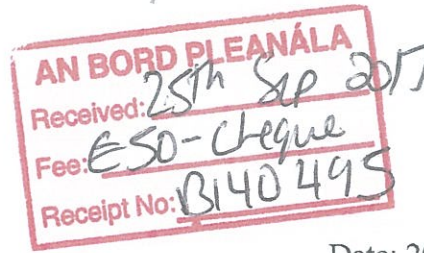


The Secretary  
An Bord Pleanála  
64 Marlborough St  
Dublin 1



Date: 20/9/2017

**RE:** Development: Dublin Mountains Visitor Centre / Strategic Development Initiative

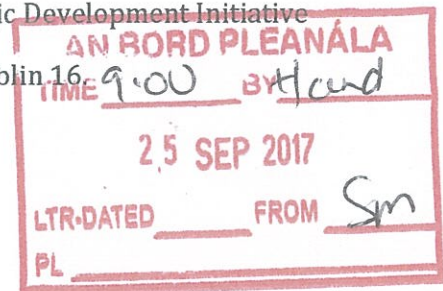
**Location:** Hellfire Club / Montpelier Hill / Massy's Wood, Dublin 16

**Applicant:** South Dublin County Council.

**Reference No:** JA0040.

**Observer:** Selina Guinness

**Observer Address:** Tibbradden, Mutton Lane, Rathfarnham, Dublin 16.



Dear Sir or Madam,

I hereby submit the following observation in respect of the above application. We enclose the relevant amount of €50 in payment of the observation fee.

I am a local landowner, and farm in the immediate neighbourhood of this application.

I would like to call for an **oral hearing** into this application on the grounds of its scale and its prominent location in an area of outstanding natural character. The Dublin Mountains comprises one distinct area undergoing considerable development pressures, yet these development pressures are differently treated by the three counties that share the management of this natural resource: Dun Laoghaire, Wicklow and Dublin. Conflict between amenity and agricultural uses is particularly acute in an area so close to the capital city. Whereas the Wicklow Mountains National Park affords protection to the high amenity areas in the uplands, no such protection is afforded the Dublin Mountains, towards which the capital city is orientated in its streetscape. An oral hearing would allow the issues raised by this proposal, developed in the name of 'public good' by the executive function of a representative body, to be properly examined in public.

I submit that this development is out of all scale and proportion to the principles of sustainable development in the sensitive upland landscape of the Dublin Mountains, and shows inadequate regard to the negative impact of this development on the current agricultural zoning of neighbouring lands.

The proposed development is too large for the chosen site and doesn't represent an appropriate addition to this fragile and important landscape, neither in its landscaping and architectural design, nor in its function and use.

I contend that the proposal fails to fully account for, and protect, the demesne heritage of Killakee House sited at Massy's Woods, and endangers and limits excavations at the archaeological site on Montpelier Hill through its proposed works and long-term operation. I believe that prior to the full excavation and investigation of the archaeological significance of this world-class Neolithic site on Montpelier Hill, this interpretive centre is premature, and *de facto* cannot claim to be respecting the heritage of the area.

I believe the design of this development is inimical to the landscape amenity of the surrounding hills – and will adversely affect protected views from neighbouring Tibbradden and Kilmashogue.

I contend that the provisions made within this proposal to increase visitors from 30,000 to 300,000 visitors per annum fail to account for the increased pressures on the local road network with the planned expansion of residential development in Ballycullen, Scholarstown, Oldcourt and surrounding areas.

**Please see overleaf a list of additional reasons why I think An Bord Pleanála should refuse planning permission for the above development**

Yours faithfully,

Selina Guinness.



My grounds of objection are set out as follows.

## 1. "The Receiving Environment"

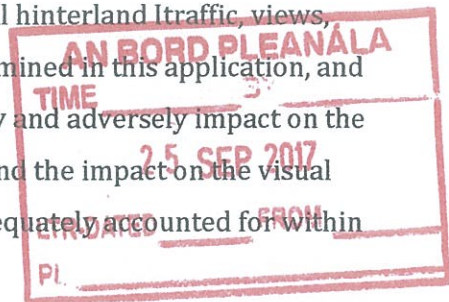
Section 9.2.2 National Strategy.

*"The Dublin Mountains and associated uplands occupy the southern side of the County and extend into the adjoining counties of Dun Laoghaire-Rathdown and Wicklow. The diverse topography and land cover of the Dublin Mountains includes areas of natural beauty and ecological importance (including 3 of the County's Natura 2000 Sites) and is a key element of the County's Green Infrastructure network. The mountains also offer significant recreational and amenity value, with popular orienteering courses, climbing areas and walking, running, hiking and mountain bike trails.*

*"The Landscape Character Assessment of South Dublin County (2015) highlights the high value and sensitivity of the Mountain Area. The protection of this landscape and its environment is a priority of this Plan."*

In its account of the receiving environment, the application does not sufficiently account for the Dublin Mountain areas that lie in adjacent Dun Laoghaire Rathdown. These include Tibbradden and Kilmashogue. The proposed development directly threatens the capacity of the local community in these areas to enjoy the rural amenity and to continue and develop sustainable agriculture.

The impact of this proposal on the immediate and natural hinterland [traffic, views, biodiversity etc] across the county boundary goes unexamined in this application, and yet the traffic and visitor numbers generated will directly and adversely impact on the zoning objectives of these areas. Similarly I would contend the impact on the visual amenity of the Dublin Mountains area as a whole is inadequately accounted for within this proposal.



## 2. Zoning Objective HA-DM

*"To protect and enhance the outstanding natural character of the Dublin Mountains Area."*

### Sub-standard Design.

The design of the proposed landmark building on a prominent upland site, adjacent to a carpark that will be visible from all the neighbouring hills will not in any way 'enhance'

the **natural** character of this landscape, or its visual amenity. The design of this building is out of sympathy with, and out of proportion to, any of the vernacular architecture in the immediate locale. Nor does it represent a sensitivity to the landscape (such as represented by Dominic Stevens' Mimetic House) but appears to address the hills monolithically as a landmark of commercially driven opportunism. Its appearance, and the design and layout of its facilities with prominent display of its extensive carpark, recall a motorway service station. The 'wow' factor boasted within the accompanying documentation is not substantiated with reference to best architectural practice, or guaranteed by international competition.

I contend that the construction of this building directly contradicts South Dublin's specific zoning objective HCL9 Objective 1 to ensure "that new development is . . . designed and sited to minimise environmental and visual impacts."

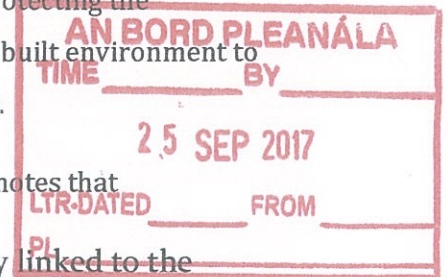
The promotion of amenity use from 30,000 visitors to 300,000 visitors in an archaeologically sensitive area, complete with full tourist and commercial facilities that will generate traffic and litter, runs counter to the objective of protecting the outstanding **natural** character of this area. Instead, it allows the built environment to further encroach on Dublin's most prominent **natural** resources.

Under section 2.3.3, the summary of the SDC Development Plan notes that

- i) Cultural use is open for consideration if 'directly linked to the heritage and amenity value of the Dublin Mountains'.
- ii) Recreation facilities are open for consideration if 'directly linked to the heritage and amenity value of the Dublin Mountains'.
- iii) Restaurant/Café use is open for consideration if 'in existing premises' and not above the 350m contour.
- iv) Shop-local is open for consideration if in existing premises and not above the 350m contour.

My contention is that

- the proposal betrays a lack of knowledge of the existing heritage of the site, in particular in relation to Massy's Wood, and disregard for the archaeological value of the site, currently being uncovered.
- The zoning objectives specify that both the heritage AND the amenity



value must be satisfied by development in this category.

- That the proposed cultural and recreational uses capitalise commercially on the area's heritage, but do not integrally seek to protect or enhance this heritage and as such are only indirectly linked.
- Further, that the proposed restaurant and shop runs counter to the zoning objective in its location, scale and use (neither being directly linked to the heritage value, not in existing premises).

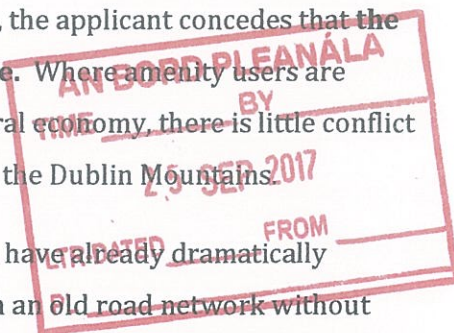
## 2. Adverse Impact on Zone RU: "To Protect AND Promote Rural Amenity AND To Provide for the Development of Agriculture."

The Dublin Mountains are under intense pressure for development. The M50 provides a boundary and encroachment of development beyond that boundary into the foothills of the mountains as proposed in the subject case would set an undesirable precedent that would undermine the principle and entire rationale for the agricultural zoning objective on farmland contained within the South County Dublin development plan.

The zoning of the Dublin Mountains is designed to protect rural amenity **and provide for** agricultural activity within this sensitive landscape. In the summary of the relevant portions of the SDC Development Plan in Section 2.3.3, the applicant concedes that the **compatibility of these two objectives relies on scale**. Where amenity users are limited in number and managed by the local agricultural economy, there is little conflict between these two user groups. This is not the case in the Dublin Mountains.

Recent initiatives by the Dublin Mountain Partnership have already dramatically increased recreational use, and this exerts pressure on an old road network without provision for pedestrians, and other leisure users. Where much attention is paid to the protection and provision of amenity users within this landscape, there is scant attention paid to the protection and provision of agriculture in the adjacent fields bordering the site and within the local area (zone <sup>RS</sup> B). The models of partnership with local landowners <sup>referred</sup> mentioned in these plans, do not reflect the lived experience of the local farming community.

The continuation of farming activity in the Dublin Mountains is essential to the protection of all the soft targets for development: landscape, biodiversity, heritage, environmental sustainability. Essentially the integrity of this fragile ecosystem, so attractive to amenity users, is preserved and managed by farming. Farmers in the Dublin



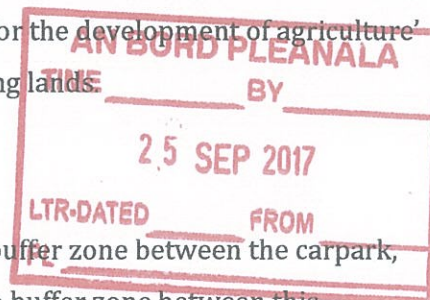
Mountains are predominantly under contract to farm in an environmentally sustainable manner through GLAS and its predecessor, REPS.

The encroachment of an essentially suburban / urban generated land use with a catchment area across Dublin within the agricultural zone brings with it all the attendant problems of disturbance and trespass.

On page xi, the applicant notes:

**"It is possible that increased usage of the site will result in an increase in nuisance and impacts to neighbouring land owners/farms, e.g. trespass and littering on their properties, and disturbance of animals."**

This admission is immediately discounted in a series of assertions without supporting evidence, or further consideration of how this development will impact on the zoning objective 'to protect rural amenity and to provide for the development of agriculture' which pertain to part of the site and the surrounding lands.



#### Site

The site is too constricted to provide an adequate buffer zone between the carpark, restaurant and the neighbouring lands. There is no buffer zone between this commercial leisure use and the neighbouring agricultural use, which is essential for agriculture to survive in this area.

The proposed increase in visitor numbers from 30,000 to 300,000, particularly urban day trippers with little knowledge of the countryside, directly threatens the viability of farming activity in the area in the following main regards.

1. Access: Inaccessible by public transport, the influx of coach and car traffic to the site impedes local residential traffic and farmers' access to fields. We contend that the proposed access arrangements to and from the site are unrealistic, and that the impact of traffic on current road-users within this narrow rural road network is detrimental to the continued safe operation of farming enterprises in the area.
2. Litter: refuse thrown directly into fields, or blown in from the hedges, already represents a direct hazard to livestock through ingestion and injury. There is no proper provision for increasing litter wardens, or providing refuse bins in the plans submitted.

3. Dogs: while dog attacks always represent a risk to livestock, this risk increases a hundred-fold with the numbers presented here.

4. Trespass: the damage caused to walls and fences, and livestock hazard, is consistently under-estimated by amenity users who enter private property once the lower slopes of the Dublin Mountains are marketed as primarily an amenity zone.

### **Uses Permitted in Principle / Open for Consideration Zone B.**

I contend that the construction of a destination leisure centre attracting 300,000 visitors, to a wide range of amenity activities on this one high profile site, far exceeds the definition of a café / craft centre defined as 'permitted in principle'.

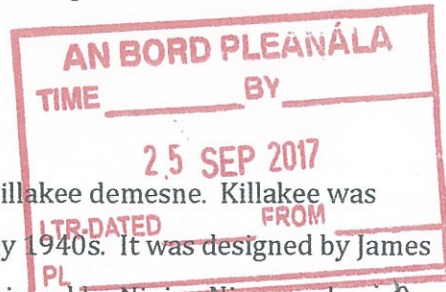
Uses shown as 'open for consideration' are uses which may be permitted where the Planning Authority is satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, which **would not have undesirable effects and would otherwise be consistent with the proper planning and sustainable development of the area.**

I contend that the provision of a large café on top of Montpelier Hill effectively suburbanises an area of High Amenity. Further the undesirable effects of increasing existing visitor numbers from 30,000 (the figure provided at public meetings by the council) to 300,000, on the adjacent areas zoned for the protection of agriculture and rural amenity is inconsistent with the sustainable development of the immediate local area.

### **2. Heritage.**

Massy's Woods is the Coillte name for the former Killakee demesne. Killakee was demolished by the Forestry Commission in the early 1940s. It was designed by James Gandon for Luke White, with elaborate gardens designed by Ninian Niven and with conservatory and fruit houses by the curvilinear glasshouse specialist, Richard Turner. Killakee developed a magnificent arboretum, the remnants of which can still be found in the exotic species listed on site. These gardens were a nineteenth century attraction to visitors on a par with Powerscourt.

I hold the photographic archive to the Massy Estate, dating from 1900 to 1914, and have informed the applicants of this fact. To date, none of the applicants have approached me to look for further information on this heritage.



The entire proposal shows no awareness of the rich architectural and horticultural heritage of Massy's Woods. No research has been done. The management programme outlined in 3.6.2 proposes to leave the walled garden as a ruin, save for the inappropriate and unambitious plan of making it a 'wildflower garden'. The entire thrust of the plans for this site are for standard recreational uses as would be found in any urban or linear park, with minimal structural repairs essential to ensure their safety. It might be expected that the state forestry service might recognise the educational and horticultural value of a site of this stature. The Lost Gardens of Heligan provides one sustainable model of visitor attraction to a garden of similar value and stature in Cornwall. Beyond proposing a minimal architectural survey of existing structures, the South Dublin County Council proposal for an interpretative centre pays no attention to, and does not propose to engage with, the heritage of this site. This is a lost opportunity and betrays the low standing, cynically accorded to the local and national heritage in the design of this commercially driven tourist attraction.

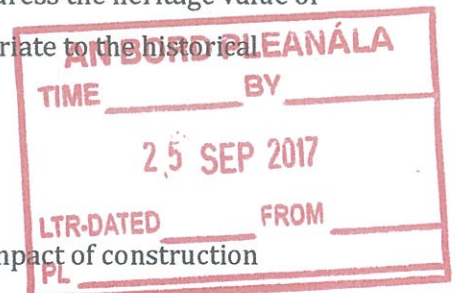
The proposed walkway linking Hell Fire Club and Massy's Wood is an ugly piece of decking that will detract from the visual amenity of the area and suburbanise an area of outstanding natural beauty.

In sum, I contend the plans for Massy's Estate inadequately address the heritage value of this site and that the landscaping plans proposed are inappropriate to the historical integrity of the Killakee demesne.

Hell Fire Club Archaeological Site.

I would also like to express my concern about the significant impact of construction works, and later visitor numbers, on the current and future excavations of the largest Neolithic passage tomb to be found in the Dublin area, just below the Hell Fire Club on Montpelier Hill. The construction of tourist facilities will limit the extent of future excavations at the site, and suggest that the proposal for a permanent 'interpretative' centre is premature when the findings of these recent digs are so recent and so promising.

**The zoning objectives put equal emphasis on the heritage and amenity values of High Amenity areas, yet here the amenity strengths of the proposal come at the cost of the area's architectural and archaeological heritage.**





#### 4 Traffic

SDCC has consistently refused planning permission for small-scale developments on Killakee Road. One such refusal by SDCC (Register Reference SD16A/0428) in 2017 stated that:

"The proposed development constitutes undesirable ribbon development on a substandard rural road network."

It is critical to note that this was in reference to a one-off small scale housing development.

This decision cannot be reconciled with a proposed development that foresees an increase from 100,000 visitors to 300,000 visitors each year within this same road network.

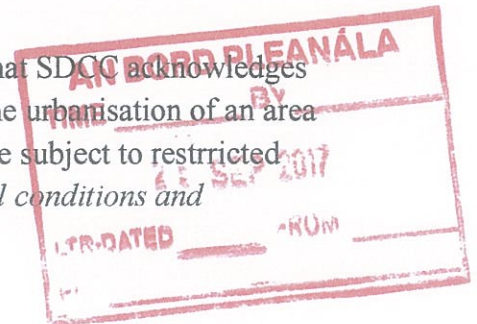
In addition, the impact of this development on the road network leading to the rear entrance of Massy's Woods at Cruagh – namely Cruagh Road / Edmondstown Road, and Tibbradden Road in Dun Laoghaire Rathdown – is inadequately considered in the account presented here.

Large scale housing developments near Gunney Hill are already causing strain on the narrow roads. High traffic volumes are already present at Killakee Rd and Mt Venus Rd during morning and evening rush hour. The plan for a further 10,000 housing units in the Oldcourt / Ballycullen / Scholarstown area will also put exponential pressure on the road network. Any plans to upgrade this road system will detract from the natural amenity of this area where hedgerows and old stone estate walls predominate and add significantly to the unique landscape character.

This is going to be exacerbated by the further narrowing of the road by the provision of footpaths and street lighting all the way down from the Hellfire to the current footpath/street lighting services down near Woodtown, going towards Stocking Lane and Scholarstown road.

The provision of additional lighting in this rural area negatively impacts on the visual amenity of the Dublin Mountains' Dark Skies, and will effectively aid the suburbanisation of this rural environment.

All of these proposed changes will impact negatively on what SDCC acknowledges is a "substandard rural road network" and will also lead to the urbanisation of an area that SDCC, in their own Development Plan, state needs to be subject to restricted development and show regard for "*pertaining environmental conditions and sensitivities, scenic amenity and availability of services.*"



In addition, I would like to voice my support for the points raised in submissions authored by Hendrik Van Der Kamp on behalf of local residents, and the local IFA objection.



Selina Guinness.

