

AN TAISCE – THE NATIONAL TRUST FOR IRELAND
SOUTH COUNTY DUBLIN LOCAL ASSOCIATION
PLANNING COMMITTEE

C/o Moret
Edmondstown Road
Dublin 16

AN BORD PLEANÁLA	
TIME _____	BY _____
21 SEP 2017	
LTR-DATED _____	FROM _____
PL _____	

9th September 2017

The Secretary
An Bord Pleanála
64 Marlborough Street
DUBLIN 1.

Re:- Ref. PL 06S. JA0040
Dublin Mountains Visitor Centre

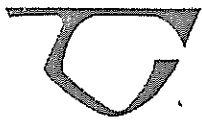
Dear Sir

We enclose herewith a submission on behalf of An Taisce for the above project.

We are not enclosing a fee as we are a prescribed body.

Yours faithfully

Patrick Leonard
Member, Planning Committee
An Taisce South County Dublin Assoc.



An Taisce
The National Trust for Ireland

**DUBLIN MOUNTAINS VISITOR
CENTRE
MONTPELIER HILL AND MASSY'S WOOD**

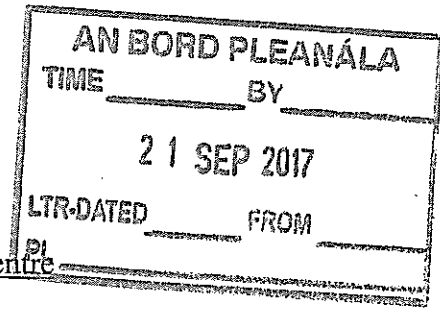
**Submission on behalf of An Taisce in
conjunction with the South County Dublin
Association of An Taisce**

Overall Concept

An Taisce would welcome enhanced public recreational access to the Dublin and Wicklow Mountains in particular to create improved walking routes. It is important to ensure that any intervention does not conflict with the ecology and landscape of the area. Any proposal for the Killakee/Hell Fire Club area should be part of an overall strategy for the Dublin and Wicklow mountains area, identifying, complementing and protecting the special character of the area. Despite the involvement of the Dublin Mountains Partnership (DMP) (which includes the Dublin City Council (DCC) and Dun Laoghaire-Rathdown County Council (DLRCC)), there is no evidence that this has been discussed with, and agreed by, the elected representatives of DLRCC, DCC or Wicklow County Council, all of whom have direct connections with the mountain area.

The objective of the proposal is to attract a great many more people to visit the mountain area, and enjoy its attractions. The disadvantage is that in so doing it would reduce the sense of remoteness and naturalness experienced by many visitors at present and create problematic traffic impact. However, the concept as presently suggested leaves large areas, including those immediately associated with the Hellfire Club itself, free of development, and experienced only by those with the will and energy to walk up the hill.

The establishment of additional trails up to the Hellfire Club is welcome. We also commend the proposal to open the area around the Hellfire Club by the removal of trees to the south and west, thereby increasing the visibility of the old building.



Visitor Centre

The Visitor Centre is the main built element of the proposals as they now stand. A number of issues are of concern to An Taisce.

Primarily our concern is whether the Visitor Centre should not be by adaptive re-use of the existing old Steward's House, rather than by building a new structure, which would certainly affect the views and prospects from the hill, and from below.

Siting. In any event, the proposed siting, on the hillside, is selected primarily, presumably, because it offers extensive views down to the north and the east. An Taisce is of the opinion that the siting (should the proposal for a new structure proceed) should be lower on the hill, closer to the car park, and to the upper end of the pedestrian bridge to Massy's Wood. Certainly, for wheelchair users, there would be considerable difficulties in accessing the Visitor Centre from the currently proposed terminal of the bridge.

Zoning issues. The area west of the Killakee Road is within the South Dublin County Development Plan, 2016-2022, under Zoning Objective "High Amenity – Dublin Mountains". Under the relevant regulations a Restaurant/Café, and "Shop-local" are "open for consideration, *if in existing premises*" (our emphasis).

The current proposals include the statement that "the restriction of restaurant/café and shop-local use to existing premises only, should not apply. These facilities are typical – and indeed necessary – for a visitor centre development as encouraged by Policy Objective ET5 Objective 3." That argument would have greater force if no existing premises had been available, but such is not necessarily the case, as outlined in the following.

Steward's House. Steward's House, situated close to and below the car park, and beside Killakee Road, should be reconsidered as a potential visitor

centre. The arguments against its use are not convincing. They are –

That the property is not within the ownership of SDCC or Coillte, and would have required a speculative purchase with public funds. Cost, of course, is a factor, and would have to be considered. But it is *possible* that the total cost of acquisition and conversion of an old property could be less than the building of a new. The Sliabh Gullion Visitor Centre, illustrated in the Design Report at 2.01, shows one example of period buildings and a courtyard used for this purpose.

“Not all of the development objectives of the applicant could be met by this site”. In particular, the absence of a view from the site is mentioned. However, walkers, for whom the project is mainly intended, would experience their views in any event.

“The property is occupied by protected structures”. True, and a certain constraint, but again, could be dealt with. It is preferable for heritage buildings, such as the stables at Steward’s House, should find a new use rather than be left empty.

“Constrained in size and in terms of road access”. Size might limit some of the objectives achieved in the current proposal. The scheme would certainly have to be tailored to deal with the available space. (Though, indeed, the available space, estimated at 921 square meters (so stated in Planning Application SD10A/0032), is comparable to the size of the Visitor Centre now proposed.) Access from the rear to the car park should cause no problem.

In sum, the use of the old house and its outbuildings as a visitor centre could limit, minimally, the extent of the development available in a new building, but in our opinion that disadvantage would be more than outweighed by the advantages of (a) a development-free hillside, and (b) the re-use of an old building for a new purpose. Furthermore, there would be no doubt that the re-use of the old protected building would conform with the zoning objectives of the Development Plan.

Pedestrian Bridge to Massy’s Wood

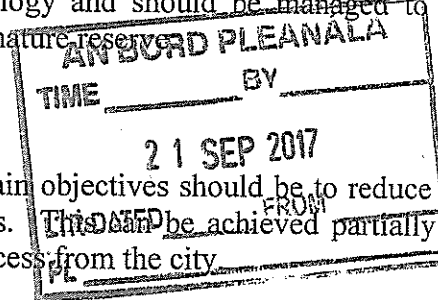
The concept is a very interesting one, but not essential to the scheme as a whole. We recommend its omission, for the following reasons: (1) Where it crosses the road it would require health and safety

screens or netting, which would be dominant and unattractive; and (2) it would draw many people into Massy’s Wood, some of whom might not be interested in or sympathetic to its environment. A specific crossing at road level, above the point at which vehicles enter the car park, would also have the effect of spreading the usage of people to the Massy’s Wood, but mainly those who would have a particular interest in walking in the woods or in their ecology, and would not be affected by many cars using the road above that point.

The heritage remains of the walled garden area have seriously deteriorated, and even if tidied up (which is envisaged) would not be particularly impressive. Massy’s Wood generally is an amenity available to those who want a quiet walk through trees, or to study the ecology and should be managed to the standard of a nature reserve.

Access

One of the main objectives should be to reduce the impact of cars. This ~~could~~ be achieved ^{FROM} partially by shuttle-bus access from the city.



It is undesirable to attract considerably more cars than at present, particularly at weekends; and taking account of the steepness and narrowness of the roads, including the pinch-point one way traffic on the R115 just below the Gunney Hill junction. The proposal should include measures to provide public transport access in line with Smarter Travel policy.

Shuttle-bus. In our view a shuttle-bus service on weekends operating, not only from Tallaght, but from the city centre is necessary. The proposals envisage a shuttle service operating from the Luas terminal, and a park-and-ride facility, in Tallaght with possible interconnections with Dublin Bus routes 15 and 15B in Ballycullen. This is unlikely to be used except by a minority of people. A direct service from the city centre would take less than half the time (the combined time of public transport from the city centre, plus shuttle bus), and would not require a change of vehicle.

As the proposals envisage this project to be a gateway to the Dublin and Wicklow Mountains, and the interpretative centre to have relevance to that larger area, it is suggested that some of the shuttle buses should extend their range beyond Montpelier into further reaches of the hills. *Inter alia*, this would encourage walkers from point to point serviced by the bus.

Connection with Dublin Mountains Way

As mentioned above, the concept of this being the gateway to the mountains would suggest that specific provision should be made for a pedestrian connection with the Dublin Mountains Way, not necessarily following the existing road route. (The Landscape Design Report suggests that this could be done at the southern end of Massy's Wood (Drawing 16508-2-402))

Management

Proposals for overall management seem to be poor. Dependence on voluntary input (e.g. Voluntary Rangers), even if provided by the DMP Volunteer Ranger Service, particularly in the colder winter months, is uncertain and risky. In our opinion the scheme should be conceived to operate independent of *voluntary* input, which, if and when available, could be used to enhance basic services.

Conclusion

We are generally in favour of the scheme, but with reservations:

1. Steward's House and outbuildings could be used as the Visitor Centre in lieu of building a new one on Montpelier Hill.
2. If Steward's House cannot be used then the proposed Visitor Centre should be placed at the same level as the upper car park.
3. As this project is intended to serve as an introduction to the Dublin and Wicklow mountains, there should be a specifically designed pedestrian route to the Dublin Mountains Way.
4. The pedestrian bridge access to Massy's Wood should be omitted and replaced by access at road level at the same spot.
5. Minibus access should be from the centre of Dublin city; and not only from Tallaght.
6. Massy's Wood should be managed to the standard of a nature reserve with the protection of its biodiversity as a primary objective.

