

Christine Brennan

From: Deirdre Cronin <deirdrecronin100@hotmail.com>
Sent: Monday 23 March 2020 09:21
To: SIDS
Subject: REF JA0040 submission

Categories: Last Date

The Secretary

An Bord Pleanála

64 Marlborough St

Dublin 1

2020

20th March

Dublin Mountains Visitor Centre- Strategic Development Initiative

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

Planning Authority: South Dublin County Council

Ref: JA0040

To whom it may concern,

An Bord Pleanála requested the applicant to conduct additional monitoring/surveying of the otter. However the surveying conducted seems to have inadequacies that may lead to a continued failure to vindicate the protections afforded to a mammal classified under Annex II and IV of the Habitats Directive.

Because of inadequate surveying it is not possible to claim with reasonable scientific certainty that the effects on the otter population will be mitigated during either construction or operational phases.

The level of surveying and monitoring recommended in the Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes is substantially more rigorous and robust than that implemented to date in the Dublin Mountains Project proposal.

According to the aforementioned:

*"Initially, surveys will be required to identify structures which could potentially be used as resting sites, followed by targeted inspections of any such features for evidence of use by otters. **Given that otters can use such features on a relatively infrequent basis, this is likely to require multiple visits over the course of an extended period (up to 12 months).** The importance of a structure as a natal or rearing holt can only be reliably determined by either the use of remote cameras or watching the structure from an appropriate distance."*

A similar timeframe does not seem to have been employed in this case.

The Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes also acknowledges that:

"Where otters are present it will be particularly important to determine whether or not any resting sites (such as holts or couches) are present, and their level of importance."

It proceeds to note that:

*"Optimum Survey Period Otter surveys can be undertaken at any time of year, but are **less likely to provide reliable results during mid- to late-summer**, when the presence of dense vegetation may make it difficult to find field signs and holts."* Unfortunately the surveys provided occurred in the period June/July 2019.

Because the surveying continues to be problematic, it raises difficulties in assessing whether proposed mitigation is adequate and, as it stands, the DMP could threaten the viability of the otter population in Massy's Wood, Glendoo Brook and the wider Glenasmole Valley SAC.

I request the reopening of the oral hearing.

Yours sincerely,
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