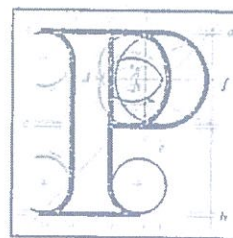


Our Ref: 06S.JA0040  
P.A.Reg.Ref:

Your Ref:



An  
Bord  
Pleanála

Declan McKeever  
Bayview  
Killakee Road  
Rathfarnham  
Dublin 16

22nd September 2017

Re:

Proposed Dublin Mountain Visitors Centre and all associated works  
in the:  
Townlands of Mountpelier, Killakee and Jamestown in South Dublin.


Dear Sir,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

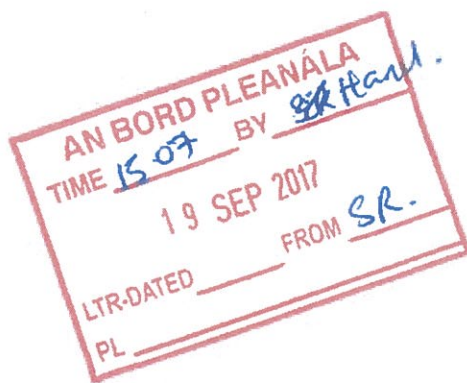
Please note that the proposed development shall not be carried out unless the Board has approved it or approved it with conditions.

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

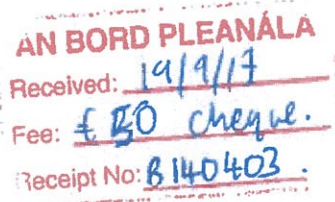
Yours faithfully,

  
Kieran Somers  
Executive Officer  
Direct Line: 01-8737107

EI02



Submission to An Bord Pleanála  
**Ref No: JA0040**  
Proposed Dublin Mountain's Visitor Centre



Declan McKeever  
Bayview  
Killakee Road  
Rathfarnham Dublin 16  
087 2432571

## INTRODUCTION

I have been a resident in the Killakee area since 1992 and live just down from the proposed development on Killakee Road. I have been taking a keen interest in the plans, reports and consultations and have attended a wide variety of meetings concerning the development. I wish to make some observations in relation to same.

While I profess no expertise in planning, biodiversity or heritage I do have some local knowledge of the area that should be of interest and perhaps help in the decision process

On Page 161 of the EIAR

*"The site environs represent a centuries-old visual amenity for local residents and the people of South County Dublin in particular. The foothills to the Dublin Mountains have provided an aesthetic backdrop to Dublin's evolution and development, particularly over the last half century, as the southern suburbs of the city have extended to within 2-3km of the site."*

To quote also part of the planning statement "Generations of people have come to the mountains and enjoyed spending time in this natural heritage environment"

The area is well known to Dubliners and by people further afield and is a unique facility with a natural and somewhat magical charm. There has been an increase of visitors to both Massy's and Montpelier Hill particularly at the weekends and it is great to see more people enjoying the facility for what it is presently.

There is no doubt also that there are issues that need to be resolved such as parking issues and also basic facilities such as litter and waste management. But it is equally important for all of us that the existing facilities including ecology and heritage are protected and enhanced for the enjoyment of future generations.

## CONCERNS

I would have some concerns about the development on a number of fronts and have produced two questions below from a planning and sustainability point of view that voice my main concerns.

The questions are as follows.....

***Does the over commercialisation and over intensified development of an existing local amenity, affecting the built heritage, biodiversity, natural character and environment of the local area, constitute proper planning?***

***Can the planned development of the Dublin Mountains Visitor Centre, planned in isolation of, or without consideration to, all other Dublin and Wicklow mountain amenities and attractions, be considered to be a future proofed or sustainable development if it proceeds?***

In a nutshell, I believe the developments plans are too intense in such a relatively confined area and will ruin the character of what is trying to be preserved in the first place. I would like to object to this development – JA0040.

I believe that the overall plan for the development needs much broader thought and discussion. The proposed project is being squeezed into an area purely because it is in the



area of South Dublin County Council. There is no mention in any of the reports of consultations or liaisons with Dún Laoghaire-Rathdown County Council or Wicklow County Council or any other regional body. There is no overall plan for the Dublin Mountains complete area and beyond. This is a plan in isolation of all other areas. Other sites have not been considered or also been rejected because they are not owned by South Dublin County Council or Coillte.

Does a group of much smaller scale developments situated in maybe Tibbradden, Killakee, or further apart such as Seefin and Lough Dan make more sense for the wider Dublin and Wicklow mountains area? Or should a headquarter building such as Rathfarnham Castle be considered as a base to promote all Dublin and Wicklow Mountains amenities?

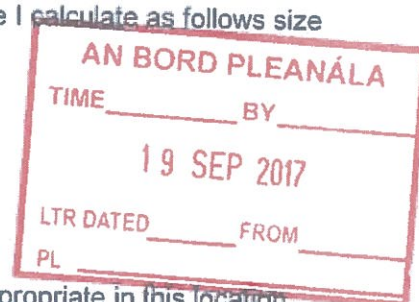
### COMMERCIALISATION

The proposal as it stands is elevating the project from a local amenity to a regional or national facility. The Planning Statement (P18) states that the project will be *"subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivity, and availability of services"*.

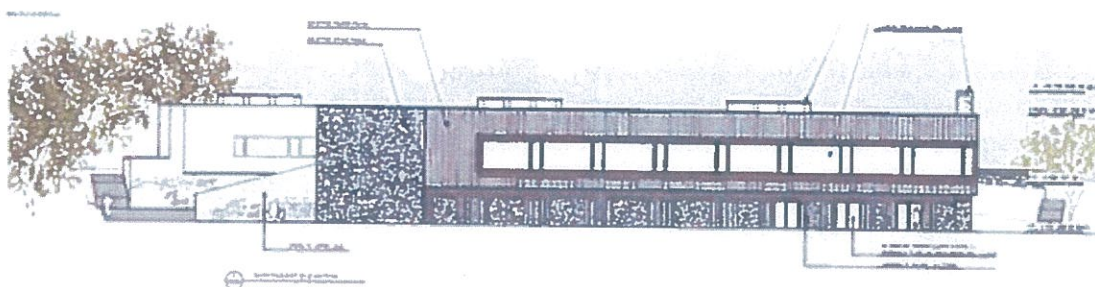
But I would argue that point and would refer to the elevation part of following Drawing No. 1639 / PA / 004 / A – This is an elevation of the Visitor Building. While the building itself is a relatively low elongated shape it is still a large building at a height of 8.5 metres high and length of nearly 48 metres long.

The building dominates the landscape and the gross external size I calculate as follows size is as follows

Lower floor visitor centre	396 sq. metres.
Upper floor visitor centre	469 sq. metres
Rear visitor interpretation building	342 sq. metres
A total of 1207sq. metres which is 12,992 square feet	



This is a building of industrial scale proportions and I believe inappropriate in this location

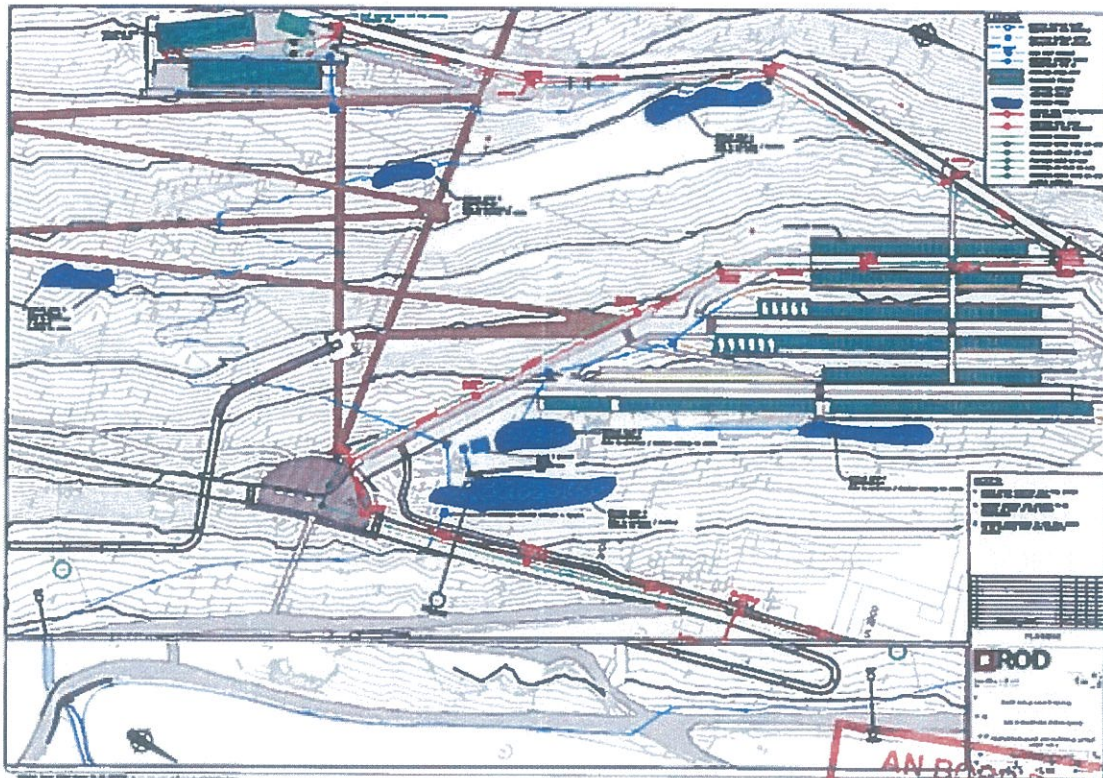


We also refer to Drawing No ROD DRC0030 below which shows the landscape intersected with new pathways, trails, tarmac roads, grasscrete car parking, surface water and foul water drains, manholes and storage ponds.



Is the below plan subject to  
"an appropriate scale of development".

Does it  
"protect and enhance the outstanding natural character of the Dublin Mountain area"?



### TREE TOP BRIDGE

The tree top bridge is a Corten steel structure that is some 7.5 metres high over the roadway and 330 metres long. The drawings present the bridge with full leaf cover and I would ask what this would look like in wintertime.

The Corten steel is also a very industrial type finish which I think will be unsympathetic to the Steward's House aspect as you travel up the road.

Will the bridge eventually have a protective steel cage fitted over the roadway section similar to other bridges in the area?

The idea that this bridge will deter people from parking on the road as they can use this bridge for access to Massy's is unrealistic and it is hard not to consider this element as a pure tourist attraction for commercial purposes that disregards all other concerns.



### ZONING AND PLANNING

"The application site is located in the Dublin Mountains High Amenity zoned area of South Dublin".

Page 40 of the planning statement states

*"The provision of a modestly scaled café and shop ancillary to and supportive of outdoor recreation are also consistent with the relevant zoning"*

And page 29 of the Business plan states

*"The principal revenue generating engine on-site is the restaurant"*

I would argue that the proposed Visitor Centre is primarily a restaurant/café and as such the high amenity zoning states this is open for consideration only in an existing premises. Therefore it contravenes the zoning.

### TRAFFIC

The EIAR states page 282.

*"these roads have considerable landscape character and do not need to be widened for a modest increase in traffic attracted to the proposed Dublin Mountains Visitor Centre"*

Nobody really knows what the traffic levels are likely to be and I would like to point out that there will be a lot of service vehicles for the proposed centre to include delivery vans and trucks and waste disposal trucks etc. These vehicles are normally large, as deliveries are made on a particular route to suit other deliveries in bulk, and subsequently they create a lot more noise and more potential for traffic problems because of their size.

I wonder about the effectiveness of the shuttle bus service as this will be a considerable effort required to use the service and I wonder if it will be used. If it is not a success the increased car traffic would be considerable,

### LIGHTING

Page 32 of the planning statement states

*"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. For the safety of staff and visitors some external lighting is proposed"*

The issue of lighting in general needs to be assessed in a more detailed fashion.

Will the proposed centre require lighting at night time from a security point of view?

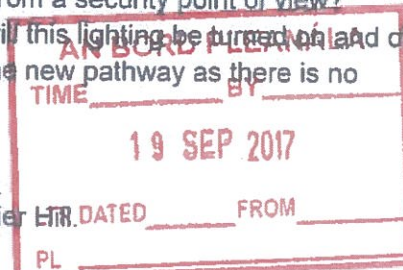
The Tree Top Bridge similarly has lighting and when will this lighting be turned on and off?

Also, is there lighting proposed for Killakee Road for the new pathway as there is no reference to lighting in the plans?

### ARCHAEOLOGICAL/ ARCHITECTURAL HERITAGE

On Page 200 of the EIAR it states referring to Montpelier

*"there are strong similarities to Brú Na Bóinne which is a World Heritage Site..... there are also similarities to the landscape around Stonehenge in the UK which is also a World Heritage Site"*



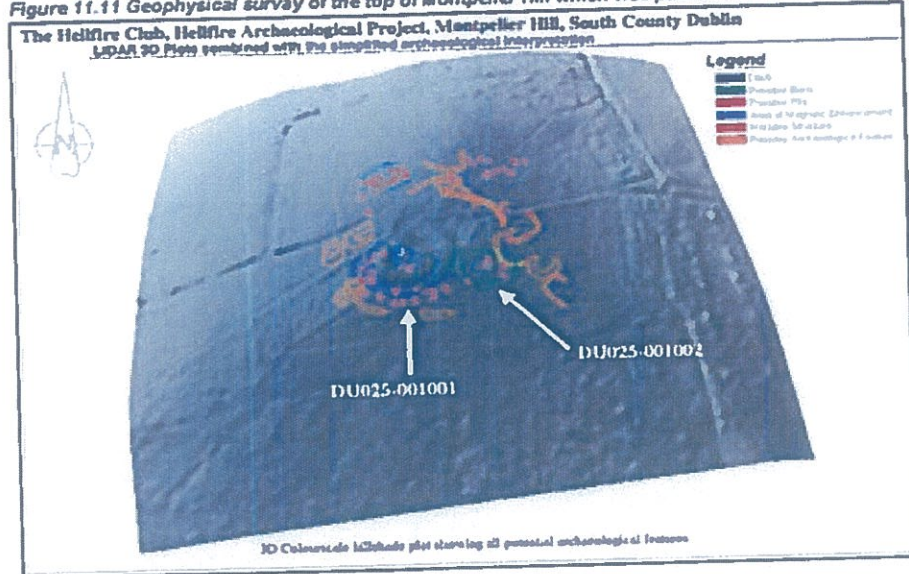
There are not many areas in Ireland or further afield where a statement such as the ones above could stand up. The language used also suggests that the area requires a lot more archaeological investigation.

On Page 210 of the EIAR it continues

*"A geographical survey was carried out but was confined to the open area at the top of Montpelier Hill"*

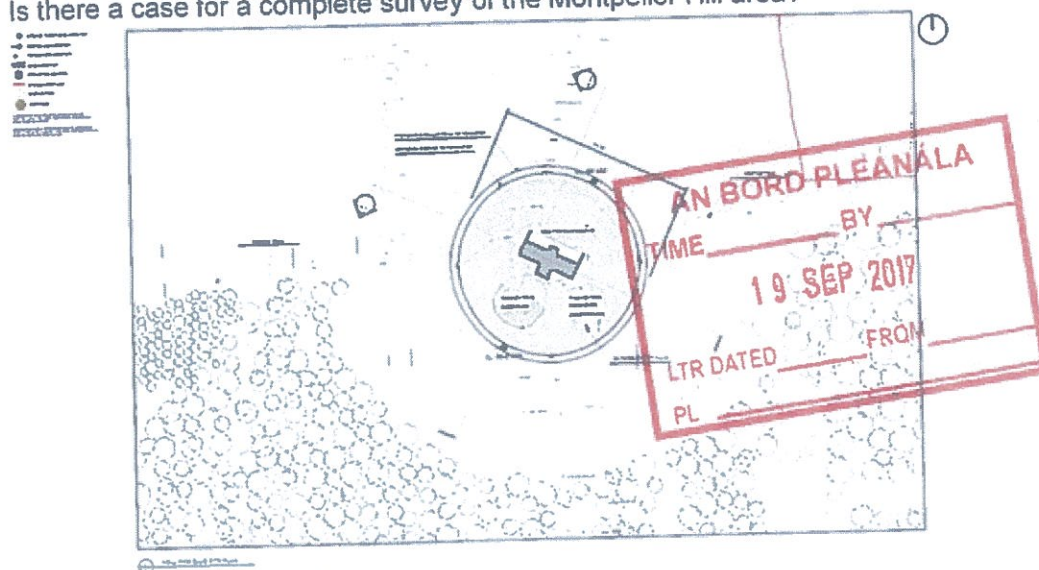
The photo below is taken from the EIAR report

Figure 11.11 Geophysical survey of the top of Montpelier Hill which was published in Jackman (2015)



Even if this small area that was surveyed, there seems to be evidence of further archaeological features. Will these be disturbed during the building works at the Hellfire Club i.e. the removal of the stairs, the laying of gravel floor and the laying of cables and pathway up as per the proposed drawing below Drawing No 1639/PA/015/A? (The drawing below appears to show the circular ring cutting through some possible archaeological features)

Is there a case for a complete survey of the Montpelier Hill area?





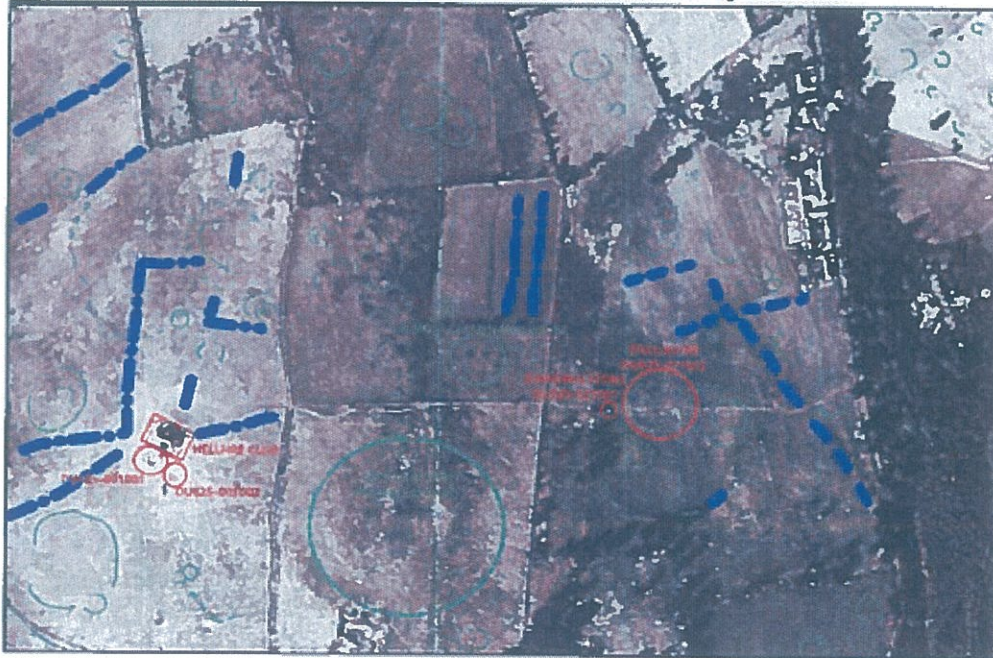
The report continues on page 212

*"The tombs of Montpelier Hill form part of a major cluster of megalithic tombs located on the North and West perimeter slopes of the Dublin and North Wicklow Mountains. There are 7 Portal Tombs, at least 11 Passage Tombs, 7 Wedge Tombs and 2 unclassified Tombs."*

So, from an archaeological and built heritage point of view, it would seem to make much more sense to investigate the tombs as much as possible before any development is allowed. The tomb on Montpelier Hill seems to be typical of or of much greater significance than any of the others and on page 213 of the EIAR it states.

*"The recently excavated tomb at Montpelier hill (du025-001001) is one of the largest in the series"*

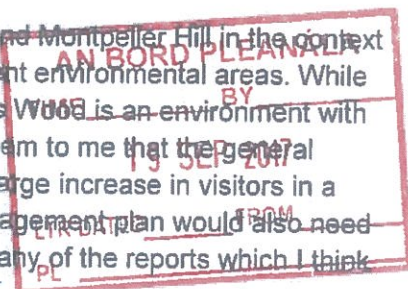
**Figure 11.12** The 1950's pre plantation aerial photograph, as annotated by Jackman.



Furthermore, Neil Jackman, the archaeologist has annotated an old aerial photograph as above and there are other possible features all over the Montpelier hill area. He does state however that the features may be caused by shadows etc., but they are still worthy of some investigation. If the development proceeds they are likely to be damaged or lost perhaps forever

### **BIODIVERSITY**

There seems to be little separation between Massy's Wood and Montpelier Hill in the context of environments even though the areas are completely different environmental areas. While the Montpelier Hill area is deemed to be a plantation, Massy's Wood is an environment with specimen trees and is broadly a deciduous forest. It would seem to me that the general environs of Massy's wood need to be protected from such a large increase in visitors in a much different way than Montpelier Hill and a Woodland management plan would also need to be implemented. There is no consideration given to this in any of the reports which I think is a mistake.





On Page 18 of the Planning Statement

*"the Red Squirrel was found likely to be significantly impacted"*

One would wonder what this actually means and although they are a protected species this does not seem to matter when there is a development concerned, which is a shame.

Also on page P90 the EIAR says about birds.

*"The habitat assessment undertaken as part of the multidisciplinary walkover surveys did not identify habitats that would likely support important assemblages or significant populations of birds of conservation concern. Further detailed breeding or wintering bird surveys were not required"*

The above is the total amount of information for birds, which does not seem right to me. I have myself had a deceased Peregrine Falcon in our garden, and have seen Falcons at different times in the area. I believe the Falcon is a protected species and this would make me wonder about the depth of the Bird survey and analysis undertaken. It would not have taken a lot to investigate this further as Michael Fewers book, Hellfire Hill mentions a lot of the local bird population including the Peregrine Falcon and rarer still the Merlin which is a visitor to Montpelier Hill according to his book.

Another small point worth noting is that there is no mention of deer anywhere in the EIAR. Deer are capable of exerting considerable influence on agriculture, forestry and conservation habitats (according to the Government publication on Deer, A framework for Action, published in 2015). Yet there is no mention in any of the reports which I would think is a serious omission. I can also tell you that I have walked up to the Hellfire Club at dawn and you are guaranteed to see deer in large numbers at this time of day.

Page 75 of the EIAR states:

*"detailed habitat surveys were conducted to define sensitive habitat in December 2016, this is outside the recognized optimum period for vegetation surveys/habitat mapping i.e. April to September"*

Considering the points above I find this statement very worrying and it would make one wonder about the priorities of the surveys, and how seriously they are taken.

### **OPERATIONAL PLAN**

The operational plan outlines the management structure and operation of the project. While this is welcome it is a little short on detail and is vague.

The plan notes "Key commitments" to monitoring and management of the cultural and natural heritage resources as follows

#### **On Trails Monitoring and Management**

*"It is proposed that the Management Steering Group carry out an annual inspection of the site trails. The inspections will be carried out by DMP and Coillte"*

#### **On Archaeological and Architectural Heritage**

*"It is proposed that for a period of five years the Management Steering Group carry out or arrange to have carried out an annual inspection and repair (if necessary) of all architectural and archaeological features (visible on the ground) of the site"*

#### On Ecological Monitoring and Management

*"It is proposed that for a period of five years the Management Steering Group carry out or arrange to have carried out an annual inspection/survey of all Key Ecological Receptors (habitats and species) on the site"*

These statements are welcome but a little vague and non-committal.

I would have thought that there would be management plans and schedules in relation to this as the items above are crucial to the sustainability of the amenity whether the development happens or not.

I think it is telling that the business plan is a more substantial document than the operational plan.

#### **BUSINESS PLAN**

The business plan document is a cause for concern on a number of fronts with the most worrying one the contradictions with the other documents and figures such as:

On page 8

*"the centre will have parking for 330 vehicles"* which is not what the rest of the report states.

On page 14

*"the DMVC has no direct competitors in the immediate area, although mountain bike hire is available at Ticknock, along with tea coffee and snacks" ...*

We all know that there is a café at Timbertrove which is a hundred metres or so away, and there is also the Hazel Café which is on the way to Ticknock from Killakee Road

On Page 24

*"The project has been resized and is now planned at a scale of app 750 sq. metres"*

This is the most worrying contradiction as if the business plan is based on a building much smaller than what is actually being proposed it throws doubt on all the information in the business plan in relation to overheads and expenses etc

The business plan also is contradictory in its own report as follows:

On page 5 it states

*"it is not intended that the newly developed facilities should be operated for commercial gain"* but on page 23

*"it will be important to sell the DMVC actively and aggressively ..... Marketing creates awareness, but selling closes the sale".*

And again on Page 19

*"it is intended that the DMVC will operate on a cost neutral basis"*

But on page 35

*"to secure this outcome the DMVC will need to be marketed and sold in a commercial manner"*

AN BORD PLEANÁLA	
TIME _____	BY _____
19 SEP 2017	
LTR DATED _____	FROM _____
PL _____	



These statements are at complete odds with each other and with other contradictions the report seems to have been compiled in isolation from the other reports

### **CONSULTATION**

It needs to be pointed out here that the landowners meeting of 27<sup>th</sup> February in Whitechurch library was a very unsatisfactory affair. The presentation was such that the majority of those in attendance were unsatisfied with the presentation as there was no new information given and there was a feeling that this was a box ticking exercise by SDCC, Coillte and the Design Team.

Contact with local landowners was haphazard with Mr De Forge, Recreation Manager with Coillte, arriving unannounced or not at the scheduled time.

The planning document states that *"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"*.

There was no question of any input by Locals as these were neither invited nor any suggestions accepted. I emailed Daithi De Forge after the meeting seeking clarification of points raised and requesting a return email stating that my notes were accurate. To date I have not received a reply.

As a summary to all the above I would state as follows

1. The development is over commercialised and too intense for the area.
2. Alternative sites have not been investigated thoroughly and the plans are in isolation of the broader area requirements.
3. The area has an unsuitable road infrastructure in relation to the proposal.
4. The archaeological heritage has not been investigated in any real way and any development for that reason should not be permitted.
5. Biodiversity has not been adequately investigated.
6. The Operational Plan is vague and non-committal.
7. The Business Plan is contradictory to other elements of the submission.
8. The Consultation process was wholly unsatisfactory and for that reason is flawed

Yours Sincerely,

  
Declan McKeever

