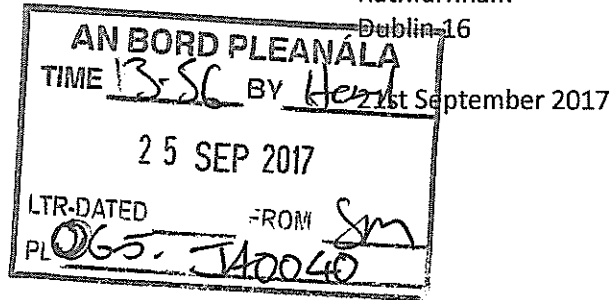


Bohernabreena Branch of the
Irish Farmers Association
c/o Philip Gallagher
Cruagh Lane, Killakee
Rathfarnham
Dublin 16



The Secretary
An Bord Pleanála
64 Marlborough St
Dublin 1

RE: Proposed Dublin Mountains Visitor Centre / Strategic Development Initiative

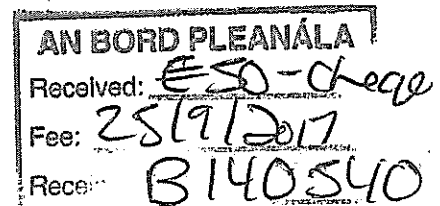
Location: Hellfire Club / Montpelier Hill / Massy's Wood

Applicant: South Dublin County Council.

Reference No: JA0040.

Observer: Philip Gallagher, Chairperson, Bohernabreena Branch of the Irish farmers Association (IFA)

Address: c/o Philip Gallagher, Cruagh Lane, Killakee, Rathfarnham, Dublin 16.



Dear Sir/Madam

I am writing to you in my capacity as Chairperson of the Bohernabreena branch of the Irish Farmers Association (IFA) who represent the interests of farmers and landowners who are residing and actively farming in the greater South Dublin area and specifically farmers and landowners who are residing and actively farming in the townlands of Cruagh, Jamestown, Killakee, Glenasmole, Friarstown and Bohernabreena all of which are adjoining and in the immediate vicinity of the area and lands covered by the planning application for the Proposed Dublin Mountains Visitor Centre.

The Bohernabreena branch of the IFA have met formally on a number of occasions to specifically allow our members to discuss this planning application and have also brought the planning application to the attention of the IFA County and National Executives. The views expressed here are the consensus of the members of Bohernabreena IFA.

I personally am a local landowner and my family have farmed along almost the entire eastern boundary with Massy's wood for the last 70 years. I continue to actively farm this land to date.

I am submitting this document in respect of the planning application submitted to An Bord Pleanála, under Section 175(3) of the Planning and Development Act 2000 for approval of development of the Proposed Dublin Mountains Visitor Centre.

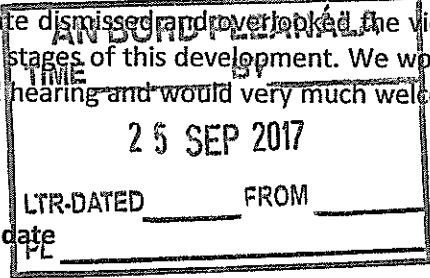
I will also make reference to the Environmental Impact Assessment Report (EIAR) also submitted with the planning application in respect of the proposed development.

I will also make reference to the participants who submitted this planning application specifically South Dublin County Council (SDCC) and its partners in the proposed development namely Coillte, and the Dublin Mountains Partnership (DMP).

I am submitting the following observations on behalf of the members of the Bohernabreena branch of the IFA in respect of the above application. I enclose the relevant amount of €50 in payment of the observation fee.

On behalf of the Bohernabreena branch of the IFA I would like to request an oral hearing into this application on the grounds of its scale and its prominent location in an area of outstanding natural character. While the Wicklow Mountains National Park affords protection to the high amenity areas in the uplands, no such protection is currently afforded the Dublin Mountains. It is the collective view of the IFA members who actively farm in the immediate vicinity of the proposed development that an oral hearing would allow the issues raised by this proposal to be properly examined and fully discussed in an appropriate public forum.

The Bohernabreena branch of the IFA are strongly of the view that both SDCC and Coillte and in particular the Dublin Mountains Partnership have to date dismissed and overlooked the views and concerns of the IFA members in the area at the various stages of this development. We would very much welcome the opportunity to participate at an oral hearing and would very much welcome the opportunity to do so on behalf of our members.



Background & Summary of the Consultation Process to date

I think is important to outline the lack of an effective consultation process to date with this specific development and previously with other related issues in order to clearly demonstrate why IFA members feel they have valid concerns that once again their views and livelihoods and businesses will be negatively impacted on if this development goes ahead in its current format.

Initially only a small number of the landowners, farmers and residents who are either residing or actively farming in the vicinity of the proposed development were made aware of a hastily convened invite-only meeting hosted by SDCC and Coillte that took place in Ballyboden Library on the 27th February 2017. This was the first occasion that the proposed development was signalled to residents and farmers in the area. The main difficulty with this meeting was that the majority of farmers and landowners who are impacted by this proposed development were never notified in any way or format that this meeting was taking place.

The two main speakers at the meeting representing SDCC and Coillte (Frank Nevin and Daithi De Forge) were questioned on the scheduling of this meeting and clearly admitted that they had been provided with all of the names and addresses of all residents, landowners and farmers etc. in the area but despite having all this information in advance of the meeting they admitted at the meeting that they did not attempt to contact all these people concerned and invite them to this meeting.

Daithi De Forge was so badly informed at that meeting that he admitted that he was even unaware of all the entrances to Massy's Wood from the Cruagh Lane or Killakee Road side. His interaction on behalf of Coillte to that point had been haphazard meetings and chance visits to random residents in

the area. I should point of that this was only 5 months prior to the lodging of the planning application for the proposed development.

Even though we were not formally invited to this meeting on 27th February both myself and a number of other IFA members attended and made ourselves known at the meeting and questioned SDCC and Coillte as to why all residents were not informed in advance that this meeting was taking place. I also personally spoke to Frank Nevin, SDCC and Daithi De Forge, Coillte after the meeting and requested that they formally meet with all residents and farmers on the Cruagh Lane side of Massy's wood. Daithi De Forge gave a clear undertaking at this time that he would follow through on this request and contact details were provided. No further contact with the IFA members present was received from Coillte after this meeting.

A further meeting was scheduled to take place in Tallaght Stadium and on this occasion quite a number of the local residents and farmers were formally written to and invited to the meeting. However I should point out that there are still a number of farmers and landowners in the area who properties immediately adjoin the area covered by the proposed development who have never being formally contacted to date by either SDCC or Coillte to be advised of the proposed development.

AN BORD PLEANALA
TIME FROM
25 SEP 2017
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The meeting in Tallaght Stadium, which took place on the 22nd March 2017, and which was convened by SDCC and Coillte to brief local residents, landowners and farmers was clearly attended by quite a number of individuals who were not representative of any of these categories but gained entrance to the meeting and used up a significant portion of the time allocated to people attending to pose questions to SDCC and Coillte.

I specifically raised the point at the meeting again with Coillte who were again represented by Daithi De Forge as to why he had not followed up as previously committed to schedule a meeting with local farmers and landowners. On this occasion he again committed to attending a meeting the following week. This was now only 4 months before the planning application was to be submitted.

The brief minutes of the Ballyboden and Tallaght Stadium meetings that were finally made available to participants are extremely brief in nature and do not in any way reflect, represent or gauge the level of views and concerns that were raised in particular by farmers and landowners who attended these meetings. SDCC and Coillte by their own admission were using these gatherings as an "information gathering exercise" and were clearly not interested in getting into the specific and well-made points and concerns being put forward at these meetings on the issues referred to here.

Having applied considerable pressure at the Tallaght Stadium meeting a number of residents and farmers from the townlands of Cruagh and Jamestown finally met with Daithi De Forge on the 29th March 2017 and brought to his attention the access road to Massy's Wood off Cruagh Lane. A number of issues including parking of cars in this and other areas around Massy's Wood, issues with professional dog walkers, inadequate fencing, trespass, littering, anti-social behaviour and water rights to Massy's Wood were highlighted to Daithi De Forge on this occasion but no firm solutions or commitments were provided to the people in attendance. His proposed solution to the issues with the random parking of cars on Cruagh Lane, an area where there is no dedicated parking for visitors to Massy's Wood, was to install electric gates across a public road. This is clearly not a feasible option for residents or visitors.

The issues of professional dog walkers who arrive on a regular basis with between 10 – 15 dogs and let them loose in Massy's Wood and Hellfire club was also highlighted but to date no action has been taken against these individuals even though they are in contravention of Coillte rules for dog control.

Area	Responsible Party	Issue	Resolution	Status
Massy's Wood	Coillte	Access Road	Electric Gates	Proposed
Cruagh Lane	SDCC	Parking	Dedicated Area	Proposed
Hellfire Club	Coillte	Dog Control	Rules Enforcement	Ongoing

These professional dog walkers regularly use a number of Coillte properties in the SDCC/Dun Laoghaire/Rathdown areas to walk these dogs. The hazard posed by loose dogs to livestock is well-established as is the resulting potential negative impact on livestock and the livelihoods of farmers in an area where drystock farming of sheep and cattle is the main agricultural enterprise.

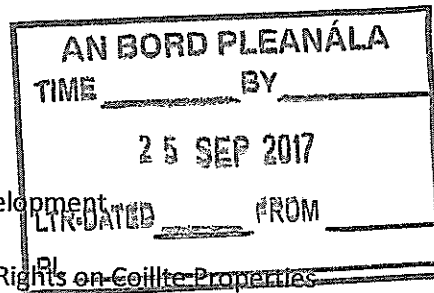
Jasper Petersen from the Dublin Mountain Partnership also attended this meeting for a brief period of time and the issue of car parking and traffic management was also raised with him. His response was that this matter had been discussed with the community Guard. The community Guard he referred to is from the Dundrum Garda Station in Dun Laoghaire Rathdown and does not even have responsibility for Massy's or Hell Fire Club areas.

Views of the Bohernabreena Branch of IFA

As stated previously the members of the Bohernabreena branch of the IFA have met formally on a number of occasions to specifically allow our members discuss this planning application and have also brought the planning application to the attention of the IFA County and National Executives.

The following points are the views and concerns expressed by local IFA members through our internal consultation process and clearly outline why our members support the view that An Bord Pleanála should refuse planning permission for the above development. These points are as follows and more specific information under each of these points is detailed below in our submission:-

- The Environmental Impact Assessment Report
- The Dublin Mountains Partnership
- Maintenance of the Site
- Traffic Plan
- Environmental Concerns
- Zoning of the Areas included in the Proposed Development
- Dogs and Dog Walking
- Fencing of Coillte Property/Woodland and Water Rights on Coillte Properties



1. Environmental Impact Assessment Report (EIAR)

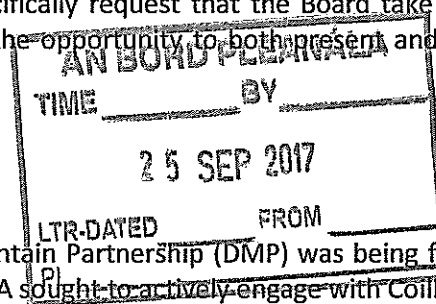
Having carefully examined the Environmental Impact Assessment Report (EIAR) there is absolutely no reference to farmers or to active farming in the area or to the impact that the proposed annual visitors of 300,000 by way of littering, trespass on properties and dog control etc. would have on the significant number of farm animals (cows, cattle, sheep and horses etc.) that are grazed on the farmland immediately surrounding the proposed development.

While the EIAR clearly and quite rightly references the existence of numerous animals including Bats, badgers, red squirrels, otters and other animals and refers to the impact that the proposed development will have on these animals absolutely no consideration has been noted specifically in relation to the existence of farmers in the immediate area or to the significant number of farm animals that are herded in these areas. It is also worth noting that the EIAR does not in any way take account of the wide and varied selection of wild birds that inhabit the area particularly, buzzards, hawks, wood pigeons and a variety of small birds. It is also worth noting that the GLAS scheme referred to in this submission was introduced to be placed along the boundaries with woodlands to

support and compliment the existence of wild birds and provide a food source. There is currently 1 hectare of this bird cover directly along the eastern boundary of Massy's wood at Jamestown.

The direct impact on the farmers and their livestock in the areas impacted by the proposed development and any impact on their livelihoods and resulting negative impact on their incomes has been deliberately excluded from the EIAR and from the documentation relating to the overall development. It is the view of Bohernabreena IFA that on this basis the EIAR and the lack of consultation to date, specifically with farmers in the area, is seriously flawed. It is the view of Bohernabreena IFA that once again farmers and their businesses as a significant direct stakeholder in the area have been overlooked and deliberately excluded from the EIAR and that the anticipated negative impact on their livestock from increased visitors, littering and dogs etc. has also been overlooked and not taken into account.

The Bohernabreena branch of the IFA would specifically request that the Board take this specific point into consideration and we would welcome the opportunity to both present and discuss this point further at an oral hearing.



2. Dublin Mountains Partnership

I should also point out that when the Dublin Mountain Partnership (DMP) was being formed quite some time ago the Bohernabreena branch of the IFA sought to actively engage with Coillte and other representatives to have some of its members included as one of the interest groups represented on the actual DMP forum. This approach was taken on the basis that farmers in the greater Dublin Mountains area are clearly responsible for farming and maintaining large areas of land that adjoin the lands covered by the DMP. This approach was rejected outright by the DMP and farmers were deliberately excluded from being represented on the DMP. This is despite the fact that farmers are responsible for farming and maintaining large tracts of land in the in South Dublin and in the Dublin Mountains on an on-going basis and in line with stringent conditions laid down by both the Department of Agriculture & Food and also by the European Commission (EC).

Farmers with farmland in the immediate vicinity of both Massy's wood and the Hellfire Club have joined the Rural Environmental Protection Scheme (REPS) and more recently the Green Low-Carbon Agri-Environment (GLAS) Scheme which is part of the Rural Development Programme 2014-2020. The GLAS Scheme first opened in February 2015 and is co-funded by the EU. This ambitious scheme aims to focus on the rural environment, focusing in particular on the preservation of various habitats and species, mitigating climate change and improving water quality.

These Schemes are closely monitored, implemented and inspected and stringently enforced on the ground by the Department of Agriculture and its officials to ensure compliance of participant farmers with the schemes. So for the DMP to reject outright the request from farmers to be represented clearly demonstrates the intention of the DMP, who are party to this development to deliberately exclude direct stakeholders from this forum. It is clearly the view of IFA members in the area that the DMP is a partnership in name only and in essence ignores the views of a significant level of stakeholders from the Dublin Mountains.

There was a further wider consultative forum established under the DMP but neither the Board of the DMP nor the wider consultative forum had convened any meetings at all over the last 18 months until surprisingly a meeting of the consultative forum was convened in May 2017 for a last minute discussion of this Project. The fact that no meetings were convened for this lengthy period was acknowledged by Coillte at the meeting in Ballyboden Library and in Tallaght Stadium.

This poses the question as to how can the DMP be promoting and supporting this planning application when they are clearly not representing farmers or a significant number of active and directly impacted stakeholders in the area of the Dublin Mountains. The DMP are clearly ineffective and are unable to convene meetings or agree on any consensus of approach from its Board or forum to promote the area represented by the DMP.

It is the view of Bohernabreena IFA that the DMP should be obliged to allow representatives from the Farming community in the Dublin Mountains area be represented on their Board and that issues such as this development are discussed in this forum going forward. Bohernabreena IFA would welcome the opportunity to actively participate in this process.

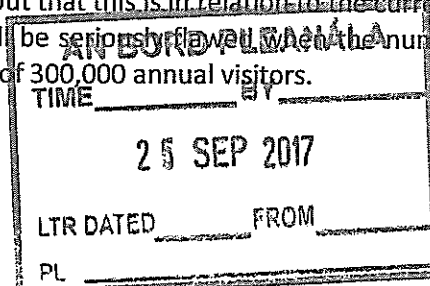
3. Maintenance of the Site

I note from Page 37 of the Environmental Impact Assessment Report, Section 3.13.1 that a steering group comprising of SDCC, Coillte and the DMP will be established and have responsibility under 3.13.1 b) b) "Liaison with the neighbouring landowners, residents and other stakeholders, facilitated through the consultation forum of the DMP" and P37 3.13.1 b) "management and maintenance of the Hell Fire Club and Massy's Wood properties"

I for one reside in the immediate areas of Massy's wood and over the last 40 years or so Coillte and SDCC has done little or nothing of any significance to maintain Massy's Wood or the Hell Fire Club area to any great extent. Both of these areas of considerable natural beauty have been let go to rack and ruin and no attempts in maintaining either the historic walled Gardens or the pathways through Massy's Wood have been made so much so that all of these areas are in a considerable level of disrepair and are extremely run down. The numerous visitors to Massy's wood in particular, many of whom I interact with and talk to on a daily basis are extremely sceptical of the ability of both Coillte and SDCC to maintain or in any way enhance these facilities. SDCC and Coillte were specifically requested to clarify at the meetings in Tallaght Stadium how they would allocate or source funding to maintain these areas or protect the proposed development from vandalism which is currently a real problem and they could offer no satisfactory response to these questions.

The fact that the proposed Development is to be operated on a non-profit basis raises significant concerns as to the maintenance and security of the areas covered by the Development. For SDCC and Coillte to proposed to somehow invest approx. €19,000,000 million in the proposed development and not have or be in a position to present to stakeholders any clear business plan to support the maintenance or security of the proposed development or the surrounding areas including Massy's wood and the Hellfire club clearly represents a serious flaw in the development plan.

The issue of anti-social behaviour and the on-going random destruction, vandalism and littering of the existing infrastructure (fences, benches, signage and trees) which is clear to see for anyone who visits this area on a regular basis and to date both SDCC and Coillte are unable to address these issues in any discernible of effective way. I should point out that this is in relation to the current level of visitors and clearly the current inadequate efforts will be seriously flawed when the numbers of proposed visitors are ramped up to the anticipated level of 300,000 annual visitors.



It is the view of Bohernabreena IFA that it is questionable that the EIAR can state the above details highlighted on Page 37 that Coillte, SDCC and the DMP can perform these tasks in relation to the upkeep of these areas when their disappointing record to date clearly demonstrates to the contrary.

4. Traffic Plan

The issue of traffic management in the area of this development is already an area for concern and farmers and landowners in the area have raised and highlighted on numerous times with An Garda Siochana in both Tallaght and Rathfarnham Garda stations the impact of visitors to the area parking on the main roads and in non-designated parking areas. Bohernabreena IFA is also aware that Dublin Fire Brigade have highlighted and expressed concern in relation to access through the local road network specifically around the hellfire club. There are regular on-going issues with maintaining adequate access for farmers to receive deliveries of feedstuff, fertilizer, fuel and other regular deliveries required to maintain their businesses.

With the inability of SDCC and Coillte to effectively manage either the opening or usage of their car parks in the Hell Fire Club area or indeed in the greater Dublin Mountain area this has an on-going negative impact on traffic and local access particularly on weekends where residents and landowners regularly have to deal with significant numbers of cars parked on the main roads even when the Coillte car parks are open and not even full. This a regular issue in the Kilmashogue Wood, Pine Forest and Hellfire Club car parks. While there is clearly no parking on the Killakee Road and on Cruagh Lane both of these areas are used on a regular basis by visitors to the area.

Depending on which version of the available documentation that you read Coillte/SDCC either will provide parking for free or will request visitors to pay for their parking. The traffic plan details that parts of the Killakee Road will be reduced to single lane traffic in a number of sections and again there is inadequate detail on how this will operate in practice and will result in delays in accessing the surrounding areas particularly at busy times on weekends, summer periods and will present difficulties over the winter months due to the impact of inclement weather on road conditions.

It is anticipated that the proposed development will attract approximately 300,000 visitors annually. This level of visitors equates to approximately 822 people per day 365 days of the year who will either drive or be coached into the area. This level of visitors compares quite well with recently released visitor levels (Irish Independent article from 3rd April 2017) to The Powerscourt Estate, House, Gardens, restaurant/coffee shop and Garden Centre near Enniskerry where in excess of 250,000 people visited in 2016 and where in excess of 300 people are also employed. This clearly demonstrates the potential scale of the proposed development at the Hell Fire Club and also shows that it clearly out of scale for this rural area with no support infrastructure and no discernible attractions other than the Hell Fire Club ruins and some neglected forest trails. The business case supporting this not for profit development is at best a work of fiction.

This substantial increase in the levels of traffic needs to be considered carefully and while ignoring the inadequate business plan surrounding the attraction of this level of visitors to the proposed development, there clearly needs to be careful consideration in relation to a traffic management plan for the development and farmers, landowners and residents need to be consulted as part of this process along with other stakeholders.

The main point the Bohernabreena IFA wishes to make in relation to parking is that wider consultation is required with all stakeholders and An Garda Siochana to ensure this issue is addressed and effectively managed particularly in relation to the significant increase of visitors to the area.

BOHERNABREENA IFA	
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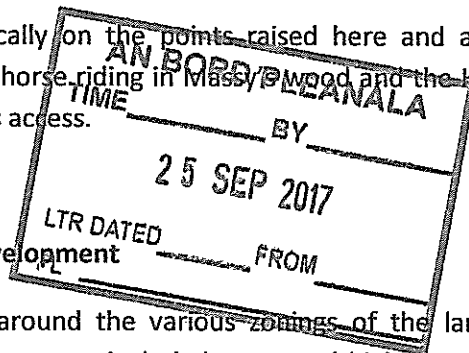
5. Environmental Concerns

Bohernabreena IFA notes the specific detail in the development plans to divert rainwater from the new Hell Fire Club car parking area via a new drainage system into a tributary of the Owendoher River which runs through Massy's Wood. There are already significant land erosion issues at a number of points along the course of the Owendoher River through Massy's Wood which have also resulted in the erosion of some of the 8 stone bridges that are located in Massy's wood some of which are protected structures. The stone bridge on the Coillte access road off Cruagh Lane, which is a protected structure, has recently being replaced having being previously destroyed by river floods. Any plans to increase the level of water flowing through this river will in time have a resulting negative impact on these structures.

Bohernabreena IFA also notes that there are plans in the Development to include a horse trail as part of the Development and while this is welcome for the two equestrian centres and other private users in the area, it is currently the policy of Coillte that horses are currently excluded from Massy's wood and also from the Hell Fire club area and there are Coillte signs at the entrances to Massy's wood to this effect.

IFA members have also brought to the attention of Daithi De Forge, Coillte that as a result of river erosion along the eastern boundary (townland of Jamestown) in Massy's wood there is an extremely steep drop off from the proposed horse trail which is also eroded by rainwater down into the river. This trail is currently extremely dangerous for walkers let alone horses and their riders and requires immediate attention to address the river erosion issues. Again these aspects of the proposed development do not seem to have been investigated or fully considered.

Bohernabreena IFA would welcome clarification specifically on the points raised here and also specifically in relation to the existing Coillte rules around horse riding in Massy's Wood and the Hell Fire Club areas and in relation to their future policy on this access.



6. Zoning of the Areas included in the Proposed Development

Bohernabreena IFA would like to also raise the issue around the various zonings of the lands included in the proposed development. While some of the areas included are zoned high amenity and some are zoned agricultural the fact it is anticipated that the proposed development will attract in excess of 300,000 visitors annually surely is at odds with the maintaining of these areas as high amenity due to the increased level of traffic (cars and coaches etc.) that will be required to transport these 300,000 visitors to the area.

The concept of ferrying 300,000 visitors to and from the Hell Fire Club is extremely questionable and surely defeats the aim of a high amenity area. Either way this results in a significant increased use of the limited rural roads infrastructure already in the area. It should also be pointed out that there is already a significant level of road usage particularly past the entrance to the Hell Fire Club car park from motorists who already use this route

Bohernabreena IFA would also point out that quite a number of its members in the immediate areas surrounding both the Hell Fire Club and Massy's Wood have been refused planning permission for private residences on the basis that the construction of a further private residence would lead to

increased road usage and traffic. This is despite the fact that in most cases these individuals are already residing and working in the area thus resulting in no additional traffic on these roads.

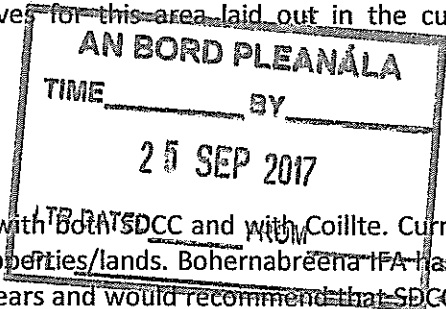
There should be some consistency in the application of this ruling particularly around the progressing of this Development which will result in a significant increase in the road usage on all routes to the proposed development.

In conclusion on this point, the subject site spans two different planning zones: HA/DM and RU. All access to the proposed development will pass through lands zoned RU, and yet the application fails to demonstrate proper consideration of the council's obligation under its own zoning directive to **"To Protect AND Promote Rural Amenity AND To Provide for the Development of Agriculture."** Failure to properly consult with IFA members and adjacent landowners suggests that the Council pays little heed to this undertaking to provide for the development of agriculture within its jurisdiction.

Furthermore, where the negative impact on agricultural activity in the adjacent area is briefly raised in the supporting documentation issued, this is only to dismiss the impact as of secondary consequence to amenity use, without any proposals to adequately address the legitimate concerns of farmers to protect their livelihoods.

It is possible that increased usage of the site will result in an increase in nuisance and impacts to neighbouring land owners/farms, e.g. trespass and littering on their properties, and disturbance of animals.

In short, Bohernabreena IFA urge the Board to reject this application on the grounds that it contravenes the Council's own stated planning objectives ~~for this area laid out in the current development plan.~~



7. Dogs and Dog Walking

This specific issue has been raised on an on-going basis with both SDCC and with Coillte. Currently Coillte has no rules in relation to dog control on their properties/lands. Bohernabreena IFA has had numerous discussions with both organisations over the years and would recommend that SDCC and Coillte introduce Bye-Laws for visitors to the area to contain their dogs on leads.

It should be noted that there is already a strict policy for the mandatory use of dog leads currently in place in the nearby Marlay Park which is used by quite a lot of the regular visitors to Massy's Wood and the Hell Fire Club but under two completely different sets of dog control rules.

While the majority of visitors to the area clearly recognise the presence of sheep and other animals in the surrounding areas, there are always some individuals who do not pay any attention to controlling their dogs. This not only impacts on animals in the area but also on other people who just wish to enjoy their walk or have their own dogs on a lead and are being attacked by loose dogs. There have recently been instances of both visitors to the area and horses and other dogs being bitten by out of control dogs. The mandatory control of certain breeds of dogs is also not highlighted or enforced by Coillte.

The issue of professional dog walkers has also been raised by Bohernabreena IFA with Coillte on a number of occasions. This is where one individual is running a professional dog walking service and will arrive with up to 15 dogs in a van and just simply let the 15 dogs out with no leads and walk

through the Massy's Wood or Hell Fire Club areas and have absolutely no regard for farmers or their livestock and indeed for residents or other walkers or dog owners who are using the walkways through these woods. The issue of dog control is already an on-going reported issue for farmers along sections of the Wicklow Way. Despite IFA members raising these issues with Coillte on a number of occasions no action has been taken by them to address this issue with the identified individuals concerned.

Bohernabreena IFA would request that as part of any future development in the Dublin Mountains area that ABP request SDCC/DMP and Coillte to engage with stakeholders on this issue and look at revising their rules around dog control to ensure that their properties and surrounding lands are made safer for all concerned.

8. Fencing of Coillte Property/Woodland and Water Rights on Coillte Properties


The issue of inadequate fencing surrounding Coillte Properties was also discussed with Daithi de Forge as part of the proposed Development. Coillte are obliged to install adequate fencing around their properties to ensure that both people and dogs are kept within the relevant walking areas. By their own admission Coillte accept that the current fencing wire previously installed by them is inadequate for these needs. With an anticipated substantial increase in visitor numbers to Massy's Wood and the Hell Fire Club this is clearly an aspect of the development that needs to be addressed.

A number of farmers whose farms join directly onto both Massy's Wood and the Hell Fire Club currently have water rights to the rivers running through these Coillte Properties. These rights are required due to the absence of an adequate water source on the relevant farmland. These are historic water rights granted by Coillte over 60 – 70 years ago and Coillte are aware of their existence.

Bohernabreena IFA would request that as part of the proposed development that both the issue of inadequate fencing and water rights are addressed and assurances provided that the current agreements continue to be honoured and maintained.

Bohernabreena IFA would have some concerns that if the Coillte lands at Massy's Wood and at Hell Fire Club are assigned to another entity to manage these properties once any development takes place that these agreements would be no longer honoured. Bohernabreena IFA would request that ABP ensures that these agreements are maintained and honoured in full as part of any planned or future developments regardless of the future ownership or control of these Coillte woodlands or properties.

Yours sincerely


Philip Gallagher
Chairperson
Bohernabreena IFA

