

Ellen Morrin

From: John Lawlor <lawlor.jg@gmail.com>
Sent: Thursday 23 April 2020 14:52
To: SIDS
Subject: attn: Kieran Somers. RE: DMP Addit Info submission/23rdMarch2020

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Kieran,

hope you are all well and safe there. I wish to make a request please, hope you can facilitate.

In the cover letter of my observations document I requested a second oral hearing. I wish to withdraw that request ONLY and replace it with a call to the Bord to make a final judgement of rejection for this project.

Best regards, John Lawlor.

p.s Could you in your response acknowledge receipt of march 23rd submission please. thanks.

Christine Brennan

From: John Lawlor <lawlor.jg@gmail.com>
Sent: Monday 23 March 2020 17:25
To: SIDS
Subject: addendum/John Lawlor/DMP/Addit info2020(Ref:06S JA0040)

The Secretary,
An Bord Pleanála,
64 Marlborough St,
Dublin 1.

21 March 2020

Ref:06S JA0040

RE; Dublin Mts Visitor Centre.

Additional information submitted by the aspirant developer applicant.

Please include in my comments submission.

Dear Sir/Madam,

concerning the co-developers (Coillte) interests in this development and the development of the Dublin Mountains as an amenity for the Irish people and our friends and visitors.

The Minister for communications, climate action and Environment has issued public notices on 19th sept 2018 offering prospecting licences for the mining of minerals and metals in the Dublin Mts, areas include Montpellier, Cruagh, Glendoo, Killakee, Piperstown and Tibbradden. Coillte the co-developer in this DMP project proposal being a major stakeholder in these nominated areas...what effects do they believe take-up on these licences will have with regard to their plans of development in this area? And how specifically will it impact the nature and bio-diversity of the proposed development area itself, an area which the co-developer is directly responsible for?

Yours, John Lawlor

Christine Brennan

From: John Lawlor <lawlor.jg@gmail.com>
Sent: Monday 23 March 2020 15:30
To: SIDS
Subject: John Lawlor. (DMP.Addit info2020)06S.JA0040
Attachments: DMP.2020.John Lawlor.Responses to Addit Info..pdf

Dear Sir/Madam,

here are my further responses to Applicants additional Information submitted to the offices of An Bord Pleanala on the 23rd December 2019

best regards,John Lawlor.

The Secretary.
An Bord Pleanála,
64 Marlborough St,
Dublin 1.

21 March 2020

Ref:06S JA0040

RE; Dublin Mts Visitor Centre.

Additional information submitted by the aspirant developer applicant.

Dear Sir/Madam,

here are my further responses to Applicants additional
Information submitted to the offices of An Bord Pleanála on the 23rd December 2019

In the light of the Tsunami of additional information I respectfully request a second oral hearing as there are so many matters raised by it they cannot be all properly addressed in a single written document.

Yours in trust,

John Lawlor.

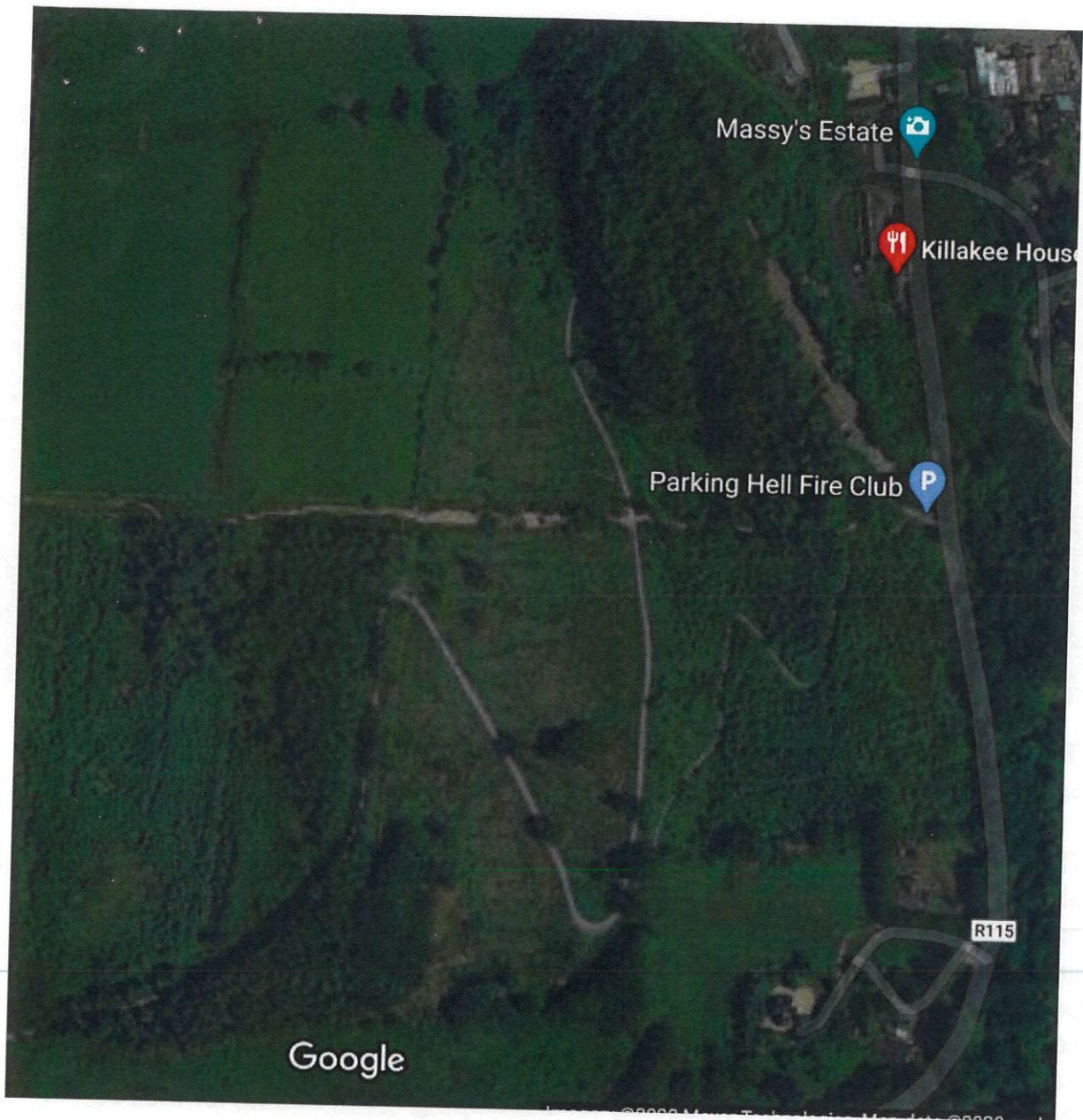
THE RED SQUIRREL. Pine Marten. MITIGATION PLANS.

It cannot be forgotten that the co-developer (coillte teo) at least one year before plans were made available to the public, clear felled the proposed site under the pretence that their crop of trees had reached maturation and required commercial harvesting. This harvesting was carried out without ANY environmental studies whatsoever. (*get the money out*).

That action has likely damaged a major habitat area of the red squirrel and more importantly has isolated the red squirrel from further feeding and habitat grounds to the west of the proposed Montpellier hill.



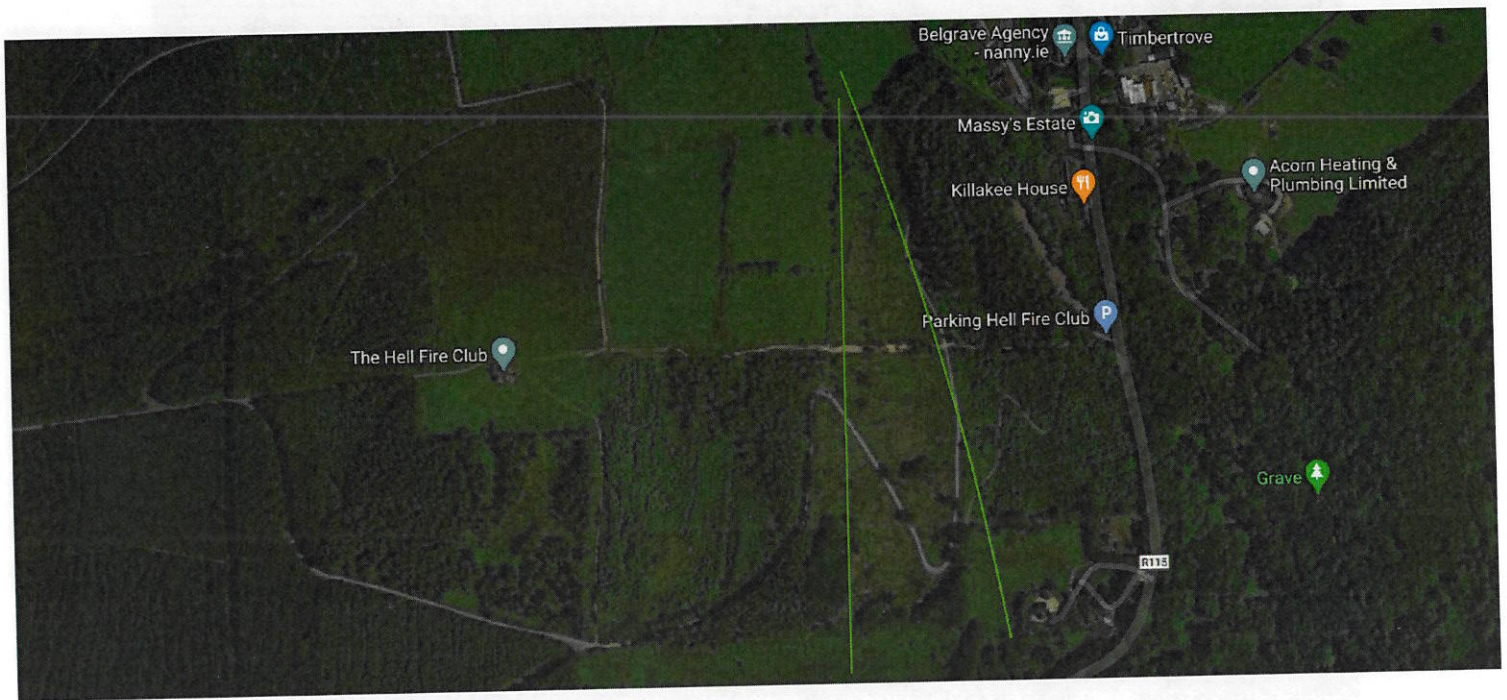
Before the clearfell. (photo early 2000's).



After the clearfell. (photo2016/2017)

As the Pine Marten also eats conifer seed, in this instance what has been done to the red squirrel has been done to the Pine Marten also. If studies had been commissioned before clear-felling natures presence would have been documented properly. This reveals self evidentiary truths about the levels of REAL commitment to biodiversity and wildlife preservation the developers SDCC/COILLTE TEO have displayed here to date.

Presently the red squirrel crosses back and forth between Massys Wood and Montpellier Hill to access the mature broadlead woodland habitat and conifer tree plantation habitat which delivers a pretty ideal dual habitat its comfortable in.



The 2016 clearfell (within green lines) shows loss of habitat and loss of tree bridge for red squirrel.

The large *extended* feeding/habitat grounds of the red squirrel (to the left of above picture), have become very difficult to access as the clear fell has created an extensive no mans land where the squirrel has to cross large stretches of open ground, incurring real danger, whereas before.... if you jump back and forth with the before/after photos ...you can see that the tree cover was far greater, allowing the squirrels to travel largely by tree with only small areas, tracks usually, where they had to cross ground. *Safe tree travel for the squirrel to and from feeding grounds are quite obviously a bare necessity for developing good habitat for the red squirrel.*

This is not the first time our little red friends have been nuked with heavy habitat loss or interference at this location. Lets just look at the **proposed building site**



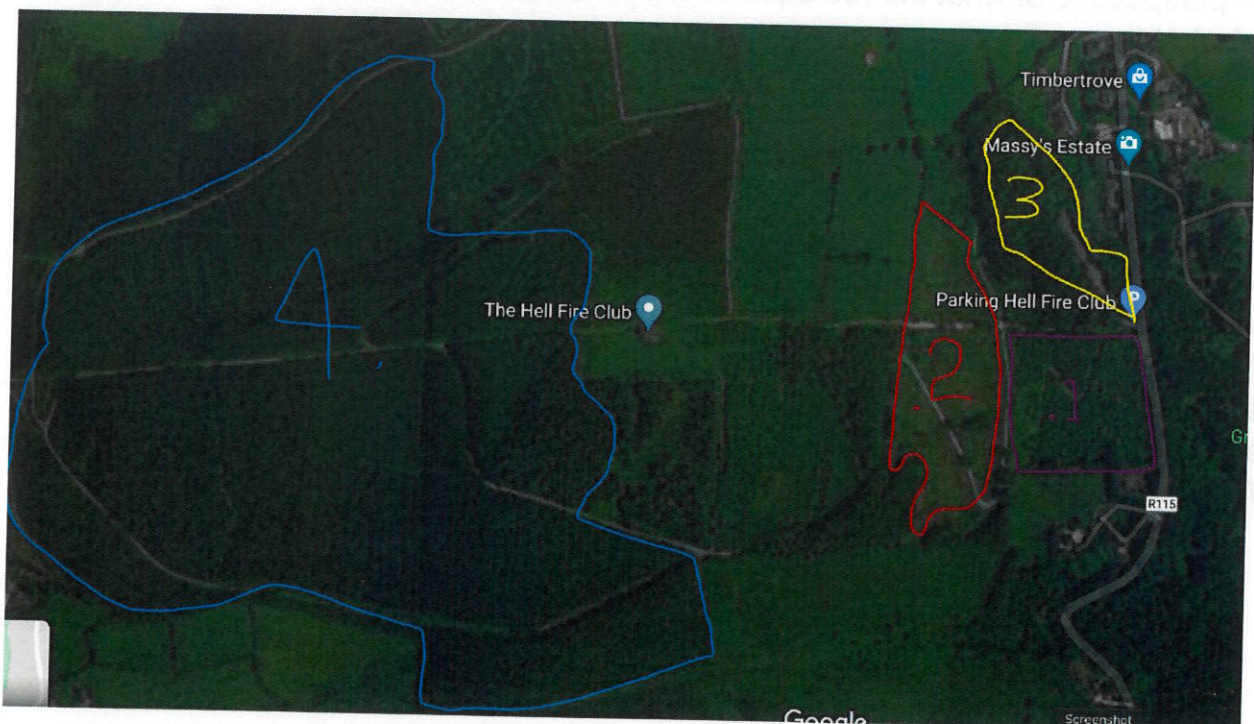
area. I call it the zigzag zone, after its track. This was clear felled in the late 1990's early 2000's. Clearfelled and replanted largely with a selection of native broadleaves and some conifers. Those trees are 10 to 15 feet tall now but the plantation is still not very red squirrel friendly in that the trees are not yet tall enough to form a canopy to allow them to easily traverse the area to get safely to the more mature feeding grounds, the primary one (the nearest one) being the remaining stand that encircles the car park. The ground also is quite densely overgrown with briar and impenetrable brush making good predator cover and thereby a no go area for the red squirrel. It will be some years yet before that changes.

But before clearfelling this area must have been a strong and safe area to be in for the red squirrel. The road runs beside it with Massys Wood on the other side. Its likely that this was the favoured place for the squirrels to cross from one habitat to the other as generally not too many people were/are to be met walking on the road south of the entrance along with a lot less traffic.

Whereas today local observation is regularly spotting the red squirrel cross the road at the entrance to car park or along the 100 metres to the north toward Massys wood main pedestrian gate and the Stewards hse...

...so it seems that the red squirrels are crossing the R115 from Massys at the busiest location presently. Crossing the road, scaling the stone containment wall 4-6ft up into the belt of relatively new broadleaf trees, probably planted around the same time as the zigzag dev site area. From there, they can safely watch from the trees to time their traversing of the car park up into the stands of remaining pinetrees that is their habitat. This they do regularly before us all dangerously crossing the car park at ground level. These same stands of red squirrel habitat that will also be largely clearfelled if the development is allowed.

So lets just go back to an aerial photo again to summarize.



Zone 1. (purple) Late 1990's early 2000's habitat loss for the red squirrel from clearfelling. Additionally possible loss of safer crossing area as a result. Replanted early 2000's with mixed broadleaves and conifers, not yet a safe and attractive habitat for Red Squirrel. This zone will again experience serious amounts of tree felling to facilitate the construction of the proposed building and the Tree walk bridge.

Zone 2. (red). Clearfelled in 2016 by developer before the plans for development were made public. This wiped out half of the Red squirrels habitat that was nearest to Massys Wood, the location to their second favoured habitat. This act additionally drove a very large wedge between the red squirrel lower habitats and feeding grounds, just described and those much larger ones above and to the west of the development site.

Zone 3. (Yellow). This is the remaining red squirrel conifer habitat adjacent to their broadleaf habitat of Massys Wood. This is where they are spotted most regularly. All trees within the yellow zone will be clearfelled. If you like this is the last stand of red squirrel conifer habitat that is within easy and safe reach of the critter. The plan is to remove that too for the expansion of the developments carpark.

Zone 4. (blue). The remaining stands of Industrial conifer plantations. Quite possibly no longer safely accessible for the red squirrel as the previously described clearfelling practice of 2016 created a no mans land or treeless land corridor exposing the red squirrel to real predatorial dangers over long ground journeys to the higher feeding areas.

The developers wearing their Industrial hats hold right and intent to clearfell harvest any and all the remaining stands of trees within the blue zone.

Please excuse my long winded way of expressing to you, in the light of all this birds eye perspective of what the red squirrel has already experienced from their masters and what they will further experience if this project is green lighted, may I express here the highest sense of exasperation when faced with the facile mitigation plans presented here for the red squirrel and the Pine Marten within this project. Who is fooling who here? Are we in a climate change and biodiversity emergency or not?

In summary what is going on here *naturewise* is the slow but accelerating destruction of important Red Squirrel/Pine Marten habitat along with the breaking of the ACTUAL Tree bridge that naturally exists between those habitats of Massys Wood and Montpellier Hill that these critters have used for many years....for the bad purpose of building a man made Treebridge for humans which will bring them safely up to a concrete box with a lovely window and yet another coffee to slurp. Who's the loony behind all this waste of money and time and good resource?

We don't know how many red squirrels lived in this habitat before the co-developer clear felled the actual proposed building site area, my so called zigzag zone in the late 1990's early 2000's. Neither do we know how many red squirrels lived in the canopy of the considerably larger area that was clear-felled in 2016 just before this project was publically unveiled. All we know is that we don't see too many red squirrels at all here since the heated eye of bad interest locked on to this hillside.

If we are to believe the quoted science here...

EIAR/Ch 6/Biodiversity/p.109

The carrying capacity of the Hell Fire Club and Massy's Estate, based on Gurnell *et al.* (2009), is 4-16 Red Squirrels at the Hell Fire Club (40 hectares of conifers @ 0.1-0.4 squirrels/ha) and 42 Red Squirrels in Massy's Estate (47 hectares @ 0.9 squirrels/ha).

.....and add that to the EIAR Field study which herein reported sighting only ONE red squirrel, I think all must be led to construe that a red squirrel population collapse has quite possibly happened here right before our very eyes and for the proposed reasons set out above...

...the bad systemic practice of clearfelling tree habitat of red squirrels carried out by the co-developer, the same co-developer who delivers the scientific opinion to us here that in the short term red squirrels may disappear from the site and it will be an acceptable loss. Acceptable I suppose in willful expressed belief that after development they will return?

Return to what when the developer/commercial forester has removed 75% of the conifer habitat that lies adjacent to its equally important Broadleaf habitat in Massys Wood and destroyed the tree bridge to the high feeding grounds of Zone 4 further up the hill, with plans to clearfell that Zone 4 also.

6.5.2.1 Red Squirrel

Red Squirrel could be impacted by the proposed development and have been included as a Key Ecological Receptor.

Really?

6.5.2.2 Pine Marten

Pine Marten could be impacted by the proposed development and has been included as a Key Ecological Receptor.

Really?

Clearfelling is environmentally an unacceptable practice under any circumstances within the climate change/Biodiversity emergency this Country along with the EU and the rest of the planet as declared. End of story. Any company that continues to practice grossly unsustainable behaviour cannot be trusted with public funded projects that requires sensitive management of wildlife habitats.

Link to confirmation studies of the synergy that exists between Red Squirrel and Pine Marten which mitigates Grey squirrel numbers the possibility of which was referred to only in the EIAR. Interestingly its a U.K Science Researched Project, with IRL Irish Research Council Funding.

[Pine Marten - British Red Squirrel](#)

Red Squirrel and Pine Marten are protected by the Irish Wildlife Act. When does this protection kick in? If it doesnt kick in now be assured that this high and cherished nature habitat will most certainly NOT be protected by a corporate Hellfire Acts?

Footnote:

I just discovered recently that in zone 1 (the proposed dev site and footbridge area) there exists a deer rutting pond. With my developers hat I'd be saying ,well we'll get rid of it, the deer can feck off somewhere else. With my Gerrit van Gelderen/Eamon deBuitlear hat on I'd be saying wow, thats fantastic, how does that work, can we get to see them? At it?

THE WALLED GARDEN.

EIAR pt1/Chapter 6 Biodiversity. Page 125

The creation of a wildflower meadow in the walled garden will lead to a loss of c. 0.61ha of scrub and mixed woodland habitat. Specimen trees in the walled garden will be retained.

I could have a blind spot with regard to this but I cannot see the results of the studies of the huge insect depository that exists in the lower section of the walled garden? Is there anywhere in this biblical ring bound EIAR doorstep study that deals with this?

All of us being in the climate change EMERGENCY NOW must keep in mind that the BIODIVERSITY emergency NOW is equally important, they both are inextricably linked. We cannot forget one for the other...

...In the summer of 2018 I walked through the walled garden of Massys Wood where the remains of the historic curvilinear Turner Glasshouse lie. The overgrown area of foilage there was at the height of its summer growth, shoulder high, in flower, fecund and dense.

It was the extraordinary sound of the buzzing of insects that arrested me. The volume was so high it stopped me in my tracks momentarily fooling myself into believing that a swarm of bees were nearby. No swarm though, just a very high population of insects on the wing going about their pollinating and regenerating way. I do not exaggerate the level of insect wing sound, it was so high. The warmth of the summer sun was on and it sounded like Massys wood walled garden was the Insect ground zero five star habitat for the whole area.

In the light of the now regularly reported major global losses in pollinating insect numbers and the potential ramifications of breakdown of the pollinating processes for humanitys food sources of fruit, vegetable and crops, does this small vibrant habitat I have described to you here deserve better recognition, attention and study than the few repeated descriptions of *'scrub that will be cleared for a meadow'*? I bang the table with closed fist outrage and shout loudly to the Gods that this shallow, infantile pseudo science study is not good enough...I demand BETTER science. This is an EMERGENCY. Science is delivering half truths to the corporate sector and has being doing so for 20 yrs. It must stop now, with this process today.

<https://www.theguardian.com/environment/2019/mar/26/widespread-losses-of-pollinating-insects-revealed-across-britain>

MASSYS WOOD and its non existant WOODLAND MANAGEMENT PLAN.

One of the critical objections people have locally to this proposed project comes from the lack of confidence they have with regard to the needs of Massys Wood being served. The co-developer/custodian of this property has a long record of management neglect of this little woodland gem stretchin over the last 30 years or more.

Since the unveiling of this proposed project to the public and since the oral hearings and the three rounds of additional studies been produced there is *still* no woodland management plan in place for Massys Wood. Even though this woodland is regarded by elder foresters here in Ireland to be **THE first designed urban Woodland in Ireland.**

The owner/custodians have consistantly failed to avail of the myriad of opportunities in these last three years to do the right thing. A proper woodland management plan would be the taproot for the secure future of the woodland for everyone living around the area, giving some return of confidence and basis to face the development plans with grounded feet and balanced objectivity.

This failure reinforces peoples mistrust of Coillte and their secret agreement with the other state instrument partner in SDCC.

Yes, scattered throughout the EIA you can find bits and pieces of management proposals. Upgrading paths, creating signage, Bridleway and the only real management plan related to the growing environment is the **Alien Plant Species Management Plan...draft. Nov 2019**

6.9.3.7 Invasive Species (KER 9) P.141

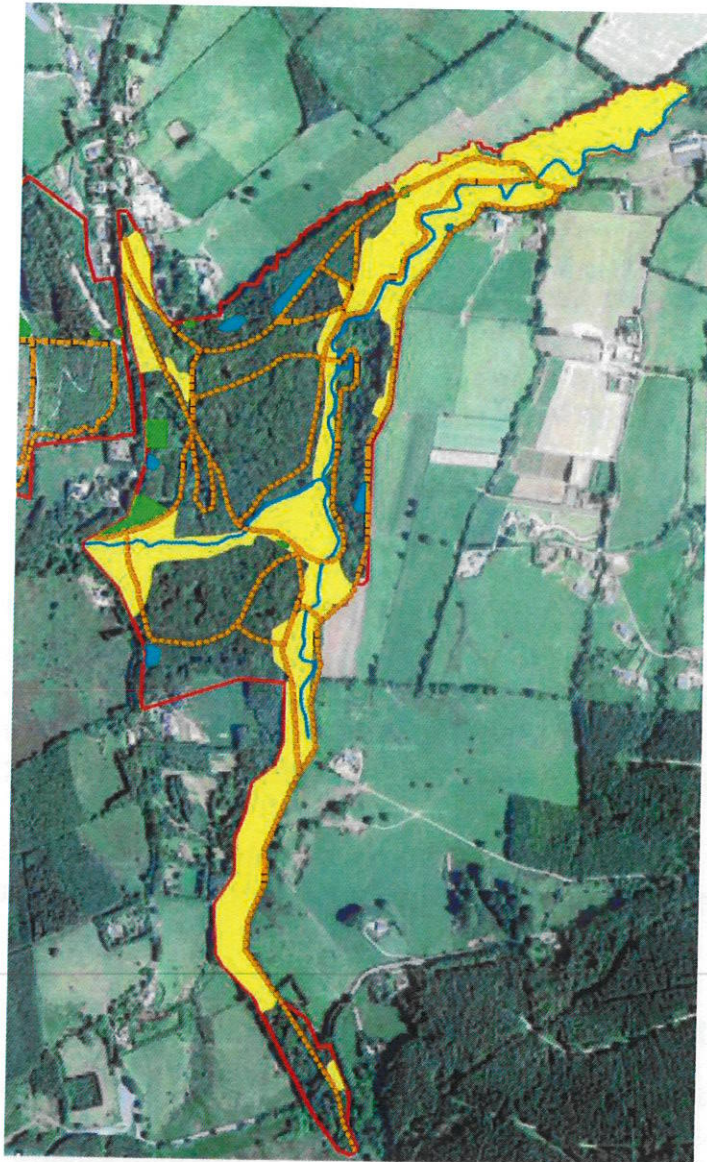
- Herbicides will be used in accordance with the European Communities (Plant Protection Products) Regulations, 2012 (S.I. No. 159 of 2012) and the (Sustainable Use of Pesticides) Regulations, 2012, (S.I. No. 155 of 2012) (as amended).

The Alien Plant species Management Plan recommends on P15 of this plan...

6.1 Rhododendron and Cherry Laurel.

Rhododendron and Cherry Laurel should be controlled using a Glyphosate-based herbicide approved by the manufacturer for use near water. Stump treatment is the most effective and environmentally sensitive method in the case of Massy's Estate.

As can be seen on page 7 of the Plan, Fig 2, a colour coded map of invasive species in Massys Wood, the yellow marked areas represents the presence of..



...Cherry Laurel and Rhodendron. That looks like close to 25% of the 100 Acres Massys Wood covers and most of that close to and following the woodland river. Approx 25 Acres requiring the recommended treatment of Glyphosate herbicide.

'Glyphosate, which has been on the market since the 1970s, has received much international attention since the International Agency for Research on Cancer ([IARC](#)) of the World Health Organization ([WHO](#)) classed glyphosate as a "Group 2A – [probably carcinogenic to humans](#)" in 2015 and recently, due to a number of court settlements in relation to glyphosate.'

source link;

<https://www.rte.ie/brainstorm/2019/0830/1071797-what-a-pesticide-like-glyphosate-is-doing-to-your-health/>

'Forget cancer. The next EU debate on the safety of glyphosate will be about the environment and the harm the ubiquitous herbicide can do to life in meadows and rivers.

The EU's three-year reevaluation of the world's most politically contentious weedkiller begins next month, with several countries such as France, Germany and Austria already pledging to phase it out.

EU countries narrowly granted [a license](#) to glyphosate in 2017 after a heated debate about whether it causes cancer. While its producer, the German chemical giant Bayer, is now facing thousands of lawsuits in the U.S. over concerns that it is a carcinogen, it is more likely that the European debate will now take a different course.'

<https://www.politico.eu/article/battle-over-glyphosate-shifts-to-the-environmental-front-pesticides-herbicides/>

Considering all the touchy feely industry driven,publically funded, gaze directed, pseudo science placed before us all in this public funded EIA report and its false empty science MITIGATION plans what impact would this extensive use of carcinogenic herbicide have on the wildlife habitats of birds,badgers,squirrels, deer,dogs,insects and all wildlife in Massys wood. Including children and adults?

Specifically how would this mitigation plan impact on the 49 recently discovered rare to Dublin and very rare protected Bryophytes growing by the waterway in Massys Wood?

6.5.2.6 Bryophytes

*The Bryophyte survey recorded rare and protected bryophytes in the study area. The report is presented in Appendix S2. One species, *Orthotrichum stramineum*, is listed on the Flora (Protection) Order 2015 and was recorded on the trees in the vicinity of the proposed canopy bridge. Another species, *Plagiothecium laetum*, was recorded near the proposed visitor centre. Within the study area, the most notable findings were:*

- *One moss listed on the Flora (Protection) Order 2015*
- *Four Red List mosses, two ranked Vulnerable and two ranked Near Threatened (Lockhart et al., 2012)*
- *Two species not previously recorded in Co. Dublin*
- *Five species not recorded in Co. Dublin since 1959*
- *49 species considered rare in Co. Dublin*

25 acres, a quarter of Massys wood to be possibly treated/saturated with a banned herbicide that has links with human cancer and is similar in its makeup to pesticides.

A potential visiting nightmare of Industrial Agri/Forestry practice attempting to transfer their nuking capacities of plants and insects over to nature reserves?

Taking the clearfelling ambitions already released across the road from Massys, here is some kind of balancing behaviour in the planned ambitions, comforting no?

LIGHT POLLUTION.

The proposed development is seeking to place a pathway along Gunney lane and Kilakee rd, all the way up the hill to the site at Massys wood and Montpellier Hill. Those pathways must be accompanied by streetlights. No?

If so where are the studies regarding the resultant light pollution that this will produce?

Night time lights in building.

6.9.2 Non-Specific Mitigation Measures

- *The opening hours of the visitor centre are 8am-8pm from April to September and 9am- 5pm from October to March. This will limit the presence of light spill from the visitor centre and outside lighting after dark. For a short period, light spill from the visitor centre will be felt over a small area.*

10.7.5 Night Time Assessment

Five representative views were assessed for the visual effects at night from the new building due to lighting in the evening time. Although it is proposed that the visitor centre operate during daylight hours only (up to 8pm in the summer and 5pm in the winter months), it is possible that the building would remain internally lit occasionally after dark.

Under what circumstances is this occasional interior lighting after dark scenario envisaged?

6.12 Major Accidents Disasters and Climate change.

It is considered unlikely that the proposed development will result in an increased risk of major accidents or disasters.

7.10 MAJOR ACCIDENTS AND NATURAL DISASTERS, CLIMATE CHANGE AND NATURAL RESOURCES

It is considered unlikely that the proposed development will result in an increased risk of major accidents or disasters.

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10.9 MAJOR ACCIDENTS AND NATURAL DISASTERS, CLIMATE CHANGE AND NATURAL RESOURCES

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14.8 MAJOR ACCIDENTS AND NATURAL DISASTERS, CLIMATE CHANGE AND NATURAL RESOURCES

It is considered unlikely that the proposed development will result in an increased risk of major accidents or disasters.

Am I not right in saying here that it is not sufficient for the EIA to 'consider' that the impacts on Climate Change will be imperceptible. This statement really needs to be evidenced.

This project proposal has not adequately evidenced the potential to impact on climate change both individually and in-combination with other plans and projects. There is no detailed evidence of the direct and indirect sources of greenhouse gas emission that will result from either the construction or operational phases, merely assurances that there will be an imperceptible impact.

Climate change is the result of millions of individual actions which individually have an imperceptible effect. It is the cumulation of the imperceptible effects that has brought the nation and the planet to a state of emergency.

This project is not a necessary piece of infrastructure and it will be contributing directly and indirectly to greenhouse gas emissions. For judgement to be made here the science has to deliver greenhouse gas emission figures. Where is the science evidence of assessments here?

INCREASED FOOTFALL MEANS INCREASED CAR AND BUS POLLUTION.

The plan is to enlarge a car park from 80 spaces to 275 spaces

The plan is to increase visitor numbers from 100,000 to 300,000

Coilltes figures for average car visits to hellfire car park is 2000 weekly,

The new car park offers 5 tour bus spaces. Tour buses average a two hour stay so at peak summertime thats 25 tour buses a day. Thats 25 buses up the hill to Montpellier and 25 back down. 50 passes of large tour buses on the Killakee/ Military rd each day. Which is 350 passes of tour buses per week.

This project aspires to be a 15 million euro flagship tourist destination so those tour bus spaces, make no mistake about it will be pre booked and fully booked each day during the high tourist season.

From a road that NEVER has a tour bus on it to a road that has 350 tour bus passes every week, thats an explosive development beyond acceptable levels.

A development that the developers scientific Traffic Noise Impact Assessment study reports...

EXECUTIVE SUMMARY .

'It has been found that the change in road traffic volumes on the main access route to the site, via Killakee Road, will not change significantly as a result of the development. Therefore, the change in noise environment during the peak hour period of Sunday afternoon is less than 1dB which is considered to be negligible.

In addition, the existing noise climate along Killakee Road was found to be dominated by road traffic. Therefore, the proposed development and the

introduction of small amounts of additional traffic will not alter the existing soundscape in the area.

In conclusion, the proposed development will have a negligible impact on the existing noise environment as a result of additional road traffic. No mitigation is considered necessary.'

Original survey lasted FORTY TWO MINUTES on a Sunday afternoon 25th June 2017. (EIAR vol 2. Chapter 9, Appendices, Air,Noise and Vibration.

50 Tour Bus passes each day, 350 per week and the twisted science is telling us this change of road traffic volume will be audibly negligible to what currently exists?

I haven't added the expected doubling of car traffic which would be delivering 4000 cars a week, that 570 cars a day!

And lets add the developers Tallaght shuttle link not so MINI-Bus every 15min up and down, thats 8 passes an hour,by 10 hrs a day, thats 80 large minibus passes each day, 560 Minibus passes each week?

NEGLIGIBLE NOISE LEVEL CHANGES?SO...NO PROBLEM..NO NEED FOR MITIGATION?

Pushing aside this breathtaking bit of scientific research on noise levels.

My burning man question is where is the science in this EIAR report on carbon emission projections from the *negligible* increased Traffic that will result from this development as quite obviously vehicle movement on this road wishes to multiply dramatically?

Additionally where is the calculated carbon emissions total for this whole development?How can we really assess this projects merit from a climate chane perspective without REAL SCIENCE carbon emission figures?

The Killakee road is one step removed from a country lane, we have relatively quiet and calm traffic volume. We have A LOT of cyclists. We have Horses and their Riders coming up and down this road every day.
The road is a STEEP hill. It has a major bend at the foot of it. All plans for this development concerning the road is making the road more DANGEROUS.

Where is the MITIGATION report on potential MAJOR ACCIDENTS for this?

DMP VISITOR CENTRE WRONG LOCATION.

The proposed DMP VISITOR CENTRE is NOT a Dublin Mts Way resource. It is NOT at the beginning or the end or even mid-way of a waymark trail. It is building proposal to create a tourist attraction.

Conceived while national denial of climate change was still securely in the bag the projects intent was to triple visitor footfall in three years, principally by making the location, tour bus accessible, to deliver those tourists into a concrete pillbox-like building with a cinema screen sized window offering a kick ass view of Dublin city and bay making the traditional lung filling good air walk to the top and its fine reward of panoramic views meritably gained pretty much obsolete.

No consultation with the thousands of local visitors already using the facility every year, the project can be seen as a theft of a natural resource for the people of Dublin, where development will give it to a much larger number of tourists changing the experience and atmosphere radically for the worse. (Glendalough has become highly congested and dysfunctional in the very recent years because of tour bus tourism).

From observation and use it looks like most people who come to walk Montpellier and Massys Wood park their car, open their car boots, change their footwear and kit up, then depart. When they return the same actions generally unfold.

The idea of showers and changing rooms do not relate to the function of this idea where it is placed. The REAL hill and Mountain walkers are elsewhere, they do not generally come through here BECAUSE it is out of the way of the national walk routes.

So most local people figured that as this involved the Dublin Mountains Partnership and the promotion of the newly mapped and established Dublin Mountains Way, the services must be for the long walk hikers returning back to Dublin after traversing the Wicklow and Dublin ways.

But, as stated before here the proposed development is actually sited a considerable distance away from the Dublin Mts Way and cannot be seen as connected in any way.

It is an idea in the wrong place, proposing a building in the wrong place and for the wrong reason.

Final comment . The medicine of the natural environment.

Being able to swiftly get away from our rat-race life into a calming and naturally recalibrating atmosphere is a great gift to have. Especially when its on our doorstep.No Money needed,no spend needed, no eye temptations to kids or adults for yet another coffee shop stop. No interpretations needed.The coffee stops are there already but not in your face. Massys Hellfire Woods still has that quality for all of us but it needs help to maintain and improve it.

Surveillance and signage are two major urban pollutants. We get out to the sticks, to the water and the wild, to the nature...in order to switch off. In order to get away from BEING STUDIED or instructed with interpretation.

You dont bring the city up to the wilderness any more in climate emergency... you restore the wilderness and then bring the wilderness back to touch and embrace the city to keep it and its civilisation harmonised with Nature. That is the task of the Urban Planner and the environmentalist today, is it not?

PROPOSAL TO MONITOR VISITOR BEHAVIOUR

EIAR Ch 6/Biodiversity/p146

- It is proposed to monitor visitor behaviour for a period of five years post construction. The monitoring shall be carried out using cameras or counters and will be carried out by a suitably qualified person. The visitor monitoring will establish what proportion of visitors use the different looped walks, enter Cruagh Wood and the Dublin Mountains Way from the site of the proposed development and finally, it will record the number of walkers entering the upland habitats on Cruagh Mountain.
-