



# Keep Ireland Open

*Keep Ireland Open is dedicated to the preservation of access to our heritage of open mountains and countryside*

Web site: [www.keepirelandopen.org](http://www.keepirelandopen.org) Email: [info@keepirelandopen.org](mailto:info@keepirelandopen.org)

7 Ardagh Close  
Blackrock  
Co. Dublin

To: The Secretary  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1.

20<sup>th</sup> September 2017

Dear Sir/ Madam

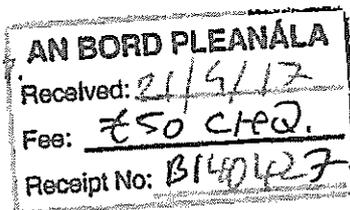
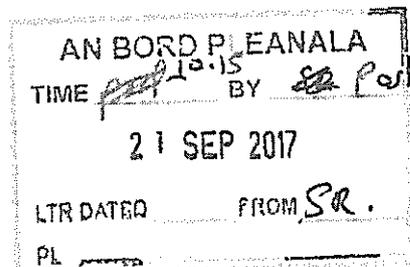
Planning Application: Dublin Mountain Visitor Centre – Strategic Development Initiative.  
Hellfire Club/ Montpelier Hill/ Massy's Wood.  
Reference: JA0040.

We wish to make a number of observations on the above application.

We object to the proposed development primarily on the grounds that it will have a negative effect on the many hundreds of existing walkers, recreational users and groups who are represented by Keep Ireland Open. Hellfire Club and Massy's Wood are prime amenity areas for locals and for the citizens of Dublin. The amenity will be severely limited and degraded by the extent of the development and will discourage walkers from availing of the wonderful existing amenity.

The situation will be exacerbated by the massive increase in traffic to the area. The roads leading to the area are small rural roads and they are entirely unsuited to a large-scale commercial development of this nature. This will be a major disincentive to existing walkers and users who will be deprived of one of Dublin's few open access areas. Keep Ireland Open have been campaigning for years for legislation to provide access to walkers, given the restrictive legal situation on access in Ireland. This development will make matters worse for walkers from Ireland's largest conurbation.

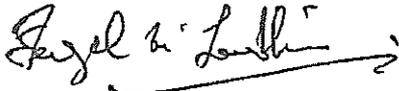
We also believe that the application is contrary to proper planning and sustainable development for the reasons set out in the attached pages and that planning permission should be refused.



The matter is of national as well as local importance, and we are calling for an Oral Hearing where all the complex matters involved can be fully addressed.

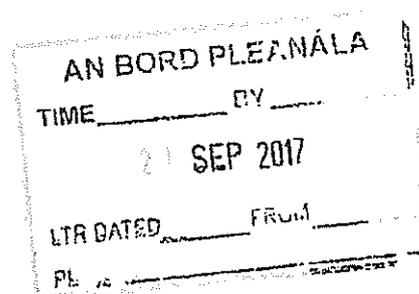
We enclose €50 fee for the submission.

Yours faithfully



Fergal McLoughlin  
PRO  
Keep Ireland Open.

Encl. 3



Keep Ireland Open

Observations on Planning Application JA0040.

\*Environmental Impact Assessment Report – Vol. 1.

p.xvii Landscape and Visual Impact.

“The magnitude of Landscape Change is categorised as Low – Change that is moderate or limited in scale, resulting in minor alteration to key elements, features or characteristics of the landscape.”

We challenge this statement. The area will be seriously degraded for existing walkers and recreational users, due to the proposed large concrete buildings, extensive car parks, bus parks and related works.

p.38. 3.16. Visitor Numbers.

What is the basis for the estimated numbers of between 225,000 and 300,000?

p.51. 4.1.9. Orlagh House.

We challenge the contention that Orlagh House was unsuitable. It is a location which would provide suitable access for visitors and it would avoid the disruption and degradation caused by the proposed development. Similar arrangements have been successful in Mullaghmore and Newgrange, with the visitor centre placed at a distance which does not destroy the principal attraction.

p.58. 5.3.1.1 Potential Local Receptors.

Timbertrove cafe: the owners and staff have stated to many of our members that they are totally opposed to the development because of the disruption and traffic chaos. They believe they will be put out of business by the development.

p.59. Existing recreation users of the site: The effect on these is totally understated. None of our members was surveyed in any way and we are unaware of how this was assessed.

p.64. 5.4 Potential Impacts of Proposed Development.

We consider the impact on existing recreational users, local residents and businesses to be unacceptable.

p.135. Introduction.

The fact that the Landscape and Visual assessment was based on a desktop study is evident in the paucity of the subsequent statements on these vital areas.

p.138. Categories of Landscape Change.

We regard the level of Landscape Change in the proposed development as “Very High” resulting in change which is “totally uncharacteristic in the context” The same applies to “Categories of Visual Change” (p.40). For these reasons alone, the development should be refused planning permission.

p.147. Chapter 11. Implementation. par 2.

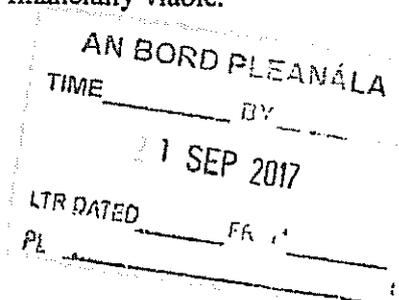
The areas are zoned "High Amenity Dublin Mountains" – "to protect and enhance the outstanding natural character and amenity of the Dublin Mountains area". The proposed development will degrade and destroy the natural character and amenity of the area.

p.162. 10.4.4.2. Access and Parking Improvements.

The extension of car parking from 80 to c. 275 spaces is indicative of the increased space which will be required, intruding on existing natural space/ walking area. There is mention of "some coach parking spaces". How many? Where? Is it proposed that these will increase?  
As previously stated, the existing roads are totally inadequate for the increase in traffic.

p.299. Predicted impact of the Proposed Development.

"The predicted impact of the proposed development for roads, traffic and transportation will be small and can be comfortably accommodated by the existing road network" This is an extraordinary statement which is strongly contested by local residents, by existing users and by the plan itself which aims to increase user numbers to make the venture financially viable.



\*Section 6. Architects Drawings and Design Report.  
6b Design Report Final

p. 21/34. 3/10. Car Parking.

"The increased parking area is laid out in three parallel tiers which will ascend the hillside from the existing parking area entrance". This will be highly intrusive visually.

p.22/34. Photomontage.

Photomontages of the buildings are wholly inadequate in the number of visuals supplied and the angles and views portrayed.

6g. 1639-PA-005-A. Elevations.

The elevations are clear evidence of the visually intrusive nature of the buildings, in comparison to the existing natural woodland.

\*Section 8. Engineering drawings and Reports.

p.8. 5.6.2. Proposed development. "It is assumed that the contractor will have sufficient resources to facilitate safe access during hours that the car park is in use by the public"

This is wholly inadequate.

\*Section 12. Business Plan Report.

p.26. Table 4.2 Assumptions.

It is clear from the assumptions that the development will be commercially driven, as evidenced by the elements listed to make it a viable business operation (Visitor numbers, Events, Shop sales, Restaurant, Bar, Exhibition, Staffing, Professional fees, Marketing etc.). This raises a number of issues:

1. There is a conflict of interest between providing a community facility on the one hand, and a commercial operation which needs to make a profit.. The proposed development fits the latter category. It is commercially led – there is little if any public benefit.
2. At what point will there be a charge for the car park? - a further disincentive to locals, walkers and recreational walkers.
3. If the development is a success and pulls in increased numbers, it will be to the detriment of existing users. If it is a failure, the community will be stuck with an expensive, ugly white elephant.

AN BORD PLEANÁLA

TIME \_\_\_\_\_ BY \_\_\_\_\_

\*Overall:

21 SEP 2017

There are many other reasons why the development should be refused planning permission:

PL \_\_\_\_\_

- environmental/ ecological issues have been inadequately dealt with. The mapping of bird and mammal life in particular is vague and inconclusive.
- Badger and red squirrel habitats will be sacrificed for buildings and car parks.
- Biodiversity should be properly addressed by treating the Hellfire separately from Massy's Wood.
- The wall garden of Massy's Wood needs to be addressed more fully.
- There has been inadequate briefing of locals/ affected individuals and groups.

20<sup>th</sup> September 2017.

