

The Secretary
An Bord Pleanála
64 Marlborough St
Dublin 1

AN BORD PLEANÁLA	
TIME	7:07 BY Hand
25 SEP 2017	
LTR DATED	FROM Sm
PL	

Date: 25th September 2017

RE:

Development	Dublin Mountains Visitor Centre-Strategic Development Initiative
Location	Hellfire Club/Montpelier Hill/Massy's Wood
Applicant	South Dublin County Council
Reference Number	JA0040

Dear Sir,

I would like to object to the above development.

My Name is: Gerard Kennedy

My Address is: 66 Mount Drinan Avenue
Kinsealy
Co Dublin

AN BORD PLEANÁLA	
Received:	25/9/2017
Fee:	€50 cheque
Receipt No:	B140530

I submit that this development is contrary to sustainable development, principles of proper planning. I also contend it is contrary to the SDCC's Development Plan, including its objectives and policies. I believe that it is a development which is both contrary to the current land-use /zoning of the area and which is also unsustainable/detrimental to the overall ecology/environment of the area.

Please see overleaf a list of additional reasons why I think An Bord Pleanála should refuse planning permission for the above development

Enclosed please find a payment of EUR 50 in respect of the Objection Fee.

Yours Faithfully,



1 of 5

Reasons to Object

I wish to comment on the above referenced Development under the following headings and in the order set out below:

- Zoning
- Ecology
- Archaeology/Architecture
- Sustainability/Amenity

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

Zoning Issues

- The development is in a high amenity area which is also in close proximity to agricultural zoning. The prospects (view etc.) are also protected.
- There are a number of existing farms and retention of the existing rural farm businesses and holdings into the future will be severely affected by the development.
- Much of the area is zoned H and pursuant to this, Cafe/restaurants are only to be considered in the context of existing premises; such is not the case in this proposed development. The reference to this site being necessary for a "wow" factor is a term that is subjective and not recognised in planning law. Should an Bórd Pleanála consider that such a "wow" factor is a valid basis on which to proceed, then An Bórd may be acting ultra vires. There a number of sites on the surrounding areas with a good if not a spectacular view. E.g. Ticknock/Orlagh/Glenree are all existing buildings/developments with acknowledged and prominent views.
- Given that the EIAR readily admits that all proposed changes will be permanent and primarily will be moderate or greater in terms of severity of impact - it is essential that utmost care be taken in ensuring that the H zone retains its integrity.
- We have serious concerns regarding the site selection process – too narrow with some sites ignored and not an independent process.
- The area is zoned H and offices are not a permitted development; the plans appear to include such offices within proposals.
- For a number of years developments in the affected areas and surrounds have only been allowed where toilet soil and human waste is dealt with on site through septic tanks etc. The proposed development clearly fails to abide by SDCC's own guidelines and contains plans to install soil pipes and that these would run down the hill to pass under the R115 and to link to the main sewage system at some indeterminate distance. Were a commercial or residential entity to propose development, then South Dublin County Council would use its own planning rules to refuse permission.

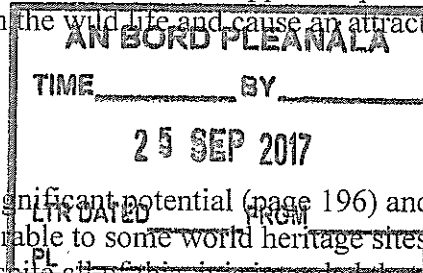
Ecology

- The EIAR is generally deficient in respect of ecology. The mapping of bird and mammal life generally is either non-existent (in the case of birds) or vague/incomplete (mammals). It is also noteworthy that in relation to biodiversity there is no real sense of Massy's Woods as being fully separate from the Hellfire.
- There can be no argument over the serious impact upon the ecology. SDCC is clearly ready and willing to sacrifice protected species and their habitats e.g. Red Squirrels, Badgers etc; that this destruction will be undertaken simply for a commercial use -

20/5

coffee shop/restaurant is simply disproportionate and clearly a massive over-intensification of use which will also significantly impact on amenity.

- The drainage run off from the site will be detrimental to the current pristine condition of the water in Glendoo Brook and the wildlife in the water; ground and bird-life. Such drainage run off will contain pollutants that arise from vehicles e.g. carbon deposits; Hydrocarbons; Nitrous Oxide; phenol formaldehyde binding agent; metal shavings; plastics; etc.
- The proposed walkway will lead to pollution of the grounds under such walkways as users will discard glass and plastic bottles; food and snack wrappers of plastic and paper construction. This will interfere with the wild life and cause an attraction to vermin and ultimately infestation.



Architecture/Archaeology

- The EIAR makes it clear that the site has significant potential (page 196) and that the site at Montpelier Hill is considered comparable to some world heritage sites - Stonehenge is mentioned at page 200. Despite all of this, it is intended that stairways be put in the middle of this archaeological material.
- It should be noted that at places like Newgrange and Mullaghmore interpretative centres are placed some distance away from the actual site that is being interpreted or in a nearby town/village so as to maximise the economic potential e.g. Rathfarnham Village or Tallaght Village where public transport is already provided for. We further note the general comments in relation to the actual centre in any event. The site has no real public good/interpretative value. It is primarily a restaurant. All of the public spaces are seen as being of commercial value.
- The destruction of currently underground archaeology which will occur in the course of the works of the car parks and the proposed building and proposed drainage works will severely limit the opportunity for further future site investigations.

Sustainability/Amenity

- A large part of the funding is proposed to be granted through from Failte Ireland funds which are aimed at large scale commercial activities. The proposed visitor numbers can be clearly linked to efforts to justify such an investment. Sustainable in that sense is clearly linked to financial sustainability.
- The Business Plan and Planning Statement make conflicting references as to the importance of commercial activity.
- The reality is that a threefold increase in visitors will be sought. There is no Woodland Management Plan or other ongoing control/monitor to ensure the sustainability of the existing environment. The precise references to the types of tourist sought (*Culturally Curious* and *Social Energisers*) in the business plan contrasts markedly to the issues within the EIAR in relation to Biodiversity etc.
- It is extremely worrying that SDCC have no Biodiversity Plan in place and they have no dedicated Biodiversity Officer unlike other Dublin Local Authorities. A dedicated Biodiversity Plan is an essential ingredient for any positive exploitation of the Dublin Mountains Area and the location in particular.
- There has been significant confusion demonstrated by SDCC and Coillte to date. They have sent letters to Wicklow County Council and Dun Laoghaire Rathdown County Council about engagement but apparently never once sought active

3065

engagement with those local authorities with a view to finding a more suitable site in the whole range of the Dublin Mountains. There is no sense of partnership with other local authorities and no proposal based on any proposal for a cross council proposal on sustainable development.

E.g. One: Within Wicklow County Council Area there is Glencree; it was approved as a visitor centre in 2007-2008

E.g. Two: Within DLR County Council there is Ticknock, a vacant site (former Total Fitness Gym) with amazing views which is within a 5 minute, minibus ride of Ticknock/Three Rock. We note that Glencree National Park uses a similar 'park and ride' approach to their national park.

- AN EURLAIGH NATIONAL PARK
TIME _____ BY _____
15 SEP 2017
- References to preserving the landscape and fauna/flora sit beside the reality of significant negative impacts on the overall environment and visual panorama and the planned destruction of habitats of protected animals such as squirrel and badger. In particular the application proposes and specifically applies for destruction of existing red squirrel drays and badger sets. There has been insufficient or inadequate enumeration of the number of such endangered species in the proposal.
 - Archaeology that is compared by the applicants to Stonehenge and World Heritage Sites will be intersected/overridden by a stairwell and pylons for the purposes of tourism; which is an inadequate reason to justify such a proposed development.
 - SDCC has consistently limited planning development in this area because of the limitations of the road infrastructure and the overall environment and now plans a threefold increase in footfall - most of which will be casual tourism with no real vision for real education and sustainable development.
 - The proposed development would be not be a gateway to the Mountain Area but a destination whereby most visitors would only access the visitors centre and travel no further.
 - Any reference by the parties to this application concerning consultation with the residents or users of the affected areas was limited to telling the persons affected that this development is as presented. Such consultation is deficient and cannot be accepted as being a validly conducted.
 - For many years the number of visitors and users to/of the area have been limited to the period between April and September and even then limited by the prevailing weather conditions on any given day. The proposed development would operate on the same basis and any proposed increase in visitor numbers would be limited to the same limitations.
 - The proposed development is situate on the R115 which is a narrow carrigeway which is just wide enough for two cars to pass with care. Apart from a widening of the opening to the proposed site, no change is proposed to the road that will cope with the proposed and projected road traffic.
 - Increased congestion on the R115 will actively discourage frequent users of the area such as myself. I have used Massys Estate; Hell Fire and Cruagh Wood weekly since about 25 years ago and for most of my life since childhood. During the winter months there is little or no traffic through the area
 - Increased congestion on the R115 will force traffic onto unsuitable single track roads such as the Bohernabreena-Piperstown road up to where it joins with the Military Road, thus causing disruption to the community at that area and disruption to the farm community in that area.
- 24/9/17

- Access to Cruagh Road will be disrupted and users of that area will be gravely discommoded.
- Persons who use the woodland floor in Massys Wood to walk would have their experience affected in a detrimental manner by this development.

Additional Reasons/Comments:

A public hearing is requested in order that An Bord Pleanála can examine the points raised in this objection.

AN BORD PLEANÁLA	
TIME _____	BY _____
25 SEP 2012	
LTR DATED _____	FROM _____
PL _____	

It should be remembered that the area is in a natural state and the attendant natural quality of the area is part of the experience. Surely anyone want a manicured landscaped walk than St Endas, Marley Park Bushey Park and other parks are available. Children in particular need to be able to explore in wellington boots and rain gear not just to in the planned conditions

Alm
 G. KEMNEY 50/5

