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The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

25th September 2017

Re: Application JA0040: Dublin Mountains Visitor Centre

Dear Sir/Madam

Mountaineering Ireland wishes to submit a comment on the above planning application.

1. Context and introduction

As the representative body for walkers and climbers on the island of Ireland, Mountaineering Ireland* has a particular interest in ensuring the sustainable use of Ireland's upland areas, incorporating mountains, hills, bogland, forests, cliffs and coastline. Mountaineering Ireland therefore represents a community of interest in this application drawn from South Dublin and across the Greater Dublin Area.

While limited in their extent, the uplands are very significant elements in Ireland's landscape, providing defining geographic features, some of our most beautiful scenery and our largest areas of relatively wild land. Mountaineering Ireland has recently agreed its vision for the future of Ireland's mountains and upland areas:

Mountaineering Ireland's vision is that Ireland's mountain landscapes will be valued and protected as environmental, cultural and recreational assets.

The character of Ireland's hill and mountain areas is changing all the time due to various factors, but principally the incremental creep of infrastructure. Mountaineering Ireland recognises that the Hell Fire Forest and Massy's Wood, while part of the uplands, are not particularly wild in character, and that the overall site has been significantly modified by man. Nonetheless, it is not an urban or suburban park, and should not be developed as such. Many people visit the Hell Fire Forest and Massy's Wood to get away from the busyness and structures of urban living and to enjoy active or passive recreation in a natural setting. Mountaineering Ireland appeals to the Board to ensure that these positive attributes are retained in the future development and management of Hell Fire and Massy's Wood.

Consultation with Mountaineering Ireland members on the proposals for Hell Fire and Massy's Wood has identified mixed views. The majority of respondents agreed there is need for better management of traffic and amenity in both the Hell Fire Forest and Massy's Wood, to cope with increasing usage and to maintain and improve the value of the woodland. However there is discomfort with the tourism focus of the proposals and particular concern about the 'wow factor' treetop canopy walk. Given that this is a Council-led proposal it is surprising and disappointing that it does not show greater vision for how the proposed development could improve the quality of life for local residents, instead of giving priority to the needs of one-off visitors.

Directors: P. Barron; F. Hackett; N. Hore; P. Kellagher; U. MacPherson; M. Maunsell; R. Millar;
C. O'Connor; P. O'Sullivan; I. Sorohan; D. Stelfox; Seamus Walsh; Simon Walsh.

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Registered Office: Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15.

Mountaineering Ireland believes this welcome investment should be directed into an overall plan for the management of recreation and the maintenance and upgrade of facilities across the Dublin Mountains area. This would support wider public enjoyment of the State-owned land in this area, while avoiding adverse impact on landscape character and the natural environment.

2. Comments on the proposed development

2.1 Parking

Mountaineering Ireland members recognise the need to address the issues to do with roadside parking at Hell Fire and Massy's Wood, it is clear that much of this relates to the limited capacity of the current car-park and to how the car-park is managed.

The manner in which Hell Fire Wood, Tibbradden car park and other nearby facilities have been operated has caused frustration for many Mountaineering Ireland members, with car parks remaining closed all day, or closing early, and with high release fees being charged when cars get locked in. Based on these experiences some Mountaineering Ireland members have little confidence that the Hell Fire and Massy's Wood development, if approved, would be operated as envisaged.

Those reservations aside, the proposals for expanded, and actively managed, parking are welcome. Mountaineering Ireland also welcomes the commitment that there will never be a charge for parking, or for use of the proposed pedestrian bridge, the Ramblers' Lounge or the public toilets.

2.2 Potential for greater social contribution

Mountaineering Ireland welcomes the potential of these proposals to enable wider participation in physical activity, bringing both physical and mental health benefits for participants. This is in keeping with national policy, most notably the Healthy Ireland National Physical Activity Plan (2013-2025).

The rationale for the proposed development seems to be largely built on developing a tourist attraction. As this is a Council-led proposal it is Mountaineering Ireland's assertion that the overall project should have a stronger social purpose, otherwise its tourism focus will detract from the real potential for this development to make a meaningful contribution to the improvement of the health and wellbeing of the local population.

For example, it is notable that the proposed staffing in section 3.14 of the Environmental Impact Assessment Report (EIAR) includes a marketing executive; it would be far more appropriate for this to include an education officer or a community engagement officer. There is scope for the development to connect with initiatives such as Get Ireland Walking and to host forest school learning, ecotherapy, or similar sympathetic uses.

The higher proportion of young people in the South Dublin area is noted in the EIAR, yet the only reference to youth visiting the facilities seems to be through school trips. The proposed development offers potential for targeted initiatives to engage disadvantaged youth in outdoor activities and to direct their energies in a constructive way.

If the proposed Dublin Mountains Visitor Centre is to function (as envisaged) as a gateway to the wider Dublin and Wicklow Mountains then it is important that in addition to passively providing information through an interpretive display, that the centre should be committed to encouraging responsible recreational engagement with the mountains. This again points to the need for staff with an educational remit; it is not realistic to expect that all of this could be delivered through the DMP volunteer rangers.

It is Mountaineering Ireland's position that the corporate event focus in the Dublin Mountains Visitor Centre Business Plan is not appropriate given the public investment in the facility and is not needed as there are many commercial establishments offering such services. The business plan also anticipates that 15% of visitors will make a purchase from the restaurant bar; Mountaineering Ireland considers the serving of alcohol to be inconsistent with a proposition of healthy physical activity and engagement with the natural environment.

2.3 Pedestrian bridge

Mountaineering Ireland is not in favour of the proposed pedestrian bridge, believing this to be inappropriate, unjustified and liable to generate management issues.

Its inclusion appears to be largely to make a tourist attraction, by providing the 'wow factor' required for a new tourist destination of national status. As stated above Mountaineering Ireland believes this is not an appropriate proposition for Hell Fire and Massy's Wood and that this site should be developed and managed primarily to accommodate local usage. At 100,000+ visitors per annum, usage of this site is already at a high level. This is not a static figure, rather a snapshot within an overall picture of increasing participation in walking, running and outdoor activity generally. With the proposed improvements in the condition of the site and the addition of a coffee shop and educational facilities, visitor numbers at this location are certain to increase significantly without any need to artificially stimulate growth through a 'significant digital marketing campaign' as proposed in the Business Plan. It should also be borne in mind that the 100k visitor number is for vehicles entering Hell Fire Forest and did not capture roadside parking, therefore it is likely to be an underestimate of current usage.

According to the applicant's Planning Statement (6.3.1.1) *'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.'* Mountaineering Ireland questions the appropriateness of this proposition and the capacity of the site to sustain a large influx of tourists.

The tourist attraction proposition would provide little benefit locally. There is no significant tourism infrastructure in the South Dublin area to take advantage of increased tourist numbers and it is very unlikely that this would evolve in response to the development of the Hell Fire and Massy's Wood site given the proximity of the city.

Mountaineering Ireland highlights the very significant management challenges and costs which can arise when a structure, or a natural feature, suddenly becomes a tourist attraction. This has been played out in recent months at Cuilcagh in Co. Fermanagh where a stepped boardwalk installed to protect blanket bog from the impact of walkers went viral on social media. A video of the boardwalk under the title of the '*Stairway to Heaven*', reaching 1.4 million views in a few weeks. This contributed to more than 3,000 people visiting

Cuilcagh in the four-day period over the Easter weekend, similar to the total number of visitors for all of 2013. This caused serious traffic congestion, strained relations with local residents, and has resulted in damage to fragile habitats and unprecedented management costs, principally related to traffic management and litter collection.

Mountaineering Ireland does not agree that the proposed bridge would protect or enhance the landscape, or that it would be sympathetic to the natural and cultural heritage resources of Hell Fire and Massy's Wood, as suggested in section 5.3.2 of the Planning Statement. Rather, it is Mountaineering Ireland's position that the bridge as proposed would be incongruous in the woodland setting due to its scale, and that it would be particularly intrusive in the more natural and historic setting of Massy's Estate. Due to the length of the approach to the bridge some visitors returning to the car park from Massy's Wood would not use the bridge and would instead cross the road as currently. If the bridge is approved its design should be adjusted to provide more direct access from the Massy's side of the road. The bridge would also require tight management control to prevent it becoming a magnet for anti-social behaviour, especially within the bridge house.

Mountaineering Ireland was not able to find any evidence of the applicants considering alternative options for crossing the road. Some Mountaineering Ireland members proposed an underground crossing but it is acknowledged that this would also be costly and again would require strict management; there are likely to be simpler and more cost-effective options based on slowing the flow of traffic.

2.4 Management issues

There seems to be surprisingly little in the Operational Management Plan and the EIAR about how the trails, the forest environment, and recreational activity will be managed on a day-to-day basis. These appear to be outside the responsibilities of the private operator, yet it seems that the management steering group would not have a hands-on role.

Although there is reference to the Dublin Mountains Partnership (DMP) volunteer rangers being on-site in the Visitor Centre at busy times, there should be a more regular presence on behalf of the management steering group, possibly through the DMP Manager (and any future additional DMP staff) being based in the centre. Examples of issues currently in need of management in the Hell Fire Forest and Massy's Wood include trail maintenance, littering and other anti-social behaviour. The emplacement of litter bins in the car park and at the visitor centre will not prevent, or resolve, casual littering throughout the site. It is worth reiterating that littering is one of the management issues associated with the massive upsurge of visitors at Cuilcagh.

Despite current signage requiring that all dogs in the Hell Fire Forest and Massy's Wood should be kept on leads this is neither actively encouraged or enforced; this may prevent people with young children or those with a fear of dogs from using the facilities. The propensity for conflict between different users of the trails will increase with higher visitor numbers. There is currently a high level of dog walking activity in the Hell Fire Forest and Massy's Wood, yet neither the needs of dog walkers, or their management appear to be considered in the proposals.

The Operational Management Plan refers to the volunteer rangers possibly assisting in the marshalling of traffic at peak periods. Without a Dublin Mountains Partnership Manager on-site, there could be a risk of volunteer rangers getting drawn in to covering work that should be done by the private operator's team. It is important that the development of the Dublin Mountains Visitor Centre should not result in the volunteer

rangers only operating in the centre and its immediate surroundings, thus depriving the wider DMP area of the services of the volunteer rangers.

Participation in outdoor recreation activities has the potential to contribute significantly to the health and wellbeing of our population, but this requires more than investment in physical infrastructure. Regular management oversight of the amenities at Hell Fire and Massy's Wood will be vital, otherwise the quality of the visitor experience will quickly deteriorate.

2.5 Public transport connections

While in theory the proposed shuttle bus from Tallaght, the footpath, cycle lane and park-and-ride facility should all improve access to the site, these will require significant ongoing promotion if they are to succeed as there is a strong attachment to the use of private cars. Mountaineering Ireland believes that a public transport link to the site is desirable; extending the 15b bus service to Hell Fire Wood, at least in summer or weekends would provide either an additional or alternative option for linking the site with public transport.

Recent local experience is relevant in this regard. The Dublin Mountaineer subsidised bus service which the DMP operated for a couple of years had low usage levels and the service was withdrawn.

2.6 Visitor centre

The views of Mountaineering Ireland members on the need for, and the design of, the visitor centre itself were mixed. While the design and layout appear to be well-considered, the scale of the building is larger than the language in the information booklet and application information would suggest (it is described in the EIAR and the Planning Statement as 'modest' in scale). At a total floor area of 980sqm the development is 10 times the size of an average 3-bed semi-detached house. The café, to accommodate 70 - 80 patrons, is described as having a seating area of 175sqm, which seems in excess of what would be needed to cater for those numbers (typically 1.0 sqm per person).

Section 5.3.1 of the Planning Statement includes the following: *'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.'*

This reference to outdoor recreation and heritage appreciation being the primary function of the site is noted and welcome, it is Mountaineering Ireland's position that the site does not have the capacity for development as a 'visitor attraction of national significance' and therefore a more modest visitor facility should be sufficient.

2.7 Trails

Mountaineering Ireland is generally welcoming of the proposed improvements to the trail network in Hell Fire and Massy's. There is no reference to reinstatement of the permanent orienteering courses in both Hell Fire and Massy's. To do so would be compatible with the other activities proposed for the site and it would enhance opportunities for physical activity, engagement with the natural environment and skills development.

Mountaineering Ireland's key comment in relation to the trail network is that if the Hell Fire Forest and Massy's Wood site is to be a gateway to the Dublin Mountains then a connection must be achieved between Hell Fire Forest and the Dublin Mountains Way. Mountaineering Ireland appreciates that the short distance between Hell Fire Forest and the Dublin Mountains Way is likely to be privately-owned land but that the management steering group should make every effort to secure agreement to connect the two.

Mountaineering Ireland notes in the Operational Management Plan (Section 4) that an annual inspection of all trails by the DMP and Coillte will identify where repairs are required. Given the anticipated levels of usage Mountaineering Ireland believes there should be provision for trail maintenance throughout the year.

2.8 Woodland

Hell Fire Forest and Massy's Wood are quite different in character, due to topography, species etc and this is reflected in different management priorities, with Massy's managed principally for its amenity value and Hell Fire as commercial conifer plantation.

Mountaineering Ireland welcomes the proposed conversion of 26ha in Hell Fire Forest to broadleaf woodland. However, Mountaineering Ireland believes that as other areas within Hell Fire Forest are felled, that these should be replanted with a more diverse mix of species, progressively converting the whole Hell Fire Forest to an area which is managed for its amenity value, rather than as commercial plantation. This would enhance the natural beauty of the site and its biodiversity. This is in keeping with the vision for the future of the forests in the Dublin Mountains recently proposed by the Dublin Mountains Initiative, of which Mountaineering Ireland is a member.

The forestry report in the EIAR focuses on the 26ha in Hell Fire Forest which is due to be converted to broadleaf planting, it wasn't clear what, if any, plans there are for the future management of the woodland within Massy's. Massy's Wood appears to be in need of better silvicultural management and Mountaineering Ireland believes this should be accommodated within the future plans.

2.9 Archaeology

A number of members expressed concern that the development proposed for Hell Fire and Massy's would threaten the archaeological and heritage features within the site. The recent excavations at the Hell Fire Club have awakened public awareness of the archaeological richness of this site, and with investigations ongoing, further information is likely to become available on its significance.

Mountaineering Ireland welcomes the recommendations for stabilisation and repair of the archaeological and architectural heritage features within both sites, and the commitment to annual inspection and repairs. It is hoped that the works within the Hell Fire Club itself, particularly the lighting may discourage anti-social behaviour there and bring a more positive feel to the building. Members are particularly keen that the only remaining section of the Military Road within Massy's Wood is preserved. In conclusion, Mountaineering Ireland urges the Board to ensure that these important attributes of the site are respected and protected.

3. Conclusions

Mountaineering Ireland recognises the various issues associated with the current condition of Hell Fire Forest and Massy's Wood; this is a site in clear need of investment and management, more than development. Mountaineering Ireland is concerned that the proposals as outlined will not address the current issues, other than perhaps parking, and will in fact generate further management challenges.

It is Mountaineering Ireland's assertion that the core purpose of the Dublin Mountains Visitor Centre project should be re-focused away from creating a tourist attraction to meeting local recreational need, to actively encouraging responsible recreation and to proactively engaging with schools, youth groups, and relevant special interest groups. This should take place within the context of an overall plan for the management of recreation, and the maintenance and upgrade of facilities for recreation across all the publicly-owned lands in the Dublin Mountains area.

Mountaineering Ireland welcomes those aspects of the proposals which will address the current parking issues, enhancement of the trail network within Hell Fire Forest and Massy's Wood, as well as better stewardship of the site's important heritage assets. Mountaineering Ireland is not in favour of the proposed pedestrian bridge, believing there is little justification for it and that the money involved could be better spent.

Mountaineering Ireland is concerned that the site may not have capacity for the tourism development which is envisaged, leading to traffic problems, poor visitor experiences, adverse impacts on the physical fabric of the site, and other management issues. Mountaineering Ireland has highlighted recreation and environmental management issues at the site that will require ongoing attention and which do not appear to be adequately provided for within the Operational Management Plan.

Mountaineering Ireland welcomes the affirmation in the Planning Statement (section 6.1) that *'what makes the site unique and attractive must be protected'*, and urges the Board to do all within its power to ensure this commitment is upheld.

Mountaineering Ireland trusts that you will take these views into consideration when deciding on this application.

Yours sincerely

Helen Lawless, Hillwalking
Access & Conservation Officer

*Mountaineering Ireland is the representative body for walkers and climbers on the island of Ireland. Mountaineering Ireland's mission is to represent and support the walkers and climbers of Ireland and to be a voice for the sustainable use of Ireland's mountains and hills and all the places (coastline, crags, forests) we use.



Mountaineering Ireland is recognised as the National Governing Body for the sport of mountaineering by both Sport Ireland and Sport Northern Ireland. The term mountaineering refers to a wide spectrum of activities that includes walking, rambling, hillwalking, rock and ice-climbing, bouldering and alpinism. Mountaineering Ireland has over 12,500 members, comprising 181 clubs and approximately 1400 individual members (September 2017).