

South Dublin Conservation Society  
c/o 4 Plasóga Choill Rua,  
Cill na Manach,  
Tamhlacht  
Baile Átha Cliath 24



The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

8<sup>th</sup> January 2018.

**Re: Case Ref. PL06S.JA0040 - Proposed Dublin Mountain Visitors Centre and all associated works, by South Dublin County Council – Further Information Submission.**

Dear Madam/Sir,

Please find following our response to the further information submitted for the above proposed development.

Section 3 and 7.2.3 – Red Squirrel. We agree with the Department of Culture, Heritage and the Gaeltacht’s point that there should be Scots Pine planted amongst the broad leaved trees being planted in the Hellfire Wood, to help provide an attractive habitat for Red Squirrels.

Section 4 – Pine Marten’s. As Pine Marten’s are being relied on to help protect the Red Squirrel from encroachment by the Grey Squirrel, then a full study of the distribution of Pine Marten’s across the Hellfire and Massy’s Woods should be carried out to establish their numbers/frequency in the area. Otherwise how can it be known if Pine Marten’s will help provide protection for the Red Squirrel? Camera traps could be used to catch nocturnal activity as well as human observation.

Section 5 and Section 7.2.1 – Bats. The Further Information Report does not address our point about the possible negative impact on bats of the visitor information centre building with its large glass windows. The Report only refers to the present situation where there is minimal vegetation around the proposed site of the visitor centre and few bats observed. In years ahead when trees are grown up around the building (expressly with the aim of increasing biodiversity), bats could be flying along over the tree tops and be on a collision course with the windows. The report has not envisaged this future situation. We refer again to the study in the Science Journal where it was shown that buildings with large glass windows pose a serious threat to bats as the smooth surface of the glass disrupts their echolocation system. (<http://science.sciencemag.org/content/357/6355/1045>, also see this article in New Scientist: <https://www.newscientist.com/article/2146716-bats-crash-into-windows-because-of-a-glitch-with-their-sonar/>).

Section 7.1.4 – “the works will be limited to trail improvements and other minor works. The improved trails will encourage users to remain on paths.” From the available plans it is

proposed to put in place several new trails for different types of users so this will be breaking new ground to put in hard surfacing where there was none before, thus destroying existing vegetation.

On Page 7 of Dublin Mountain Visitor Centre Design Report, there is a map showing proposed walking routes shows routes nearly all along existing paths except for the green ones labelled Piperstown Gap and Orlagh Link. On page 35 there are two plans showing proposed equestrian trails and walking routes which include large segments of new paths, in particular between the site of the proposed visitor centre and the HellFire Club. Firstly, these maps do not agree with each other, and secondly if the second pair of maps is the final proposal this is an excessive amount of new surfaced ground.

Section 8.3 – Wastewater Treatment. The Irish Water Code of Practice for Wastewater Infrastructure states that a dwelling is counted as consisting of 2.7 people (Section 3.6) so 20 dwellings amounts to 54 people using a 150mm pipe each day. It is proposed to increase visitor numbers to the Hellfire/Massey's Wood to 300,000 a year ultimately which amounts to an average of 822 people per day. Even if only half those people use the toilet when visiting it is still a significant multiple of 20 houses worth. What happens when the sewer pipe is found to be inadequate? It would have to be replaced with a larger pipe. We still contend this will be a trojan horse for greater housing development in the area, which in turn could have a cumulative negative impact on the Hellfire/Massey's Wood, especially its existing biodiversity, as well as the surrounding rural community.

Page 5 of the Dublin Mountains Visitor Centre Engineering Report for Planning gives a context of 10 households of 2.8 people per household having a design flow of 4,200l/day. How does a design flow for 968 people come up with 9,854 litres per day when a straight scaling up calculation arrives at a figure of 145,200 litres per day?

Section 9.1 – Location of Building. The further response for not selecting the Steward's House/Killakee House as being 'in separate private ownership and not part of the Coillte lands' is completely inadequate. In our initial submission we raised concern about the obsession with having a view being one of the key criteria for site selection of a visitor centre and this has not been addressed satisfactorily. We do not agree that this is a legitimate object, or certainly not an overriding objective for a visitor centre. The main function of a visitor centre is to provide facilities and interpretation of the main attraction, the built and natural heritage. We maintain that conserving and using existing built heritage with links to the site to be promoted to visitors is far more important than a view. It would also be much appreciated by visitors. The real view is obtained by getting out and walking up the hill itself. (Section 15.2.2 referenced in the submissions response table, Appendix A, No. 82, doesn't address this matter at all.) On Page 29 the South Dublin Tourism Strategy 2015, Section 3.1.1, is quoted regarding a visitor centre, saying: 'The ideal location should be selected with excellent panoramic views over Dublin Bay, through elevated viewing locations.' But this does not say that the views should be from the centre itself.

Sections 9.2 and 9.3 – Works to Hellfire Club and Archaeology. We welcome the proposed adherence to the Department of Culture, Heritage and the Gaeltacht's requirements of reports to be submitted to them before works are carried out.

Section 9.2.5 – The R117 does not run past Montpelier Hill/Massy's Wood. It is the Sandyford-Enniskerry Road.

Referring to the R115 along the approach to the Hellfire Wood entrance, why does the wall of Massy's Wood have to be demolished and trees felled to make way for the footpath? Why not put a pedestrian path just inside Massy's Wood parallel to the wall, or mostly use the existing path in the wood plus a bit of a curve up towards the road at the end where the pedestrian gate is opposite the entrance to the Hellfire Wood.

Section 10.2 – Visual Impact. Our concerns about the visual impact of the visitor centre on site have not been fully addressed in that the future planting is meant to disguise the building so that it is only seen from close by but still has not provided any photomontages to illustrate this. In general the tone of the submission in this section implies that the visitor centre is the primary destination for visitors to the site rather than the natural and built heritage of the site. The purpose of a visitor centre is to provide information about the site and some essential facilities such as toilets, and is secondary to the site itself.

The highest point of the building, at 308m, is not well below the 350m development limit. Furthermore, contrary to what is stated on Page 22, the building does not nestle into the landscape. It can be seen on the elevation drawing no. 6g (DRAWING NO.: 1639 / PA / 005 / A) that it is proposed to build out the hillside to provide the platform for the building. Normally when houses are being built on a slope in rural areas they are required to cut into the slope. This is what one would usually understand to be 'nestling in'. Rural houses and buildings don't usually need a whole wood planted around them to ensure they don't obtrude from the landscape.

Section 12 – Addressing Planning Concerns, Page 26. The South Dublin County Development Plan 2016-2022 is the legal implementation document of all kinds of national, regional and local policies so what is written in that is what has to be adhered to. Our point still stands that the zoning for the proposed development area is 'High Amenity Dublin Mountains, HA-DM, To protect and enhance the outstanding natural character of the Dublin Mountains Area'. Under this zoning category a restaurant/café and a shop are only permitted in existing buildings. Whether the proposed café occupies more or less floor space than the other uses is irrelevant, it is still not permitted. The further information report refers to specific objectives relating to the development (Page 76 of the County Development Plan) but there are conditions to be noted as follows: ET5 Objective 3: To support the development of a visitor facility in or adjacent to the High Amenity – Dublin Mountains zone (HA-DM), subject to an appropriate scale of development *having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.* (our emphasis)

ET5 Objective 4: To support the development of an outdoor pursuits centre in or adjacent to lands designated with Zoning Objective High Amenity – Dublin Mountains (HA-DM), subject to an appropriate scale of development *having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.* (Our emphasis)



Section 17 – Consultation, Page 42. The submissions from the Department of Culture, Heritage and the Gaeltacht and Inland Fisheries Ireland were not available on the project webpage until early November 2017.

There was no consultation stand set up at the Hellfire car park as an opportunity to engage with the people who actually use those woods or Massy's Wood.

Regarding the Operational Management Plan submitted by South Dublin County Council, we note that it is the intention of South Dublin County Council to establish a permanent management steering group comprised of 'suitable representatives from South Dublin County Council, Coillte and the Dublin Mountains Partnership as well as Community Representatives'.

This management steering group is meant to provide a direct avenue of communication for the local community through a 'local stakeholder representative' process. South Dublin County Council envisages that this 'stakeholder representation' will be decided by and come from the groups/individuals/organisations that have engaged in this process through an independent stakeholder forum.

The question arising from this intention is whether the local community would want to participate in any 'local stakeholder representative' process in the first instance due to the lack of proper consultation that has taken place to date with this proposed development. The fact that so many from the local community have submitted objections against this proposed development shows the disregard that South Dublin County Council has had for proper real consultation and the need to involve the local community in participating in the proper planning and sustainable development of the area that they reside and work in. An Bord Pleanála need to take note of this fact when adjudicating on this proposal.

Due to the unusual nature of this proposed development and the potential of it to do irreversible harm to the landscape and set a highly undesirable development precedent, we see it as essential that an oral hearing take place and request that one be arranged, under Section 134 of the Planning & Development Act, 2000 to ensure that every point made in submissions and possibly others by experts are fully explored before a final decision is made.

We would urge An Bord Pleanála to refuse planning permission for this proposed development as this Project is not consistent with the proper planning and sustainable development for the area. And that South Dublin County Council is failing in its duty to protect the natural environment and built heritage of the Dublin Uplands/Mountains and in doing so is clearly in breach of its own objectives/policies as set out in its own County Development Plan.

Yours sincerely,



Padraig MacOitir

On behalf of the South Dublin Conservation Society

