



23 March 2020

SID-2018-SD

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1

Application to An Bord Pleanála by South Dublin county Council undr Section 175 (3) of the Planning & Development Act 2000 (as amended) for permission for a proposed Dublin Mountains Visitor Centre at the Hellfire Club and Massy's Estate, Killakee Road, Rathfarnham, Dublin 18

A Chara,

I refer to the notification in relation of the receipt of further information for the above-proposed development. Outlined below are the nature conservation recommendations of the National Parks & Wildlife Service (NPWS) of the Department of Culture, Heritage and the Gaeltacht.

In previous submissions to ABP dated the 25th September 2017 and the 4th January 2018 this Department commented inter alia on the potential impacts of the proposed development on flora and fauna. Specifically concerns were expressed in relation to; appropriate assessment, red squirrels, pine martens, deer management, badgers, birds (particularly tree nesting merlins), vegetation clearance (in relation to nesting birds), flora, the Glendoo Brook, and the impact on hedgerows along approach roads, as well as the potential effects on bats of the installation of lights on these roads.

Further information (FI) has now been furnished to ABP by the applicant at the Board's request in relation to appropriate assessment and biodiversity considerations within the EIAR.

Appropriate Assessment

Previously, this Department had expressed concern at the possible impact the proposed visitor centre development and associated works could have on any merlins which might nest in the Hell Fire Club plantation. This was in the context of merlin being one of the qualifying interests for which the neighbouring Wicklow Mountains Special Protection Area (Site Code 004040) was designated. It was also the Department's view that any potential impacts on this SPA and the other nearby Natura 2000 sites (i.e. the Wicklow Mountains Special Area of Conservation (Site Code 002122) and the Glenasmole Valley SAC (Site Code 001209)), as a result of an increase in the numbers of people drawn into the area by the new visitor centre, especially along the Dublin Mountain Way route, should be properly assessed. The FI supplied to the Board by the applicant has addressed these concerns.

The merlin survey of the Hell Fire Club plantation area in 2018, and the more extensive 2019 survey for breeding merlins which encompassed neighbouring plantations as well, strongly suggest no nesting by merlins has been attempted in these areas in the last two breeding seasons. Therefore the proposed development is unlikely to negatively impact on the utilisation by merlins of the Wicklow Mountains SPA.

Similarly, the predictions of very limited increased usage by people of the SPA and Wicklow

Mountains and Glensmole Valley SACs, based on and extrapolating from surveys of the usage by walkers of routes from the development site presented in the additional FI, would suggest that the proposed development would only have minor impacts on these European sites. The measures to mitigate these limited impacts proposed by the applicants, signposting to request visitors to stay on paths and keep dogs on leads, while directing them towards waymarked trails within the plantations, consequently seem appropriate.

Biodiversity Considerations within the EIAR

It is noted that in response to the Board's request to the applicant to undertake additional ecological monitoring/ surveying, several useful surveys are included in the new FI, particularly the surveys of bryophytes, bats, badgers and squirrels. With regards to the implications to the results of certain of these surveys this Department makes the following comments:

Bryophyte Survey

This survey identified a species of moss, *Ortotrichum stramineum*, protected under the Flora (Protection) Order, 2015, growing on trees in Massy's Wood close to the site of the proposed canopy bridge which is to link the wood with the visitor centre site in the Hell Fire plantation. It is recommended it should be a condition of any planning permission granted for the proposed development that the measures proposed to protect this species and three other red data book bryophytes identified in the Bryophyte Survey Report submitted as an appendix to the EIAR should be implemented in full. The measures set out in this document to protect the tufa features identified in Massy's Wood should also be implemented in full.

Squirrel Survey

The squirrel survey identified both red and grey squirrels as being present in the mixed, mainly deciduous Massy's Wood, while only red squirrels were found to be present in the Hell fire Club plantation. Based on these observations and the known ecologies of these squirrel species the following is stated (in the draft Red Squirrel Conservation Plan included as an appendix to the EIAR) in relation to the proposals to plant up the visitor-centre-site section of the Hellfire club plantation with deciduous trees, mainly: "The conversion of areas of clear-fell, coniferous woodland and scrub to broad leaved will convey a competitive advantage on Grey Squirrels over Red Squirrels."

Yet it appears it is still intended to continue with the proposed replacement of coniferous trees with deciduous trees in the Hellfire Club plantation. As set out in previous comments by this Department, such an approach, will potentially lead to the loss of the most significant feature of the visitor centre site from a nature conservation viewpoint -the presence of red squirrels.

It is therefore recommended that it should be a condition of any planning permission granted for the proposed development that the applicant should prepare a revised Forest Management Plan for the site retaining the majority of the mature conifers present on the visitor centre section of the Hellfire Club plantation, to be managed on a selection basis, to be supplemented with plantings mainly of Scots pine.

Deer Management (not addressed in Further Information (FI))

Given the significant population of deer in this area, it is recommended that the landowner would assess the implications of this population and put in place appropriate deer management arrangements as necessary.

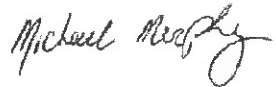
Kindly forward any further information received; or in the event of a decision being made a copy of same should be forwarded to the following address as soon as it issues to

*The Manager, Development Applications Unit,
Department of Culture, Heritage, and the Gaeltacht,
Newtown Road, Wexford Y35 AP90*

Preferably, documentation associated with the above can be referred electronically to the DAU at the following address: manager.dau@chg.gov.ie

In addition, please acknowledge receipt of these observations by return.

Is mise le meas,

A handwritten signature in black ink, appearing to read "Michael Murphy". The signature is written in a cursive style with a large, stylized initial 'M'.

Michael Murphy,
Development Applications Unit
Tel: 053-9117516

