The Secretary An Bord Pleanala 64 Marlborough St Dublin 1

Date:

21-09-2017



#### 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:

LIAM MCNEVIN

My Address is:

IS, GLENLYON CRESCENT

KNOCKLYON

DUBLIN 16

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 Pleanala should refuse planning permission for the above development

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

Yours Faithfully,

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AN BORD PLEANÁLA
TIME LOM BY LACAL
21 SEP 2017
LTR DATED FROM AD

# Reasons to Object

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

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

## **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.
- Cafe/restaurants are only to be considered in the context of existing premises. This is
  not the case here. The reference to this site being necessary for a "wow" factor is
  something which is not recognised in planning law. It is subjective and the reality is
  that there a number of sites on the surrounding areas with a good if not a spectacular
  view. E.g. Ticknock/Orlagh/Glencree 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.
- We have serious concerns regarding the site selection process too narrow with some sites ignored and not an independent process.

# **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 coffee shop/restaurant is simply disproportionate and clearly a massive overintensification of use which will also significantly impact on amenity.

#### 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 below 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.

#### Sustainability/Amenity

- A large part of the funding is coming from Failte Ireland funds which are aimed at large scale commercial activities. 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.
- There has been significant confusion demonstrated by SDCCtand Coille to NALA date. They have sent letters to Wicklow County Council and Dun Laoighaire

  Rathdown County Council about engagement but never office-looked to engage with them to find a more suitable site in the whole range of the Dublin Mountains. There is no sense of partnership with other local authorities and no joined up thinking.

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

E.g. Two: Within DLR County Council there is Fieknock, 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 Glenveigh National Park uses a similar 'park and ride' approach to their national park.

- 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 -red squirrel and badger. Archaeology that is compared to Stonehenge and World Heritage Sites will be intersected/overridden by stairs for the purposes of tourism.
- SDCC has consistently limited 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.

## Additional Reasons/Comments:

PLEASE READ 2 page Letter overleaf

Thank you

# Do Not Defile Montpelier Hill! Hell Fire Club

by Liam McNevin

#### LANDSCAPE AS PRESENCE

"HOW CAN PEOPLE BE SO INSENSITIVE TO THE DIGNITY AND INDEPENDENCE OF LANDSCAPE?

THIS ABUSE AND RAPE HAS ITS ROOTS IN GREED BUT ALSO IN BLIGHTED PERCEPTION.

LANDSCAPE AND ITS EXTRA-HUMAN INHABITANTS EXIST MAINLY IN THE MODE OF STILLNESS AND SILENCE -THEY CANNOT FIGHT BACK,

LANDSCAPE IS YULNERABLE • IT CANNOT GET OUT OF THE WAY."

JOHN O'DONOHUE



There is a lot of talk about development these days as if in doing so we are making something better.

When I was young we were told the 'best things in life are free.' How true that turned out to be.

As a boy I was always out and about; cycling, hiking and hosteling with An Oige. With a family of my own the enthusiasm for the great outdoors naturally passed on to them.

When I walk along Montpelier Hill these days I see scores of parents availing of this public amenity. They appreciate the quietness, the wildlife and the fantastic scenery.

Over my time working with the Hell No campaign and collecting signatures for the petition on Saturday and Sunday mornings in the Hell Fire car park, the common theme amongst people was that Hell fire and Massy's Wood were places to come and get away from the hum-drum of suburbia, if only for a short while. It has a natural appeal, for generations of Dubliner's as well as the new comers to our shores. It is a family friendly place but improvements can be catered for. The need for toilets, the upgrade of the car park and pavements as well as the current structures in Massy's Wood that need repair.

The development density in the surrounding area has been huge over the last twenty five years and the public amenity that is Montpelier Hill must not be interfered with.

As you are well aware the lands in the local areas of Old Court/ Ballycullen are

currently under a Local Area Plan with an estimated five thousand dwellings to be built in the coming years. From a traffic management plan that would bring an extra ten thousand cars into the area working on the average of two cars per household. Two new schools are also included in the Local Area Plan. This would lead to additional traffic coming into the area, as naturally the schools would be feeder orientated.

Now introduce this proposal by S.D.C.C. to build a monstrosity around 60 metres in length at a height of 350 metres. They want to bring a pipe 3.5 km down the road to connect it to the main sewer on Stocking Lane. All this for one restaurant and a coffee shop. Also in the proposal they say that street lighting, pavements and a cycle lane are to be introduced from the M50 bridge on Stocking Lane up the R115 route with no mention of road widening. Are they having us on?

They say that an extra 300,000 visitors can be catered for. This figure is to be achieved in the main from the months of April through to September/October. That's around twenty eight weeks of the year and would work out at about a thousand extra visitors a week and added to the people who already visit. One only has to look to Glendalough any weekend over the summer months to understand what this would mean; i.e. waiting a half an hour in your car to move a couple of hundred yards! The result will be less people able to visit locally.

They base this visitor figure of 300,000 on Airfield in Dundrum. But really you are not comparing like with like. Airfield is situated much nearer to Dundrum Village which has much better modes of transport. For e.g. the Luas and a regular bus service.

Due to the housing shortage all green spaces in established residential areas are now under threat. For e.g. Firhouse playing fields were lost to two schools. Knocklyon United pitches along St. Colmcille's Way are also under review. This trend of green spaces disappearing is happening all over Dublin. The importance of Hell Fire and Massy's Wood to remain as a public amenity is now more important than ever!

There have been construction developments in other areas of Dublin and 'the sense of place', hasn't been compromised. Take Killiney Hill with its spectacular views. It is very popular with locals and tourists all the year around. The hill of Howth is another fine example. Can you imagine Dublin without them?

The same respect must be given to South Dublin County. If the proposed plans go ahead then access to roam free will be denied. If left alone 'a sense of place,' will be maintained. Do not defile Montpelier Hill!

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