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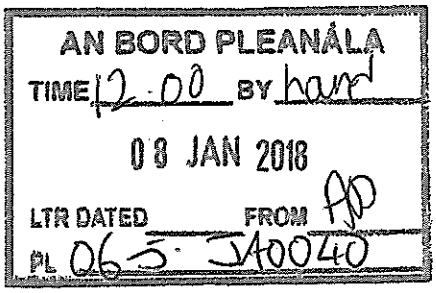


The Secretary
An Bord Pleanala
64 Marlborough St
Dublin 1

3rd January 2018

Further information Response
Reference No 06S JA0040
Re: Proposed Dublin Mountains Visitors Centre and all associated works in the: Townlands of Mountpelier, Killakee and Jamestown in South Dublin
Applicant: South Dublin County Council

Dear Sir, Madam,

Further to your letter of 9th October 2017 requesting additional information for the above project and the response from Paul Keogh architects I am writing to you to respond back to the additional information submitted. I am using the same format list as in Appendix A as listed in the further information response (FI)

1. **Site Overdevelopment Section, and intensification of Use - Section 15.0,-15.7**
   I have noticed the comments on the further information documents as being similar to the original submission. I am still very much of the opinion that the development is too intense in such a relatively confined area.

2. **Inadequate Consultation Process - Section 17.00**
   The FI refers to section 17.0 and addresses the consultation process. This section has addressed none of the concerns in the original submission and there is no new information.
   It is worth mentioning here that there are well over 12,000 objectors to the proposed development at this stage that have signed petitions.

3. **Visitors Centre Alternatives Section 15.2.2**
   The revised information on this refers to section 15.2.2 and is in relation to floor area (which I presume is a clerical error).

4. **Visual Impact - Section 15.9**
   This refers to section 15.9 which does not exist in the revised information.

5. **Landscape - Section 10.2**
   I note answers to queries in relation to the bridge structure that the lighting to the handrail will be omitted and that there will be ne no protective steel cage, both points are to be welcomed. (A further issue arises however in relation to the security and safety of the bridge with the above proposal).

6. **Zoning Considerations - Section 12.1**
   I note the section above in relation to this and I note also the reliance by the FI on the economic and Tourism Policy ET5 of the SDCDP as follows,
   "it is the policy of the council to support the Development of a sustainable tourism industry that maximises the recreational and tourism potential of the county, through the implementation of the South Dublin Tourism Strategy 2015"

   On page 30 it states that the Land Use Zoning Tables *"Are for Guidance Only"* and Policy ET5 Objective 3 of the SDCDP specifically supports the development of a visitor centre in the HA–DM area. Noted also on page 40 this Policy ET5 was ratified in June 2016. The above statements are trying to justify the development by moving the goalposts.

   I would also think that any persons in Dublin who have been refused planning permission or who have not applied because of Zoning would find the statement above preposterous.

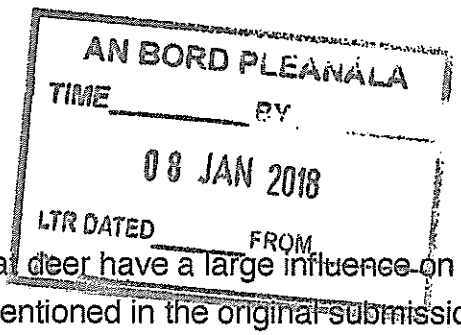
7. **Traffic / Roads - Section 11.0**
   This section reiterates the points in the original submission, but I would still ask about the shuttle bus service. The revised information states on page 25:
   ".....International and domestic tourists. These visitors are much more likely to use public transport to reach the site that the local amenity visitors"
   I do not believe this to be a realistic assumption and have seen no evidence or transport plan in the submission or FI response to support this statement.

8. **Lighting - Section 15.8**
   There is no section 15.8

9. **Archaeology/ Architecture/ Cultural Heritage - Section 9**
   The Department of Culture, Heritage and the Gaeltacht is mentioned as approving of the proposed maintenance works in this section and hopefully they will have a solid legal input into any decisions affecting the above points.
   Noted in the above section are the omissions of the replacement stairs and the alternative solutions for bringing power to the Hell Fire Club building.

10. **Ecology /Biodiversity – Section 3.0, 6.2, 6.6, 7.1.3, 7.1.4, 7.2.3,7,3**
    Section 3 does not exist so presume it should be section 2?

    I quote from An Bord Pleanala letter dated 9th October 2012 to Paul Keogh Architects.
    "The applicant is requested to address the above comments in relation to Birds and Cumulative impact and provide further information and clarification on such matters. Please note that any conclusions made in regard to screening for appropriate assessment should be set out clearly with details of courses of information/frequency of surveys/days etc. identified".
    This request seems to have been largely ignored with two research reports mentioned. One of which refers to study written in 1988 and referring to Merlins in the Orkney Isles, the other referring to a story of decline of Merlins in the Peak District in the 1970s . I would have thought the above is wholly inadequate particularly in relation to cumulative impact which is ignored in totality



    Section 6.2 Birds as above

    Section 6.6 Deer
    My original point in relation to this was that deer have a large influence on the environment so they should have been mentioned in the original submission.

    Section 7.1
    This section relates to surveys performed *"over a two – day period by experienced professional ecologists"* and further on *"while records of transects routes were not kept, surveyors verified that all areas of the site were covered by the survey."*

A 2-day survey seems wholly inadequate and I would have thought that a record of transect routes would be essential to the survey as we have no real information otherwise.

Section 7.13 Seasonally of the Surveys
Again, this section states *"it is considered that surveys of these habitats, while not within the preferred survey season provide an accurate and adequate description hereof."* This reads to me as more observational than factual.

Section 7.14 Detailed Botanical Surveys.
I had not made any comments regarding above in my submission and this must be an error.

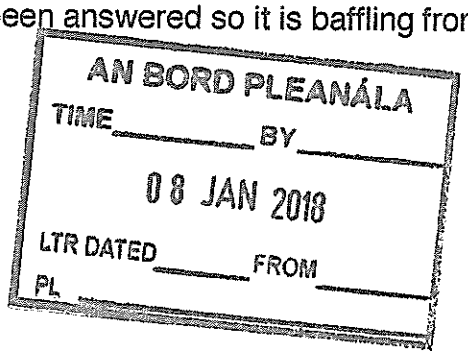
Section 7.23 Red Squirrel
Noted the request and receipt of Conservation Management Plan.

Section 7.26 Birds
Omitted from list but see 6.2 above.

Section 7.3 Distinction Between Hellfire Forest and Massy's Wood.
The FI refers to the original EIAR in relation to this, but there is still no Woodland Management Plan for Massy's Wood.

11. **Site Management - see revised Operational Management Plan**
This document is a revised Operational Management Plan and while the plan has elaborated on the points of the original document, it is still very vague and non-committal.

12. **Business Plan - Section 12.0 – 16.4**
This section is unusual in that it is short on any figures or calculations for tourists numbers or types, turnovers, cost recovery ETC. None of the errors in the original submission have been answered so it is baffling from that point of view.



In conclusion, the requests and suggestions made by a large number of individuals and organisations have been largely disregarded in this FI document with some minor changes in relation to lighting etc. It remains being a development that is over scaled and inappropriately located. I stand behind the content of my original submission .

Yours Sincerely,

Declan McKeever

Declan Mckeever
Killakee Road