

To: An Bord Pleanála

From : Friends of Massy's Wood

AGENT: ELIZABETH DAVIDSON

Coordinator Friends of Massy's Wood

Development : SID Dublin Mountains Visitor Centre

Location Hellfire Club / Montpelier Hill/Massy's Wood

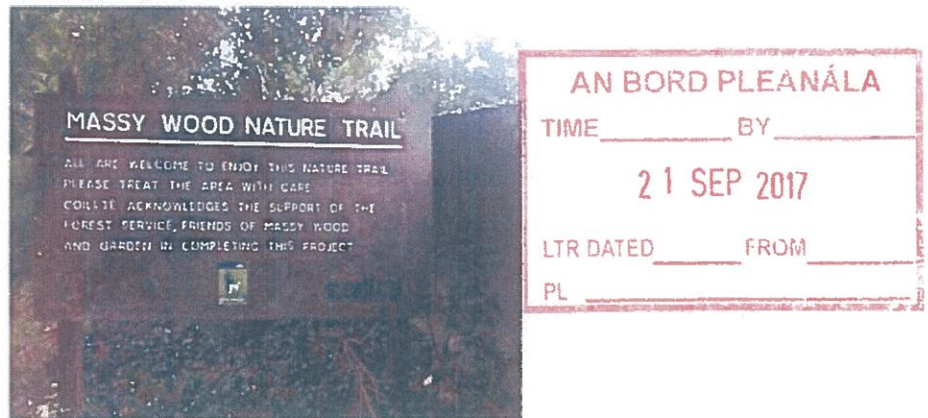
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TIME <u>1pm</u>	BY <u>hand</u>
21 SEP 2017	
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Received: <u>21/09/17</u>	
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Massy's Wood Is a 100 acre Broadleaf Forest , claimed to be unique in an urban setting in Europe, being within the city boundary.

Friends of Massy' s Wood is a community organisation which is been in existence for over 25 years. It is registered with the PPN of South Dublin County Council. (REG NO: SDCPPN 0504)



Our relationship with Coillte has been excellent over this time, witnessed by this sign in Massy's Wood.

The majority of the current users of the woods are single walkers and families with dogs both on and off-lead, who walk in the woods for an hour. Walkers normally access either Massy's Wood or Hellfire Wood but not both.

Our records will show that much of the proposed improvement work to Massy's estate was discussed by us and Coillte many years ago. Proposals for the preservation of the walled gardens, and involvement of the community exist in minutes and documents. The estate has been actively neglected by its owners for some time and is in consequence deteriorating.

This organisation would welcome continued relationship with Coillte in order to safeguard this wonderful wilderness for the future.

Despite a promise to invite this organisation to a stakeholder meeting ( see attached emails) no invitation was issued.

*In relation to the present proposal we have a number of observations and submissions, which have been informed by the Feasibility study, and the plans submitted to An Bord Pleanala on the implications of the proposed development for proper planning and sustainable development in the area concerned and the likely effects of the proposed development on the environment:*

## Zoning

Zoning for Massy's wood is in two areas:

### **HA(LV,DV,DM)**

*To protect and enhance the outstanding natural character and amenity of the Liffey Valley, Dodder Valley and Dublin Mountains areas*

### **RU**

*To protect and improve rural amenity and to provide for the development of agriculture*

yet there is no real distinction made between them , and no discussion of what they mean in the context of Massy's Wood.

- Massy's Wood has been described in the plans as a "working forest" which is misleading, this area has been an amenity forest for over 25 years.

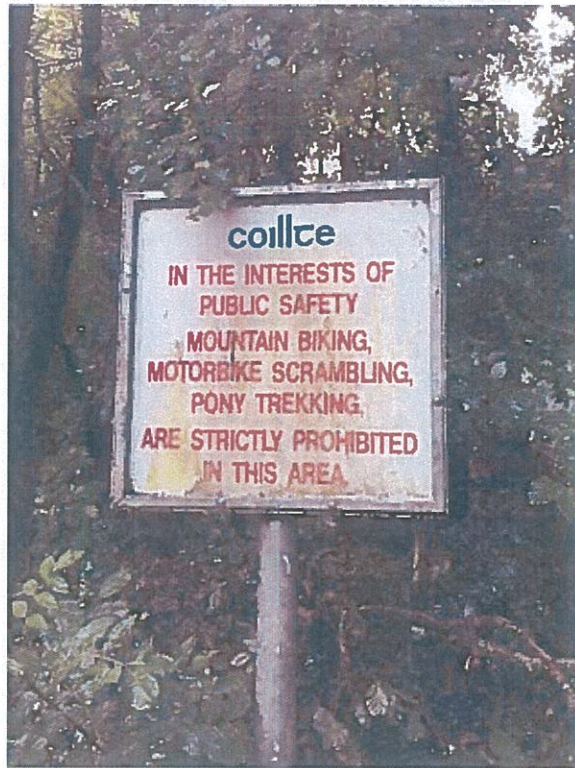
## Ecology/Environment

This lack of understanding can be further illustrated by looking at the following significant elements of the local environment :

- In relation to Equestrian activities, these are currently forbidden in Massy Estate and the Hellfire site: See attached photograph of notice at entrance to Massy Wood from Cruagh Lane. This is acknowledged in the Feasibility study p.87 " no official equestrian trails"



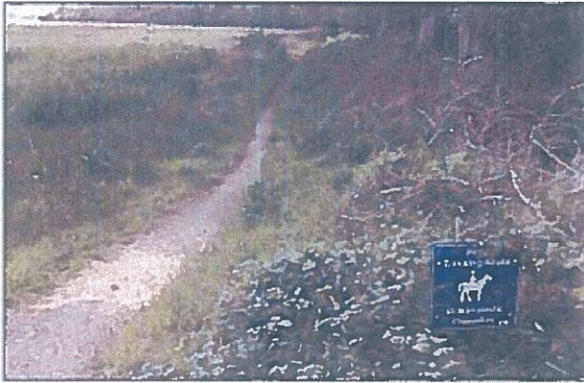




Sign at entrance to Hellfire Car Park

Riders currently accessing the Montpelier Hill and Massy Wood are trespassing and because of this, numbers are extremely low. It is noted that there are individuals with Rights of Way / access to water but these do not confer on them the right to ride horses in the area.

It should be noted that this photograph on P13 of The Architectural Report "existing equestrian routes in Massy's " is not actually from this location and is misleading.



*Existing equestrian routes in Massy's*

If Horse Riding were to be permitted in the woods, as proposed, no assessment has been undertaken of the damage that would be done through increases in numbers, as it would become very attractive to ride on a 5 mile/8 km walk in the mountains.

In the vicinity of the proposed site, as acknowledged, there are five riding establishments or livery stables with horses and ponies whose owners would wish to access the trail. This does not count individually owned horses and ponies in the immediate locality. The community stables at Fettercairn are also within boxing distance and this would be an obvious attraction. There appears to be no consideration given to the damage that these numbers of riders would present.

The perimeter trail indicated in the maps in Massy's Wood is completely unsuitable along the eastern edge bordering farmland as it is narrow and fragile with exposed roots and degraded edges, bordering on drops of up to 20 m.







**The perimeter trail**

The average weight of a horse is up to 1000kg and a pony would be 40 -60% of that on average. Most would have metal shoes, which can tear up ground and damage roots etc. Damage would come from constant use, compacting earth which would degrade especially in poor weather, in addition to large deposits of manure which are unavoidable in the circumstances, which can cause hazardous surfaces and also pollution to watercourses. Horses catching hooves on roots and slipping on exposed wet roots could cause accidents with drastic consequences to both horse and rider

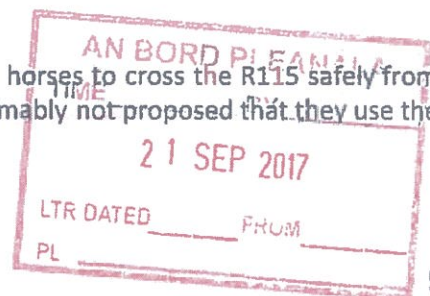
No consideration is given to access of horses and riders to the trails, no facilities considered for horseboxes or lorries in the car park.

It would be inevitable that groups of riders would access the trails together, perhaps as treks from commercial stables, or groups of users, creating a hazard when sharing trails with pedestrians, dogs, buggies and wheelchairs as is indicated in the drawings.

There is no mention of revenue from licensing/permits of horse riding activity in the business plan therefore it is assumed that it is not the intention of the developers to charge for the use of trails.

#### **Roads**

There is no provision given to the needs of riders and horses to cross the R115 safely from Massy Wood to Montpellier and in reverse. It is presumably not proposed that they use the footbridge?



With reference to the road proposals, there has been no consideration of the equestrian traffic which would be attracted to the development and the safety of horses and riders.

Horses, by law, do not use footpaths, and in consequence would be sharing a smaller space on the road with cyclists in both directions and vehicles using a complicated yield system, in addition to frequent shuttle buses and coaches. Horses can be unpredictable in traffic and can cause disruption and delays. Large vehicles, such as buses could be a particular hazard.

For the welfare of horses there would need to be access to water provided, especially in the event of the Glendoo stream being inaccessible, as per proposals, on the Massy Wood site. Ponds on the Hellfire site are unsuitable, and in any case it is proposed to fence them off.

Traffic problems of illegal parking on R115 opposite the entrance to Massy's Wood could be addressed by re-opening the car parking area in the wood accessed further up the hill to the South. This car park was closed some years ago.

The proposed moving of 100 metres of wall on the R115 1.2 metres into Massy's wood will not only cause visible alterations to the appearance of the wall but will inevitably cause root damage to trees along the wall and disturbance to habitats in the area.

#### ENVIRONMENTAL IMPACT

It is stated in the environmental impact statement that the magical quality of the woods should be protected. It is hard to see how this can happen with triple the amount of visitors to be brought to the area.

The introduction of Corten steel with its urban, edgy appearance is at total odds with the soft multilayered sylvan scene. The supports for the tree top canopy bridge are to be set in concrete, this will cause disruption to roots of trees, in addition to the impact of the footfall in a concentrated area. The bridge will also need to be covered with some kind of cage to prevent missiles or humans being projected on to the road. This will detract considerably from any 'wow' factor. None of the illustrations in the plans include such a covering. It is for these reasons that the introduction of a footbridge should not be considered.

It would appear that the screening for the EIA was done in a 'multi disciplinary walkover' on a single day in November 2016, when many species would be hibernating or invisible. As the site comprises 152 hectares, it is difficult to see how this might be adequate for an area in such close proximity to Natura 2000, Wicklow National Park, and SCAs, and for the two named persons conclude in a single day that there would be no impacts on these areas. The project is described here as "small scale" which presumably is an attempt to minimise its importance.

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**There is incoherence between the documents.**

E.g This "walkover saw no badger or otter signs" yet a permit has been applied for to destroy badger setts. Also otter spraint was observed.

The relationship between Pine Martens and the return of the Red Squirrel is vital to the survival of the latter species, yet no acknowledgement is made of this. Both of these mammals exist in Massy's Wood.

The bat survey does not indicate numbers of bats observed or the methodology used in counting or identifying bats.

The birds in the woods are not included despite the proximity to Natura 2000 and SACs

There is no mention of the deer in the woods which would be displaced on to neighbouring farmland and domestic gardens by increased human traffic. Sika Deer are protected under the 1976 Wildlife Act and have not been properly addressed in the EIAR. A baseline survey needs to be conducted to gauge numbers.

The culverting of the R115 to facilitate spill from "Swales and ponds" and piping of same to the Glendoo Brook will cause disturbance and root damage along the path of the pipeline to the Brook and also cause pollution with potential to harm the entire Dodder Catchment Area, as the Glendoo flows into the Owendoher River which in turn flows into the Dodder. The Inland Fisheries department has noted the possible effects on salmonids in the waterway. The quantity of overflow is unknown and could well have a detrimental impact on the flow and depth of the brook which in turn would affect the Biodiversity dependent on the brook. This has not been addressed.

( note that the Brook is also referred to in documentation as Jamestown Stream and Owendoher River)

Page 8 of the engineer's report re water treatment refers to 'apartment buildings' ???

The route of the proposed culvert to the stream is unclear in the submitted documents however from the topography of the site it will have to pass under a section of the Military Road, which is protected. ( see below map from British Library)

The lack of engagement with Dublin City Council, and Dun Laoghaire Rathdown Council in relation to the Dodder Catchment area is noted despite the statement in the SDCC Development Plan 2016-2022 in the Infrastructure and Environment quality objective:

"South Dublin County Council will co-operate with Dublin City Council and Dun Laoghaire Rathdown County Council in the preparation of an Environmental Management Plan for the River Dodder and its environs."

There is no detail of a Woodland Management Plan, no timetable for the 'improvements ' which are proposed, especially in relation to impacts on protected species.

The proposals to grub out the vegetation in the Walled Garden, remove self sown trees , remove ivy etc.etc in addition to the removal of laurel and rhododendron species, and fence





off the stream may sound minimal but will have a devastating impact if undertaken within a short timeframe. The entire nature of the Wood will be affected detrimentally.

There has been serious damage to paths caused by water erosion which has been caused by neglect of water run-off slipways and consequently the paths themselves have become surface drains. There is no specific detail in the application about who will become responsible for general maintenance? If Coillte, why has this maintenance not been carried out to date?

In the past a clean up day Friends of Massy's Wood collected some 7 tons of rubbish from the wood which had accumulated under Coillte's watch. Who will be responsible for the increased littering in Massy's Wood?

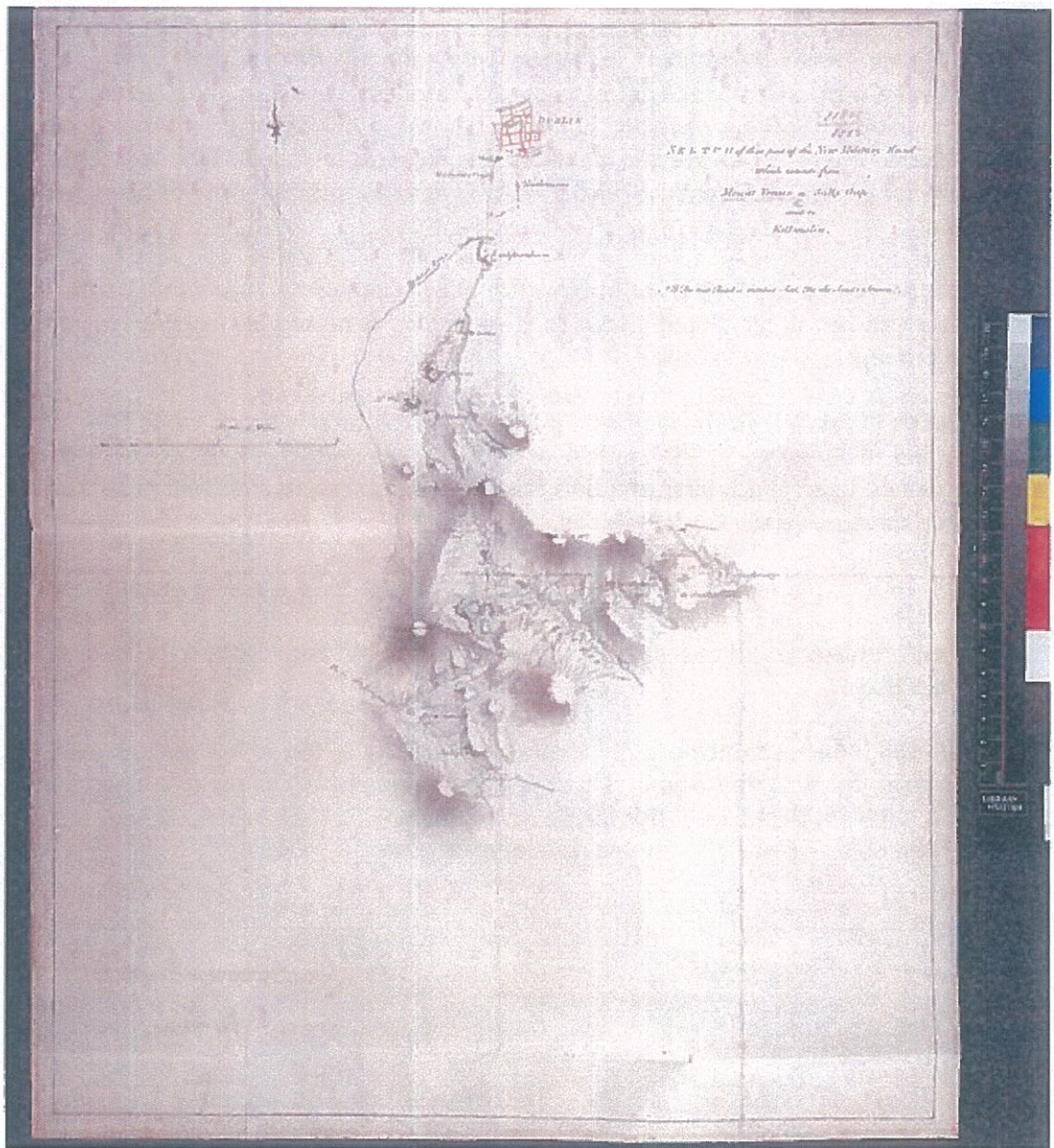
The proposals in relation to the archaeological and architectural heritage could be seen as excessive and unnecessary in the context of a wilderness garden. Walls and bridges are home to insects, upon which birds and bats feed. If these are all cleaned and repointed as in proposals this biodiversity will be affected.

The fact that SDCC does not have a dedicated Biodiversity Officer is a matter of concern.

**The proposal constitutes an over intensification of use of the amenity and will contribute to its destruction**

**Above all the immense increase in footfall proposed in the development will be devastating for this wilderness area. Up to 24000 walkers plus an unknowable number of horses and ponies will tear apart this fragile space, destroying the amenity, the protection of which is an objective of SDCC current development plan.**





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[:friendsofmassywood@gmail.com](mailto:friendsofmassywood@gmail.com)]

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ithi yesterday. Friends of Massy's Wood has had a long and cordial

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relationship with Coillte dating back over 20 years. Due to the death of a key officer on our committee the group had ceased to meet as regularly. We very much wish to continue to have an input into discussions of issues relating to the Wood and our wide membership has a pool of talent and energy which could be harnessed for the good of all parties.

With reference to the proposed Flagship Development, I look forward to receiving invitation to consultation meeting as discussed.

Kind regards

Elizabeth

Sent from my iPad

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