



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	17 th 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