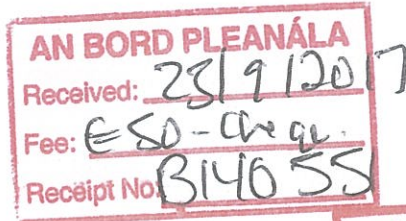


Frank Doyle
Montpelier Farm, Killakee Road,
Rathfarnham, Dublin 16

The Secretary
An Bord Pleanála
64 Marlborough St
Dublin 1
23rd September 2017



RE:

Development: Dublin Mountain Visitor Centre – Strategic Development Initiative
Location: Hellfire Club/Montpelier Hill & Massy's Wood
Planning Authority: South Dublin County Council (SDCC)
Ref. No. JA0040

Dear Sir or Madam.

I am a family farmer and resident of Killakee. I have lived here all my life (58 years). Besides farming I worked for 8 years with the renowned Irish Wildlife Filmmaker Eamon De Buitlear as a Research Field Assistant and cameraman; gaining from him experience and wisdom on matters wild, environment and ecosystems.

I wish to object in the strongest possible terms to the proposed development at Montpelier Hill/Hellfire Club and Massy's Wood.

Observations over 50 years

As a young boy growing up on our family farm one of my jobs was to move the cows up and down Montpelier Hill before and after milking time. I remember looking down the mountain to the city. It seemed so far away. The nearest clusters of houses were at Tallaght Village, Rathfarnham and Ballyboden. Since then I have observed the growth of the city creeping slowly towards the mountains. Housing estate after housing estate filling up, that once rural space that was once farming land. Beautiful green fields full of cattle, crops of grain and sugar beet. Each field separated by extensive hedgerows filled with

hawthorn and blackthorn bushes, beech trees and oak trees. And seeing the changing contrast with the changing seasons. That beautiful landscape is all but gone now, filled with development - houses and industrial units. So much so, that you can now see your shadow in the field cast up by all that light pollution, emanating from the encroaching city. The Green Belt also known as the Dublin Mountain Contour Line has been moved time and time again with each County Development Plan, rezoning after rezoning especially after the Ballycullen Oldcourt Local Area Plan was adopted by SDCC - there was no reference in the EIAR to this statutory plan! Developers buying up farmland, years in advance, with the profits from each phase of development, knowing that rezoning will follow.

Now, South Dublin County Council (SDCC) in partnership with Coillte and funding from Fáilte Ireland propose to bring urbanisation into the heart of this mountain with their proposed interpretative centre, restaurant and retail shop.

This would change a pristine rural type heritage road setting, into an urban-style road, leading to an urban-type facility. Changes include road widening, taking away existing ancient hedges and ditches (which have existed for hundreds of years and have evolved into wild habitats used as valuable ecological corridors for animals and plants) and replacing this habitat with a concrete footpath, a 3km sewer pipe, gas-pipe, road drain-pipe, and water-pipe, and urban-style street lighting all the way up the R115 rural mountain road so that according to their over-ambitious plans, a 'theme park' is delivered for 'social energisers' and the 'culturally curious' market.

This will drastically and forever change this rural landscape and its rich heritage character. It opens up a gateway for future urban developments to follow (as I have observed before). This has happened time and time again. It seems that you, An Bord Pleanála, will have the final say on whether or not you allow this to happen.

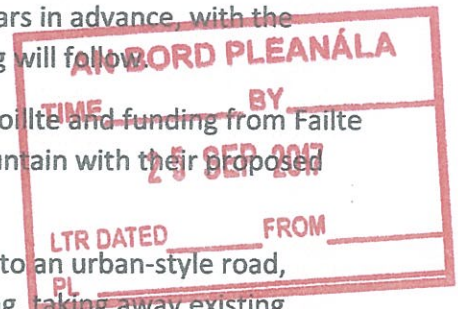
This new themed urban road will lead to a proposed interpretive centre, retail space and restaurant and 300+ carparking facility which is totally oversized and not in keeping with SDCCs own 2016-2020 County Development Plan (see 4.6.0. Rural Economy).

SDCC says that in rural areas of the county there is a need to balance demands for social and economic activity with the protection of the environment and the character of the rural landscape. This development has no respect for the delicate balance of the area. It is the stated intention of the council to restrict development in rural areas to appropriate forms of development and there is substantial planning precedence on record in the Planning Dept. of SDCC. If a private developer were to submit such a planning application – they would be refused by SDCC. This is not an appropriate development for this area.

Under ETC objective 3 SDCC says it aims “to protect agriculture and traditional rural farming enterprises from unplanned and incompatible urban development”.

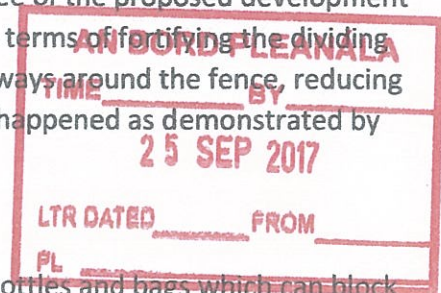
History of our family farm

Our family farm borders the Hellfire Club (Coillte forest), separated by over 1,500m of farm fencing. The Council plans indicate the entire fence line will be paralleled by a walking trail for visitors on the Coillte side of the fence. At the moment only approximately 1,000m of



the 1,500 is paralleled by a walking trail/fire break. The proposed plan adds an additional 500m of walking trail which increases the potential for even more trespass, fences being deliberately broken and littering into the farming fields. As it stands we have problems with people camping, picnicking, taking shortcuts and leaving their litter behind (portable barbecues, plastic/glass bottles, sometimes broken, plastic bags and food wrappers). We also have problem with dogs chasing livestock.

The Coillte representative who sits on the steering committee of the proposed development project assured me that these issues would be addressed in terms of fortifying the dividing fence (people proofing it) and reducing the amount of pathways around the fence, reducing the potential for trespass and littering. This clearly has not happened as demonstrated by the current plan.



The cumulative impact on the farm is:

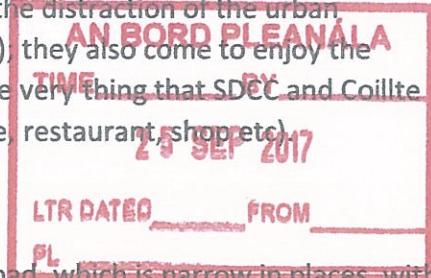
- Cows tend to chew and sometimes swallow plastic bottles and bags which can block digestive systems which can result in death(see attached photos of some litter collected at hellfire cllub
- Broken bottles cause foot damage to cows and horses
- We run a stock bull with our herd of Kerry cows (an endangered rare breed). Stock bulls are always a danger especially when they see unfamiliar faces
- Stock fences being continually trampled by recreational users and repair costs are burdensome
- Dogs chasing livestock can lead to cows aborting their calves
- Our family farm is divided by the R115 (the road leading to the proposed centre). We have to cross that road daily on foot and with animals from our house (east side of road) to the bulk of the farmland (on the west side). Our children and their friends cross that road on ponies and with their pet dogs and cats which follow them everywhere (more often during the school holidays). As it stands traffic can be heavy at times and again especially in the summer holidays when the proposed centre would be at its busiest. I was alarmed that no accommodation for animal traffic was provided for at my farm's various egresses in any Road Drawings by the Roughan O'Donovan Consultants (ROD). At the Tallaght Stadium 2 day event I spoke with the ROD representative and indicated exactly where my egresses were and he took a note of them but no action took place. Lollilop Ladies cannot solve this problem.

The flora and fauna of the mountain farm is quite extensive. We have been in REPS 2,3 and 4 and are currently in the GLAS schemes, as are many other farmers in the surrounding area. GLAS promotes biodiversity on all levels and is designed to protect and enhance the natural environment from the dangers of over-intensification. These schemes are supported by our government and EU directives. I feel that the 300,000 per year visitors sought to support this development is unattainable and unrealistic. The 80,000 current users (estimated per annum) have reached the upper limits of sustainability for this precious, vulnerable ecosystem.

This development would catastrophically affect the livelihoods of all those whose farms border it.

Escaping the urban environment

From personally talking to hundreds of people who regularly visit the Hellfire/Massy's Wood, they constantly tell me they come here to escape the distraction of the urban environment (i.e. housing estates, shops, kids on WIFI etc); they also come to enjoy the wildness of the mountains and woods, eager to escape the very thing that SDCC and Coillte want to impose onto and into the hills (interpretive centre, restaurant, shop etc).



Traffic

The R115 is a rural road. I travel daily up and down this road, which is narrow in places, with sharp corners. The traffic volume can be quite high at times with local use, traffic to and from Timbertrove (local timberyard and café), traffic to Hellfire and Massy's Wood and Pine Forest, other traffic travelling to Wicklow and Glencullen, any ponies and horses, lorries delivering to Timbertrove (as well as Timbertrove's own transport lorries), many touring minibuses from business coming out of Dublin on their way to Wicklow, many cyclists on leisure and training sessions who are constantly speeding down the mountain road and occasionally pedestrians and hikers. If SDCC put a footpath and cycle lane onto this rural road, narrowing it even more - imagine the congestion caused by e.g. two tour buses or large farm machinery trying to pass each other.

Increased traffic volume will lead to accidents, fatal or otherwise. The nearest public transport is Ballycullen (15, 15B buses) and if people decide to walk up the remaining 3km there will undoubtedly be fatalities from speeding descending traffic. The M50 has become a bottleneck in recent times in the morning and evening, with the result that people are using the R115 as a rat run. This traffic is also on the increase. These users tend to speed and will not even slow down for horses or pedestrians.

The Business Case

At the outset of this proposed project and its launch in the Council Chambers in 2016, SDCC (SDCC) unveiled the project as a €19 million master plan which "could welcome 1 million visitors and generate €4.3 million for the local economy in the first 5 years". See attached article from the Tallaght Echo. Now, in their final plan, SDCC is saying that the project will run at a loss for the first 4/5 years. Knocksink Visitors Centre (Enniskerry, Co Wicklow) is now being used as a storage facility by NPWS. SDCC compare their flagship to Airfield but Airfield is located in an urban setting, serviced by the LUAS and has Dundrum Shopping Centre as a neighbour in its favour.

Massy's Wood

Massy's Wood is a unique woodland habitat. It's a quiet and peaceful woodland which is used by the local and greater community of Dublin. The woods are a stronghold habitat for the protected and endangered red squirrel. Many dreys can be seen in the treetops in winter when the leaves have fallen and the canopy is more open to view. My daughter and I counted 18 dreys on one visit last winter. The woodpecker can be seen and heard there in

the summer months also. Other species we see include buzzard, merlin, long-tailed tit, dipper, dunlin, tree-creeper and the odd sighting of a kingfisher. Other animals, which inhabit Massy's include otters, pine martins, badgers, hedgehogs, foxes, deer, stoats and shrews.

The Glendoo River/Owendoher River flows through Massy's Wood with its many old bridges (perfect nesting sites for the dipper) and probable home for the European Cave Spider. This important spider (which is rare on the East Coast) also resides in the old ice house which is set into the river bank near the old gardens in Massy's Wood. Other species include bluebells, ferns and fungi.

In the EIAR assessment only the badger was mentioned as being in Massy's Wood and several setts were missed entirely in the study area.

SDCC seems to place no value on all of the above. It has no experience in the management of such a rare ecosystem (holding such a massive range of biodiversity) within the city limits of the capital.

All the urban parks SDCC manages are virtually void of wildlife. The main reason for this is the large footfall, bad management and lack of interest in flora and fauna. The proposed "treetop walk" would increase footfall in Massy's Wood 12-fold and would have the effect of sterilising significant parts of Massy's Wood to make it like a suburban park. How is this the "protecting and preserving" of the environment that SDCC so values?

Biodiversity

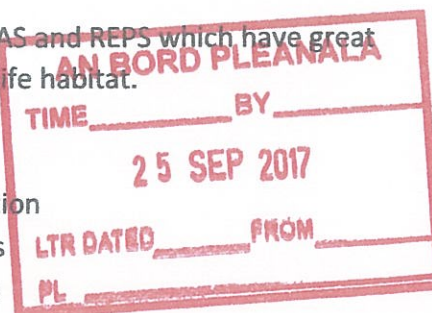
It seems strange that SDCC is one of the only Dublin Local Authority not to have a dedicated Biodiversity Officer. They don't even have a Biodiversity Plan. Surely, they should be obliged to have a Biodiversity Plan? Is this a reflection of their complete lack of focus, competence and interest in biodiversity?

As a Farmer, I and my neighbouring farms, participate in GLAS and REPS which have great emphasis, thankfully on Biodiversity and caring for our wildlife habitat.

Some of the GLAS objectives are:

- To fence off and protect watercourses against pollution
- To protect historical heritage & national monuments
- Enhance the Biodiversity in Grassland and Meadows
- Plant and extend hedgerows
- Create habitat for ground nesting bees
- Support for endangered rare breeds: e.g. Kerry Cow
- Plant wild bird seed crops which also benefit bees e.g. the rare Red-tailed Bumble Bee
- Install Bird and Bat Boxes

No where in the EIAR is any attempt made by SDCC/Coillte for this flagship project to fit in and act in a synergistic way with other farmers' efforts in order to adhere to National



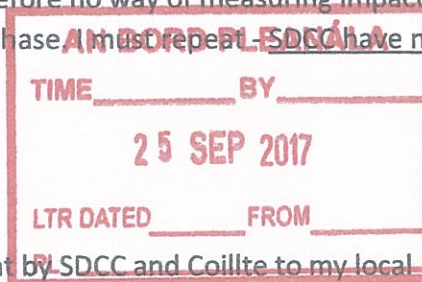
Agricultural Policies. Farmers are responsible for the '*forty shades of green*' that Failte Ireland promote both nationally and internationally. As a Montpellier Hill Farmer i am part of that ppromotion

The plans for upgrade of Forest Roads alarms me greatly as there is such little detail about their design or materials to be used.

Glendoo River

I am objecting to the installation of a culvert to accommodate the surface water of a car park. Glendoo River should not lose its pristine water quality to become the receiving watercourse for surface water from a large car park and a commercial operation. Where is the public good in that?

There is a distinct lack of study of the Glendoo River / part of the Owendoher/Dodder Catchment as part of this EIAR and its riparian vegetation and the potential risks posed by this development. There is no baseline study and therefore no way of measuring impact during the construction phase and post construction phase ~~must repeat SDCC have no Biodiversity Officer and no Biodiversity Plan.~~



Engagement by Coillte and SDCC:

I have reported my concerns of the lack of engagement ~~by SDCC and Coillte to my local~~ branch of the IFA. Other farmers have equally expressed their frustration at the superficial level of engagement/consultation/information gathering on the 27th February in Whitechurch Library and again on the 22nd March in Tallaght Stadium with landowners/farmers – they just aren't listening to us. Some farmers who border this subject site were not even invited and have never been consulted. Coillte have a poor track record with local farmers in respect of overspill litter, broken fences etc. Now, SDCC by, ignoring their own Development Plan and Zonings seek to endanger our farms with utter contempt and ignorance of how these rural lands work under the pressure of encroaching urban development.

In addition

- In my opinion, the “wow factor” view of the Dublin mountains (mentioned in SDCCs application) is looking up at the mountains, not looking out the window of an oversized restaurant/interpretive centre.
- No mention or documentation is made of the plant diversity in the study area. For example, many herbal or medicinal plants such as eyebright, speedwell, yarrow, cowslips and orchids are ignored. Ignored too are bird species even protected ones

(including the protected barn owl, red kites, buzzards, long-eared owl, merlin, woodpecker etc).



- This is over-sized and over-ambitious project not suited to the mountains and possibly should be located in the foothills, where the mountain gateway actually begins e.g. Tallaght Stadium. No farmer ever puts a gate in the middle of a field. Glenveigh National Park is an example where the visitor centre was appropriately located outside the park itself.
- As it stands, the proposed development area has already 10km of walking trails and tracks with many “wow factor” views over the entire suburbs and Dublin Bay. How many trails do we need?
- There is a carpark at Hellfire which could be extended with little impact and at a considerably lower cost than the proposed new and oversized carpark.
- There already is a coffee shop/cafe (Timbertrove) which is used regularly by many of the existing 80,000 visitors to this high amenity area. An assessment of potential damage to existing businesses has not been made in the EIAR as it should have been. Timbertrove Café’s business (Killakee Rd) would be threatened by the development.
- In terms of public good and amenities, SDCC are only adding a restaurant and retail shop (with very small interpretive component), stone steps and stairs (which will not be used by the majority of visitors because of exhausting steep climb – 45 degrees in places.
- This development involves road, ecology and livelihood disruption to a farming-based community in an area zoned Zone RU: “To Protect AND Promote Rural Amenity AND To Provide for the Development of Agriculture.”

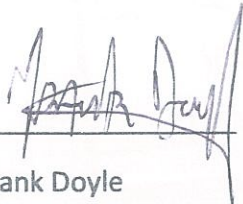
The above are just some of the downsides of the proposed development. I and my family object in the strongest possible terms.

I do respectfully submit that An Bord Pleanala should hold an Oral Hearing.

Thank you for the time you have taken to read this objection and please feel free to call to Montpelier Farm which can be seen from 90% of the Greater Dublin Area. It is a farm that we are very proud of.

Please see enclosed 50 euros regarding an Objection Fee.

Yours sincerely


Frank Doyle

AN BORD PLEANÁLA
TIME _____ BY _____
25 SEP 2017
LTR DATED _____ FROM _____
PL _____

Tony Shannon - RECREATIONAL AREA →

FRANK DOYLE
REF No SA0040 ←

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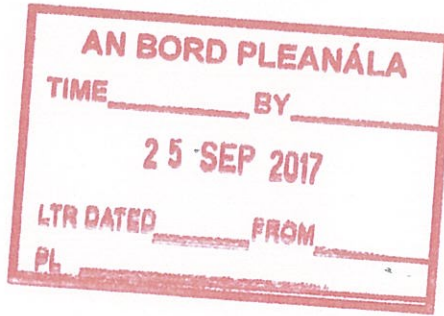


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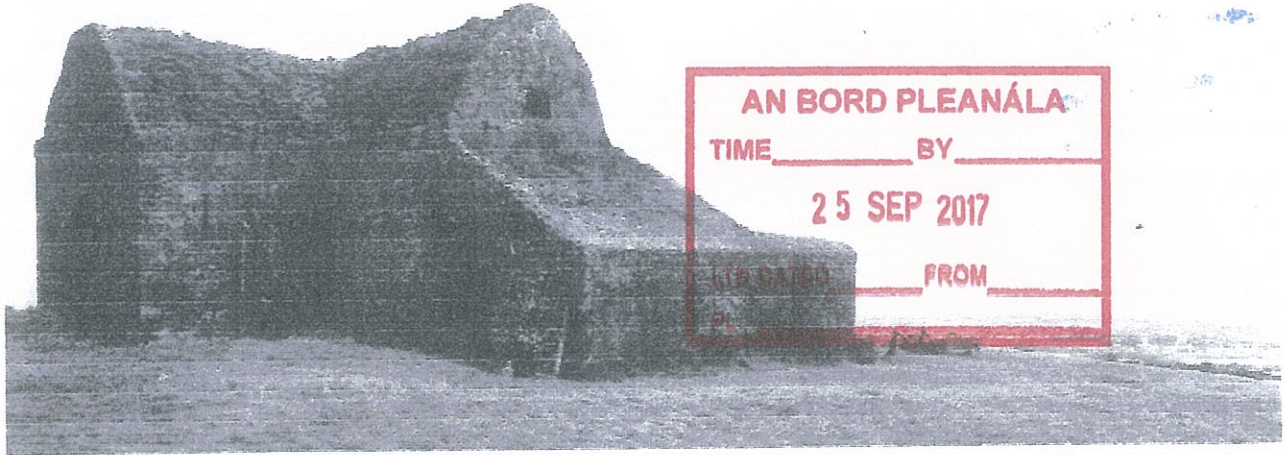


Hell Fire Club central to new €19m tourism plan for county

By Mary Dennehy

THE Hell Fire Club and Massey's Estate could soon be an integral part of Dublin's tourism portfolio after South Dublin County Council unveiled a €19 million draft master-plan – which could welcome up to one million visitors and generate around €4.3 million for the local economy in its first five years.

The council is proposing to develop a flagship tourism project in the Dublin Mountains and after examining a number of locations, the Hellfire Club and Massey's Estate were chosen – which, if the project is passed, will see a tree-top walk link the two scenic locations.



*

As per a memorandum of understanding with Coillte, which owns the lands, the council conducted a feasibility study that shaped a draft masterplan – which was presented to councillors on Monday.

The €19 million draft masterplan, which was led by Paul Keogh Architects, will connect with existing routes and trails and include a Dublin Mountains Visitor Centre, an events venue, a shuttle drop-off, an upgraded car park, an arrival promenade and a tree-top footbridge between the Hell Fire Club and Massey's.

After the presentation on Monday, the council is progressing onto the next stage of the project, which involves preparing an Environmental Impact Statement (EIS) and lodging a planning application with An Bord Pleanála by the end of the year.

All planning applications that require Environmental Impact Statements must go directly to the planning authority, bypassing local authorities. ✕

Frank Nevin, the Director of Economic, Enterprise and Tourism Development with South Dublin County Council, told The Echo: “We want to make sure that this development does not impact on the environment or its scenic views and the Environmental Impact Statement will deal with a host of issues that will help us ensure that the environment remains unique and that all [historical] architecture will remain protected alongside flora and fauna. *Right of way - Custom And Practice*”

“People also live in the area and many local people use this area every day for walking. We have to make sure that this development does not disadvantage them; we have to look at the overall environmental impact. *Custom And Practice*”

"Transport will be key to this and we need to examine how we can get people in, around and out again without impacting on this natural and historical area."

on RESIDENCE

According to visitor projection reviews, which were carried out by economist Jim Power, the proposed project, which will be developed in partnership with Coillte, has the potential to generate nearly €4 million for the local economy in its first five years – with up to one million tourists expected to visit in the same timeframe.

1,000,000 ÷ 5 = 200,000

Mr Power is quoted in the report as saying: "The proposed flagship attraction in the Dublin Mountains has the potential to become an integral part of the overall Dublin tourism portfolio and make a significant economic and financial contribution to tourism in Dublin and at a national level."

SEE FIGURES

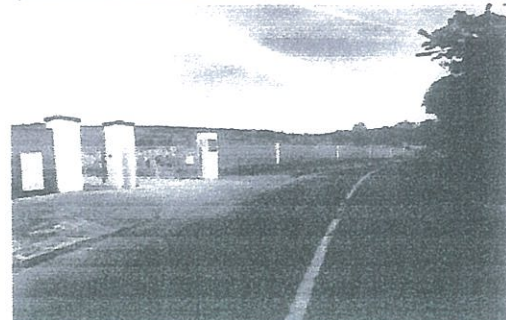
The council told The Echo that it hopes to lodge its planning application and Environmental Impact Statement to An Bord Pleanála by the end of the year – and will then identify funding.

Mr Nevin said: "The council will have to make a contribution to the project but we will be working on looking for funding opportunities for this project, which has huge potential due to its beauty, views, wildlife, history and close proximity to Dublin city and services such as hotels, restaurants and shopping centres."

READ MORE:



Schools across county commemorate Proclamation Day for new generation>>> Click [HERE \(/news/itern/schools-across-county-commemorate-proclamation-day-for-new-generation\)](http://news/itern/schools-across-county-commemorate-proclamation-day-for-new-generation)
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