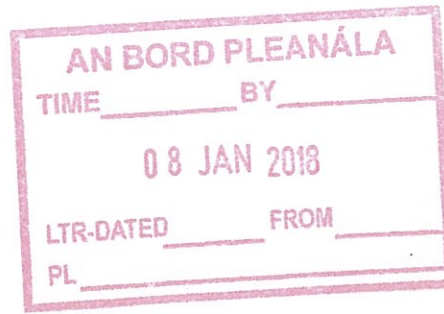


The Secretary  
An Bord Pleanála  
64 Marlborough St  
Dublin 1



Date: 8<sup>th</sup> January 2018

Dear Sir,

RE:

<b>Agent</b>	Angela O'Donoghue
<b>Address of Agent</b>	17 Glendoher Close, Rathfarnham, Dublin 16
<b>Development</b>	Dublin Mountains Visitor Centre-Strategic Development Initiative
<b>Location</b>	Hellfire Club/Montpelier Hill/Massey's Wood
<b>Planning Authority</b>	South Dublin County Council
<b>Reference Number</b>	JA0040

I understand that this stage of the Planning Process there is an opportunity to comment on the 'Further Information' that the Applicant (SDCC) has submitted to An Bord Pleanála. I understand that the deadline is the 8<sup>th</sup> of January and that there is no fee if we have already made a submission – this is the case here. Please note that in the Further Information documentation that SDCC have submitted that our original submission is recorded by SDCC as being No 71.

I would like the Board to look in the first instance at the injurious and negative commentary that the Applicant has made regarding our original submission referring to it as a "Chain Letter A". Their administrative process should not be discriminatory and disrespectful to people who simply are interested in the proper planning and the sustainable development of their area. We would like the Board to review this action of the Applicant as it would appear we were not the only ones. People who make submissions both individually or collectively have a right to their good name.

Despite the Applicant supplying 'Further Information', I submit that this development is contrary to sustainable development, principles of proper planning. 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. For these reasons and the additional reasons overleaf, I respectfully submit that An Bord Pleanála should refuse planning permission for the above development

Yours Faithfully,

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Angela O'Donoghue

## **Reasons to Object**

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

- **Zoning**
- **Ecology**
- **Archaeology/Architecture**
- **Sustainability/Amenity**
- **Traffic Safety and Carrying Capacity**
- **Agriculture & Rural Amenity**
- **Errors & Omissions**

## **Zoning**

The Applicant has not addressed the concerns raised in the original submissions by concerned residents and organisations in relation to this project heretofore. It remains a proposal that is inappropriate in terms of scale and location. The applicants claim (12.1) that the zoning AH-DM is "for guidance only" and therefore justifies the breaching of conditions throughout this application but the Applicant needs to be reminded that:

- The proposed development is in a high amenity area which is also in close proximity to agricultural zoned lands. These lands are zoned for the protection of rural amenity and the promotion of agriculture with an obligation to protect and promote agriculture. 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/Glenree are all existing buildings/developments with acknowledged and prominent views.
- Given that the EIAR and the Further Information 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. The poor quality of cross references in Appendix A in the DMVC Summary of Submissions and sheer scale of errors and omissions contained in this document necessitates us, to respectfully submit that this application be rejected.
- We still have serious concerns regarding the site selection process – too narrow with some sites ignored and it was not an independent process.

## **Ecology**

SDCC do not have a Biodiversity Plan nor do they have a dedicated Biodiversity Officer unlike all the other Dublin Local Authorities – which is a huge reason why the Ecology Information is incomplete in the EIAR and in the subsequent Further Information documentation. SDCC didn't undertake any additional site survey work prior to submitting their Further Information. A 2-day walkabout does

not constitute a scientific examination of evidence and data, as is required. I expected more care and attention to this unique ecological lung to the City by the Applicant. I also note that the Applicant has now remembered that birds are part of these lands but the fact that this omission and that of the Pine Marten and others had to be pointed out to the Applicant and the poor quality and vagueness of the Further Information does not build any confidence in the Applicant's ability to manage this DMVC from an ecological sustainable point of view

- 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 over-intensification of use which will also significantly impact on amenity.

### **Architecture/Archaeology**

- The Further Information submission fails to address the issues raised by Groups like An Taisce and the Irish Georgian Society. It is noticeable that the heritage value of the Massy Demense in particular has been largely ignored. It is interesting to note that the Applicant has failed to address the reason why for e.g. other locations like Stewart's House and Orlagh were not reviewed again after the scale of the project was reduced in half. A thorough examination of all alternative locations has not taken place as in the custom, practice and expectation for a project of this nature and recipient of state funding.
- 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.
- The rural character of Killakee Road with its historic significance, being part of the Military Road, built in 1800 as one of the first purpose built roads in Ireland will be permanently and irreversibly changed from a beautiful country road to a boring suburban road with its corresponding footpaths and streetlights. Sadly, it will cease to delineate the urban sprawl of the City from the natural heritage and 'wilderness' of the Dublin Mountains.

### **Sustainability/Amenity**

SDCC have not seriously considered the likely consequences for proper planning and sustainable development in the area in which it is proposed to situate the development. A full description of proposed development including details of construction and operational phases and impacts, likely emissions and/or discharges, phasing, and any mitigation measures proposed are not included in the Further Information submitted by SDCC.

- 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 SDCC and Coillte to date. They have sent letters to Wicklow County Council and Dun Laoighaire Rathdown County Council about engagement but never once 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 Area there is Glenree; 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 Glenveigh National Park uses a similar 'park and ride' approach to their national park.
- The Further Information clearly indicates that 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 and a metal bridge for the purposes of tourism. By seeking to 'interpret' this site with a DMVC, the Applicant will as a by-product irreversibly and permanently damage its character, heritage, prospects and amenities.
- SDCC has consistently limited development in this area because of the constraints 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.

### **Traffic Safety and Carrying Capacity**

The concerns expressed heretofore regarding the carrying capacity and safety of the road network serving the proposed DMVC has not been addressed. The present dispersal of local traffic generated by Edmondstown Road closure due to urgent remedial works raises further questions about the carrying capacity and sustainability of the immediate local road network. This was not acknowledged or examined in the Further Information documentation. Serious concerns are also posed by concurrent housing sprawl, as part of the neighbouring LAP Ballycullen and Oldcourt as exemplified by ongoing developments in Stocking Lane and Ballycullen Road - the two main thoroughfares to Montpelier Hill. Given that the proposed DMVC's projected visitor numbers would be accompanied by a substantial increase in private and public transport and place further pressure on narrow, well-established rural routes, a traffic management plan and details pertaining to construction and operational phases are essential. We are particularly concerned about the arrangements for cyclists and their safe passage distance of 1.5m on both sides of the road. We note that the installation of chicanes/pinch points where traffic is supposed to yield to create single lane movements is simply unsafe and unpredictable for cattle, cars and cyclists. We also note that there is no full time Cycle

Officer in SDCC and there is no Cycle Plan for the Local Authority area. We note that it is a matter of record that Mairead Forsythe of Cyclist.ie in their submission has stated the following:

Regarding a one-way system/chicanes Cyclist.ie state

The proposed arrangement for the one-way section is expected to *“have a strong traffic calming effect to reduce traffic speeds in addition to sharing the limited road space appropriately”*. However the precedents quoted in the Boyne Valley and the Netherlands are not comparable as the steepness of the road could have unexpected consequences.”

In conclusion Cyclist.ie state:

We do not believe that the proposal will improve access by bicycle; on the contrary, the increase in traffic will present a more dangerous environment for cyclists and the measures proposed do very little to improve cyclist safety.

## **Agriculture & Rural Amenity**

There is a zoning obligation to **“to protect and improve rural amenity and to provide for the development of agriculture”**

I note that there was a number of submissions made regarding agriculture and rural amenity and there was a complete lack of consideration by the Applicant to their concerns. Numbers 2 (IFA), Number 29 Frank Doyle and Number 39 Selina Guinness. It is our belief that the Applicant has failed to demonstrate how this project will impact on the farming community and how this proposed development adheres to the Zoning that pertains to these lands and the surrounding lands. In fact we concur with the above referenced that this development is not only contrary to zoning but contrary to many of the National Agricultural Policies.

## **Errors & Omissions**

We had tremendous difficulty reading Appendix A (Cross Reference Matrix) and the accompanying documentation in the Main Response by CSR. **These errors make it difficult to respond adequately to the issues raised.**

e.g. Seamus Murphy No 68 - so bearing in mind he is the owner of Stewart’s House and his property was rejected by the Applicant in their considerations of location. So, the Visitor Centre Alternatives has a reference of 15.2.2.but if you check on page 35 you will see that it says 15.2.2. and it deals with Floor Areas – which clearly and patently is not relevant.

e.g. In some cases the note box is empty – that is SDCC don’t address the issue raised e.g. Dept of Culture, Heritage and Gaeltacht no. 27 the topic Cumulative Impact the notes by SDCC says not addressed - that beggers belief!

**AN BORD PLEANÁLA**  
TIME \_\_\_\_\_ BY \_\_\_\_\_  
08 JAN 2013  
LTR-DATED \_\_\_\_\_ FROM \_\_\_\_\_  
PL \_\_\_\_\_