

**Christine Brennan**

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**From:** Gino Kenny <Gino.Kenny@oireachtas.ie>  
**Sent:** Monday 23 March 2020 13:55  
**To:** SIDS  
**Subject:** People Before Profit Dublin Mountains Visitor Centre Submission. fStrategic Development Initiative  
**Attachments:** PBP Hellfire Sub March 2020.docx

To Whom It May Concern,

This is People Before Profit's submission regarding the Dublin Mountains Visitor Centre - Strategic Development Initiative

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

Planning Authority: South Dublin County Council

Ref: JA0040.

Regards

**Deputy Gino Kenny**

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The Secretary  
An Bord Pleanála  
64 Marlborough St  
Dublin 1

23rd March 2020

Dublin Mountains Visitor Centre - Strategic Development Initiative  
Location: Hellfire Club/Montpelier Hill/Massey's Wood  
Planning Authority: South Dublin County Council  
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To whom it may concern,

The applicant was afforded the opportunity to undertake further surveys and monitoring in order to strengthen their proposal to conduct large-scale development at Montpelier Hill. However the surveying once again would seem to fall short of what is required to adequately allay fears that significant, irreversible and undesirable damage to both flora and fauna may result. In the absence of adequate baseline information it is impossible to provide the clear protections that exist in law and to mitigate adequately for any negative consequences to the biodiversity of the area.

With regard to the bat population the Bat Mitigation Guidelines for Ireland (pg 32) note that "Radio-tracking provides the most powerful way of determining what foraging areas are used by bats from a particular roost or whether the bats from a particular roost have alternative roosts nearby. Bats can be caught at, or close to, the roost, fitted with miniature radio transmitters and then tracked as they move to, and between, foraging areas or other roosts. Such a technique is unlikely to be necessary for the majority of developments, but may be required when development which may affect a Natura 2000 site for bats is proposed. "

Radio tracking does not appear to have been employed in this case, and no explanation is offered as to why it was deemed unnecessary.

In addition it is recommended (pg 38) that "Several dawn or dusk surveys spread over a period of several weeks from June to August will greatly increase the probability of detecting significant maternity roosts".

According to the EIA (pg 112) One emergence and one reentry survey was undertaken at Tree 1, Tree 2 and Tree 3 (1/7/2018 and 18/7/2018)

In the absence of fully comprehensive surveying it is not possible to be fully satisfied that the mitigation proposed is fully adequate to protect the bat population of the area.

The surveying of the otter also raises the issue of some potential inadequacies continuing in the assessment of risks posed by the development to that species, in particular with regard to chosen surveying dates and time frames.

The dangers posed by the development to the red squirrel are hugely significant yet the mitigation measures do not appear suitably robust to counter them. The loss of habitat described as "unavoidable", is only unavoidable if this proposal is allowed to proceed.

According to the applicant (EIAR pg 138)

"Tree planting the Hell Fire Club will consist of at least 10% Scots Pine and shrub planting will include 20% hazel. In the context of the wider landscape and the South Dublin red squirrel population, which currently depends on monocultures of conifers that are subject to clear-felling, a permanent native woodland will be a positive impact. Broadleaved woodland can support a higher population density of red squirrels and provide a year round food source for the species."

Yet the Vincent Wildlife Trust notes

"Red squirrels can be successful in all woodland habitats, and are even seen in higher densities in broadleaved and mixed forests; however, when the grey arrives to a broadleaved wood the red will disappear, usually within 20 years. Red squirrels can survive however in coniferous woods, which do not provide enough food resources for the larger greys. However, even a small amount of broadleaved habitat in the vicinity can tip the balance towards the grey squirrel once more."

It is then questionable as to whether this mitigatory intervention will be to the advantage of the red squirrel at all.

Furthermore, the proposal to monitor the red squirrel population from year 1 post construction and thereafter annually for a minimum of five years seems to offer far too little protection to a species that is under threat.

Neither the impact of the three fold increase in visitors nor the case for the location of such a large scale gateway development at this particular site has been adequately considered in the additional information provided. Reasonable scientific certainty has not been provided regarding impacts on the area and as such we would request an oral hearing to further consider these important matters.

Yours sincerely,  
Gino Kenny, TD  
Richard Boyd Barrett, TD  
Brid Smith, TD  
People Before Profit,  
Dail Eireann,  
Leinster House.