

AN BORD PLEANÁLA
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Ref: 06S.JA0040
Mr Kieran Somers
An Bord Pleanála
64 Marlborough Street,
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18/3/20

**Re: SDCC response to An Bord Pleanála request of 6/2/19 for further additional information.
An Bord Pleanála Ref 06S.JA0040**

Dear Kieran

Further to my previous submissions of 8/9/17, 15/12/17 and my Powerpoint Presentation at the oral hearing I wish to comment as follows on the latest SDCC submission:

There are only 2 ways to access the Dublin Mountains southwards from the proposed Dublin Mountains Visitor centre.

1. Via the R115 southwards. This is a narrow twisty road and is dangerous for pedestrians.
2. Via the pedestrian path through the southern neck of Massy's Wood.

Cunnane Stratton Reynolds state that "A three-fold increase in visitor numbers at Hell Fire Club is highly unlikely to result in a significant increase in visitor numbers accessing Cruagh Wood or the Natura 2000 sites through the existing trail network." (Page 120 EIAR vol1 – Main Report)
The Roughan & O Donovan Walker Survey Report (Supplementary Appendix S9) has been quoted to support this.

If this were to be correct then all but a tiny number of those wishing to visit the Dublin Mountains proper south of the Hellfire Club will bypass the visitor centre in their vehicle which confirms that it is the Dublin Mountains visitor centre in name only and there is no reason why it should not be located farther down the mountain in an urban area where it will be well served with public transport, will result in a much lower carbon footprint and will not damage the forest environment which it is supposed to serve.

The following are some reasons why the proposed future visitor numbers are understated:

1. There is a 2nd path in the southern neck of Massy's wood on the western side of the river (refer to photograph in App 1) which was not included in the survey.
2. Improved pathways will make access through Massy's Wood to the Natura 2000 sites much easier
3. Currently public awareness of the path through the southern neck of Massy's Wood is low and improved signage will make people aware of the access.
4. Anybody visiting the proposed Dublin Mountains centre with the intention of actually walking up into the Dublin Mountains has no other option.
5. The 2018 survey was carried out in November when low visitor numbers to the Natura 2000 sites can be expected.

6. The Natura impact statement recognises that "Amenity use is very high, with Dublin city close to the site." (Natura impact statement Page 36)?

The fact remains however that the Natura 2000 site is deteriorating so either the visitor numbers are understated or it is an extraordinarily sensitive environment. (Refer to plate 4 on P13 and plates 6&7 on P15 of the Supplementary Appendix S9 and my photographs in Appendix 2). The paths are eroding rapidly and have become drains. Draining of the peat bogs which are the principal landform of the Natura 2000 sites is very damaging.

Page 36 of the Natura impact statement lists the main threats to the SPA as "...walking, horse riding, unmotorized vehicles, paths, tracks and cycle tracks" currently all these activities are taking place and are causing damage and therefore any increase is not acceptable.

One of the principle causes of damage are dogs which dog walkers allow to roam free over and around the Natura 2000 site. Cunnane Stratton Reynolds quote Banks and Bryant (2007) <https://royalsocietypublishing.org/doi/10.1098/rsbl.2007.0374> in support of their recommendations (page 127 of EIAR vol1 main report). Cunnane Stratton Reynolds acknowledge that dog walking has negative effects (a 35% reduction in species and a 41% reduction in abundance) as per Banks & Bryant but they then state that the impacts are short term which is not the case as per the following quote from Banks and Bryant (2007)

"It is also possible that the particular sensitivity of ground dwelling birds to dog walking ([Blumstein et al. 2005](#)) may lead to a cascade of potential behavioural changes in birds with implications for their local conservation ([Hill et al. 1997](#)). Our results therefore support the long-term prohibition of dog walking from sensitive conservation areas"

Merlin have nested in the area in the past in the conifer plantation at the south east corner of the last section of forestry on the left hand side of the road as you travel south on the military road. Grouse and meadow pipits are present but in ever decreasing numbers. Given the scenario outlined above it is hardly surprising that Merlin have ceased to nest in the area and that ground nesting birds have declined substantially.

It should be noted that the Banks & Bryant study is focused on dog walking with dogs on leads and dogs allowed to roam free will have a much greater impact.

Dog walkers allowing dogs to exercise by roaming free on open mountain moorland is commonplace in Ireland and I have personally witnessed dog walkers with several large dogs allowing them to roam free on the Natura 2000 site during the nesting season.

In the past some signs have been erected but these were taken down or vandalised presumably by angry dog walkers. Erecting signage as proposed is therefore not a solution particularly as there is no proposal to supervise the site or to impose penalties. Additionally the Developer proposes that the signboards include "A request to remain on the paths and to keep dogs on the lead" (Page 65 of the Natura Impact statement). This legitimises bringing dogs into the Natura 2000 area which is contrary to the recommendations of Banks and Bryant and indeed to common sense where ground nesting birds are present.

20 MAR 2020

The situation in Massy's Wood is similar and subject to the same pressures and there is no part of the wood that is not subjected to roaming dogs and/or walkers walking off the existing paths. The Cunnane Stratton Reynolds report refers to quiet areas (page 127 of EIAR vol1 – Main Report). Currently there are no areas of Massy's wood which are free from roaming dogs and yet they plan to build a bridge into the centre of the wood increasing the footfall by 1200% and still have quiet areas for red squirrels and other wildlife?

In my PowerPoint Presentation to an Bord Pleanála I identified eight birds protected under annex one of the EU directive, nine on the Irish Red list and nineteen on the Amber list. Is the

developer entitled to ignore the protection that these birds require just because they are only protected under Irish law rather than being protected through a Natura 2000 site?

An Bord Pleanála allowed a full cycle of a year for SDCC to undertake comprehensive ecological surveys but yet they were undertaken over a 3 month summer period which does not give a comprehensive picture. In particular I noted in previous submissions that the narrow neck on the south of Massy's wood which is the only pedestrian access from the proposed development to the mountains is also an ecological corridor for wildlife to escape from the harsh mountain environment down to the shelter of the main wood in wintertime. This has not been addressed. The Survey Transect Routes (Vol 2 Supplementary Index S4) also do not include the southern neck of Massy's Wood.

Pine Martens are present in and around Massy's Wood (App 3) and amongst other things they play a valuable role in controlling Grey Squirrels which in turn allows red squirrels to recolonise the wood. Pine Martens are very shy animals and the huge increase in footfall will be very detrimental to them.

The Natura Impact Statement (page 17 item 2.12.3) states that equestrian trails will be "predominantly surfaced in grass" obviously this will not work as grass will not grow in the forest and anywhere it does it will very quickly be churned up into mud by horses.

Cunnane Stratton Reynolds drawing no 16508-2-103 titled Glendoo Brook Corridor shows the existing walking trail on the eastern side of Massy's Wood being converted to an "equestrian trail (with walking permitted)" formed from rolled dust. This path is very narrow along much of its length accommodating either a horse or a pedestrian in single file only (refer to Appendix 4). The dust will very quickly become churned up, mucky and unsuitable for pedestrians in addition to the unacceptable safety risk of pedestrians sharing a single file path with horses.

The drawing does not show where this trail ends or returns to its beginning at the rear entrance to Massy's Wood.

In response to a question at the oral hearing Cunnane Stratton Reynolds confirmed that it did not continue all the way south to Cruagh Road but that it would loop back on one of the paths on the westside of the river to the starting point.

Currently there are 4 main pedestrian paths through Massy's Wood and the developers proposal is therefore to give two of them over to equestrian use leaving two to cope with the 1200% increase in traffic in Massy's Wood?

Page 146 of the revised EIA report states that "A survey of the trail conditions shall be carried out on an annual basis for five years post construction to establish if there are any changes in the patterns or intensity of use on the paths within the application site and leading into the upland habitats on Cruagh Mountain. The inspections will be carried out by the Dublin Mountain Partnership (DMP) and Coillte"

The results of the Coillte and DMP mismanagement of Massy's Wood and the resultant demise of its biodiversity and wildlife over a long period of time are there for all to see and it would be a tragic mistake to rely on them to supervise themselves going forward with such a proposed dramatic increase in footfall.

An Bord Pleanála have now given SDCC three separate opportunities to demonstrate how they will protect and enhance the biodiversity and wildlife of the Natura 2000 sites, Massy's Wood and the Hellfire Club and they have failed to do so so the time has come for the Bord to refuse the application.

Yours sincerely,

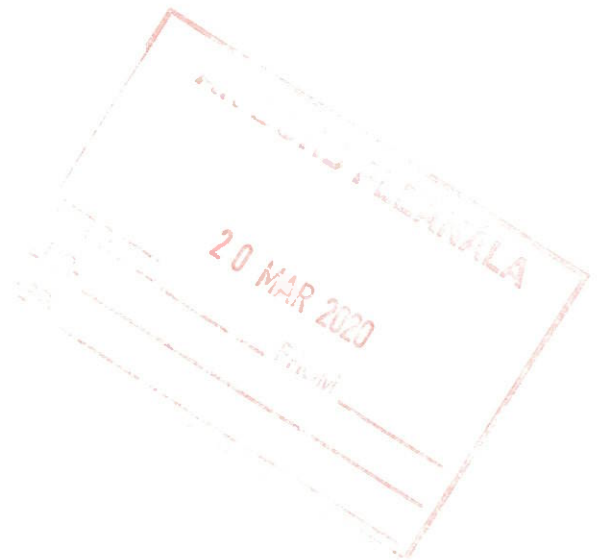
David Hanley

20 MAR 2020

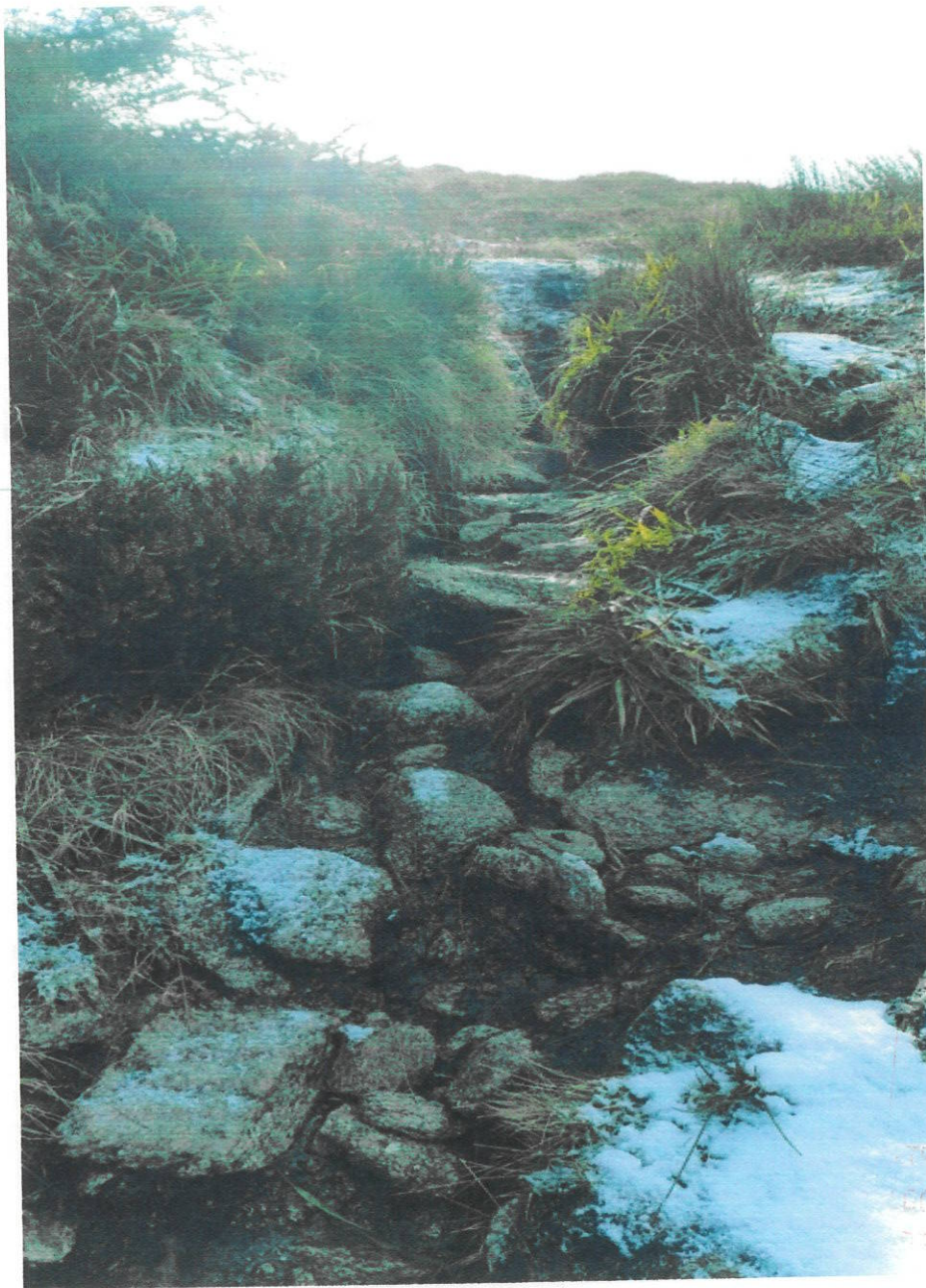
App1
Alternative path from Massy's Wood
to Cruagh road at Keoghs cottage on
west side of Glendoo Brook



App 2 Paths adjacent to boundary with SPA



App 2
Junction of path to Natura 2000 site with Cruagh
pathway



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20 MAR 2020

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App 3

Pine Marten and Badger – taken 60m west of the southern neck of Massy's Wood



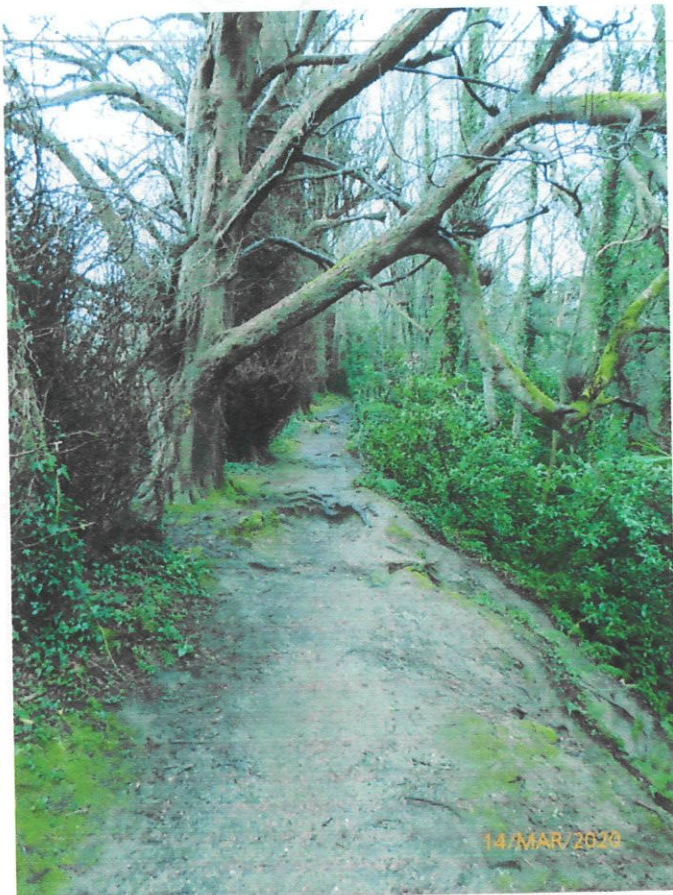
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APP 4 Proposed combined equestrian and pedestrian path



APP 4

Proposed combined equestrian and pedestrian path



Very Steep Bank

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