

To : An Bord Pleanála

Re: Dublin Mountain Visitor Centre – Strategic Development Initiative

Location: Hellfire Club/Montpelier Hill/Massy's Wood

REF: JA0040

From : Elizabeth Davidson, Mount Venus House, Mount Venus road, Rathfarnham D16E429

As a long-time resident of the area and a habitual user of the amenities of the location site and in appreciation of the outstanding natural beauty and amenity of the Dublin Mountains, I make the following submission in opposition to the proposed development and for

the implications of the proposed development for proper planning and sustainable development in the area concerned

and

the likely effects of the proposed development on the environment

EPA guidelines on consultation with the public state that " To be of value....must be expertly structured to ensure clarity and consistency"

Any 'consultation' with locals and interested parties was completely random :

1. Coillte representative calling unannounced to an unrepresentative number of residents without an agenda or questionnaire or structured form of any kind.
2. Chaotic 'landowner' meetings which excluded stakeholders but admitted uninvited members of the public. Public Minutes for these meetings are inaccurate and have been challenged
3. Two day 'information meetings' in Tallaght Stadium which took no accurate record of attendees, had no methodology for capturing feedback, no timetable for attendance of representatives of organisations to answer questions
4. No acknowledgment of the thousands of letters sent to the Mayor of SDCC, and Daithi de Forge of Coillte in protest at the lack of consultation and asking for engagement.
5. Emails to the Council's dedicated email address econdev@sdcc.ie went unanswered

And yet the planning statement claims there is 'widespread support' from the public!

There are over 6000 signatories to petitions against this development

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Received: 21/09/17

Fee: € 50

Receipt No: B140154

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Site Selection

Despite the project being described as "small scale" in the planning application, The size and scale of this proposed development is such that it is no longer a local facility but of regional and national significance, in this circumstance it is wholly inappropriate that a scoping exercise was not conducted with the relevant Council bodies which border at this site: Dun Laoghaire Rathdown Council and Wicklow County Council

It is hard to understand why these bodies were not partners to this project, as well as Dublin City Council especially as it is an objective of the SDCC to liaise with Dublin City Council and Dun Laoghaire council on the subject of catchment areas.

these two councils should have been involved *ab initio* because of the Dodder catchment area affecting all three councils.

The fact that funding has been sought from a national agency indicates the ambition for the project outside of local interest

However on further reading the plan with reference to site selection it would appear that a set of preconditions existed which meant that no site would be suitable apart from the selected one.

SDCC Development Plan 2016-2022

Economics & Tourism Objective 8.1

"To support the sensitive restoration of heritage buildings and sites and operate flexibility with regard to the use of converted buildings to facilitate heritage tourism."

The rejection of Orlagh House as a site was simply based on the extraordinary notion of a WOW factor, as that site would have been more suitable as it is an existing historic building, has excellent car parking facilities, is close to a bus route, has public drainage, and access to the walking trails around the area.

The rejection of Orlagh was justified by the fact that there is currently no direct walking route to the Hellfire club, however in SDCC development plan 2016 to 2022 it is a specific objective to secure by means of a negotiation with farmers and landowners access to the wider network of trails. The fact that the current owner of Orlagh has secured such access is an indictment of the lack of genuine effort that went into the sourcing of an alternative site.

The purchaser of Orlagh has commenced business in the building which includes information, walking trails, and other health and well-being activities. All in a building with stunning views understanding aspect. The WOW factor is that this building was rejected.

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When the concept plans were reduced in size from the original 2000Sq metres, it was surely incumbent on the developers to see if a suitable existing building could be obtained

The Steward's house which is adjacent to the existing car park and to the road, has been used in the past as a restaurant and planning has recently expired for conversion of outbuildings. This building is currently in private ownership and is a listed building/protected structure. However it would not have been without the bounds of possibility for the council to have approach^{ed} the owner to see if some deal could be done. The fact that this building has an historic link with Massy's Estate makes it all the more suitable for use in this location. The building would benefit from an input of cash to refurbish and restore.

The Total fitness building in Sandyford is an existing building with stunning views over the city and located within a short walk of the Dublin Mountains/Wicklow\way is currently vacant.

The Glencree Centre for Reconciliation was approved by Wicklow county council as a Mountains Visitor Centre, this is only a short distance from the existing development site and has all the amenities which would be required: cafe/bathrooms/visitor shop/meeting rooms, and an authentic historical past

The location of Tallaght Stadium next to the Luas, with outstanding views of the mountains and large car park, could form an off-site location for a visitor centre.

There does not seem to have been any consideration of an off-site centre- such as in Newgrange or Stonehenge- where the archaeological site would not be compromised.

Zoning

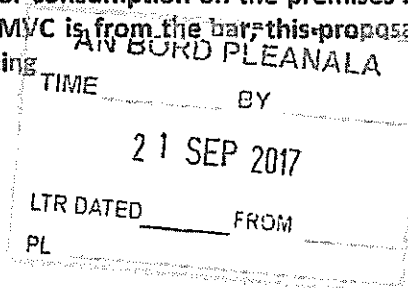
The zoning of the area is HA(DM,LV,DV) *"to protect and enhance the outstanding natural beauty and amenity of the Dublin Mountains Liffey Valley and Dodder Valley"*

This application breaches not only the zoning but also the objectives of South Dublin County Council development plan 2016 to 2022.

According to the Development Use classes related to Zoning Objective plans a restaurant is not permitted unless it is developed in existing premises. A restaurant is further defined as a building or part thereof which has ~~its~~ primary function of the serving of meals and refreshments for consumption on the premises.

As the largest part of this proposed building is a restaurant/cafe with a takeaway facility also this comes under the above description.

Similarly a public house defined as ' a building or part thereof... licensed for the sale of intoxicating liquor to the public for consumption on the premises'. As one of the revenue streams of the proposed DMVC is from the bar, this proposal is in further breach of the Development Plan Zoning



Under the zoning objective offices are not permitted, yet this development is to include the centre for the Dublin Mountains Partnership to be their headquarters and to run their operations from.

Car parking is to be limited to small scale amenity and recreation (see below) the proposal to extend the existing parking area to cope with 300 cars plus coaches and shuttle buses is directly in contravention of this objective

Table 11.12: Zoning Objective 'HA - DM': 'To protect and enhance the outstanding natural character of the Dublin Mountains Area'^a

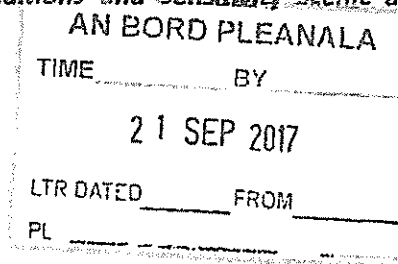
Zoning Objective 'HA - DM'	
Permitted in Principle	Agriculture. Car park ^{a,b} , Open Space.
Open for Consideration	Bed & Breakfast ^a , Cemetery ^a , Childcare Facilities ^a , Community Centre ^a , Cultural Use ^a , Doctor/Dentist ^{a,d} , Education ^a , Garden Centre ^{a,d} , Guest House ^{a,d} , Health Centre ^{a,b} , Home Based Economic Activities ^{a,d} , Hotel/Hostel ^{a,d} , Industry-Extractive ^{a,d} , Place of Worship ^{a,d} , Public House ^{a,d} , Public Services, Recreational Facility ^a , Residential ^{a,d} , Restaurant/Café ^{a,d} , Rural Industry-Food ^{a,d} , Sports Club/Facility ^a , Shop-Local ^{a,d} , Veterinary Surgery ^{a,d} .
Not Permitted	Abattoir, Advertisements and Advertising Structures, Aerodrome/ Airfield, Allotments, Betting Office, Boarding Kennels, Camp Site, Caravan Park-Residential, Concrete/Asphalt Plant in or adjacent to a quarry, Conference Centre, Crematorium, Embassy, Enterprise Centre, Fuel Depot, Funeral Home, Heavy Vehicle Park, Hospital, Housing for Older People, Industry-General, Industry-Light, Industry-Special, Live-Work Units, Motor Sales Outlet, Nightclub, Nursing Home, Office Based Industry, Offices less than 100 sq.m, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m, Off-Licence, Outdoor Entertainment Park, Petrol Station, Primary Health Care Centre, Recycling Facility, Refuse Landfill/ Tip, Refuse Transfer Station, Residential Institution, Retail Warehouse, Retirement Home, Science and Technology Based Enterprise, Scrap Yard, Service Garage, Shop-Major Sales Outlet, Shop-Neighbourhood, Social Club, Stadium, Transport Depot, Traveller Accommodation, Warehousing, Wholesale Outlet, Wind Farm.

^a In existing premises
^b In Villages to serve local needs
^c In accordance with Council policy for residential development in rural areas
^d Not permitted above 350m contour
^e For small-scale amenity or recreational purposes only
^f Directly linked to the heritage and amenity value of the Dublin Mountains
 *Note: The Division between the 'HA-DM' and 'HA-DV' zones occurs at Fort Bridge, Bohernabreena.

In order to circumvent the Development Plan there has been an attempt to portray this development as 'public good'. However it is clear from the business plan that this is a highly commercial (if initially unprofitable) project where one of the principal revenue streams is from charging schoolchildren for visits, which they can currently make for free.

ETS objective three SDCC Development Plan 2016-2022

To support the development of a visitors facility in or adjacent to the high amenity Dublin Mountains zone subject to an appropriate scale of development having regard to their pertaining environmental conditions and sensitivity scenic amenity and availability of services.



The scale of this development could not be described as "appropriate" as it proposes to increase the footfall by 310% and will impact severely on the environment and the amenity of the area

There is a lack of consistency in the descriptions of the proposed development-

The engineer's report page 1 describes the construction of "visitor centre building at Hellfire Woods (gross floor area: 96 6 m²) (Dublin Mountains visitor centre) to consist of two buildings side-by-side situated parallel to the existing Forest Road, at a level of approximately 300 m above sea level. They will contain basic facilities for walkers and casual visitors, seated cafe for 80 no. people and interpretation, exhibition and education facility. "

In drawing number 1639/page 004/8 and elevation of the building:

The front of the building is approximately 48 m with a height of 8.5 m. This will present an enormous facade in the landscape

the lower floor of the visitor centre is described as 396 m² the upper floor of the visitor centre 469 m² the rear visitor interpretation building 342 m² which is a total of 1207 Square metres when access areas are factored in (not 96 6 m²as above) which is a large industrial scale building totally unsuitable for the location. The building will dominate the landscape and be visible from The areas from which the view/prospects are protected.

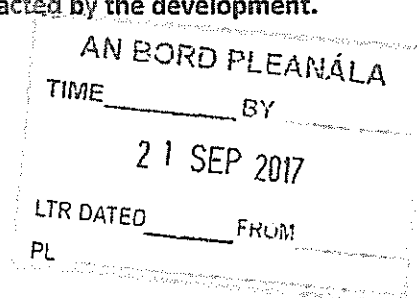
And to add to the confusion on p.24 of the business plan the building is now 750sq.m with a restaurant seating 75.

The large glazed area at the front of the building will reflect sunlight from early morning until late afternoon and will be visible similarly. Light escaping from this window, and with necessary security lighting will have an impact on wildlife particularly bat species.

As it is proposed to open the building until 8pm in summer 5pm in winter (according to the business plan) but with the possibility of corporate events and other profitable bookings to late night. This will mean there will be also artificial light visible from a wide area, and consequently light pollution in a rural area adjacent to farmland and livestock.

This can hardly be described as having regard to the scenic amenity of the area.

The Planning statement when describing local receptors does not include farmers whose livelihoods are likely to be impacted by the development.



Environmental impact

Human beings

Users of the woods and the local amenity of the hellfire club walk will be re-routed for a number of years during the construction phase and will also be limited in the hours which they can access the walk.

Many users come to the area in off-peak times: late evening, Christmas Day, New Year's Day, and solstice evenings. It is difficult to see the visitor centre/restaurant being open at these times, whether the car park will be is not clear, and this will have a negative effect on existing users. At Ticknock, the car park is closed when 'Zipit' is unattended and users

Existing users come to the area to escape from commercial activities and pressure. The wilderness is what attracts them and as visitors are currently car-dependent they are likely to go elsewhere to find it.

The landscape

The EIAR refers to significant and permanent changes to the landscape particularly at the entrance to Hellfire Wood , the trees to the left of the existing car park are destined to be removed by clearfelling, contrary to the stated policy of Coillte who at Ticknock have eschewed clearfelling in favour of selective removal of trees in order to mitigate the effect on the landscape.

SDCC Development Plan objective

TM7:3 'To ensure that car parking does not detract from the comfort and safety of pedestrians and cyclists or the attractiveness of the landscape.'

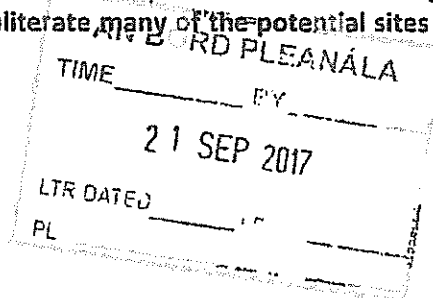
The introduction of the Corten steel footbridge to this rural and high amenity area is to urbanise visual aspect and degrade the area. The footbridge will need to be covered with safety wire in order to protect users and road users.

Material assets, including architectural and archaeological heritage and cultural heritage

EIAR

11.3.1.1 page 109

The archaeological treasures of the site had been described as on a par with Stonehenge and Bru na Boinne and are considered a potential World Heritage Site. Notwithstanding this it is proposed to obliterate many of the potential sites and to damage others.



A study which was commissioned last year from Abarta Heritage Neil Jackman Hellfire club archaeological research project opened up 2 small trenches in October 2016 and had a brief look at what they contained.

That this study was undertaken in three weeks and yet Niall Jackman reported the potential for further discovery is of a high archaeological significance.

It is noted that the above project has not yet reported final findings. The report is due to be launched in December 2017, so it is hard to believe that this planning application should have been made without the results of this important survey.

The above Project is more of a 'Time Team' approach rather than a serious survey, this is no way suggesting that Neil Jackman is not a serious professional, rather that the brief does not suggest that the clients were taking the matter seriously.

The proposal is to "clean up" the protected structure of the Hellfire Club and install security lighting et cetera without ascertaining e.g. whether in fact the construction of the club included orthostats from the original cairn.

The images of the standing stone (SMR#DU 026-021001) on page 203 and 204 of the EIAR illustrate the degradation of this site under Coillte's management. On page 20 for this stone is in an upright position in a publication dated 2006, The stone is now in a horizontal position having been knocked over by forestry machinery and no consideration given to its reinstatement although this has been recommended.

This is the area which it is proposed to put the "feature stairway to summit" inserting Corten steel and paving slabs into the hillside in this area where archaeological remains are yet undiscovered.

In the Architectural Report at 3.07 reference is made to the focal point of the Hellfire Club (incidentally incorrectly spelled throughout) with its history and inherited stories. Many of these stories are nothing more than 'bogeyman' tales, but the actual history of the Hellfire Clubs and the conduct of its members is not suitable material for schoolchildren with stories of prostitution drunkenness devil worship et al..

This proposal has the potential to be the Wood Quay of this century and I am asking An Bord Pleanala to reject it in its entirety.



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