

Planning Statement

In support of an Application by South Dublin County Council to An Bord Pleanála, under Section 175(3) of the Planning and Development Act 2000 (as Amended), for Approval of Development of the:

Proposed Dublin Mountains Visitor Centre



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July 2017

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In Association with

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1.0 INTRODUCTION

1.1 INTRODUCTION

This Planning Statement is submitted to An Bord Pleanála in support of an application, under Section 175(3) of the Planning and Development Act 2000 as amended (hereafter referred to as the Act), for approval of development of the proposed Dublin Mountains Visitor Centre.

The Planning Statement should be read in conjunction with the Environmental Impact Assessment Report (EIAR) submitted with the application under separate cover.

The Planning Statement and EIAR have been prepared by Cunnane Stratton Reynolds Ltd (CSR) on behalf of South Dublin County Council (SDCC) and its partners in the proposed development, Coillte and the Dublin Mountains Partnership (DMP)¹.

CSR has prepared the Planning Statement in consultation with the design team lead by Paul Keogh Architects, the project engineers Roughan & O'Donovan, Cathal Crimmins Architect (responsible for archaeological, cultural and architectural heritage aspects), Veon forestry consultants, and CHL tourism development consultants.

1.2 PLANNING PROCESS

The application for development approval is being made to An Bord Pleanála under Section 175(3) of the Act. Applications under Section 175(3) are made by local authorities when the authority proposes to carry out development within its functional area, in respect of which an environmental impact statement (EIS) (or environmental impact assessment report – EIAR) has been prepared.

Applications under 175(3) of the Act follow the procedure detailed in Part 10 of the Planning and Development Regulations 2001 as amended (hereafter referred to as the Regulations).

1.2.1 Environmental Impact Assessment Screening

The obligation to conduct EIA under Irish law arises under Section 172(1) of the Planning and Development Act (until it is amended to transpose Directive 2014/52/EU), which must be interpreted and applied in accordance with the Directive 2011/92/EU. The EIA screening process described below was carried out accordingly.

Section 172(1) of the Act provides for mandatory EIA where the particular threshold for the relevant class of development is exceeded. Section 172(1) also requires that EIA be carried out in respect of sub-threshold development where the planning authority or the Board determines that the development would be likely to have 'significant effects on the environment'. Section 172(1) provides as follows:

“(1) An environmental impact assessment shall be carried out by the planning authority or the Board, as the case may be, in respect of an application for consent for proposed development where either—

¹ The Dublin Mountains Partnership was set up in May 2008 with the aim of improving the recreational experience for users of the Dublin Mountains, whilst recognising the objectives and constraints of the various landowners. The partner organisations involved are Coillte, South Dublin County Council, Dun Laoghaire Rathdown County Council, Dublin City Council, National Parks and Wildlife Service and the Dublin Mountains Initiative, an umbrella group representing the recreation users of the Dublin Mountains.

- (a) *The proposed development would be of a class specified in—*
- (i) *Part 1 of Schedule 5 of the Planning and Development Regulations 2001, and either—*
- (I) *such development would exceed any relevant quantity, area or other limit specified in that Part, or*
- (II) *No quantity, area or other limit is specified in that Part in respect of the development concerned, or*
- (ii) *Part 2 of Schedule 5 of the Planning and Development Regulations 2001 and either—*
- (I) *such development would exceed any relevant quantity, area or other limit specified in that Part, or*
- (II) *No quantity, area or other limit is specified in that Part in respect of the development concerned, or*
- (b)(i) *the proposed development would be of a class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 but does not exceed the relevant quantity, area or other limit specified in that Part, and*
- (ii) *The planning authority or the Board, as the case may be, determines that the proposed development would be likely to have significant effects on the environment.”*

The Regulations identify:

- the development classes which should be subject to mandatory EIA (Part 1 of Schedule 5);
- the classes of development which should be subject to EIA where they exceed a certain threshold of scale (Part 2 of Schedule 5);
- the classes of development which should be subject to EIA (Part 2 of Schedule 5) where the planning authority or the Board determines that they would be likely to have significant effects on the environment due to the characteristics of the proposed development, the location of the site, or the characteristics of the potential impacts (Part 2, Schedule 7).

The proposed development can be classed as ‘Tourism and Leisure’ development, the class of development identified in Article 12, Part 2, Schedule 5 of the Regulations. The proposed development does not comply explicitly with any of the particular development descriptions (a) to (e)² of Article 12. Therefore it does not exceed any threshold defined in Article 12 and Section 172(1) (a) of the Act does not apply.

However, Section 172(1) (b) (ii) of the Act does apply in the case of the proposed development. The development is a ‘Tourism and Leisure’ development and therefore should be screened for EIA in accordance with Schedule 7 of the Regulations. Schedule 7 sets out the screening criteria for determining whether a development would or would not be likely to have significant effects on the environment. These criteria include:

² Article 12, Part 2, Schedule 5 of the Regulations:

“12. Tourism and leisure

(a) Ski-runs, ski-lifts and cable-cars where the length would exceed 500 metres and associated developments.

(b) Sea water marinas where the number of berths would exceed 300 and fresh water marinas where the number of berths would exceed 100.

(c) Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms.

(d) Permanent camp sites and caravan sites where the number of pitches would be greater than 100.

(e) Theme parks occupying an area greater than 5 hectares.”

“The environmental sensitivity of geographical areas likely to be affected by the proposed development, having regard in particular to:

- The absorption capacity of the natural environment, paying particular attention to the following areas:

(c) Mountain and forest areas,

(h) Landscapes of historical, cultural or archaeological significance.”

The site of the proposed development is in a mountain and forest area. It is also a landscape of historical, cultural and archaeological significance.

In accordance with Article 120(3)(b) of the Regulations SDCC made a request to An Bord Pleanála in February 2017 for a determination as to whether the development would be likely to have significant effects on the environment, and therefore whether an EIS (or EIAR) should be prepared in respect of the development. On the 9th of May 2017 the Board directed that an EIAR be prepared, for the following reasons and considerations:

“Having regard to the scale and nature of the proposed development, to its location in a sensitive but highly frequented landscape south of the Dublin built up area, to the prevalence of artefacts of cultural, historical and archaeological heritage throughout the general area and to the ecology of the area the Board considered a full and proper consideration of all the possible significant effects on the environment of the proposed amenity development and the potential for mitigation of these required that an environmental impact assessment process be undertaken. Therefore, it is considered that the preparation of an environmental impact statement is required.

“In deciding not to accept the Inspector’s recommendation not to direct that an environmental impact statement be undertaken the Board noted the Inspector’s view that the historical and archaeological features of the lands had proved to be resilient to date notwithstanding the numbers of visitors to the area. However, the Board considered that the proposed development is such that further significant additional numbers of visitors will be encouraged to use the facilities provided and it is deemed appropriate that the effect of these, and other, impacts be properly assessed.”

The Order from the Board, and the Inspector’s Report, are included as Appendices A and B to this report.

1.2.2 Part 10 Application Requirements

The planning process for development by a local authority, where EIA is required, is detailed in Part 10 of the Regulations, specifically Chapter 4 (Articles 118-123). Article 118 states as follows:

“118. When making an application for approval under section 175(3) of the Act, a local authority shall, subject to article 119, send to the Board–

(a) 3 copies of the plans and particulars of the proposed development,

(b) 3 copies of the EIS for the proposed development,

(c) A copy of the notice published under section 175(4) (a) of the Act, and

(d) A list of the bodies to which notice was sent under section 175(4) (b) of the Act, a copy of each notice and an indication of the date on which the notice was sent.”

The information submitted with the application complies with these requirements. Regarding (d) above, notices were sent to the following prescribed bodies:

- The Arts Council of Ireland;

- Fáilte Ireland;
- An Taisce – the National Trust for Ireland;
- The Heritage Council;
- The Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs;
- The Minister for Housing, Planning, Community and Local Government.

Reason: Regulations Article 121(a),(c),(n) – The site is in an area of special amenity; development may affect a view or prospect of special amenity value of interest (e.g. views of the Hell Fire Club building); the site contains protected structures and monuments; the development might affect nature conservation; .

- Dún Laoghaire Rathdown County Council;
- Wicklow County Council.

Reason: Regulations Article 121(d) – The development may affect the area of these local authorities.

- Inland Fisheries Ireland.

Reason: Regulations Article 121(g) – the development may involve carrying out of works adjacent to the banks a river.

- Transport Infrastructure Ireland.

Reason: Regulations Article 121(k),(l) – The development involves road widening, possible traffic increase and public transportation.

2.0 PROPOSED DEVELOPMENT

2.1 DEVELOPMENT DESCRIPTION

2.1.1 Physical Elements of the Development

The proposed development is described in the newspaper notices as follows:

The proposed development includes (a) the conversion of 26 ha of Coillte's Hell Fire forest property from productive conifer forest to mixed deciduous woodland for use primarily as amenity open space; (b) modifications, including new sections of trail, and upgrade of the existing network of walking and equestrian trails throughout the Hell Fire and Massy's Wood forest properties; (c) construction of a 'tree canopy walk'/pedestrian bridge over the R115 to link the trail networks of the two properties, with a 'bridge house' at the Hell Fire end of the bridge; (d) conservation works to the Hell Fire Club building (South Dublin Record of Protected Structures ref. 388) and the architectural heritage of the Massy's Wood property including the walled garden (part of South Dublin Record of Protected Structures ref. 384); (e) installation of heritage interpretation signage along the network of trails; (f) construction of a new parking area for 275 no. cars (including 14 no. disabled spaces) and five coach spaces to replace the existing parking area on the Hell Fire forest property; (g) construction of a visitor centre comprising two buildings (one single storey and one two-storey) side-by-side at an elevation of c. 300m on the Hell Fire forest property, with a combined gross floor area of 980 sqm, accommodating the following uses/spaces: audio-visual/exhibition facility (101 sqm), education room (55 sqm), café with seating area (175 sqm), servery (36 sqm) and kitchen (60 sqm), 'Ramblers' Lounge' (43 sqm), retail (45 sqm), kiosk (27 sqm), toilets (66 sqm), facility management offices (55 sqm), and associated reception, circulation, plant and storage spaces; (h) construction of a stand-alone electricity substation (23 sqm); (i) installation of a new watermain line and sewage pipe under the R115 from the Hell Fire property to the existing watermain and public sewer network; (j) construction of a network of swales and ponds for attenuation of surface run-off, and a culvert beneath the R115 to channel overflow of surface water into the Glendoo Brook; (k) modifications to the existing entrance to the Hell Fire forest property; (l) installation of new fences along sections of the Hell Fire property boundary; (m) all ancillary works and landscaping on the Hell Fire and Massy's Wood properties.

It is proposed to make modifications to the stretches of the R115 and R113 roads connecting the site to the urban area to the north, including the provision of a footpath (minimum 1.5m width) and an advisory cycle lane (1.5m width), and the retention of a carriageway of sufficient width for two-way traffic except at one location where a single lane traffic shuttle is proposed. The proposed modifications to the roads do not require encroachment into adjoining private lands, but do require localised widening of the R115 by 1.2m into the Massy's Wood property for a stretch of c.100m.

The development is described in further detail in Section 3.3 of the EIAR, and in the package of documents and drawings submitted with the application, notably the Dublin Mountains Visitor Centre Design Report produced by Paul Keogh Architects.

2.1.2 Operational Elements of the Development

A critical part of the proposed development, not included in the description of the physical elements above, is the Operational Management Plan. This document sets out the proposed management measures for the site which have been designed to (a) mitigate the impacts on key

environmental receptors (e.g. archaeology and architectural heritage, and biodiversity), and (b) where possible go beyond mitigation of impacts to achieve enhancement of the condition and management of environmental aspects and features.

The Operational Management Plan sets out the envisaged structure and responsibilities for management of the development during operation. The measures include the establishment of a **permanent management steering group comprised of SDCC, Coillte and the DMP** with responsibility for:

- (a) management and maintenance of the development overall, and specifically the facilities outside of the direct responsibility of the private operator;
- (b) management of the contract, lease or license of the private operator of the facilities;
- (c) liaison with neighbouring landowners, residents and stakeholders, facilitated through the consultation forum of the Dublin Mountains Partnership;
- (d) coordination of forest operations ongoing in the western part of the Hell Fire forest property (the area largely unaffected by the proposed development), and
- (e) monitoring and management programmes for:
 - the trails network;
 - archaeological and architectural heritage features, and
 - biodiversity (specifically the Key Ecological Receptors identified in the EIA process).

The Operational Management Plan also identifies access and parking management measures including:

- (a) car park monitoring and variable message signs to prevent queuing and overspill parking;
- (b) the proposed shuttle bus from Tallaght;
- (c) the proposed park and ride facility at Tallaght Stadium.

The value of this document, if approved by the Board as part of a grant of permission, is that management capacity (and responsibilities) will be established organisationally and practically/on-site, for the better stewardship of both the site's most important environmental/heritage assets and the recreation infrastructure.

2.2 SITE SELECTION

A Feasibility Study for a Dublin Mountains tourism facility in South Dublin County Council's area of jurisdiction was carried out 2015. The Feasibility Study considered six possible sites (and combinations of sites) for development of a visitor centre. These were:

- Hell Fire Wood;
- Massy's Estate;
- Combination of Hell Fire Wood and Massy's Estate;
- Steward's House;
- Featherbed;
- Cruagh.

The site selection process was informed by the following analysis and considerations:

- (a) Comparison of the potential environmental effects of development on the alternative sites – refer to Section 4.1 of the EIAR, particularly Table 4.1 which summarises the comparison of potential effects);

- (b) Consideration of which site could best meet the development objectives of SDCC, Coillte and the DMP – refer to the Design Report and Section 3.1 of the EIAR;
- (c) Consideration of which site was best aligned with tourism and economic development policy at national, regional (Dublin city-region) and local level – refer to the Design Report, and the Business Plan produced by CHL Consulting;
- (d) Consideration of which site had the greatest potential to realise the policy and objectives of planning policy at national, regional and local level and – refer to Section 4.0 of this report;
- (e) Existing patterns of access to and use of the Dublin Mountains for recreation.

The result of the process was the selection of the combined Hell Fire and Massy's Wood site. It was considered to be by far the most attractive site from a visitor's perspective - due to its variety of topography (including mountain top, slopes and river valley), its landscape character (including coniferous forest and deciduous woodland) and spectacular views, its range of habitats and biodiversity, and a unique concentration of archaeological and architectural heritage assets and cultural associations. It was the most accessible site, and an established recreation amenity with growing usage and a requirement for management of the growth. Its potential as an attraction and the issues associated with its existing use (e.g. illegal parking outside of the site on the R115) combined to indicate that the Hell Fire and Massy's have the greatest potential for recreational use and enhanced environmental stewardship of a publicly owned property in the Dublin Mountains.

2.3 DESIGN PROCESS

Once the site had been selected, an iterative design process was followed culminating in the proposed development the subject of this application. The process began with a review of the 'Emerging Masterplan and Concept' which was produced at the end of the Feasibility Study. This review was carried out in parallel with

- a) the process of environmental impact assessment in which sensitive environmental receptors were identified so as to avoid, reduce or mitigate impacts on these factors;
- b) analysis of relevant planning policy to ensure maximum alignment with the policy and objectives of the South Dublin County Development Plan 2016-2022);
- c) a process of consultation with stakeholders and the public.

During this design process the characteristics of the development evolved significantly from the original 'Emerging Masterplan and Concept'. Among the key decisions was a substantial reduction in the scale of the proposed visitor centre building, from over 2,000 sqm to less than 1,000 sqm. Refer to Section 4.2 of the EIAR for a description of some of the key design/layout and activity alternatives considered in the design process.

In addition to reduction and refinement of the physical elements of the proposals, the design process resulted in proposals for the operation and management of the development. These proposals are described in the Operational Management Plan submitted with the application and summarised in Section 2.1.2 above.

3.0 SITE AND EXISTING ENVIRONMENT

The existing environmental conditions pertaining to each environmental factor are described in detail in the relevant chapters of the EIAR. This chapter provides an overview of the application site and the wider receiving environment. (Sections 3.1 and 3.2 below are the same as Sections 2.1 and 2.2 of the EIAR.)

3.1 THE APPLICATION SITE - OVERVIEW

The application site is comprised of Coillte's Hell Fire and Massy's Wood forest properties, and sections of the R115 and R113 regional roads between the existing Hell Fire property entrance and the South Dublin urban area. The two forest properties have a combined area of c.152 ha.

Fig 2.1 *Coillte's Hell Fire and Massy's Wood forest properties in context (not to scale)*



3.1.1 Hell Fire Forest Property

Coillte's Hell Fire forest property is 105 ha in extent and is an actively managed commercial coniferous forest. It is located on Montpelier Hill, one of the outlying northern hills of the Dublin and Wicklow Mountains. The forest property has a single access point, from the R115 Killakee Road which runs along its east boundary.

The property is characterised by its steeply sloping topography, rising from a level of approximately 250m at the entrance off the R115, to 383m at the summit of Montpelier Hill. Montpelier Hill has a conical landform which in combination with its position as one of the northernmost hills of the Dublin Mountains provides panoramic views over Dublin Bay to the east, the city to the north and east, and the Dublin and Wicklow Mountains extending in an arc to the south.

The property is managed primarily as a productive forest, with plantations of predominantly Douglas fir of various ages including areas recently clear-felled and replanted, areas of mature forest due for harvesting/clear-felling in the near future, and areas mid-growth. This defines the landscape character of the property, along with the topography which provides panoramic views, and the presence of the Hell Fire Club in a clearing at the top of the hill.

The property is also used as a recreation facility. A parking area with a capacity of c. 80 cars is provided on the lower eastern slope of the hill near the entrance. The network of forest roads and additional trails are used for walking and horse riding. It is estimated by Coillte that some 100,000 visitors use the site annually. On busy weekend days and holidays the parking area regularly overflows leading to uncontrolled parking outside of the property on the R115. This causes traffic congestion and safety issues on the R115.

Survey of the property has shown that it provides habitat for species including the protected red squirrel, badger and bats. During survey red squirrel were sighted on the property and a drey (nest) was located. A disused badger sett was identified. Trees with bat potential were identified. Three ponds were identified on the site, supporting Common Frog and potentially Smooth Newt.

The property includes the Hell Fire Club building located at the top of Montpelier Hill. The building is a protected structure (South Dublin Record of Protected Structures ref. 388) constructed in 1725 and has iconic status in the cultural history of Dublin. It attracts visitors including locals, Dubliners, domestic and foreign tourists, school and special interest groups. There is occasional anti-social behaviour in and around the building at night, some which is damaging to the structure (e.g. graffiti on the internal walls, and fires being lit inside the building). The path directly up the east face of Montpelier Hill to the building is heavily used. This has caused erosion, and scarring of the landscape. A standing stone half way up the path has been overturned at some point in the past and its setting is compromised.

Alongside the Hell Fire Club building are the remains of two ancient tombs. A licensed dig in 2016 (as part of the Hell Fire Club Archaeological Project) revealed that one of these is a Neolithic passage tomb featuring megalithic art and still containing – despite historic disturbance – other archaeological features. It is thought that stone from the cairn of the tomb was used in the construction of the Hell Fire Club building. This is the subject of ongoing investigation. It is also thought that some stone may have been taken from the cairn for the construction of the Military Road which runs through Massy's Wood.

The archaeologist carrying out the 2016 dig (Neil Jackman, Abarta) believes that Montpelier Hill is rich in archaeology. Using an aerial photograph from before the hill's afforestation he has identified numerous topographic features that may be indicative of archaeological remains. Any or most such remains would have been heavily disturbed by subsequent forestry activity.

3.1.2 Massy's Wood Forest Property

The Massy's Wood property is 47 ha in extent and located to the east of Montpelier Hill and the R115 Killakee Road.

The property is accessed by an entrance off the R115 along its western boundary. This is used as a pedestrian access point and a vehicular entrance for forest management operations only; there is no public parking provided on the site. Visitors use the Hell Fire forest parking area and cross the R115 on foot, or park on the R115. There are also pedestrian entrances along the eastern boundary at the end of Cruagh Lane (a road in private ownership), and at the southern extent of the property off Cruagh Road where the Dublin Mountains Way passes the site.

The lands of the property slope steeply (although less steeply than the Hell Fire property) to the north east. A small, fast-flowing river – the Cruagh or Glendoo Brook, a tributary of the Owendoher River - flows south to north through the property inside its eastern boundary.

Commercial forestry operations have been scaled back on the property and it is now managed as a mixed woodland predominantly for recreation amenity. It is covered in broadleaved woodland of beech and oak, ash, fir, larch and spruce. There are some areas of coniferous plantations, and specimen trees from the original Killakee demesne, including species such as Giant Sequoia, Monkey Puzzle, and West Himalayan spruce, Monterey Pine, and Western red cedar. In places exotic invasive species such as Cherry laurel and Rhododendron have a strong hold and are being cleared and reduced. Whilst predominantly a recreational forest with high biodiversity value, woodland management works are ongoing with areas of beech wood thinned in 2016.

The landscape character of Massy's Wood contrasts with that of the Hell Fire property. Whereas the Hell Fire lands are exposed due to their elevation and slope, Massy's Wood is enclosed due to its lower elevation and the narrow valley of the Glendoo Brook, and the permanent broadleaved woodland cover. The property is extensively used for walking and to a lesser extent cycling and horse riding.

Survey of the property has shown that it provides habitat for species including the protected badger, bats and otter. A disused badger sett was identified. Otter spraint (faeces) was identified. A number of trees with bat potential were identified. The Glendoo Brook provides habitat for otter and also for fish including salmonids, and birds including the kingfisher.

Massy's Wood is rich in cultural heritage features. Most notable is the large, multi-roomed walled garden, the walls of which are predominantly intact. The garden is overgrown with scrub. Other architectural features of the property include a gate lodge, an ice house, and the ruins of a cottage on the river bank, a stone well and numerous bridges over the river. These are collectively a protected structure (South Dublin Record of Protected Structures ref. 384). A 750m section of the Military Road (RPS ref. 385) traverses the property inside the western boundary. This is the last remaining un-paved section of the original Military Road.

3.2 THE RECEIVING ENVIRONMENT - OVERVIEW

The receiving environment is described in more detail in the chapters covering individual environmental topics. The following is an overview of the site context.

The application site is located in the Dublin Mountains High Amenity zoned area of South Dublin. The forest properties are integral to the forested upland landscape of South Dublin and have a significant concentration of landscape and visual amenity resources, cultural and natural heritage, and recreational use between them.

There is a concentration of rural houses and enterprises in the vicinity of the site, mostly to the north of the site, along the R115. The businesses include Timbertrove, a timber products manufacturing and resale enterprise which has an attached homeware shop and café, and the Killakee Livery Yard. Immediately adjacent the site to the north is the Steward's House and attached stables, belfry and gate (protected structures, RPS ref. 380). The house operated as a bar/restaurant for 30 years in the late 20th century, and is currently in use as a residence. The property has been the subject of several planning applications for small scale (three units) tourism accommodation development in the last number of years. Permission was granted in 2010 but not implemented and has now expired. In addition to these properties there are several houses fronting the R115 to the north and south of the site, forming a distinct concentration of rural development. These properties and their occupants are sensitive receptors to the potential environmental effects of development at the site.

In the wider environment, there is a concentration of rural (though partly urban-generated) housing in the Jamestown area to the east of Massy's Wood, and along the Cruagh Road, in the valley of the Owendoher River between Montpelier Hill and Cruagh Mountain. These houses are within 1-1.5km to the east of the Hell Fire forest property. The occupants would be sensitive especially to landscape and visual effects of development at the site.

A short distance further to the north east there are the more urbanised areas of Rockbrook and Mountvenus, which lie outside of the M50 (which passes some 2km to the north east of the site), somewhat removed from the city to the north. The relationship of these areas to the Dublin Mountains landscape is less direct (than the communities in the immediate vicinity of the site and in Jamestown and Cruagh Road), but residents would be among the existing users of the site for recreation, and enjoy views of the site in places (e.g. at Mountvenus cemetery). Further to the north on the edge of the city are the recently developed suburban areas of Ballycullen, Woodstown and Killinniny. There are existing users and numerous potential users of recreation facilities on the site in these areas.

Piperstown Road and Mountain Road pass to the west of the Hell Fire forest property and Montpelier Hill, on the side of the Glenasmole River Valley, somewhat removed from where the proposed development is concentrated near the R115. These roads have a relatively dense concentration of housing dispersed along them, but are separated from the Hell Fire Club and Massy's by the bulk of Montpelier Hill and the extensive coniferous forest on its west flank.

These concentrations of settlement in the site environs are effectively the southern outlying areas of urban generated development beyond the edge of Dublin city.

Spread in an arc to the south of Montpelier Hill and the site lie the taller and more remote Dublin and Wicklow Mountains including Fairy Castle, Cruagh and Glendoo, Kippure, Seefingan and Seefin, and Corrig. The transport and settlement patterns in this area are sparse. Forestry generally stops beneath the 500m contour so the mountains are covered predominantly in moorland and bog. There are large areas designated as Special Area of Conservation (SAC) and Special Protection Area (SPA) at these

upper elevations. The Glenasmole Valley to the west of Montpelier Hill is also a designated SAC and proposed Natural Heritage Area (pNHA).

Thus, the site is situated on the threshold between the city and the rural environs. Development at the site has the potential to affect both of these environments and environmental receptors.

3.3 PLANNING HISTORY

3.3.1 Subject Site

There have been no planning applications for development of the subject site; the existing forestry (and recreation) use is of long standing.

3.3.2 Adjoining Lands

The majority of planning applications for sites adjoining or nearby the application site are for one-off houses and house extensions. There has been very limited recent development in the area owing to the zoning objective of 'HA – DM' High Amenity Dublin Mountains: *"To protect and enhance the outstanding natural character of the Dublin Mountains Area."*

There have been two planning applications for non-residential development on the site of Killakee House/Steward's House and stable buildings immediately north of the Hell Fire forest property, west of the R115. The planning history of Steward's House is set out in the table below.

Planning Ref.	Description	Decision
SD10A/0032	Redevelopment of Killakee House and old stable buildings which are Protected Structures. Demolitions include extensions to the perimeter of the main house together with internal partitions and the existing staircase. The works will involve extensive conservation works to the main building including internal remodelling and the provision of additional windows in order to use the structure as a single residential unit. The works will also involve the conversion of the original stable buildings into 3 no. holiday home residential units which will include the construction of a ground floor/basement extension to the western side. The coach house will be converted for use as a games room and maintenance facility. Car parking for all units will be in the entrance courtyard.	Split decision by SDCC. Granted by ABP. The permission was not implemented and is now expired.
SD08A/0411	Demolition including extensions and other structures to perimeter of main house, and single storey store room to northern side of entrance gates. Construction of 2 storey glazed atrium structure to south western side and a first floor terrace to southern end of the return building to the main house which is to be used as a single dwelling unit. The works also involve conversion of the original stable buildings into 3 no. holiday home residential units, which include reconstruction of perimeter walls and the construction of a single storey over basement extension to western side. Car parking for all units in entrance courtyard.	Refused by SDCC and ABP.

The history of this site is of relevance given its proximity to the subject site and the uses proposed which were commercial/tourism related.

The development proposal under Reg. Ref SD08A/0411 was refused by SDCC and ABP for failing to comply with the policies for the area, notably the zoning ('B': To protect and improve Rural Amenity and to provide for the development of Agriculture), and the potential negative impact on the character of the protected structures.

A similar development proposal in 2010 (SD10A/0032) resulted in a split decision by SDCC, refusing permission for the conversion of the stable buildings to holiday homes and associated car parking, while granting permission for the work to the main house. The grounds for refusing the holiday homes were fears of traffic safety linked to the adequacy of the existing access/entrance to Steward's House and achieving safe sightlines. The Board Inspector agreed with this decision. The Board however permitted the development in its entirety (including the conversion of the stable house to three holiday homes) noting that a restaurant had previously operated on the site for 30 years with no traffic issues, and finding that a new use for the stable buildings was the best means of ensuring their continued protection. This permission was not implemented and lapsed in October 2016.

3.3.3 Relevant and Similar Developments in the Dublin/Wicklow Mountains

The online planning registers of SDCC, DLRCC and WCC were searched to identify planning applications for tourism related developments nearby the site in the Dublin/Wicklow Mountains. One application was identified, namely ZIPIT Forest Adventures which is now operating at Tibbradden Wood on the boundary between South Dublin and Dun Laoghaire Rathdown, 3.5km from the application site by road.

ZIPIT Forest Adventures was granted permission in 2012 under SDCC Reg. Ref: SD11A/0282 and DLR Reg. Ref: D11A/0530. The permitted development consists of:

- Construction of the end point of High Wire Adventure Activity Course located in trees;
- Wooden platforms suspended on trees;
- A log cabin and decking area;
- Provision of temporary toilets;
- Ancillary works.

Planning permission was granted by both SDCC and DLRCC. Part of the site fell into the SDCC's Dublin Mountains High Amenity zoned area. The site fell beneath the 300m contour and as a recreational use was deemed open for consideration.

4.0 CONSULTATION IN THE DESIGN PROCESS

Consultation events that took place during the design process included:

Date	Consultation Event
14 February 2017	Presentation to Elected Members, County Library, Tallaght: Initial design proposals and EIA baseline findings presented.
20 February 2017	Presentation to Local Oireachtas Members, County Library, Tallaght: Initial design proposals and EIA baseline findings presented.
March 2017	Project information webpages launch on http://www.sdcc.ie/services/parks-and-recreation/dublin-mountains-project : These pages have provided all relevant project information including feasibility reports, records of meetings, project updates etc.
27 February 2017	Landowners meeting, Whitechurch Library, Rathfarnham: Information meeting on initial design proposals.
22 March 2017	Landowners meeting, Tallaght Stadium: Further information and feedback meeting.
06 & 07 April 2017	Public open days, 8am-8pm, Tallaght Stadium: Display of emerging design proposals and engagement between the public, SDCC, Coillte and the design and EIA team.
12 June 2017	Presentation to Elected Members at Council Meeting, County Hall, Tallaght: Presentation of final project design, feedback from Councillors, and Council agreement for the application for development approval to be submitted to An Bord Pleanála.

Various presentations made at these events, and reports on the events, are available on the SDCC project website, <http://www.sdcc.ie/services/parks-and-recreation/dublin-mountains-project>.

4.1 CONSULTATION WITH LANDOWNERS

Contact was made with local land owners during the design process and one-on-one meetings were held between Coillte and the landowners. These meetings were held with the intention of informing the landowners, as neighbours and key stakeholders, of the project concept and to seek their input to the design process. Two landowner meetings were held where the emerging development proposals were presented and feedback was sought.

4.2 CONSULTATION WITH ELECTED REPRESENTATIVES

The County Councillors were kept apprised of the design process and the project process through a series of presentations and updates at meetings. Councillors' questions and input to the development proposals were requested to ensure that their own and their constituents' ambitions for and/or concerns about the project were considered. A presentation to Local Oireachtas Members was organised with all TDs representing South Dublin invited to attend.

4.3 CONSULTATION WITH THE PUBLIC

Public interest in the project was high, with the proposals discussed regularly on social media and in the mainstream media. Meetings were held independently by Elected Representatives to discuss the proposals and hear constituents' views. To give the public opportunity to input to the design and EIA process, a project website was developed and a two-day public consultation event was held once the development proposals were at a sufficiently advanced stage for presentation, but before any proposals were finalised. 177 members of the public attended the event. SDCC also received questions from the public by phone, email and letter.

4.4 KEY THEMES AND ISSUES RAISED DURING CONSULTATION, AND THE PROPOSED DEVELOPMENT'S RESPONSE

The topics raised during the consultation process were numerous and varied. There was widespread support for the project from public representatives and the public, but also strong opposition from certain landowners and members of the public. All comments received were considered by SDCC, Coillte and the project team, and where possible the development proposals were amended to address people's ambitions or concerns about the project. The following is a summary of some of the key themes and issues raised during consultation, and the response to these issues in the development proposals.

4.4.1 The Development Rationale

- There is widespread support among public representatives and the public for the proposed development. This support derives from recognition of the value and potential of the Dublin Mountains as (a) a recreation resource, (b) a resource for natural and cultural heritage protection and interpretation/appreciation, and (c) a potential economic resource (through tourism).
- There is strong opposition from some over concerns about impacts on the landscape, ecology, archaeological and architectural heritage, and traffic. These issues are addressed below.
- There is strong opposition by certain landowners who question the principle of encouraging/facilitating recreation in a rural area due to its impacts on the primary land use, i.e. agriculture. It was suggested that recreation is simply not compatible with the area's agricultural use (citing existing trespassing and litter problems, traffic).

Response

SDCC and Coillte recognise the value and potential of the Dublin Mountains for recreation, heritage protection and interpretation, and tourism. The proposed development is strongly supported and indeed encouraged by national, regional and local policy which seeks to encourage development of recreational access to extra-urban landscapes and heritage, and to sustainably exploit these resources to broaden the tourism offer of Dublin for the benefit of the tourism industry/economy.

The EIA has found that there will be no significant negative impacts on the landscape, ecology (other than the Red Squirrel in the short term), archaeological and architectural heritage, or roads and traffic.

SDCC and Coillte believe that recreation and tourism are compatible with other rural land uses, but that improved design and management of sites can reduce any impacts on neighbouring landowners. The proposals including the Operational Management Plan were prepared in consideration of landowners concerns.

4.4.2 The Site Selection Process

- Certain members of the public questioned the site selection process. In particular, it was questioned why Orlagh House was not selected for development instead of the Hell Fire and Massy's as they consider it to be suitable, more accessible and better serviced.

Response

The site selection process carried out during the Feasibility Study in 2015-2016 was reviewed at the outset of the design stage and to inform the design and the EIA process - the EIAR contains a

matrix comparing the potential environmental effects of development on the application site and the alternative sites considered during the 2016 Feasibility Study (refer to the EIAR Section 4.1.8). The comparison of potential environmental effects was one of several areas/themes of consideration in the site selection process. The other issues considered were:

- The development objectives of SDCC, Coillte and the DMP;
- Tourism and economic development policy at national, regional (Dublin city-region) and local level;
- Relevant planning policy at national, regional and local level;
- Existing patterns of access to and use of the Dublin Mountains for recreation.

The Hell Fire and Massy's Wood site was considered to present the greatest potential for the achievement of the development objectives, the greatest potential for realising national, regional and local planning and tourism/economic development policy, and the greatest potential for enhanced environmental stewardship of publicly owned lands in the Dublin Mountains.

The Orlagh site was considered as alternative site for the development when it became available for purchase some time after the conclusion of the Feasibility Study. This is discussed in Section 4.1.9 of the EIAR. It was found that the Orlagh House property has potential to support and consolidate the tourism offer in the vicinity of the Dublin Mountains. It could provide a high quality, highly accessible park to the growing local population, and a prestigious historic Irish House experience. The building and grounds have potential to host entertainment and corporate events, and/or a range of outdoor activities.

However, the property presents a different project opportunity to that envisaged by SDCC and its partners, and its purchase and development into a facility for public use would involve expenditure on aspects that are not a priority for the project partners currently. Furthermore, some key development objectives could not be met, e.g. (a) the provision of a distinct 'forest mountain' recreation experience, (b) the provision of access to archaeological and cultural heritage features (as there is no public land connection between Orlagh and the Hell Fire and Massy's Wood), (c) addressing the problems of parking and road congestion at the Hell Fire and Massy's (as it is considered that Orlagh would not deflect existing visitors from the Hell Fire and Massy's Wood sites).

The Orlagh House property has since been purchased by a private consortium and is not available for development by SDCC.

4.4.3 Access, Parking and Traffic Impacts

- It is widely recognised that existing use of the site causes traffic and safety issues on the R115, due primarily to unauthorised/illegal parking outside of the site as a result of overspill of the car park, and as a result of Massy's Wood having no parking area (with some people choosing to park on the road outside the Massy's entrance even when there is capacity in the Hell Fire parking area).
- Concern was expressed over the additional traffic on the R115 that would be generated by the development, and whether the road has capacity for this traffic.
- Some public representatives and public questioned whether the proposed parking (275 spaces) will be sufficient to cater for future demand.

Response

The proposed development is partly motivated by the existing access, parking and traffic issues on the R115. The response of the proposed development to these issues includes (a) provision of substantial additional parking capacity on site (increase from c. 80 spaces to 275 spaces including dedicated disabled spaces) to avoid overspill onto the road; (b) improvement to the road accessing the site from the urban area to the north, including provision of a footpath and advisory cycle lane (neither exists currently); (c) provision of technologies (car counter in parking area linked to live signage on the access road) to inform people of parking capacity in real time; (d) provision of a satellite parking area at Tallaght Stadium; (e) provision of a shuttle bus service from the Tallaght LUAS stop via the satellite parking area to the site, also linking with Dublin Bus routes serving the area. The development will also allow for active management of parking on busy days, with permanent visitor centre staff and DMP volunteers available on site for marshalling if necessary.

It is considered that these measures will significantly improve access to the site for all modes of transport, particularly sustainable modes (walking, cycling, public transport) and reduce traffic congestion and safety issues.

The Transport Impact Assessment prepared in respect of the proposed development finds that while the development would cause an increase in traffic on the R115, the increase would not be significant measured against the existing baseline, and the road has adequate capacity to accommodate the predicted increase.

4.4.4 Facilities and Activities

- Existing users of the site questioned whether all existing uses would be retained. In particular there was concern that equestrian use of the site would be excluded by the development.
- Some users/potential users of the site requested that additional uses/activities be facilitated, e.g. cycling (particularly mountain biking for children), playgrounds and adventure sports suitable to the mountain terrain.
- Some members of the public are opposed to any initiative to encourage access to and use of the site, on the grounds that it would spoil the experience for existing users, and/or have negative environmental impacts.

Response

It was considered that the development should focus on improving facilities for the existing activities pursued on the site - walking, horse riding and heritage appreciation, rather than introduce new activities. This decision was made in consideration of existing users (to avoid any potential conflicts with existing uses), potential environmental impacts, and so as not to draw existing and potential users/customers from established activity centres elsewhere in the mountains such as Zipit in Tibbradden Wood and Coillte's cycling facility at Ticknock.

The proposed suite of facilities is considered to be a sufficient, and also sufficiently modest, response to the site potential and existing and future user requirements. The improvement of access by all modes and the expansion of the parking area are necessary to address existing road congestion and safety issues. The improved trails network for walkers and horse riders will enhance their experience. The interpretation of the natural and cultural heritage of the site, and the surrounding landscape (views over the city and bay) will enrich visitors' experience. The provision of services such as toilets, food and beverage offer (the café and kiosk), small shop for items of interest to walkers and heritage enthusiasts, and the exhibition and education spaces,

will support and improve the site as a recreation and heritage appreciation facility – for casual walkers, hiking enthusiasts, families, tourists and special interest groups (schools, corporate). The proposed facilities are similar in range and scale to those provided at heritage parks elsewhere in Dublin (e.g. Phoenix Park, St. Anne's Park, Malahide Castle, etc.) and Ireland.

Together the facilities will constitute the 'visitor facility' encouraged by the South Dublin county Development Plan Economic and Tourism Policy 5 Objective 3: *"To support the development of a visitor facility in or adjacent to the High Amenity – Dublin Mountains zone (HA-DM), subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services."*

4.4.5 Environmental Impacts

- Concern was expressed by some parties over the development's potential impacts on archaeology and architectural heritage. There was concern over the extent of interventions in and around the Hell Fire Club building, over possible closure of the building to visitors, and over possible increased vandalism due to greater visitor numbers.
- Concern was expressed by some parties over the potential impacts on biodiversity. It was questioned whether the woodland and river habitats of Massy's Wood in particular can accommodate the potential increase in visitor numbers.
- Concern was expressed over the potential impacts on the landscape and views, particularly on protected views and prospects. It was questioned whether the site would be lit at night, and whether this would have visual impact on the surrounding area.
- Concern was expressed by local residents about the potential impacts during construction, e.g. noise, dust and traffic congestion.

The design approach to the site's archaeological and architectural heritage has been one of minimal intervention, with all proposals designed to repair and protect the features, interpret the heritage in a non-intrusive way, and allow safe visitor access. It is not proposed to restrict access to any of the heritage features. The Operational Management Plan includes proposals for a formal inspection programme to monitor the condition of the heritage features and the effects of increased visitor numbers to the site. If necessary, mitigation measures will be prescribed and implemented in direct response to any issues that arise. It is considered that the condition and management of the archaeological and architectural heritage of the site will be improved by the development.

The site was surveyed and all sensitive habitats and species were identified as Key Ecological Receptors (KER) in the EIA process. The potential impact of the development on these has been assessed and only one KER, the Red Squirrel, was found likely to be significantly impacted. This would occur as a result primarily of tree removal on the Hell Fire property. The trees in question are conifers that will be felled or will fall due to wind throw whether the development goes ahead or not. The development includes proposals to significantly increase the habitat for woodland fauna on the site overall by the conversion of some 26 ha of conifer forest (excluding the new infrastructure) to mixed deciduous woodland over a 10 year period. Proposals are also included for repair and protection of the Glendoo Brook river corridor. While visitor access to the site will increase, it is expected that most users will stick to the trail network (which will be improved in quality but not significantly expanded) and therefore increased footfall will not affect all areas of the site, and will be manageable (e.g. through realignment of trails). A programme of inspection is proposed to monitor the effects of the development on the KERs, and the condition of the trails, with mitigation measures to be implemented if necessary to better protect any habitats or species that show signs of damage from increased visitor access.

It should be noted – with regard to natural and cultural heritage – that with or without the proposed development visitor numbers to the site are expected to continue growing. There is currently an absence of physical infrastructure and site-focused management capacity for that growth. The proposed development seeks to provide this.

The main structural elements of the development – the parking area, the visitor centre buildings, the pedestrian bridge – have been sited and designed specifically to minimise their visual intrusion in the landscape while providing access to (and an experience of immersion in) the forested mountain landscape and views. The Landscape and Visual Impact Assessment carried out as part of the EIA found that changes to most views from the receiving environment will be neutral or beneficial in qualitative terms. Two significant benefits of the development will be (a) the return of the Hell Fire Club building to its historic position of prominence on the profile of Montpelier Hill by the removal of the coniferous forest that forms a backdrop and hides the building currently, and (b) the establishment of permanent mixed deciduous woodland cover on the east flank of Montpelier Hill (visible from the key sensitive areas of Jamestown and Cruagh), replacing the existing conifer forest which is relatively unsightly during growth and particularly after felling.

4.4.6 Surface Water Drainage and Foul Water Treatment

- Concern was expressed by neighbouring landowners over existing drainage from the site – exacerbated by forestry operations - onto their lands, and the potential for further impacts of the development on drainage.
- Some landowners and members of the public questioned the need for the proposed foul sewage connection from the site to the public sewer network. It was questioned whether SDCC would make it compulsory for local landowners to connect to the new infrastructure. It was also questioned whether the new infrastructure would be used by SDCC to justify other new development, e.g. residential development, in the locality.

Response

The proposed development includes a system of swales and ponds to capture surface water runoff on the site, including any existing runoff crossing the north eastern boundary of the Hell Fire property. This will allow for infiltration into the ground or drainage (when necessary) to the Glendoo Brook via a new culvert beneath the R115 (the Glendoo Brook is the natural drainage channel for the eastern face of Montpelier Hill including the entire site area). A petrol interceptor is proposed for the parking area to avoid the potential for pollution of surface water from the development. The removal of the entire eastern flank of Montpelier Hill from Coillte forestry operations (by its conversion to a permanent mixed deciduous woodland) would reduce the possibility of the site having any negative impacts on surface water quantity and quality (although Coillte does not accept that its operations are the cause of any issue currently).

Site investigations revealed that there is not enough soil depth for on-site treatment of foul water. Therefore connection to the public sewer network is necessary, and this would exclude the possibility of pollution of ground and surface water by foul water. SDCC has no intention of requiring landowners to connect to the sewer. SDCC has no intention to disregard or change its zoning objectives and allow development in the area as a result of the new sewer. However in response to this concern the sewer pipe diameter has been reduced (from the normal pipe diameter for similar contexts) to limit the treatment capacity which will be created by its installation.

The above is not an exhaustive list of the themes and issues raised during the consultation process. The project has generated a lot of public interest and a wide range of views on various topics. However it is considered that the key concerns of the public are addressed above, and have been addressed in the development proposals.

5.0 PROPOSED DEVELOPMENT'S COMPLIANCE WITH PLANNING POLICY

In this section the relevant planning policy at national, regional and local level is identified, and the proposed development's compliance with the policy assessed.

5.1 NATIONAL POLICY

5.1.1 National Spatial Strategy 2002-2020 – Environment and Tourism

In Section 3.3 Consolidating the Greater Dublin Area, the NSS states: *"The continuing health of the Dublin is critically dependent on [among a range of objectives]...*

"Protecting Dublin's outstanding natural setting – Dublin Bay, the Dublin and Wicklow Mountains, surrounding rural hinterlands, river valleys like the Boyne and Liffey, and physical amenities such as parks..."

In Section 5.5 Environmental Quality, the NSS states: *"Ireland's national aims for achieving sustainable development point to three policy issues relating to the environment:*

- *"an international responsibility to present and future generations which combines the concepts of sustainability and good stewardship;*
- *the role of the environment in economic development;*
- *The role of the environment in contributing to the quality of life of people."*

"International responsibility recognises that Ireland's natural and cultural environment is part of a shared European and world inheritance. The various components of that environment have to be safeguarded for their own intrinsic values..."

"In economic development, the environment provides a resource base that supports a wide range of activities that includes agriculture, forestry, fishing, aquaculture, mineral use, energy use, industry, services and tourism. For these activities, the aim should be to ensure that the resources are used in sustainable ways that put as much emphasis as possible on their renewability.

More generally, the environment also has an economic role in adding to the attractions of the country, and of different places within the country, for enterprise and people. This is part of the social role through which the environment contributes to the quality of life of people. There are different spatial dimensions to this — from the immediate surroundings of a home to the wider settings of neighbourhood and town, to countryside and coast. The benefits can vary from active recreational uses to passive use in terms of viewing scenic landscapes. These benefits depend on appropriate accessibility for people to the different experiences offered by the environment."

Box 5.1 of the NSS identifies the following among its strategic tourism opportunities:

- *"Heritage and Natural Landscapes – Opportunities to realise the potential contained in the landscape, habitats and culture of some of the least developed tourism areas through facilitating better access and developing appropriate interest activities;*
- *Urban Generated Rural Recreation – Opportunities related to the presence of attractive landscapes close to urban areas such as Dublin where weekend leisure activity could become a significant driver of year round tourism activity."*

The proposed development aligns closely with the NSS aim to add to the attractions of the country and to contribute to the quality of life for people in a sustainable manner. The development would provide benefits that 'can vary from active recreational uses to passive use in terms of viewing scenic landscapes. These benefits depend on appropriate accessibility for people to the different experiences offered by the environment'. The proposal also strongly accords with Box 5.1 of the NSS which seeks to realise the potential contained in the landscape of some of the least developed tourism areas through facilitating better access and developing appropriate interest activities. The proposal offers a significant and potentially unparalleled opportunity, within South Dublin, for 'Urban Generated Rural Recreation' making the most, in an entirely sustainable manner, of an attractive landscape close to Dublin where weekend leisure activity could become a significant driver of year-round tourism activity.

5.1.2 National Planning Framework - Ireland 2040 Our Plan Issues and Choices

In Section 5.4 Heritage and Landscape it is stated:

"Ireland has a rich vein of heritage ranging from the iconic historic buildings and sites within our towns and cities, to the natural heritage of our countryside. The NPF is an opportunity to refocus on the sustainable and adaptive reuse of our existing and historic assets, regenerate existing areas and reduce pressure for unsustainable expansion on the edges of our settlements. There is also recognition of the value of our natural heritage not only for biodiversity but also for recreation, tourism and scientific purposes."

The proposed development represents an example of 'sustainable and adaptive reuse of historic assets', and of maximising the value of natural heritage not only for biodiversity but for recreation, tourism and scientific purposes.

In Section 5.5 Green Infrastructure and Biodiversity it is stated:

"Green infrastructure (GI) is where natural and/or managed landscape features such as a watercourse and/or parkland is managed and enhanced as a multifunctional resource capable of delivering a wide range of economic, environmental and quality of life benefits, known as 'ecosystem services'..."

"These benefits can include creating an attractive environment to encourage businesses and inward investment; more places for people to access nature, outdoor recreation or social interaction or physical activity by providing quality, linked green or 'blue' (water-related) spaces for walking, cycling and other physical activity and creating a sense of place and local distinctiveness. They also generally include a holistic approach to developing the landscape inclusive of other influences, such as ecological development, improving air, water and soil quality and flood protection."

The proposed development would represent a shining example of Green Infrastructure development, where outdoor recreation would take place very distinctive, high quality, multi-functional environment with a holistic approach to landscape development/management. Numerous ecosystem services would be delivered by the facility, in tandem with tourism/economic benefits.

5.2 REGIONAL POLICY - REGIONAL PLANNING GUIDELINES FOR THE GREATER DUBLIN AREA 2010-2022

5.2.1 Green Infrastructure

The Dublin Mountains are identified as a Key Regional Asset:

“In examining G.I. development at a regional level, it is important to acknowledge a number of unique assets, which contribute to the diverse richness of the Greater Dublin Area. Notably, the Dublin/Wicklow Mountains, Bru Na Boinne, Liffey Valley and Dublin Bay exemplify this uniqueness.”

“These areas:

- support nationally and regionally unique habitats, biodiversity, and fragile ecosystems;*
- have important recreational, tourism and cultural roles;*
- provide or support forestry, crop production, agriculture and energy development;*
- provide green buffers/green wedges between built up areas;*
- Improve air quality”.*

The Regional Planning Guidelines (RPGs) recognise the Dublin Mountains as a unique Green Infrastructure asset, with multiple functions including recreation, tourism and cultural roles.

Regarding Access Management the RPGs state:

“Access to green corridors and natural heritage is complex, involving issues such as private ownership of lands or physical difficulties in accessing some of those sites which are within public ownership. It is recommended that local authorities identify strategic access points within public ownership lands and enhance and improve linkages between publicly owned sites. Furthermore, the local authorities should utilise mechanisms within the planning system where the opportunity exists, to enlarge public ownership of lands within corridors.... It is important for a number of environmentally sensitive locations that access does not result in unlimited access, but rather ‘managed access’ where appropriate. This should also be supported by transport modes such as secure and direct pedestrian and cycle routes and public transport provision.”

The proposed development aligns closely with this policy. SDCC has identified the publicly owned site as a strategic access point to the Dublin Mountains and is seeking to develop and manage the site accordingly. The site development proposals are complemented by road improvement proposals, including provision of a footpath and cycle lane (neither of which currently exists) to encourage non-motorised access to the site from the urban area some 2-3km distant. Furthermore, a shuttle bus is proposed from the Tallaght LUAS stop which would also link with the Dublin Bus routes serving the area, providing additional sustainable transport options for accessing the site.

Strategic Recommendation GIP6 states:

“To ensure the protection, enhancement and maintenance of the natural environment and recognise the health benefits as well as the economic, social, environmental and physical

value of green spaces through the development of and integration of Green Infrastructure (GI) planning and development in the planning process.”

5.2.2 Social Infrastructure and Sustainable Communities

“Informal recreation, particularly walking and cycling, should be promoted through the development and expansion of a network of safe cycle and walking routes through and across towns, accessing parkland, in the built up area and into and through rural areas. Such routes can link in with existing way marked trails, sli na slainte walks and parts of the Green Infrastructure network ... and other local resources such as existing or new rights of way. Supporting facilities such as access points and signage or web information for example play a role encouraging outdoor activity and good health.”

The provision of a safe pedestrian route from the urban area to the site would provide a link from the urban area to high quality walking facility catering for all levels of ability, and a link to the Dublin Mountains Way. This would encourage outdoor activity and good health in the receiving environment.

Strategic Recommendation SIR11 states:

“The importance of managing and enhancing recreational facilities, including publicly owned lands associated with regionally important assets (such as the Dublin Mountains) is recognised and should be supported by the relevant bodies in line with environmental compatibilities in association with plans and/or measures to protect important habitats within or proximate to these locations.”

The proposed development represents a joint initiative between SDCC, Coillte and the DMP. The environmental management of the site, and the site's recreational users, would benefit from the combined expertise and experience in land, heritage and recreation brought together by the initiative.

5.2.3 Rural Development and Tourism

“Peri-urban areas and green belt zoned lands across the fringe of metropolitan Dublin represent a particular type of rural area which can exploit markets through offerings in specialised green oriented activities, rural tourism and leisure for both international and local markets alongside more traditional rural activities capitalising on strong connectivity to urban populations and markets.”

“Rural tourism can play a strong role in stimulating rural economies. Rural development policies should accommodate rural tourism needs through development of walks, water based activities, tourism infrastructure (such as, amongst other activities, eco, agri and equestrian related tourism, open farms, pet farms and farmhouse accommodation) and rural led activities. These actions will stimulate local and wider markets, spreading the benefits and increasing citizen awareness and appreciation of their natural environment. Alongside this it is critical to ensure that increasing pressures of commercialisation and development do not serve to undermine rural ecosystems, landscapes and conservation areas thus losing what makes such destinations attractive and special places to visit.”

The site is located just beyond the fringe of metropolitan Dublin and presents an opportunity to exploit the tourism market by offering green/heritage-focused outdoor activity, capitalising on the

strong connectivity to the urban area and stimulating the rural economy locally. The development is scaled – physically and commercially - so as not to dominate the site or undermine the rural landscape but rather to retain the distinct character.

Strategic Recommendation RR5 states:

“Needs of leisure and rural tourism to be addressed in a multi-disciplinary manner in high pressure locations, taking into account natural, economic, social and cultural policy objectives and plans. Balance is required between the need to preserve the natural environment; the needs of modern farming and also making the countryside and natural areas accessible to those who wish to avail of it. Feasibility studies and best scientific evidence can be utilised to ensure that this balance is achieved.”

5.2.4 Built Heritage

Strategic Policy GIP1 states:

“To ensure that all aspects of the built heritage including archaeological, industrial, and architectural heritage, and those building which are home to protected species are suitably protected, enhanced, sensitively reused/ integrated into new development works and incorporated in development plans, records of protected structures, heritage plans and site specific projects & developments.”

Strategic Recommendation GIR11 states:

“To protect the intrinsic natural, built and cultural heritage of the GDA whilst ensuring that any future development of tourist and recreational uses are facilitated in a manner which complements and protects the intrinsic heritage features of the region.”

The proposed development includes proposals for the sensitive repair of site's architectural heritage features, with a 'minimal intervention' approach, so that they may be accessed and enjoyed safely without compromise to the buildings or their setting. The monitoring and management programmes for archaeological and architectural heritage will result in improved condition and management of these resources in the long term.

5.2.5 Natural Heritage

“Biodiversity is not just contained within specifically designated sites. Areas such as parkland, graveyards, and back gardens, hedgerows, farming land, river corridors and mountain lands support a range of species and play an important role individually and in supporting and linking habitats. Protecting these areas through legislation is not appropriate, however it is important to preserve ecological infrastructure across the GDA and within each Council. For this reason the RPGs are recommending the development of a Green Infrastructure network for the GDA.”

Strategic Policy GIP2 states:

“To protect and conserve the natural environment, in particular nationally important and EU designated sites such as Special Protection Areas, Candidate Special Areas of Conservation and proposed Natural Heritage Areas, protected habitats and species, and habitats and species of local biodiversity value.”

The proposed development includes proposals for large scale habitat/biodiversity *development*, with the conversion of productive coniferous forest to deciduous woodland managed for amenity and biodiversity. There are also proposals for improvement of the Glendoo Brook river corridor. A programme of monitoring and active management of habitats and sensitive species is proposed, to maximise the site's biodiversity while also realising its recreation potential. One of the reasons that the site was selected (ahead of other Coillte properties in the Dublin Mountains) is that it is furthest from any designated lands.

5.3 COUNTY POLICY – SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2016-2022

5.3.1 Zoning Objective

The majority of the application site, including the entire Hell Fire property and the south and western part of Massy's Wood, falls into the area zoned 'HA – DM' High Amenity Dublin Mountains, with the objective:

"To protect and enhance the outstanding natural character of the Dublin Mountains Area."
The remainder of the Massy's Wood property is zoned 'RU' Rural and Agriculture, with the objective: *"To protect and improve rural amenity and to provide for the development of agriculture"*.

Table 11.12: Zoning Objective 'HA - DM': 'To protect and enhance the outstanding natural character of the Dublin Mountains Area'	
USE CLASSES RELATED TO ZONING OBJECTIVE	
Permitted in Principle	Agriculture, Car park ^{d,h} , Open Space.
Open for Consideration	Bed & Breakfast ^a , Cemetery ^d , Childcare Facilities ^a , Community Centre ^a , Cultural Use ^j , Doctor/Dentist ^{a,d} , Education ^b , Garden Centre ^{a,d} , Guest House ^{a,d} , Health Centre ^{a,b} , Home Based Economic Activities ^{a,d} , Hotel/Hostel ^{a,d} , Industry-Extractive ^{a,d} , Place of Worship ^{a,d} , Public House ^{a,d} , Public Services, Recreational Facility ^j , Residential ^{c,d} , Restaurant/Café ^{a,d} , Rural Industry-Food ^{a,d} , Sports Club/Facility ^d , Shop-Local ^{a,d} , Veterinary Surgery ^{a,d} .
Not Permitted	Abattoir, Advertisements and Advertising Structures, Aerodrome/ Airfield, Allotments, Betting Office, Boarding Kennels, Camp Site, Caravan Park-Residential, Concrete/Asphalt Plant in or adjacent to a quarry, Conference Centre, Crematorium, Embassy, Enterprise Centre, Fuel Depot, Funeral Home, Heavy Vehicle Park, Hospital, Housing for Older People, Industry-General, Industry-Light, Industry-Special, Live-Work Units, Motor Sales Outlet, Nightclub, Nursing Home, Office-Based Industry, Offices less than 100 sq.m, Offices 100 sq.m-1,000 sq.m, Offices over 1,000 sq.m, Off-Licence, Outdoor Entertainment Park, Petrol Station, Primary Health Care Centre, Recycling Facility, Refuse Landfill/ Tip, Refuse Transfer Station, Residential Institution, Retail Warehouse, Retirement Home, Science and Technology Based Enterprise, Scrap Yard, Service Garage, Shop-Major Sales Outlet, Shop-Neighbourhood, Social Club, Stadium, Transport Depot, Traveller Accommodation, Warehousing, Wholesale Outlet, Wind Farm.
<p>a In existing premises b In Villages to serve local needs c In accordance with Council policy for residential development in rural areas d Not permitted above 350m contour h For small-scale amenity or recreational purposes only j Directly linked to the heritage and amenity value of the Dublin Mountains</p> <p>*Note: The Division between the 'HA-DM' and 'HA-DV' zones occurs at Fort Bridge, Bohernabreena.</p>	

The following is relevant from the table above:

- Car parking is permitted in principle, provided it is below the 350m contour and is for small-scale amenity, or recreational purposes.
- Cultural use is open for consideration if 'directly linked to the heritage and amenity value of the Dublin Mountains'.
- Recreation facilities are open for consideration if 'directly linked to the heritage and amenity value of the Dublin Mountains'.
- Restaurant/Café use is open for consideration if 'in existing premises' and not above the 350m contour.
- Shop-local is open for consideration if in existing premises and not above the 350m contour.

The proposed development is consistent with both the HA-DM and RU Zoning Objectives and is specifically encouraged by the Economic and Tourism policy 5 objective 3: *"To support the development of a visitor facility in or adjacent to the High Amenity – Dublin Mountains zone (HA-DM), subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services."*

The visitor centre and car parking are located well below the 350m contour, and are of an appropriate scale to the context landscape (as established by the Landscape and Visual Impact Assessment in the EIAR). The visitor centre building, while critical to achieving the intended development objectives (of creating a visitor attraction of national significance, and particularly providing a 'wow factor' view over Dublin City and Bay), is ancillary to the site's primary function as a Green Infrastructure resource providing outdoor recreation and heritage appreciation opportunities. The restriction of restaurant/café and shop-local use to existing premises only, should not apply. These facilities are typical – and indeed necessary – for a visitor centre development as encouraged by Policy Objective ET5 Objective 3. The building is designed to enhance the site and the development overall is consistent with the objective to *'protect and enhance the outstanding natural character of the Dublin Mountains Area'*.

5.3.2 Dublin Mountains

Section 9.2.2:

"The Dublin Mountains and associated uplands occupy the southern side of the County and extend into the adjoining counties of Dun Laoghaire-Rathdown and Wicklow. The diverse topography and land cover of the Dublin Mountains includes areas of natural beauty and ecological importance (including 3 of the County's Natura 2000 Sites) and is a key element of the County's Green Infrastructure network. The mountains also offer significant recreational and amenity value, with popular orienteering courses, climbing areas and walking, running, hiking and mountain bike trails."

"The Landscape Character Assessment of South Dublin County (2015) highlights the high value and sensitivity of the Mountain Area. The protection of this landscape and its environment is a priority of this Plan."

HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 9 Dublin Mountains:

"It is the policy of the Council to protect and enhance the visual, recreational, environmental, ecological, geological, and archaeological and amenity value of the Dublin Mountains, as a key element of the County's Green Infrastructure network."

HCL9 Objective 1: *“To restrict development within areas designated with Zoning Objective ‘HA – DM’ (To protect and enhance the outstanding natural character of the Dublin Mountains Area) and to ensure that new development is related to the area’s amenity potential or to its use for agriculture, mountain or hill farming and is designed and sited to minimise environmental and visual impacts.”*

HCL9 Objective 2: *“To ensure that development above the 350 metre contour in the Dublin Mountains will seek to protect the open natural character of mountain heath, gorse lands and mountain bogs.”*

HCL9 Objective 3: *“To ensure that development within the Dublin Mountains will not prejudice the future expansion and development of a National Park, the County’s Green Infrastructure Network and local and regional networks of walking and cycling routes.”*

HCL9 Objective 4: *“To ensure that development proposals within the Dublin Mountains maximise the opportunities for enhancement of existing ecological and geological features and archaeological landscapes.”*

HCL9 Objective 5: *“To support the re-routing of the Dublin Mountains Way from public roads and to improve access to publicly owned lands in the upland area.”*

The development seeks to optimise the site’s – and the wider Dublin Mountains’ – recreation and amenity value by establishing a recognised hub for recreation and heritage appreciation, while protecting and enhancing the landscape, natural and cultural heritage resources. All elements of the proposed development – the physical elements and the operational management plan - are conceived and designed with this dual objective. The development will contribute to the achievement of HCL Policy 9, to ‘enhance the visual, recreational, environmental, ecological, geological, and archaeological and amenity value of the Dublin Mountains, as a key element of the County’s Green Infrastructure network’, and will significantly improve access to the publicly owned lands in the mountains. It will likely act as a catalyst for further development of the Dublin Mountains Way as encouraged by HCL9 Objective 5.

5.3.3 Community Infrastructure

C Policy 12 Open Space: *“It is the policy of the Council that a hierarchical network of high quality open space is available to those who live, work and visit the County, providing for both passive and active recreation, and that the resource offered by public open spaces, parks and playing fields is maximised through effective management.”*

C12 Objective 1: *“To support a hierarchy of open space and recreational facilities based on settlement size and catchment.”*

C12 Objective 3: *“To develop parks and open/green spaces that cater for the diverse needs of the County’s population, in particular different age groups and abilities, through the facilitation of both active and passive recreational activities and universal access.”*

The proposed development will improve the quality, management and accessibility of an existing open space for the local population and visitors, elevating the site in the hierarchy of open space in the county. It will provide an enhanced mountain park, catering for all age groups and abilities, with complimentary amenities (toilets, food and drink offer, education and exhibition space, etc.) within reach - by foot, bicycle, car and shuttle bus - of one of Dublin’s fastest growing residential areas. CSO figures show this area to have a young, healthy population, with a high demand for outdoor recreation options.

5.3.4 Economic and Tourism Development

It is stated in Section 4.1.0: *“The County’s natural, cultural and built heritage assets are an integral part of Dublin’s tourism and leisure offer and there is potential to grow this sector of the County’s economy.”*

Section 4.5.0 Tourism and Leisure:

“Dublin is Ireland’s primary tourism destination. In 2013 the Dublin Region received 60% of Ireland’s international tourists (almost 4 million) and over 40% of their expenditure. Dublin is also a main destination for domestic tourists. Tourism is a significant economic driver and is considered a key growth sector of the Irish economy. It supports job creation across a diverse range of sectors and skill levels. It has wide ranging social and environmental benefits for host communities, with tourism initiatives often making key assets more accessible, supporting environmental improvements and sustaining services and events that would not otherwise be viable.

“South Dublin County has a range of natural, cultural and built heritage resources of outstanding merit and the South Dublin Tourism Strategy 2015 identifies a range of actions to develop and present these assets to the market. Through the boost provided by Destination Dublin: A Collective Strategy for Tourism Growth to 2020 (Growth Dublin Taskforce), and by collaborating with other parts of Dublin, South Dublin can develop a distinctive range of tourism products that will complement those of other parts of Dublin and generate substantial socio-economic benefits for the County.”

The proposed development will achieve a strategic objective of providing a tourism product that is distinct to the Dublin Mountains (and South Dublin), and defined by its landscape, natural and cultural heritage emphasis. It will complement the range of products available in other parts of Dublin, while also supporting local the local economy and environmental improvements (to the site and nearby road network).

ECONOMIC AND TOURISM (ET) Policy 5 Tourism Infrastructure:

“It is the policy of the Council to support the development of a sustainable tourism industry that maximises the recreational and tourism potential of the County, through the implementation of the South Dublin Tourism Strategy 2015.”

ET5 Objective 1: *“To support the development of tourism infrastructure, attractions, activities and facilities at appropriate locations subject to sensitive design and environmental safeguards.”*

ET5 Objective 3: *“To support the development of a visitor facility in or adjacent to the High Amenity – Dublin Mountains zone (HA-DM), subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.”*

ET5 Objective 4: *“To support the development of an outdoor pursuits centre in or adjacent to lands designated with Zoning Objective High Amenity – Dublin Mountains (HA-DM), subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.”*

ET7 Objective 1: *“To promote the active use of managed forests for tourism and leisure related activities subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.”*

ET Policy 8 states: *“It is the policy of the Council to support the development of heritage, cultural and events tourism.”*

ET8 Objective 1: *“To support the sensitive restoration of heritage buildings and sites and operate flexibility with regard to the use of converted buildings to facilitate heritage tourism.”*

ET8 Objective 2: *“To support tourism projects that seek to showcase and promote the County’s geological heritage and cultural heritage.”*

ET Policy 9 states: *“It is the policy of the Council to support sustainable rural enterprises whilst protecting the rural character of the countryside and minimising environmental impacts.”*

ET9 Objective 4: *“To support sustainable forestry development at suitable locations in the County, subject to the protection of the rural environment, sensitive areas and landscapes.”*

The above policies specifically support the development of a visitor centre in the Dublin Mountains High Amenity Area, the use of managed forest lands for recreation and tourism, and the showcasing of the County’s cultural heritage as the proposed development seeks to do. The proposals have been informed by consideration of the rural landscape character and environmental sensitivities.

5.3.5 Green Infrastructure Network

Section 8.0:

“The environmental and heritage resources of the County can be described as the County’s ‘Green Infrastructure’, a vital resource for our future.

The term Green Infrastructure is used to describe an interconnected network of waterways, wetlands, Woodlands, wildlife habitats, greenways, parks and conservation lands, forests and other open spaces that adjoin and are threaded through urban areas. The Green Infrastructure network supports native plant and animal species and provides corridors for their movement, maintains natural ecological processes and biodiversity, sustains air and water quality and provides vital amenity and recreational spaces for communities, thereby contributing to the health and quality of life of residents and visitors to the County.

The advantages of a sustainable and integrated approach to Green Infrastructure management in both urban and rural areas are wide reaching and are proven to include:

- *Improved habitats for wildlife;*
- *Cleaner air and water;*
- *Improved surface water management;*
- *‘Greener’ and more attractive cities;*
- *Tourism and recreational opportunities and improved human health and wellbeing.”*

GREEN INFRASTRUCTURE (G) Policy 1 Overarching:

“It is the policy of the Council to protect, enhance and further develop a multifunctional Green Infrastructure network by building an interconnected network of parks, open spaces, hedgerows, grasslands, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, flood management and adaptation to climate change.”

G1 Objective 1: *“To establish a coherent, integrated and evolving Green Infrastructure network across South Dublin County with parks, open spaces, hedgerows, grasslands, protected areas, and rivers and streams forming the strategic links and to integrate the objectives of the Green Infrastructure Strategy throughout all relevant Council plans, such as Local Area Plans and other approved plans.”*

GREEN INFRASTRUCTURE (G) Policy 2:

“It is the policy of the Council to promote and develop a coherent, integrated and evolving Green Infrastructure network in South Dublin County that can connect to the regional network, secure and enhance biodiversity, provide readily accessible parks, open spaces and recreational facilities.”

G2 Objective 2: *“To protect and enhance the biodiversity value and ecological function of the Green Infrastructure network.”*

G2 Objective 3: *“To restrict development that would fragment or prejudice the Green Infrastructure network”.*

G2 Objective 4: *“To repair habitat fragmentation and provide for regeneration of flora and fauna where weaknesses are identified in the network.”*

G2 Objective 7: *“To incorporate items of historical or heritage importance in situ within the Green Infrastructure network as amenity features.”*

G2 Objective 9: *“To preserve, protect and augment trees, groups of trees, Woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within design proposals and supporting their integration into the Green Infrastructure network.”*

G2 Objective 10: *“To promote a network of paths and cycle tracks to enhance accessibility to the Green Infrastructure network, while ensuring that the design and operation of the routes responds to the ecological needs of each site.”*

The development would make a significant contribution to realising the County's Green Infrastructure development policy. There would be a significant increase in permanent, deciduous, native tree canopy cover as a result of conversion of coniferous plantations to woodland managed for amenity and biodiversity. Measures are proposed to improve the habitat value of the Glendoo Brook river corridor. The trail network on the site would be improved, with a programme of monitoring and management to ensure that recreational use of the site responds to any requirements for the protection of key habitats and species.

5.3.6 Public Open Space Hierarchy and Landscape Setting

Section 8.3.0:

“Open spaces and parks are fundamental in contributing to a high quality of life for those living, working and visiting the County. They provide habitats for ecological processes, a focal point for active and passive recreation, promote community interaction and help mitigate the impacts of climate change. Open spaces and parks can range in size from a hectare to in excess of 100 hectares and have the potential to strengthen the County’s Green Infrastructure network.”

GREEN INFRASTRUCTURE (G) Policy 4 Public Open Space and Landscape Setting: *“It is the policy of the Council to provide a hierarchy of high quality and multi-functional public parks and open spaces.”*

G4 Objective 1: *“To support and facilitate the provision of a network of high quality, well located and multifunctional public parks and open spaces throughout the County and to protect and enhance the environmental capacity and ecological function of these spaces.”*

G4 Objective 2: *“To connect parks and areas of open space with ecological and recreational corridors to aid the movement of biodiversity and people and to strengthen the overall Green Infrastructure network.”*

G4 Objective 3: *“To enhance and diversify the outdoor recreational potential of public open spaces and parks, subject to the protection of the natural environment. “*

G4 Objective 4: *“To minimise the environmental impact of external lighting at sensitive locations within the Green Infrastructure network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.”*

The development’s compliance with Green Infrastructure an open space policy is addressed in Section 5.3.5 above. Regarding G4 Objective 4 specifically, the development proposals recognise the sensitivity of the local environment to external (and internal) lighting. It is proposed that the development will generally only operate in daylight hours, with the visitor centre and parking area closing nightly before the need for lighting arises. (Earlier in the design process a night-time operating restaurant was envisaged in the visitor centre.) For the safety of staff and visitors some external lighting is proposed, in the parking area, on the path connecting the parking area to the visitor centre, and around the building. Low level, directional lighting is proposed to minimise light spill from the site.

5.3.7 Natural Heritage – Non-Designated Areas

In Section 9.3.4 it is stated:

“The County supports a range of plant, animal and bird species that are deemed to be rare and threatened under European and Irish legislation and which are known to exist outside of designated sites such as Natura 2000 sites or proposed Natural Heritage Areas. This includes nationally rare plants, plants listed in the Red Data Lists of Irish Plants, the Flora Protection Order, 1999 (or other such Orders) and their habitats and animals and birds listed in the Wildlife Act 1976 (amended 2000) and subsequent statutory instruments.

“A number of habitats and species listed in Annex 1 and Annex 2 of the Habitats Directive are known to occur at locations in the County which are situated outside of protected sites. Under the EU Habitats Directive, protection is afforded to these species and habitats where they occur.”

HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 15 Non-Designated Areas:

“It is the policy of the Council to protect and promote the conservation of biodiversity outside of designated areas and to ensure that species and habitats that are protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992 are adequately protected.”

HCL15 Objective 1: *“To ensure that development does not have a significant adverse impact on rare and threatened species, including those protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992.”*

HCL15 Objective 2: *“To ensure that, where evidence of species that are protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979 and the Habitats Directive 1992 exists, appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.”*

HCL15 Objective 3: *“To protect existing trees, hedgerows, and Woodlands which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management in accordance with Living with Trees: South Dublin County Council's Tree Management Policy 2015-2020.”*

Surveys carried out for the EIA identified all protected and other sensitive species and habitats present on the site. These were identified as Key Ecological Receptors and they were specifically addressed in the EIA to ensure that they would not be subject to unacceptable negative impacts as a result of the development. The Key Ecological Receptors are also proposed to be monitored and actively managed as part of the Operational Management Plan for the development. No significant interventions are proposed in the more ecologically valuable woodland of Massy's Wood, and on the Hell Fire property the conversion of coniferous forest to more species rich woodland is proposed.

5.3.8 Heritage, Conservation and Landscape

HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 16 Public Rights of Way and Permissive Access Routes:

“It is the policy of the Council to continue to promote and improve access to high amenity, scenic, and recreational lands throughout the County and within adjoining counties, including places of natural beauty or utility, for the purposes of outdoor recreation, while avoiding environmental damage, landscape damage and impacts to Natura 2000 sites.”

HCL16 Objective 1: *“To promote the preservation of public rights of way that give access to mountain, lakeshore, riverbank or other places of natural beauty or recreational utility such as parklands, geological and geo-morphical features of heritage value and to identify and map such public rights of way as they come to the attention of the Council.”*

HCL16 Objective 2: *“To promote and facilitate the creation of Permissive Access Routes and heritage trails that will provide access to high amenity, scenic and recreational lands including rural areas, forests, Woodlands, waterways, upland/mountain areas, the Grand Canal, the Dodder Valley, the Liffey Valley and between historic villages (utilising modern technology), in partnership with adjoining local authorities, private landowners, semi-state and other public bodies such as Coillte and the Forest Service. Permissive Access Routes should not compromise environmentally sensitive sites.”*

HCL16 Objective 3: *“To promote and facilitate the continued development of the Dublin Mountains Way and the Wicklow Way in association with the Dublin Mountains Partnership, particularly Permissive Access Routes that provide access to regional and local networks of walking, running, hiking and mountain bike trails and other recreational facilities. The routing of new trails and rerouting of existing trails off public roads is encouraged.”*

HCL16 Objective 4: *“To promote and improve access, in partnership with the relevant landowners, to all the historic sites in the County and seek to maximise their tourism potential in partnership with the relevant landowners.”*

HCL16 Objective 5: *“To bring mountain amenities closer to residential communities by promoting the establishment of a network of formal footpaths, off-road paths and cycle ways that facilitate casual walkers and cyclists.”*

The proposed development, carried out by SDCC in partnership with Coillte and DMP (whose membership includes the neighbouring local authorities) would contribute to the objective of the Council to *“continue to promote and improve access to high amenity, scenic, and recreational lands throughout the County... including places of natural beauty or utility, for the purposes of outdoor recreation, while avoiding environmental damage, landscape damage and impacts to Natura 2000 sites”*. It would improve and promote access to the archaeological and architectural features on Coillte's lands, and improve their protection and management. The improvement proposals for the R115 and R113 connecting the site to the urban area to the north, including the provision of footpaths and bicycle lanes, represent a further planning gain.

5.3.9 Heritage, Culture and Landscape

HCL Policy 1: *“It is the policy of the Council to protect, conserve and enhance natural, built and cultural heritage features, and to support the objectives and actions of the County Heritage Plan.”*

HCL1 Objective 1: *To protect, conserve and enhance natural, built and cultural heritage features and restrict development that would have a significant negative impact on these assets.*

HCL2 Objective 3: *To protect and enhance sites listed in the Record of Monuments and Places and ensure that development in the vicinity of a Recorded Monument or Area of Archaeological Potential does not detract from the setting of the site, monument, feature or object and is sited and designed appropriately.*

HCL3 Objective 3: *To address dereliction and encourage the rehabilitation, renovation, appropriate use and re-use of Protected Structures.*

The EIA has found that the development would not have significant negative impact on natural, built and cultural heritage features. The protection and management of these resources will rather be improved by the implementation of the Operational Management Plan.

5.3.10 Watercourses Network

GREEN INFRASTRUCTURE (G) Policy 3 Watercourses Network:

“It is the policy of the Council to promote the natural, historical and amenity value of the County’s watercourses; to address the long term management and protection of these corridors and to strengthen links at a regional level.”

G3 Objective 1: *“To promote the natural, historical and amenity value of the County’s watercourses and address the long term management and protection of these corridors in the South Dublin Green Infrastructure Strategy.”*

G3 Objective 2: *“To maintain a biodiversity protection zone of not less than 10 metres from the top of the bank of all watercourses in the County, with the full extent of the protection zone to be determined on a case by case basis by the Planning Authority, based on site specific characteristics and sensitivities. Strategic Green Routes and Trails identified in the South Dublin Tourism Strategy, 2015; the Greater Dublin Area Strategic Cycle Network; and other government plans or programmes will be open for consideration within the biodiversity protection zone, subject to appropriate safeguards and assessments, as these routes increase the accessibility of the Green Infrastructure network.”*

G3 Objective 5: *“To restrict the encroachment of development on watercourses, and provide for protection measures to watercourses and their banks, including but not limited to: the prevention of pollution of the watercourse, the protection of the river bank from erosion, the retention and/or provision of wildlife corridors and the protection from light spill in sensitive locations, including during construction of permitted development.”*

The proposals include the realignment of a section of existing path away from the bank of the Glendoo Brook, to allow for more controlled access along the river corridor. A programme of clearance of invasive species from the river corridor is also proposed, with the restoration of riverside habitat where required. The Glendoo Brook is one of the Key Ecological Receptors identified for regular monitoring of the effects of visitor access and implementation of protection or mitigation measures if these are found to be required.

5.3.11 Views and Prospects

In Section 9.2.1 it is stated:

“The County contains many scenic views and prospects (distant objects) of places of natural beauty or interest that are located in the County and in adjoining counties. These include localised views and panoramic prospects of rural, mountain, hill, coastal and urban landscapes such as Dublin City and environs, Dublin Bay, the Liffey Valley and the Dublin and Wicklow Hills and Mountains including the Glenasmole Valley. Views of places of natural beauty or interest are not confined to those that are visible from scenic places but also from and to existing built up areas.”

Montpelier Hill is identified in Table 9.2 as a Prospect to be Preserved and Protected.

HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 8 Views and Prospects: *"It is the policy of the Council to preserve Views and Prospects and the amenities of places and features of natural beauty or interest including those located within and outside the County."*

HCL8 Objective 1: *"To protect, preserve and improve Views and Prospects of special amenity, historic or cultural value or interest including rural, river valley, mountain, hill, coastal, upland and urban views and prospects that are visible from prominent public places."*

The proposed development includes proposals for the conversion of the conifer plantations on the east face of Montpelier Hill to permanent mixed deciduous woodland. This will have long term beneficial impacts on views of the hill from the east where there is a concentration of visual receptors (in the Jamestown and Cruagh area). The visitor centre will be visible in this woodland, but at a relatively low elevation on the hill, partially obscured by trees in front of it, and further softened in views by its stone and timber cladding. The scale and design of the building took account of the site's visual sensitivity. There will be no negative impact on views towards the hill. It is also proposed to clear the conifer plantation from behind (south and west of) of the Hell Fire Club, returning the building to its historic place of prominence on the hilltop in views from the north and east. this is a further beneficial impact of the proposed development on the landscape.

5.3.12 Landscape

HERITAGE, CONSERVATION AND LANDSCAPES (HCL) Policy 7 Landscapes:

"It is the policy of the Council to preserve and enhance the character of the County's landscapes particularly areas that have been deemed to have a medium to high Landscape Value or medium to high Landscape Sensitivity and to ensure that landscape considerations are an important factor in the management of development."

HCL7 Objective 1: *"To protect and enhance the landscape character of the County by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the landscape, taking full cognisance of the Landscape Character Assessment of South Dublin County (2015)."*

HCL7 Objective 2: *"To ensure that development is assessed against Landscape Character, Landscape Values and Landscape Sensitivity as identified in the Landscape Character Assessment for South Dublin County (2015) in accordance with Government guidance on Landscape Character Assessment and the National Landscape Strategy."*

The proposed development will protect and improve the landscape character of the Dublin Mountains through the interventions described above and the active management of the site as a Green Infrastructure asset.

6.0 PLANNING MERITS OF THE PROPOSED DEVELOPMENT

The planning merits of the proposed development are summarised below in relation to four main themes:

- Benign environmental impacts;
- Economic and employment benefits;
- Compliance with planning policy;
- Compliance with tourism strategy.

6.1 BENIGN ENVIRONMENTAL IMPACTS

An Environmental Impact Assessment Report (EIAR) has been prepared and submitted as part of the application in accordance with Section 175 (3) of the Planning and Development Act 2000, as amended. That EIAR has been prepared in accordance with Annex IV of Directive 2014/52/EU which deals with the assessment of the effects of certain public and private projects on the environment.

The EIAR concludes that the environmental impacts of the proposed development will be overwhelmingly positive. The environmental assessments undertaken indicate that the following impacts will be positive should the proposed development proceed:

- **Population and Human Health:** Significant improvement in recreation facilities and opportunities leading to improvement in health and wellbeing; benefits in terms of employment and economic investment; improved management and appreciation of the recreational asset.
- **Biodiversity:** Habitat enhancement within the site generated from conversion of coniferous commercial forest to mixed deciduous woodland; creation of new habitats by proposed ponds, swales and SUDS generally; improvements to Glendoo Brook river corridor; implementation of operational management measures including the monitoring of sensitive habitats and species and responsive management for their protection.
- **Archaeology, Cultural and Architectural Heritage:** The overall impact will be positive as the existing features on site will be better protected as part of a site management package, access to features will be improved and visitors will be better informed about the heritage and its significance.
- **Landscape and Visual Resources:** The proposed development protects and enhances the landscape and visual amenity in the medium and long term and is considered an appropriate change to the receiving environment. The impacts on the majority of the viewpoints in the receiving environment will be neutral or beneficial.
- **Roads Traffic and Transportation:** Projected increases in traffic flows from the development are not significant. There will be several positive roads, traffic and transportation impacts including: increased parking capacity; improved access into the site generally by all modes; increased pedestrian and cycling safety accruing from the pedestrian bridge over the R115 and the provision of a footpath and advisory cycle lane along the road; provision of a park and ride facility at Tallaght Stadium; and the provision of a shuttle bus service from Tallaght. In combination these measures considerably enhance the access to the proposed amenity.

The most significant negative impact is a medium-term effect on the Red Squirrel, which is significant at the local scale and arises as a result of the impacts of habitat loss and fragmentation, which, given that the habitat to be lost is currently conifer plantation, would occur irrespective of whether or not the proposed

development was to proceed.

Regarding soils, geology and hydrogeology, and water and hydrology, the potential impact is slight for the operational phase. In respect of air quality, climate, noise and vibration the potential impact is moderate, and limited to the construction phase only, and reduced to within acceptable levels by adherence to the submitted Outline Construction Management Plan.

In recognition of the site's particular sensitivities, i.e. biodiversity, archaeological and architectural heritage, - and the sensitivity of these factors to increased usage in particular - the proposals for physical development are accompanied by proposals for monitoring and management. This will ensure that these prized assets will not be subject to significant negative impacts and in fact will enhance their condition and value. This is in recognition of the fact that *what makes the site unique and attractive must be protected*.

6.2 ECONOMIC AND EMPLOYMENT BENEFITS

A distinctive gateway facility is proposed that will act as a tourism attraction and activity hub for recreational pursuits in the Dublin Mountains. It will also act as a focal point for information and orientation for those wishing to explore the wider Dublin Mountains and potentially for those wishing to explore further into the Wicklow Mountains and the Wicklow Way.

The proposed development will generate employment in its own right and taken with other recreational opportunities has potential to generate employment in other locations as part of a physically linked and theme integrated network of outdoor recreational and tourism facilities. This extended network would cover three local authority areas namely South Dublin, Dún Laoghaire Rathdown and Wicklow County Council.

It is estimated that the proposed development will generate some 14 full time equivalent employment positions for skilled and unskilled employees. The local population and businesses may also benefit from construction employment should the proposed development proceed. During its operation, a high proportion of those employed are likely to be from the locality given their local knowledge and experience of the area. The development is also likely to require food produce and services support sourced locally wherever possible.

There is potential for the development to act as a hub and a catalyst for the development of outdoor pursuits in the locality and in the wider Dublin Mountains area, with benefits to the local economy. While providing for walking, horse riding and heritage appreciation and education specifically, the development could also accommodate complementary activities such as orienteering and cultural events. As an access and information hub it could support other activities elsewhere in the mountains such as cycling and adventure sports. Ultimately the development could contribute the Dublin Mountains becoming synonymous with outdoor recreation, cultural and natural heritage appreciation, with a strong brand aided by the national profile of the Hell Fire Club.

While the proposed development does have economic objectives, and a commercial element in the café, kiosk and a small shop, the core facilities including the parking areas, the trails and tree canopy walk, public toilets and the 'Ramblers' Lounge' will be excluded from the commercial operations and provided at no charge to visitors.

The proposed development has been informed by a Business Plan produced by CHL Consulting Group Ltd. This business plan is submitted with the planning application.

6.3 COMPLIANCE WITH PLANNING POLICY

The proposed development is supported at all levels of planning policy and guidance. It is aligned with and encouraged by national and regional planning guidance and specifically supported by the policies and objectives of the South Dublin County Development Plan 2016-2022.

6.3.1 National Planning Policy

6.3.1.1 National Spatial Strategy 2002-2020

The development complies with the NSS strategic tourism objective to support the sensitive development of heritage and natural landscapes through better access and developing appropriate interest activities. Box 5.1 of the NSS also recognises the potential for urban generated rural recreation such as in this case, and the opportunities presented by the presence of attractive landscapes close to urban areas such as Dublin where weekend leisure activity could become a significant driver of year-round tourism activity.

This proposal seeks to realise the development potential for tourism purposes of the single most important and recognisable environmental, recreational and tourism asset in the South Dublin, namely the Dublin Mountains, in accordance with national planning policy. The intention is to have this prized asset as the driver of the county's enhanced tourism product.

6.3.1.2 National Planning Framework – Ireland 2040 Our Plan Issues and Choices

The proposal is in full accordance with the NSS's emerging successor, the National Planning Framework (NPF), which encourages the sustainable and adaptive reuse of existing and historic assets whilst at the same time recognising the value of our national heritage not only for biodiversity but also for recreation and tourism purposes. We believe that the proposal is not only respectful to the natural heritage of the site but also makes the most of that asset by providing access to it, revealing it in an enhanced setting, managing it, and by providing amenities for its enjoyment.

The development is in accordance with Section 5.5 of the emerging NPF as proposal for enhanced management and multifunctional use (recreation, cultural and tourism activities) of green infrastructure resources, capable of delivering a wide range of economic, environmental and quality of life benefits. The emerging NPF specifically states that the creation of a high quality of life, which is a key theme of Framework, can be achieved by

'creating more places for people to access nature, outdoor recreation or social interaction or physical activity by providing quality, linked green or 'blue' (water-related) spaces for walking, cycling and other physical activity and creating a sense of place and local distinctiveness. They also generally include a holistic approach to developing the landscape inclusive of other influences, such as ecological development.'

6.3.2 Regional Planning Guidance

6.3.2.1 Dublin Mountains

The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPGs) do not just identify the Dublin Mountains as a 'regional asset' in the context of green infrastructure, they identify them as a key asset – in the select company of Bru Na Boinne, Liffey Valley and Dublin

Bay.

6.3.2.2 Green Infrastructure, Social Infrastructure and Sustainable Communities

The RPGs identify that access to green corridors and to natural heritage is complex and potentially problematic, and therefore encourage the use of lands in public ownership to overcome these difficulties. The site presents a significant, strategic opportunity in this regard. It is publicly owned, accessible from the urban area, and provides a potential hub or gateway for access deeper into the lands in public ownership in the mountains. The RPGs Strategic Recommendation SIR11:

“The importance of managing and enhancing recreational facilities, including publicly owned lands associated with regionally important assets (such as the Dublin Mountains) is recognised and should be supported by the relevant bodies in line with environmental compatibilities in association with plans and/or measures to protect important habitats within or proximate to these locations.”

The proposal is consistent with the principle of ‘managed access’ to the green infrastructure network, and the promotion of sustainable and healthy alternative modes of transport through pedestrian and cycleway improvements.

The proposal achieves a balance between the protection, enhancement and maintenance of the natural environment, with maximising the economic and social value of green infrastructure consistent with Strategic Recommendation GIP6.

6.3.2.3 Rural Development and Tourism

The proposal seeks to exploit the potential of this extra-urban area near the fringe of metropolitan Dublin in an environmentally benign manner. The Dublin Mountains are an underutilised recreational asset with potential to be cornerstone of the South Dublin tourism product. Considerable thought has gone into the strategic location of the site, the characteristics and constraints of the site, and the need for a suitably scaled and designed facility. The development is consistent with the objective in the RPGs to ‘ensure that increasing pressures of commercialisation and development do not serve to undermine rural ecosystems, landscapes and conservation areas thus losing what makes such destinations attractive and special places to visit’.

6.3.2.4 Built Heritage

The proposal accords with Strategic Policy GIP1 which seeks to protect, enhance and integrate archaeological and architectural heritage sensitively into development. Policy GIR11 which seeks to *protect the intrinsic natural, built and cultural heritage of the GDA whilst ensuring that any future development of tourist and recreational uses are facilitated in a manner which complements and protects the intrinsic heritage features of the region* is met in full.

6.3.3 South Dublin County Development Plan 2016-2022

6.3.3.1 Zoning, and the Dublin Mountains

The proposed development is consistent with the predominant zoning of the site which is as ‘HA – DM’ High Amenity Dublin Mountains where the objective is to protect and enhance the outstanding natural character of the Dublin Mountains Area. The provision of a modestly scaled café and shop ancillary to and supportive of outdoor recreation are also consistent with the relevant zoning. These facilities are typical – and indeed necessary – for a visitor centre

development as encouraged by Policy ET 5 Objective 3 which supports the development of a visitor facility in or adjacent to the High Amenity – Dublin Mountains zone (HA-DM), subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.

The proposal is entirely consistent with the policies and objectives for the Dublin Mountains.

6.3.3.2 Community Infrastructure

This proposal will improve the quality, management and accessibility of open space for the County's population and visitors, commensurate with its potential role within the hierarchy of open space in the county. The proposal also diversifies the range of recreational activities within the county available for all age groups and abilities.

The proposal is consistent with Community Infrastructure Objectives on the County Development Plan.

9.3.3.3 Economic and Tourism Development

The proposed development at this location represents an unparalleled opportunity for the County Council to grow the tourism and leisure sector of its economy through sympathetic and sustainable exploitation of its natural, cultural and built heritage assets as set out in Section 4.1.0 of the County Development Plan.

The economic and tourism policies and objectives of the County Plan support the development of a visitor centre in this location subject to sensitive design and environmental safeguards. They also support the development of heritage, cultural and events tourism and the sensitive restoration of heritage buildings and sites. The proposal is also supported by policy which seeks to support sustainable rural enterprises whilst protecting the rural character of the countryside and minimising environmental impacts. This proposal will 'showcase' important under realised components of the County's geological and cultural heritage.

The proposed development is supported by the economic and tourism policies and objectives of the County Development Plan.

6.3.3.4 Green Infrastructure, Public Open Space and Landscape Setting

The proposed development will enhance the County's green infrastructure network through the provision of a high quality, well located and multi-functional area of open space. The environmental condition and capacity of the site will be enhanced by the physical elements of the development complemented by implementation of the Operational Management Plan.

The proposed development will contribute to the achievement of the green infrastructure policies and objectives of the County Development Plan.

6.3.3.5 Natural Heritage – Non-Designated Areas

The proposed development protects designated and non-designated species and habitats within and close to the site as required in this suite of policies and objectives. Ecological assets and biodiversity within the site will be managed and enhanced by implementation of the Operational Management Plan.

The natural heritage policies and objectives relating to non-designated areas are all met.

6.3.3.6 Heritage, Conservation and Landscape

The proposal, to be implemented by the applicant in partnership with Coillte and DMP, will promote and improve access to high amenity, scenic and recreational lands while avoiding environmental damage, landscape damage, and impacts to Natura 2000 sites. It will improve and promote access to the archaeological and architectural features on Coillte's lands, and improve their protection and management.

Heritage, Conservation and Landscape policies and objectives are complied with.

6.3.3.7 Watercourses Network/Green Infrastructure

The proposals include the realignment of a section of existing path away from the bank of the Glendoo Brook, to allow for more controlled access along the river corridor. A programme of clearance of invasive species from the river corridor is also proposed, with the restoration of riverside habitat where required.

The proposal complies with the relevant watercourse and green infrastructure policies and objectives of the County Plan.

6.3.3.8 Landscape, Views and Prospects

The proposed development will protect and improve the landscape character of the Dublin Mountains by interventions including the conversion of a large area of coniferous forest to mixed deciduous woodland, and through active management of the site as a Green Infrastructure asset. The proposal complies with policy to *'protect, preserve and improve views and prospects of special amenity, historic or cultural value or interest.*

The landscape policies and objectives of the County Plan are met.

In summary, all the relevant policies and objectives of the County Development Plan are complied with.

6.4 COMPLIANCE WITH TOURISM STRATEGY

The proposed development complies with tourism strategy and policy as follows:

6.4.1 Dublin Mountains Strategic Development Plan for Outdoor Recreation 2007-2017

The concept of developing the Dublin Mountains Visitor Centre was first proposed as far back as 2007 with its inclusion in the Dublin Mountains Strategic Development Plan for Outdoor Recreation. This Plan led to the establishment of the Dublin Mountains Partnership (DMP) – a partner in the proposed development.

6.4.2 Failte Ireland/Grow Dublin Tourism Alliance Strategic Plan – Dublin – A Breath of Fresh Air (2015)

This 'Breath of Fresh Air' plan promotes collaboration amongst those involved in promoting Dublin as a tourism destination and seeks to promote what is truly distinctive and compelling about Dublin

City and the Region. A key aspiration is to promote a vibrant city 'where city living thrives side by side with the natural outdoors'. Key priority actions include the promotion of outdoor experiences by making outdoor areas more accessible, and the identification of potential trails with motivating themes. The proposed development is considered to be aligned with these key objectives.

6.4.3 South Dublin Tourism Strategy (2015)

This Strategy unequivocally identifies the Dublin Mountains as the County's principal resource for tourism. In developing its range of tourism products it is proposed that the County Council should create a hierarchy of developments to ensure that all areas and communities receive socio-economic benefit from the development of the tourism sector. The 'Dublin Mountains Park Flagship Project' is located at the top of that hierarchy.

From the audit and assessment of the county's resources it is stated that *'taking a consensus of the stakeholder research and the trends in international tourism, the greatest opportunities for tourism development in South Dublin are considered to be related to its natural environment, in particular the Dublin Mountains and the waterways'*.

The Dublin Mountains are identified as a well resourced and well managed area of significant scenic and high nature conservation value that provides:

- High quality recreation amenity and experience,
- Breathing space for residents and well informed responsible visitors, and
- Sustainable economy for those who own or manage the land.

It is further stated that:

'The recommended strategy is to move on from the Dublin Mountain Way to establish Dublin Mountains as a primary draw for domestic and overseas visitors and local residents through the development of attractions, activities and facilities catering for the interests and needs of users.'

In regard to a flagship project it is proposed that this centrepiece development will *'provide exhilarating and relaxing opportunities to be as active as you want or simply absorb the views'*.

The Strategy also identifies the need for Tallaght to capitalise on its proximity to the Dublin Mountains and its central location for access to the County, and the history of Tallaght being closely tied to the Dublin Mountains. The Strategy supports the principle of a shuttle bus linking hotels and principal urban centres with sites of tourist interest such as the Dublin Mountains.

It is identified that the recommended tourist product offering of the County is not market ready, so cannot be widely promoted until major development such as the Dublin Mountains project is completed. In essence the proposed development is fundamental to the promotion and delivery of the County Council's tourism strategy. It is also entirely consistent with that strategy.

Finally, on tourism strategy, we would point out that whilst other Dublin local authorities have Dublin Bay, beaches, the River Liffey and assets such as Phoenix Park, South Dublin County has ready access to the Dublin Mountains. It is important that this asset is utilised by the local authority to its maximum benefit without jeopardising the natural and cultural heritage that make it unique. The proposed development will contribute to achieving this.

6.5 CONCLUSION

The proposed development is plan led and fully aligned with national, regional and local planning policy and guidance.

The proposal seeks to maximise the use and value of an existing land resource, which is preferable in sequential planning terms, to developing on a new site.

The development is compliant with tourism policy at national, regional and local level. It would make sympathetic and sustainable use of the site's – and the Dublin Mountains' – landscape, natural and cultural heritage, the potential of which has not yet been realised.

In recognition of the sensitivity of the site's heritage resources to increased recreational usage, the proposals for physical development are accompanied by proposals for monitoring and management. This will ensure that these prized assets will not be devalued but rather enhanced by the development.

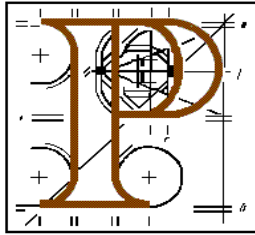
An EIA has been undertaken and it is found that there would be positive impacts across a range of environmental factors including population and human health, biodiversity, archaeology and cultural heritage, architectural heritage, the landscape, and roads, traffic and transportation.

The preparation of the development proposals has been informed by a comprehensive programme of consultation with public representatives, landowners, interested parties and the public, and has addressed various concerns raised by these parties.

The proposal is consistent with the proper planning and sustainable development of the site and the area.

End

Appendix A **Order from An Bord Pleanála directing South Dublin County Council to prepare an Environmental Impact Assessment in respect of the proposed development (Ref. 06S.JD0027)**



Board Direction

Ref: 06S.JD0027

At a meeting held on 8th May 2017, the Board considered the documents and submissions on file and the report and recommendation of the Planning Inspector.

The Board decided unanimously to direct the preparation of an environmental impact statement.

Reasons and Considerations

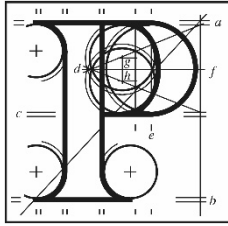
Having regard to the scale and nature of the proposed development, to its location in a sensitive but highly frequented landscape south of the Dublin built up area, to the prevalence of artefacts of cultural, historical and archaeological heritage throughout the general area and to the ecology of the area the Board considered a full and proper consideration of all the possible significant effects on the environment of the proposed amenity development and the potential for mitigation of these required that an environmental impact assessment process be undertaken. Therefore, it is considered that the preparation of an environmental impact statement is required.

In deciding not to accept the Inspector's recommendation not to direct that an EIS be undertaken the Board noted the Inspector's view that the historical and archaeological features of the lands had proved to be resilient to date notwithstanding the numbers of visitors to the area. However the Board considered that the proposed development is such that further significant additional numbers of visitors will be encouraged to use the facilities provided and it is deemed appropriate that the effect of these, and other, impacts be properly assessed.

Board Member: _____
G.J. Dennison

Date: 8th May 2017

Appendix B An Bord Pleanála Inspector's Report prepared to inform the Board's determination as to whether an Environmental Impact Assessment should be carried out (Ref. 06S.JD0027)



An
Bord
Pleanála

Inspector's Report 06S.JD0027

Development

Proposed Dublin Mountains Visitor Centre at the Hell Fire Wood and Massy's Wood properties.

Location

Hell Fire Club, Killakee Road, Rathfarnham, Co. Dublin.

Planning Authority

South Dublin County Council

Referring Body

South Dublin County Council

Type of Application

EIS Direction

Date of Site Inspection

17th March 2017

Inspector

Michael Dillon

1.0 Introduction

Under the provisions of Article 120(3)(b) of the Planning and Development Regulations 2001 (as amended), South Dublin County Council is seeking a determination from An Bord Pleanála, as to whether or not its proposal to carry out visitor centre development, would be likely to give rise to significant effects on the environment, and thereby require the preparation of an Environmental Impact Statement (EIS). South Dublin County Council is of the opinion that EIA is required for the project. The request is accompanied by two documents titled “Feasibility Study and Masterplan for a Flagship Tourism Facility for the Dublin Mountains” (undated – but a letter which accompanies the request to the Board indicates that it was drawn up in 2015) and “Feasibility Study and Masterplan for a Flagship Tourism Facility for the Dublin Mountains – Stage 3 Preferred Option Report” (undated – but indicated as being a work in progress). In addition, some drawings and maps are included from Cunnane Stratton Reynolds Land Planning & Design and from Paul Keogh Architects.

2.0 Site Location & Description

- 2.1. The site is located on either side of the Killakee Road within the foothills of the Dublin Mountains at Hell Fire Wood and Massy’s Wood (extending to some 146ha in total). Killakee Road is nominated the R115 at this location, and forms part of the Military Road linking Rathfarnham with Glencree, Sally Gap, Laragh, Glenmalure and Aughavannagh in Co. Wicklow. The 60kph speed restriction applies in this area and there are no public footpaths and there is no public lighting. There is a single, unbroken, white line in the centre of the road. Double yellow lines have been painted on the eastern (Massy’s Wood) side of the road and for a short stretch flanking the existing entrance to the Hell Fire Wood car-park on the western side – to facilitate sight distances at the car-park entrance.
- 2.2. The R115 (Stocking Lane) climbs steadily uphill from Rathfarnham (becoming the Killakee Road at Gunny Hill (L4025) – the road to Old Bawn. From this junction up to the car-park, the road is particularly steep. The area is not served by public transport. The road is between 5.0 and 5.5m in width.

- 2.3. Access to the car-park is controlled by a gate – opening hours being restricted, at present, to 08.00-17.00 October to March, and 07.00-21.00 April to September. Restricted hours of opening and heavy usage by visitors at weekends results in over-spill parking onto the western side of the R115, which restricts the flow of two-way traffic on the road. There are no facilities at the existing car-park other than signage boards and a bicycle rack. There are no litter bins, which has resulted in casual littering of the car-park and trails with sweet wrappers, beverage cans, plastic water bottles and coffee cups, amongst other detritus. There is no charge for using the car-park: security cameras are mounted on a pole at the entrance.
- 2.4. From the car-park at Killakee Road, a number of vehicular forest tracks and pedestrian trails lead uphill to the summit of Montpelier Hill (383m), where is located the ruined hunting lodge known as the Hell Fire Club. On the pedestrian route to the summit there is a large boulder in the centre of the path which is indicated on maps as a 'standing stone'. This boulder is indistinguishable from a number of others in the vicinity – except, perhaps, being slightly larger. There are fine views from the summit of Montpelier Hill to north and east over Dublin City and Bay. The woods extend to the west side of the Hill – providing fine views over Old Court, Friarstown and Piperstown. The western side of the wood is not so heavily-used as the eastern side. The Hell Fire Wood is used by walkers, hikers, pony trekkers and mountain bikers. There are electricity cables on timber poles running through the wood in the vicinity of the existing car-park. The wood is mostly coniferous plantation. Old field boundaries (walls/banks) are extant in places between the trees. There has been a considerable amount of clear-felling in recent years. Although no animals were visible on the date of site inspection, it is clear that the wood is grazed by deer, sheep and cattle.
- 2.5. The Hell Fire Club is a solidly-built, gaunt structure of two storeys, with vaulted stone roof – dating to 1725. The building is fitted with gun loops on projecting bays to front and rear. The five-bay building has a projecting two-storey, pedimented entrance bay – the original external staircase to the first floor level is no longer extant. The building has a two-storey return to the rear. The structure has just three rooms on each floor, and would originally have had an attic level beneath half of the stone-vaulted roof. The ground floor (kitchen and stores) has a stone-vaulted ceiling. The original staircase is missing – having been replaced in the recent past by a concrete

structure with welded metal balustrade. The building is flanked by two, lean-to stable buildings, which would originally have had timber lofts. There are attractive niches within the two principal rooms at *piano nobile* level. The exposed nature of the site required the construction of two projecting wing walls at the front of the building – to protect visitors from the wind – one of which has a mounting block. The building is in a parlous state, with mud at ground floor level, graffiti on walls and evidence of fires lit in the interior. To the rear of the building are the remains of two passage tombs (Neolithic/Megalithic) – now grassed over.

- 2.6. The principal access to Massy's Wood is located immediately opposite the Steward's House complex – the former stable block serving the now-demolished Killakee House, which once was the centre of the Massy Demesne. To get from the car-park at Killakee to the entrance to Massy's Wood, involves a 110m walk along the busy R115, made more difficult and dangerous by the on-road parking on the western side of the road. There are two other access points to Massy's Wood – Rockbrook to the northeast or Cruagh to the southeast – neither of which has car-parking facilities other than on-road.
- 2.7. Massy's Wood forms the core of the former Killakee House demesne – centred on Killakee House. The house, constructed by Luke White in 1806, was demolished in 1941, and has been replaced by a two-storey house which does not form part of the Coillte landholding. The demesne woodlands, of mixed conifer and deciduous species, contain a number of older specimen trees. The southern end of the wood comprises mostly beech (much of it semi-mature). Some areas of the wood have been fenced-off to prevent access by deer. The Wood occupies the valley of a watercourse – variously referred to as the Cruagh Brook/Owendougher River/Jamestown Stream. This watercourse is crossed by a number of picturesque stone bridges – constructed to beautify the demesne. The principal remnant of the former demesne is a series of three, linked walled gardens on the east bank of the Jamestown Stream – now considerably overgrown and dilapidated. These walled gardens are terraced to take account of the drop in the ground level, and once contained an attractive set of glasshouses (designed by Richard Turner) at the northern end. There are some upstanding remains of former sheds and the glasshouses within the complex. There are the remains of a ruined sawmill and associated water-driven wheelhouse on the Jamestown Stream just to the south of

the walled gardens. There is a wedge tomb some way to the south of the walled garden. [The position of this archaeological monument is not as shown on drawings submitted to the Board, but is considerably further to the east – on high ground above the Jamestown Stream].

- 2.8. There are no facilities at Massy's Wood, other than signage. The absence of litter bins has resulted in casual littering, as at the Hell Fire Wood. The wood is criss-crossed by a series of vehicular forest tracks and pedestrian trails – many of them particularly muddy on a stormy, wet, St. Patrick's Day when a site visit was carried out by this Inspector. Like Hell Fire Wood, Massy's Wood is used by walkers, hikers, pony trekkers and mountain bikers.

3.0 The Proposed Development

The proposed development (by SDCC in partnership with Coillte and the Dublin Mountains Partnership) relates to the construction of a single-storey and a two-storey visitor centre/tourism facility along with associated upgrading and redevelopment of existing facilities at the joint Coillte properties of Hell Fire Wood (105ha) and Massy's Wood (47ha). The project includes the following elements-

- New roundabout on the R115 to provide for a new access to the existing car-park.
- Expansion of the existing car-park from approximately 80 spaces to 300 spaces. Provision of over-flow 'grass-crete' car-park (72 spaces). The car-parks will be provided on a number of different levels – spread over a 20m height interval. Parking provision will be made for 10 buses/coaches.
- Bicycle parking for 50 bicycles at Massy's Wood and 100 bicycles at Hell Fire Wood.
- New 350m long tree-canopy walkway over the R115 to link the two woods. A small kiosk at the Hell Fire Wood end will control access to this structure.
- Two separate pavilions within the Hell Fire Wood are proposed. A single-storey, flat-roofed pavilion for events, with associated facilities; and a two-storey, flat-roofed pavilion AV Room, Café, Shop, Rambler's Lounge and associated facilities (total for the two pavilions being 2,427m²).

- Renovation of overgrown and dilapidated walled gardens within Massy's Wood – to include rebuilding of potting shed.
- Construction and upgrading of trails through Massy's Wood and Hell Fire Wood – with option for shuttle vehicular access from the Visitor Centre up to the Hell Fire Club.
- Small, open interpretative facility (referred to as a 'wedge enclosure') next to the Hell Fire Club and nearby passage tombs.
- Development of trails throughout the woods with signage, viewing points and a sculpture trail.

4.0 Plans, Designations & Guidelines

4.1. South Dublin County Council Development Plan

The relevant document is the 2016-2022 Plan.

- Hell Fire Wood is zoned HA – 'To protect and enhance the outstanding natural character and amenity of the Dublin Mountains', whilst Massy's Wood is partly zoned HA (the southern end) and partly zoned RU – 'To protect and improve rural amenity and to provide for the development of agriculture'. The Zoning Matrix Table within the Plan indicates that a Recreational Facility is 'Open to Consideration' within the HA zoning if 'Directly linked to the heritage and amenity value of the Dublin Mountains'.
- Map 45(11.d) indicates that it is an objective of the Plan 'To protect and preserve significant views' on either side of the R115 along its entire length in the vicinity of the site – although any views are currently obscured by forestry.
- It is an objective to 'Preserve prospects from Montpelier Hill'.
- Protected Structure ref. 383 refers to two standing stones at the site of Recorded Monument DU025-021. [I note that the Record of Monuments and Places for DU025-021, indicates an 'enclosure' and 'standing stone' at this location].
- The Hell Fire Club and associated two passage tombs is a Protected Structure – ref. 388.

- Buildings and features associated with former Kilakee House, including former gardens, bridges and walls, is a collective Protected Structure – ref. 384.
- A 750m stretch of the Military Road (constructed in 1802) remains within the Kilakee Demesne, and is a Protected Structure – ref. 385.
- Stables, tower and gates of the former steward's house at Killakee Demesne comprise a Protected Structure – ref. 380 [not forming part of Hell Fire Wood, but immediately adjacent to it and the R115].

4.2. **Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding Sub-Threshold Development**

This advice was published by the Department of the Environment, Heritage and Local Government in 2003, and stated that the criteria for deciding whether or not a proposed development is likely to have significant effects on the environment are set out in the EC (Environmental Impact Assessment) (Amendment) Regulations, 1999 (S.I. No. 93 of 1999) and in Schedule 7 of the Planning and Development Regulations, 2001 (as amended) (S.I. No 600 of 2001). The key criteria are grouped under three headings as follows-

- Characteristics of the proposed development.
- Location of the proposed development.
- Characteristics of potential impacts.

4.3. **Nature Designations**

No part of the site is located either within or immediately abutting a European site. The closest such are-

- Glenasmole Valley SAC (Site code 001209) – located approximately 2.5km to the west of the proposed visitor centre. The closest point of Hell Fire Wood to this SAC is 1.2km. The southwestern side of Montpelier Hill drains to the Dodder River – in the lower reaches of the SAC.
- Wicklow Mountains SAC (Site code 002122) – located approximately 2.0km to the southwest of the proposed visitor centre. The SAC is located uphill of Hell Fire Wood and Massy's Wood.

5.0 South Dublin County Council Environmental Impact Assessment (EIA) Screening

5.1. Mandatory EIA for this project was discounted. The project was considered under the class of development 'Tourism and Leisure' – (Class 12, Part 2, Schedule 5 of the Regulations) which includes-

(a) Ski-runs, ski-lifts and cable-cars where the length would exceed 500 metres and associated developments.

(b) Sea water marinas where the number of berths would exceed 300 and fresh water marinas where the number of berths would exceed 100.

(c) Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms.

(d) Permanent camp sites and caravan sites where the number of pitches would be greater than 100.

(e) Theme parks occupying an area greater than 5 hectares.

The development does not comply explicitly with any of the particular development descriptions (a) to (e), and nor does it exceed any threshold.

5.2. The Council considered that the provisions of Section 172(1)(b)(ii) of the Act applies, as the development is of a 'tourism and leisure' nature which should be screened for EIA in accordance with Schedule 7 of the Regulations. It is considered that the area is one of environmental and archaeological sensitivity – containing mountains and forests with landscapes of historical, cultural or archaeological significance, and that the project could have significant effects on the environment. A purposive approach must be adopted when considering Class 12 of Part 2, and should not be interpreted as just relating to the five types of development listed (a) to (e). It is considered prudent and in the public interest that section 175 of the Act be applied in this case, to ensure that the proposed development takes account, properly and transparently, of the environmental sensitivities of the area. The Council refers to the judgement of Lord Hoffman in the case of *Berkeley v. Secretary of State for the Environment* [2000] which quoted the UK government publication "Environmental Assessment: A Guide to the Procedures" (HMSO 1989) as follows- "The general public's interest in

a major project is often expressed as concern about the possibility of unknown or unforeseen effects. By providing a full analysis of the project's effects, an environmental statement can help to allay the fears created by lack of information..."

- 5.3. As a result of concern being expressed by some members of the public and public representatives over potential significant environmental effects of the proposed development, SDCC is anxious to give assurance to these parties that (a) EIA will be carried out, and (b) that An Bord Pleanála, and not SDCC itself, will be the determining authority on any application for development. The Board is requested to make a determination under Article 120(3)(b) of the Planning and Development Regulations (as amended) as to whether EIA should be carried out in respect of the proposed development.

6.0 **Legislation**

6.1. **Planning and Development Act 2000 (as amended)**

Section 172(1) states-

An environmental impact assessment shall be carried out by the planning authority or the Board, as the case may be, in respect of an application for consent for proposed development where either-

(a) the proposed development would be a class specified in-

(i) Part 1 of Schedule 5 of the Planning and Development Regulations 2001, and either-

(I) such development would exceed any relevant quantity, area or other limit specified in that Part, or

(II) no quantity, area or other limit is specified in that Part in respect of the development concerned,

or

(ii) Part 2 of Schedule 5 of the Planning and Development Regulations 2001, and either-

(I) such development would exceed any relevant quantity, area or other limit specified in that Part, or

(II) no quantity, area or other limit is specified in that Part in respect of the development concerned,

or

(b) (i) the proposed development would be of a class specified in Part 2 of Schedule 5 of the Planning and Development Regulations 2001 but does not exceed the relevant quantity, area or other limit specified in that Part, and

(ii) the planning authority or the Board, as the case may be, determines that the proposed development would be likely to have significant effects on the environment.

6.2. **Planning and Development Regulations 2001 (as amended)**

6.2.1. Article 120(3) states-

- (a) The Board shall, where it considers that sub-threshold development proposed to be carried out by a local authority would be likely to have significant effects on the environment, require the local authority to prepare, or cause to be prepared, an EIS in respect thereof.
- (b) Where any person considers that a development proposed to be carried out by a local authority would be likely to have significant effects on the environment, he or she may apply to the Board for a determination as to whether the development would be likely to have such significant effects and the Board shall make a determination on the matter as soon as possible.
- (c) An application for a determination under paragraph (b) shall, in order to be considered by the Board, state the reasons for the forming of the view that the development would be likely to have significant effects on the environment and shall indicate the class in Schedule 5 within which the development is considered to fall.
- (d) Where the Board makes a determination under paragraph (b) that a development would be likely to have significant effects on the environment it shall require the local authority to prepare, or cause to be prepared, an EIS in respect thereof.

- (e) For the purposes of paragraphs (a) and (b), a local authority shall provide information requested by the Board in relation to a sub-threshold development proposed to be carried out by the local authority.

6.2.2. *Schedule 5* – Development for the purposes of Part 10

Part 1 – Development classes subject to mandatory EIA.

Part 2 – Development classes subject to EIA where they exceed a certain threshold in terms of scale.

6.2.3. *Schedule 7* – Criteria for determining whether a development would or would not be likely to have significant effects on the environment, under three headings-

- (a) Characteristics of the Proposed Development.
- (b) Location of the Proposed Development.
- (c) Characteristics of Potential Impacts.

7.0 **Assessment**

7.1. **Requirement for Environmental Impact Assessment**

Whilst SDCC relies on Class 12 of Part 2 of Schedule 5 of the Planning and Development Regulations – under the heading ‘Tourism & Leisure’, it is acknowledged that the class does not make any reference in its five sub-headings to development of the nature of a visitor centre. The proposed development does not approximate to any of the five sub-sections within this class. There are countless other leisure and tourism-type projects which would not come within any of the five sub-sections either – swimming pools, tennis courts, youth hostels etc. – this list could be a long one. There is no other class of development, listed in either Part 1 or Part 2 of Schedule 5, which could encompass a visitor centre development, as described in the documentation submitted to the Board with this application for a determination. For this reason, I would be satisfied that the proposed development would not require EIA, and that the submission of an EIS is not, therefore, required. SDCC makes reference to public concerns and perceptions in relation to the sensitivity of the site and to the need for the project to be developed in as open and inclusive a manner as possible; such that it would be appropriate to carry out full

EIA. This is not a valid reason for carrying out EIA – either a project would or would not be likely to have significant effects on the environment, or else there is some degree of uncertainty as to the effects of a development on the environment. Parts 1 and 2 of Schedule 5 have been drafted to give an indication of the types of projects which would be likely to have significant effects on the environment. A visitor centre (as outlined in the documentation submitted) is not such a project.

7.2. **Consideration of Sub-Threshold Development**

Notwithstanding my conclusion, as set out in the foregoing section, the Board may consider that the development could be considered under Class 12, and that would trigger the need to consider it under the sub-threshold heading (there being no threshold mentioned for visitor centre developments). The ‘Environmental Impact Assessment (EIA) Guidance for Consent Authorities Regarding Sub-Threshold Development’, groups criteria for deciding whether or not a proposed development would be likely to have significant effects on the environment under three headings. I propose to consider the request from South Dublin County Council under those three headings-

- Characteristics of the proposed development.
- Location of the proposed development.
- Characteristics of potential impacts.

7.3. **Characteristics of the Proposed Development**

7.3.1. Size of Proposed Development

The total area of Hell Fire Wood and Massy’s Wood is variously indicated in documentation submitted as 146ha and 152ha. The area for development within Hell Fire Wood is stated to be 11.3ha (no area given for Massy’s Wood). The footprint of the proposed development is small in relation to the size of the overall forestry plantations at this location. Some of the development will be carried out at the existing car-park and the existing Hell Fire club building. Existing tracks and forest roads will be used and adapted for the proposed visitor centre development. The development within Massy’s Wood is largely within the existing walled gardens.

7.3.2. Cumulation with Other Proposed Development

South Dublin County Council has not indicated if there are any other large-scale projects in the immediate area which might be carried out at the same time as the proposed visitor centre, the impact of which, when considered with this proposed visitor centre project, might result in cumulative impact which would be significant in terms of environmental impact. I am not aware of any projects planned in the vicinity which would give rise to concerns in terms of cumulative impact. It is stated that normal management of the woods (planting/thinning/felling) by Coillte will continue alongside the development of any visitor centre and associated works.

7.3.3. The Nature of any Associated Demolition Works

No significant demolition is proposed with this project.

7.3.4. Use of Natural Resources/Waste/Pollution/Nuisance

Materials will be required for the construction of the visitor centre and ancillary elements of this project. Some ground excavation will be required for the construction of the extended car-park. The use of natural resources will not be significant. The development is not large, and the construction phase will not be lengthy. Adherence to best practice Construction and Environmental Management during the construction phase will ensure that development would not result in pollution of groundwater or surface water. Dust nuisance during construction could be controlled by a dust minimisation plan.

7.3.5. The Risk of Accidents, having regard to Substances or Technologies Used

The proposed development will result in no particular risk of accidents arising from substances or technologies used. The area is already heavily used by visitors. Traffic will be generated during the construction period, but for a temporary and defined period only – using the existing R115 access road. The development may result in the attraction of a considerable number of visitors, over and above those who currently visit the Hell Fire Wood and Massy's Wood properties – particularly at weekends and in the summer months. The development will result in an improvement in road safety – through removal of a substantial number of pedestrians, who currently access Massy's wood via the R115, in favour of a new pedestrian/cycle bridge access across the R115 from the visitor centre. The expansion of the car-park will likely remove some of the on-road parking –

particularly at busy times, and this in itself will result in an improvement in traffic safety. However, as has been mentioned elsewhere in this report – opening and closing times of any car-park will have an impact on parking on the R115 in the vicinity of the site entrance.

7.4. Location of the Proposed Development

7.4.1. The Existing Land Use

Whilst the two woods comprise working Coillte plantations, and would continue as such following any development of a visitor centre, the properties are already heavily used by walkers, runners, mountain bikers and pony trekkers. Predominant land uses in the area (agriculture and rural housing) will not be significantly impacted. There will be no severance of agricultural land. The expansion of the car-park will necessarily require permanent clear-felling. However, the Hell Fire Wood is a commercial plantation and would be subject to felling at some stage – even without the visitor centre development. All felling is currently subject to controls under Felling Licences. The new, tiered car-park will be landscaped, as will the over-flow 'grass-crete' car-park. It is not proposed to charge for parking, so there will be no significant change in the regime which operates at present.

7.4.2. The Relative Abundance, Quality and Regenerative Capacity of Natural Resources in the Area

There is an abundance of similar-type natural resources in the area – particularly coniferous plantations in the control of Coillte at Cruagh, and the Pine Valley (Tibradden) to the southeast. The regenerative capacity of the ecology of the area is indicated by the survival of demesne woodland at Massy's Wood and continued growth at Hell Fire Wood – despite the heavy usage for amenity purposes.

7.4.3. Absorption Capacity of the Natural Environment

The proposed visitor centre will result in the upgrading of a number of existing footpaths and vehicular tracks within the woods. These are already heavily used by visitors – documentation submitted with the applications suggesting visitor numbers in the region of 70,000-80,000 per annum – based on information from Coillte [elsewhere 100,000]. It is proposed to increase annual visitor numbers to 300,000. As with any open-air amenity facility, the weather plays a large part in the attracting visitors – fine weekend or bank-holiday weather giving a particular boost to visitor

numbers, as does infrequent snowfalls. The visitor centre buildings do not have a large footprint – and will be located within a woodland setting. They will not have any significant impact on the landscape in the area. Felling of trees in the area has a considerably larger impact on visual amenity than the construction of the visitor centre could ever have.

There is potential for impact on bat species – particularly during the construction phase. However, as already stated, the area is heavily used by visitors at present. The development elements outlined within the documentation submitted are not likely to have any significant impact on bat species. Trees within plantations such as these are thinned and felled in rotation.

There are no European sites either within or immediately abutting Hell Fire Wood or Massy's Wood. The southern end of Massy's Wood (where it emerges onto the Cruagh Road) is linked to the remainder of the wood by a muddy pedestrian path which involves crossing a number of stiles (in place to permit livestock enter the Jamestown Stream for drinking purposes). The proposed development of a visitor centre will not have any impact on this path to Cruagh Road and on the SAC beyond. A portion of Montpelier Hill drains to the Glenasmole Valley SAC. The Hell Fire Wood is located some 1.2km at its closest to the SAC. There is little development proposed in the catchment draining to the SAC, other than upgrading existing forestry tracks and creation of viewing points. This type of development will not have any significant impact on the SAC over and above existing forestry maintenance practices.

I note from the current County Development Plan that the area is primarily indicated as being 'High Amenity', although the Plan allows for the development of a recreational facility if it is directly linked to the heritage and amenity value of the Dublin Mountains. The Plan indicates that significant views are to be preserved on either side of the R115 – notwithstanding that these are limited due to the profusion of trees in this area. A pedestrian bridge over the R115 would not have any significant impact on the views from this road. The development will not have any significant impact on the prospect currently available from the summit of Montpelier Hill. There are no way-marked walking trails in the vicinity, although reference is made in documentation submitted to the re-routing of the Dublin Mountains Way, or

the creation of a spur off it, to the new visitor centre. Reference is also made to the potential for development of a cycling greenway within Massy's Wood.

In terms of cultural heritage, there are a number of Protected Structures in the immediate area. A 750m stretch of the Military Road, through Massy's Wood, is a Protected Structure. This part of the Military Road (not incorporated into the R115) is already in use as a vehicular track for forestry vehicles from the Rockbrook entrance to the wood. It is also used by pedestrians and pony trekkers. The development of a visitor centre will not have any significant impact on the remains of this road. The Hell Fire club building itself is visited by a considerable number of visitors and is partly defaced by graffiti and the setting of fires within the structure. Reference is made in documentation submitted to possible control over access to the building in order to preserve it. The adjoining two passage tombs are likewise open to visitors to range over and about them. There is little to identify these two tombs – it being posited that the stones to build the Hell Fire Club were likely stripped from the passage tombs. The direct path up to the Hell Fire Club passes a large boulder known as a 'standing stone' (although the Record of Protected Structures refers to two standing stones). This 'standing stone' is also listed on the Record of Monuments and Places of the OPW – indicating a standing stone and enclosure at this location. The path past the standing stone is heavily used by walkers and cyclists – the boulder/standing stone being particularly robust. Within Massy's Wood are the remains of a wedge tomb (DU025-022). It is located off the beaten-track at the southern end of the wood, and will not be significantly impacted by the development of a visitor centre.

I would not concur with the conclusion of SDCC that the area is one such particular historical and archaeological importance as to warrant the necessity of producing and EIS for development of a visitor centre. As pointed out elsewhere in this report, the area is already heavily used by recreational visitors. National monuments and Protected Structures in the area have been shown to be particularly resilient in terms of the sheer number of visitors and also in terms of minor acts of vandalism and rough handling. In this sense, the absorption capacity of the historical/archaeological landscape has been shown to be particularly robust. The development of a visitor centre will not introduce a significantly increased impact on existing archaeology or upstanding remains of historical structures in this area.

7.5. Characteristics of Potential Impacts

7.5.1. The Extent of the Impact

The footprint of the proposed visitor centre and ancillary development is relatively small, entailing felling some area of coniferous plantation for the visitor centre and associated car-park and the redevelopment of an existing series of old walled gardens. The R115 which serves as access to the development is wide enough for two cars to pass with care – but may not be wide enough at all locations for two coaches to pass. However, having regard to the nature of the amenity facility at this location – coach traffic will not be considerable – the majority of visits being by private car. The site is not served by public bus and could not easily be so-served, arising from the steep gradient on the R115 between the site and the L4025 County Road to Old Bawn to the north. Documentation submitted with the application refers to potential to use shuttle buses from, and overflow parking at, Council-owned lands at Stocking Lane – some 2.75km to the north of the existing car-park at Hell Fire Wood. It is not clear just how feasible such a system would be.

7.5.2. The Trans-Frontier Nature of the Impact

There are no trans-frontier impacts associated with this development.

7.5.3. The Magnitude and Complexity of the Impact

The magnitude of the impact of this development is not great. The potential for complexity is similarly not great, arising from the separation distances from European sites and the fact that the majority of the development site will ultimately drain to the Dodder catchment and into the Liffey River at Dublin Port. Some questions remain over the modal split for visitors to the proposed facility and how a greater use of public transport might be facilitated, but these are not significant in the context of the access and use pattern which already exists at this site, and the quality of the public road serving the site.

7.5.4. The Probability of the Impact

The probability of impacts can be assessed – even in the absence of detailed drawings – regard being had to the limited scale of the proposed development. There are not likely to be any significant impacts, particularly if normal construction and environmental management practices are observed.

7.5.5. The Duration, Frequency and Reversibility of the Impact

The duration of the impact will be permanent. The impact of the Visitor Centre would not be readily reversible. Notwithstanding this, the Visitor Centre will utilise elements already in place at Hell Fire Wood and Massy's Wood, and in this sense I would consider that the characteristics of the potential impact are not significant for this project. The construction phase of the proposed development would be of limited duration.

7.6. **Conclusion**

In conclusion, having regard to the submitted information, with particular reference to the 'Stage 3 Preferred Option Report', the information contained in the letter from Cunnane Stratton Reynolds which accompanied the request to the Board for a determination, together with my site inspection, I would consider that, given the description of the development and the nature of the receiving environment, the proposal would not have significant impacts on the environment. There is no need for Environmental Impact Assessment of the development, as outlined.

8.0 **Recommendation**

I recommend that the Board determine that EIA of this development is not required by reason that the development described does not come within a class of development set down in either Part 1 or Part 2 of Schedule 5 of the Planning and Development Regulations, 2001 (as amended).

Michael Dillon,
Planning Inspector.

7th April 2017