

Submission to An Bord Pleanála

Ref No JA0040

Further Information

Proposed Dublin Mountain's Visitor Centre

Declan Mckeever, Bayview, Killakee Road, Rathfarnham, Dublin 16.

Dear Mr Somers,

I wish to comment on the latest further information from South Dublin County Council as follows.

BIODIVERSITY

The further surveys identified **11 Key Ecological Receptors** (See graphic below) at the proposed site. I believe that South Dublin County Council have not fulfilled the brief requested by An Bord Pleanála and that the Natura Impact Statement has shown there is more than reasonable scientific doubt as to the effects of the works proposed on the site and on the nearby SPA/SAC.

11 Key Ecological Receptors - Construction & Operational-phase Impacts

					
Red Squirrel <ul style="list-style-type: none"> • Habitat Loss • Habitat Fragmentation & Barrier Effect • Disturbance • Direct Mortality 	Pine marten <ul style="list-style-type: none"> • Habitat Loss • Habitat Fragmentation & Barrier Effect • Disturbance • Direct Mortality 	Badger <ul style="list-style-type: none"> • Habitat Loss • Direct Mortality 	Otter <ul style="list-style-type: none"> • Reduction in water quality 	Bats <ul style="list-style-type: none"> • Habitat Loss • Disturbance 	Bryophytes & Tufa Springs <ul style="list-style-type: none"> • Habitat Loss
					
Upland Habitats <ul style="list-style-type: none"> • Habitat Loss • Disturbance 	Invasive Plants <ul style="list-style-type: none"> • Introduction and spread of invasive species 	Amphibians <ul style="list-style-type: none"> • Habitat Loss • Direct Mortality 	Birds <ul style="list-style-type: none"> • Habitat Loss • Habitat Fragmentation & Barrier Effect • Disturbance • Direct Mortality 	Glendoo Brook <ul style="list-style-type: none"> • Reduction in water quality 	

The findings clearly show there will be significant negative impact on the ecology, biodiversity and flora and fauna in the proposed area (52ha) and in the nearby Natura 2000 sites.

INCREASED NUMBER OF VISITORS

Increasing footfall by 300% (300,000 visitors) p.a. will adversely affect the integrity of the proposed site and also the nearby Natura 2000 sites which "are connected to the proposed development by a network of walking trails."

Article 6(2) of the Habitats Directive, states "that all natural habitats and habitats of species found within SACs are protected against acts liable to deteriorate them."

According to Article 6.2 of the Habitats Directive, any deterioration of habitats and significant disturbance of species for which a site has been designated must be avoided.



The proposed use of the above Information Boards as a mitigation measure to control the proposed 300,000 visitors/increase in footfall is wholly inadequate.

It's also worth noting there is no management plan for the Wicklow Mountains SAC – See point 6 in the link below

<https://www.npws.ie/sites/default/files/protected-sites/natura2000/NF002122.pdf?fbclid=IwAR1zCykxIZsQR-Kxec0DdAjWZ2TTYfEz-sznAX7rw5lvH-a5qZdTcSIJ5-A>

Regarding the Bryophyte Survey:

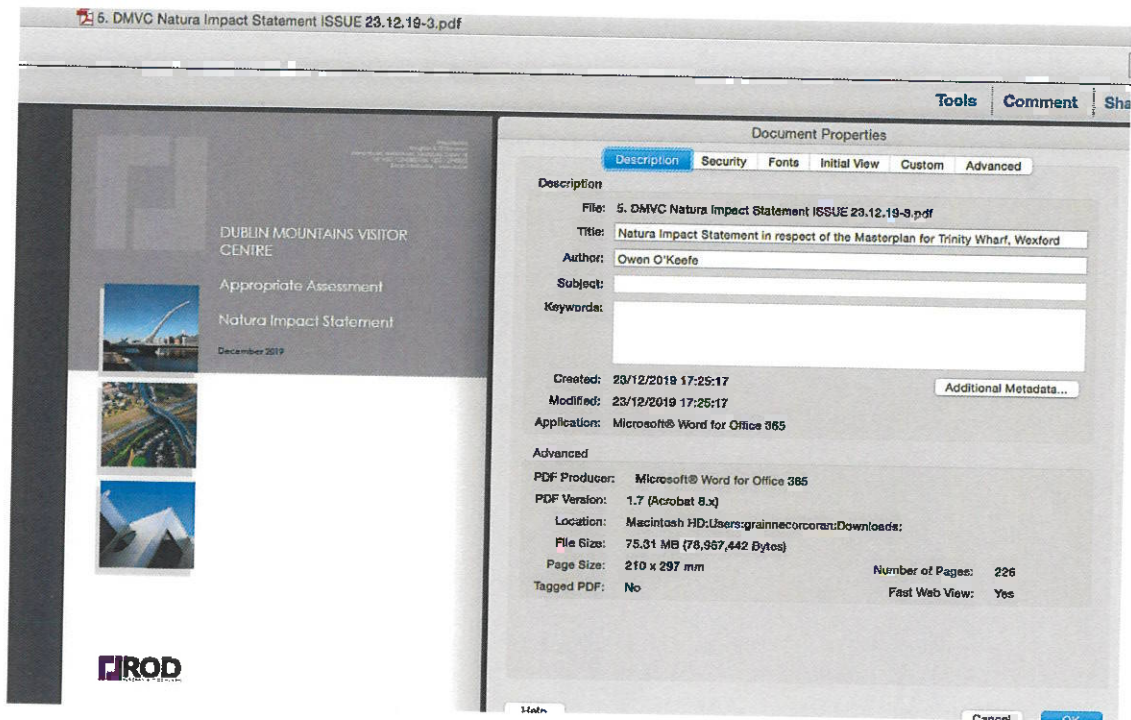
"It could be argued that the site is of National value for biodiversity, given the numbers of Red List species present." *4.1 Conservation Value – Page 10 DMVC EIAR Vol 2*

"Massy's Wood and Mountpelier Hill provide habitat and environmental conditions that are uncommon in the county, it is unsurprising that the site is important for bryophyte diversity." *Page 6 Massy's Wood and Mountpelier Hill Bryophyte Survey*

The Council propose to monitor the site as part of mitigation measures after the construction phase. I would like to point out that – Monitoring is not Mitigation!

It is also worth noting points 1 to 3 below.

Note 1: Very disappointed to see the Natura Impact Statement seems to be a cut and paste effort by ROD from the Natura Impact Statement in respect of the Masterplan for Trinity Wharf, Wexford.



Note 2: Out of the 12 months allowed for a Bird Survey the Council only availed of a 3 month period (**25.04.2019 to 27.07.2019**). During this brief period the elusive Merlin was spotted during the breeding season in suitable 'habitat'!

Note 3: I would like it noted that having paid the required administration fee of €50.00 to An Bord Pleanála I was very disappointed **not** to be notified regarding the further information.

Yours Sincerely,

Declan McKeever

