

Reference number 06S. J0040

Submission of Andrew Davidson relating to further information response from the applicant South Dublin county council required from them by An Bord Pleanala following the application for approval Of proposed Dublin Mountain visitor centre.

A common sense approach is surely likely to be what the members of An Bord Pleanala will be hoping to end up deciding upon in relation to this very complicated application. The arrival at a consensus would be aided greatly were the applicant to have dealt in a detailed and realistic way with the demanding queries set out in ABP's letter of 9 October 2017 to Paul Keogh Architect, the applicants advisors, the letter being from ABP executive officer Kieran Somers. This letter specifies that the applicant is "invited" to make a response to the submissions made, in particular to the Response from the Department of Culture Heritage and the Gaeltacht dated 25 September 2017. " It further then specifies certain wildlife species of bird which may be impacted directly or cumulatively in adjoining areas specifically protected by law. The department points to the total lack of any appropriate survey in the E I S submitted. in very simple terms this now has not been provided despite ABP's earlier decision that an EIS was essential before consideration of an application could take place. It is submitted that the approach of the applicant is still totally inadequate and borders on being dismissive of ABP's already expressed opinion. Added to this is the applicants ignoring of ABP's request for "a response to the submissions made" By us members of the public. Surely this cannot amount to an acceptable or adequate response to the request for further information? It would appear to simply assume that we can all be ignored with impunity. Many of us are not surprised by this attitude as for something over a year we had been trying to get information from the applicant about what was actually proposed with very little success. There simply was no consultation in a meaningful sense with us members of the public and this was referred to specifically in my own initial submission but ignored in the applicants recent response. This response deals with nothing specifically and again demonstrates disregard for the process in which it is involved. The fact that the applicant is itself a planning authority is very worrying! In the response to the request for further information regarding the applicants apparent ignorance of its own zoning requirements they simply dismiss the arguments made on the basis that the zoning proposals for the area are "guidance" only. It appears that this means that zoning applies to other applicants for planning permission only but not to them them for some reason. It is very clear in their own development plan for example that new buildings would not be likely to be granted planning permission for example for restaurant use whereas in existing buildings such use might be permissible. The existing building on site was a restaurant in the past and sits idle and unloved at present. Could not this existing building be successfully recycled if purchased by the applicant? It would, many of us local people believe, be available at reasonable cost as would have been Orlagh, another building with clear "wow factor" appeal which was recently available at relatively low cost. The fact that such alternatives were not considered has been promoted in earlier submissions and was always rejected out of hand when promoted by some of us as we tried to get involved in Consultation with the applicant to little or no avail.

I refer to my own earlier submission numbered 24 in appendix A and refer to my points made about an "inadequate consultation process". The applicant simply refers to "section 17.0" of its response to ABP's request for further information. The only relevant consultation where I personally felt I was involved is listed as "public open days, Tallaght stadium" 6/7th of April 2017. I and a number of others attended and viewed essentially and realistically for the first time what exactly was proposed by way of building and car park extensions. We were unable to register our almost universal horror at what was actually being proposed from a planning perspective and commonsense approach. There was general shock and dismay over scale in particular likely to adversely affect wildlife locally, traffic disturbance in particular, sewage requirements and potential pollution and so on. I personally

engaged in attempting to make sure I would be contacted as the project proceeded and kept informed and I was assured by signing their attendance form I would achieve this if adding my email address which I did. I never heard anything further officially or unofficially from the applicant or any of its erstwhile advisors. We had engaged on 6th April extensively verbally with the architect present.

"Sewage" is their next reference in the appendix to section 8.3. I accept at face value that "the construction of this sewer cannot facilitate future large scale development" stated in their further information response. I am in no way informed or qualified to dispute this in any case.

Third issue from my original submission relates to 'zoning considerations' where I am referred to section 12.1. I have read and re read section 12.1 as set out by the applicant and I find myself to a certain extent reassured on the good intentions of the applicant but interpreted at face value much of what is contained in the section is in very general broad language. Common sense again has to be harnessed to interpret opinion and there is scope therefore for individual preference but I refer specifically to the middle of page 29 on to the end of the page and just over into page 30. I quote only from the applicants own policy ET5 objective which is " to support the development of a visitor facilitysubject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services."(my underlining)

My opinion remains that the proposed building negates totally the possible achievement of the above. Surely if language such as that underlined above is to mean anything when it was being approved by Councillors who passed the policy ET5 objective then common sense tells us that these words of conditional support for a visitor facility are of major importance and An Bord Pleanála should give this aspect due consideration. Combined with several statements in the departments letter of 25th September 2017 to ABP that the Board needs to consider certain nature conservation issues when "carrying out their appropriate assessment screening" there really was initially very inadequate information provided by the applicant and little of due import added by the response to ABP's request for further information. For these reasons (inter alia) I submit this application ought to be rejected or at the very least if granted major protective conditions would have to be inserted. Were such conditions imposed in my submission they would have to require an alternative, existing building for the centre and extra parking only, if at all, between existing car park and space between it and the Steward's house. This building could always have been a compromise arrangement as an Taisce I believe has suggested and also the owner in his submission.

The final reference to my earlier submission relates to archaeology , architecture, and cultural heritage and having thought about this aspect in the light of what is contained in section 9 of the response I believe there are likely to be other submissions by those better informed and qualified than myself to comment. There is however a reference to "three reports by Jackman in 2014, 2015 and 2016" see section 9.2.4). Without sight of these reports I feel unable to comment and I register my unease about not being shown these reports as I have in the interim attended a lecture by the said Jackman on this whole topic which raised many more doubts and questions than it answered on the overall issue as to whether sufficient and adequate archaeological investigation had in fact been yet undertaken. My own earlier expressed doubts have not been addressed in the response of the applicant and in my submission this adds major weight to the arguments in favour of rejection of this whole application.

In order not to overdo my own worries and fears I now finalise my submission by referring to the final two paragraphs of the departments letter of 25th September 2017 which includes very clear and forceful wording suggesting that ABP should satisfy self in relation to construction management plans. "applicants need to be able to demonstrate that construction management plans and other

such plans are adequate and effective mitigation, supported by scientific information and analysis (My underlining). The rest of the paragraph further raises as yet undealt-with issues. This repeated inadequate response makes for very poor investigative procedures being carried out which in total in my submission make this application inadequate in many, many different aspects. It should therefore now be refused by An Bord Pleanála.

Thank you for your attention to this matter

Andrew Davidson



