunately, it is also the preferred habitat of the more competitive grey squirrel. Management measures in accordance with the Red Squirrel Conservation Management Plan will deter the grey squirrel in favour of the red squirrel, however site management and planting proposals will also be adjusted to ensure refuges of coniferous areas are retained or created within the overall planting scheme, and where clear-felling is not immediately required for siteworks or safety reasons, existing conifers will be retained to provide some continuity of habitat.

Overall, the scheme aims to reimagine the landscape at Montpelier Hill with amenity and biodiversity core values as part of the offering and experience for visitors. Any specialist management regimes to encourage key native species such as the Red Squirrel and Pine Martin must be seen as part of making the project successful. Landscape development is generally about managing incremental landscape change across the site, this process allows monitoring and also public engagement / participation to maximise the value of such efforts and ensure their success.

Please contact me with any queries.

Yours sincerely,

Paul Keogh FRIAI