

*Hendrik W van der Kamp, MScEng, FIPI, MIEI*  
*Town Planner*  
*1, Woodstown Court*  
*Knocklyon*  
*Dublin 16*  
Tel: 087 2020387 E-mail: [hwvanderkamp@eircom.net](mailto:hwvanderkamp@eircom.net)

<b>AN BORD PLEANÁLA</b>
Received: <u>24/9/2017</u>
Fees: <u>€50 - card</u>
Receipt No: <u>B140545</u>

**Submission to An Bord Pleanála**

Submission to An Bord Pleanála relating to the implications for proper planning and sustainable development in the area concerned and the likely effects on the environment, of the proposal by South Dublin County Council to provide a proposed Dublin Mountains Visitor Centre. The proposed development is located at the Hell Fire and Massy's Wood forest properties in the Dublin Mountains. The planning authority reference number is JA0040.

The submission is made on behalf of 'Concerned Residents of Killakee', c/o Paul Feenan, 'Hammond House', Killakee, Rathfarnham, Dublin 16.

<b>AN BORD PLEANÁLA</b>
TIME <u>14.53</u> BY <u>Hend</u>
<b>25 SEP 2017</b>
LTR DATED _____ FROM <u>Sm</u>
PL _____

Contents

	Page
1 Introduction	2
2 Development Objectives Are Unclear and Ambiguous	3
3 Alternatives Have Not Been Properly Considered	4
4 Carrying Capacity of the Receiving Environment is Inadequate	5
5 Summary of Objections	7

# 1 Introduction

I have been instructed by my clients 'Concerned Residents of Killakee', c/o Paul Feenan, 'Hammond House', Killakee, Rathfarnham, Dublin 16, to make a submission on the proposal by South Dublin County Council to provide a proposed Dublin Mountains Visitor Centre at the site of Coillte's Hell Fire and Massy's Wood forest properties in the townlands of Mountpelier, Killakee and Jamestown in South Dublin. The planning authority reference number is JA0040.

The application is made by South Dublin County Council to An Bord Pleanála under Section 175.3 of the Planning and Development Act 2000 (as amended) for approval of the proposed project and the Environmental Impact Assessment Report (EIAR).

My clients are deeply concerned about the proposed development because of the fundamental and definitive changes that it will make to the fragile resource of both the Hell Fire and Massy's Wood forestry resources. My clients have lived adjacent to the site of the proposed development for more than 25 years and have intimate knowledge of the pressures on the environment caused by visitor numbers. However, it is their opinion that these pressures can be managed by an appropriate woodland management plan.

By reason of visitor numbers, necessary supporting infrastructure, traffic generation and general level of activity the proposed project will seriously damage the existing area in terms of its ecology, cultural heritage, landscape character, visual amenity and rural environment. The proposed development will change an existing rural amenity in the Dublin mountains into an urban generated tourist facility referred to in the documentation as a 'recreational hub'.

The design report states: ...*"the impacts of the proposed development on roads and traffic in and around the subject sites is expected to be minimal as a result of the proposed Dublin Mountains Visitor Centre development."*<sup>1</sup> Notwithstanding the proposed measures to improve traffic safety it is considered that the existing road is unsuitable to carry the projected volumes of traffic. This is evidenced by the need for widening of the road at pinchpoints, the introduction of private coach traffic and the proposed high frequency shuttle bus service.

The conclusions in the EIAR that the impact on visual amenity would be minimal is doubtful given the length of time it will take for the tree planting to mature, combined with the proposed 'skywalk' pedestrian footbridge which is visually alien to the area particularly during wintertime.

It is noted that the justification for the project in planning terms is solely on the basis of a county wide consideration whereas for a project of this scale it is arguable that a regional planning approach should be adopted. At a regional level the Dublin Mountains and Wicklow National Park form an integrated zone offering ecological assets and recreational opportunities. With the increased pressures resulting from the growing Dublin population and increased use of rural resources for recreation purposes, a regional approach to the most appropriate infrastructure should be considered. For example, should the approach be one of a 'cluster of facilities' where

---

<sup>1</sup> *Dublin Mountains Visitor Centre – Design Report*, Paul Keogh Architects, July 2017, page 20.

the pressures can be spread amongst a larger number of facilities rather than concentrating on a single or few locations? The EIAR suggests that the proposed project can be used by visitors in conjunction with other facilities in the area. However, it is not made clear how this will be done. Will visitors be expected to walk from the site to other sites for example?

There are three main reasons why the proposed development is fundamentally flawed. These three reasons have not been properly considered in the EIAR and can be summarised as follows:

- The objectives of the proposed development are unclear and ambiguous;
- Alternatives to achieve these objectives have not been properly considered;
- The carrying capacity of the receiving environment is insufficient to cater for the proposed development.

## 2 Development Objectives Are Unclear and Ambiguous

The EIAR is ambiguous about the nature of the proposed development in planning terms and the reasons for proposing it. It refers to four objectives<sup>2</sup>:

- To formalise and facilitate improved access to recreation facilities;
- To provide improved facilities, catering for a wider range of users and enhancing their experience;
- To establish a recognised hub or gateway for recreational activities;
- To reveal, interpret and protect the Dublin Mountains landscape, natural, cultural and archaeological heritage assets.

In addition to stating these development objectives the report also refers to the Design Report: .... "The motivation for the proposed development is explained in the Design Report."<sup>3</sup> The Design Report refers to the following vision as the reason for the proposed development:

..."The Dublin Mountains Visitor Centre development is founded on a vision that the history, landscape, heritage and amenity of the Dublin Mountains should be exploited as a resource for the enjoyment of the people of South Dublin and for visitors to the area from elsewhere in Ireland and abroad."<sup>4</sup>

The objectives that the proposed development seeks to achieve are therefore unclear and ambiguous. On the one hand the development objectives are centred on the management of visitors and protection of the protected structures and existing habitat while on the other hand they are centred on the creation of a hub or gateway for recreational facilities and the provision of an interpretative centre to achieve this. These objectives are different and will lead to different appropriate solutions.

<sup>2</sup> Environmental Impact Assessment Report, Vol. 1, Main Report, July 2017, p. 25.

<sup>3</sup> Environmental Impact Assessment Report, Vol. 1, Main Report, July 2017, p. 25.

<sup>4</sup> Dublin Mountains Visitor Centre – Design Report, Paul Keogh Architects, July 2017, page 7.

Furthermore, although not mentioned in the full text of the EIAR the summary of the EIAR also makes reference to ...*"enhancing the visitor's experience"* and ...*"widen the appeal of the site"*.<sup>5</sup>

Analysing the EIAR and the Design Report in relation to the objectives for the proposed development it is concluded that the EIAR does not distinguish between the first objective to facilitate improved access and facilities of the existing forestry resources and the second objective to build a recreational hub at the site of the existing forestry resources. These are separate objectives. The EIAR is flawed in that in describing the environmental impacts of the proposed development, it does not distinguish between the first development objective to improve access and facilities for the existing sites and the second development objective to create a recreational hub at this location.

Furthermore, the EIAR fails to elaborate on the reason or reasons why the visitor's experience needs to be enhanced and/or its appeal needs to be widened, as mentioned in the summary. My clients are of the opinion that neither Massy's Wood nor the Hell Fire Club need or would benefit from enhancing the visitor's experience. My clients are of the opinion that the experience of both Hell Fire and Massy's Wood forestry sites do not need enhancing and that man made attempts to achieve this could detract from the experience of both facilities. No supporting material is found in the EIAR why such enhancement would be desirable.

My clients are further of the opinion that the growth in visitor numbers needs to be managed and that some facilities may be necessary to achieve this. However, they consider that the site is not appropriate to create a recreational urban generated hub and that the EIAR does not provide sufficient supporting material to suggest that this location is appropriate for such a recreational hub.

### **3 Alternatives Have Not Been Properly Considered**

In terms of the consideration of alternatives which is a requirement for an Environmental Impact Assessment Report, the EIAR refers to the Feasibility Report that was carried out some time ago. However, this feasibility report looked at sites within South Dublin County Council that might be considered appropriate for the location of a Visitor Centre or Interpretative Centre. A proper EIAR should consider also alternatives that would manage the growth in visitor numbers (and possible need to provide facilities to accommodate this growth) but not create a recreational hub at this location. In other words, an alternative that would not be the 'do-nothing option' but rather a 'management option'. For situations where it is considered that the existing use (and expected increase in such use) of a rural amenity may result in damage to either the environment, the protected structures themselves or lead to traffic safety concerns, it is normal practice to adopt a 'woodland management plan' where the recreational use of a woodland site is managed by means of adequate parking provision, signage (if necessary) and trails (if necessary). No such woodland management option is considered in the EIAR.

---

<sup>5</sup> *Environmental Impact Assessment Report*, Vol. 1, Main Report, July 2017, p. xii.

A second weakness and significant flaw in the EIAR's consideration of alternatives is the lack of distinction between on-site visitor centres and off-site visitor centres. There is a comprehensive body of experience and literature available on the benefits of off-site visitor centres. For example, suitable off-site visitor centre facilities have been provided in the case of Newgrange in Co. Meath, while on-site visitor centres originally proposed by the Office of Public Works for Lugalla in County Wicklow and the Burren in County Clare were both rejected on planning grounds because of damage to the fragile environment that these centres sought to 'interpret'.

#### 4 Carrying Capacity of the Receiving Environment is Inadequate

The – to some extent contrasting and complementary qualities of the two wooded areas are very well described in section 10.3.1.7 of the EIAR:

...”Hosting an estimated 100,000 visitors a year, recreation and landscape amenity add a significant contribution to the character of the Hell Fire Forest property on Montpelier Hill, and is likely to do so even more into the future, owing to its proximity to Dublin city and its high visibility from its southern and western suburbs. Montpelier Hill offers the visitor a mini-mountain experience with a summit destination, forests, taster views to the mountains further south, panoramic city views and capacity to accommodate parking and other amenities in a relatively robust landscape setting. Along its extensive western face, the Hell Fire property's substantial and uniform coniferous forest can be particularly enclosing and dark, with little to attract many walkers, runners, cyclists or horse riders. Its perimeter trails to Piperstown Glen offer views to Killakee, and there are also views south to the Dublin and Wicklow mountains from the southern perimeter. With its own atmospheric network of trails and walks, Massy's Wood has a very traditional and much-loved, child-friendly sense of nature and romance of the “idyllic woodland.” This helps lend the woods a popular and timeless sense of place. This characteristic is further enhanced by the serene Glendoo Brook corridor, with its romantic ruins and the stories and lore behind them. Massy's Wood offers no real external views. Its broadleaved woods, whilst enclosing is also inviting to the walker to explore the woods off trail, as the Beachwoods, in particular, having little undergrowth.”<sup>6</sup>

The vulnerability of the protected structures to visitor numbers is clearly stated in the EIAR: ...”Increased visitor traffic in the Hell Fire Club and the various structures within Massy's Wood has the potential to cause increased wear and tear on these structures.”<sup>7</sup>

The principles of sustainable development and in particular sustainable tourism are that the carrying capacity of the receiving environment should be taken as a starting point in defining the scope for growth in visitor numbers. The principle of ecosystem services illustrates this: the ecosystem provides the biodiversity, woodland ecology, flora and fauna and water management on the site. The ecosystem services also include the cultural value and recreational amenity that the sites offer. The ecosystem however also determines how much pressure can be accommodated. Where the

<sup>6</sup> Environmental Impact Assessment Report, Vol. 1, Main Report, July 2017, p. 157.

<sup>7</sup> Environmental Impact Assessment Report, Vol. 1, Main Report, July 2017, p. 262.

capacities are exceeded the ecosystem can suffer which ultimately results in an unsustainable form of development.

The carrying capacity should be defined in the receiving environment section in the EIAR. However, this section fails to note the fragility of the resources. This is notwithstanding the observation in the EIAR about the sensitivities of Massy's Wood: *... "Massy's Wood is classified as being of High Sensitivity reflecting its broadleaved woodland amenity character, with a strong biodiversity function, numerous heritage features and ruins and its distinctive romantic and magical character."*<sup>8</sup>

It is suggested by South Dublin County Council that the need for the proposed development arises from the visitor numbers to the amenity areas and the need to accommodate this in proper way. An example of this is the need to provide adequate car parking facilities to avoid haphazard parking on the roadside. However, the Board made it clear in its screening assessment of the proposed development for EIA, that the proposed development is intended to significantly increase the visitor numbers to the sites of both Massy's Wood and the Hell Fire Club both of which comprise protected structures.<sup>9</sup>

The EIAR states: *... "The Business Plan prepared by CHL estimates that over a five year period after opening, the facility could achieve annual visitor numbers of 225,000 (made up of 'domestic amenity' i.e. local visitors, domestic tourists, international tourists, schools and corporate groups), with this number possibly growing further to 300,000 over the subsequent five year period."*<sup>10</sup>

*... "The Business Plan for the proposed development is estimated to attract approximately 300,000 visitors per annum, 10 years after construction, which is an approximate 3 fold increase in the current visitor numbers to the site at the Hell Fire Wood. This would amount to 200,000 new visitors in addition to the existing 100,000 visitors."*<sup>11</sup>

The increase in visitor numbers is also obvious from the expansion in car parking facilities: *... "The extended car park will provide 200 additional spaces on top of the existing 75 spaces."*<sup>12</sup> In addition, five bus parking spaces are proposed while the scale of the proposed increased intensity of visitor traffic is also clearly illustrated by the proposed shuttle bus initiative: *... "This shuttle bus service will operate 7 days a week year round, with a frequency of 15 to 30 minutes according to varying seasonal and daily demand. A public transport operation licence will be required from the National Transport Authority for this service, which will determine details such as fares, capacity and operating hours. The potential demand for the bus service is determined later in this report as part of the overall transport demand assessment. The estimated journey time is 12 to 15 minutes at an average speed of 30km/h to 40km/h. Two vehicles will be required for a 15 minute frequency service."*<sup>13</sup>

<sup>8</sup> *Environmental Impact Assessment Report*, Vol. 1, Main Report, July 2017, p. xvii

<sup>9</sup> *Environmental Impact Assessment Report*, Vol. 1, Main Report, July 2017, p. 3.

<sup>10</sup> *Environmental Impact Assessment Report*, Vol. 1, Main Report, July 2017, p. 38.

<sup>11</sup> *Environmental Impact Assessment Report*, Vol. 1, Main Report, July 2017, p. 297.

<sup>12</sup> *Environmental Impact Assessment Report*, Vol. 1, Main Report, July 2017, p. 298.

<sup>13</sup> *Environmental Impact Assessment Report*, Vol. 1, Main Report, July 2017, p. 286.

While the carrying capacity is exceeded as a result of the entire project, the problem can be illustrated most clearly by concentrating on the vulnerability of Massy's Wood. My clients are particularly concerned that insufficient attention is given in the EIAR to the difference between the west side and east side of the regional road. To the west is the Hell Fire Club and this is where the car park is located. My clients have observed over the years that most of the visitors who come by car will only visit the Hell Fire Club and only a small number will visit Massy's Wood. This is not denied in the EIAR. However, the proposed development aims to link the two resources together by providing the pedestrian bridge. This is likely to significantly increase the visitor numbers to Massy's Wood at an even greater rate in relative terms than is expected for the development as a whole. In other words: while the overall increase in visitor numbers is planned to be threefold (from 100,000 to 300,000 per year) the increase in visitor numbers to Massy's Wood could be five or six fold compared to the current situation.

My clients are concerned about this and consider that this has not been sufficiently considered in the EIAR because Massy's Wood is a fragile piece of woodland. It is likely in their opinion that the woodland will not be sufficiently robust to withstand such an increase in visitor numbers. It is contrary to the proper planning and sustainable development of the area to facilitate (and indeed encourage by providing the skywalk facility) such a large concentration of visitor numbers on a relatively small piece of vulnerable woodland. This is particularly inappropriate in planning terms and contrary to the common good, because there are so many other woodland areas in the Dublin mountains that can accommodate visitors and are less vulnerable in ecological terms.

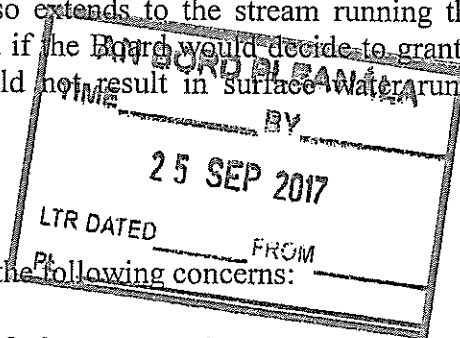
Examples of the fragility of Massy's Wood are that it is sensitive to damage when trees are being felled in the Hell Fire grounds on higher ground and the fact that the proposed project proposes to introduce horse riding into Massy's Wood. My clients note and draw the attention of the Board to the fact that the EIAR suggests incorrectly that there are existing equestrian trails in Massy's Wood. This is not the case.

The vulnerability of Massy's Wood also extends to the stream running through it. This stream should not be culverted and if the Board would decide to grant approval for the proposed development, it should not result in surface water runoff to be disposed of into the stream.

## 5 Summary of Objections

In summary, the submission is based on the following concerns:

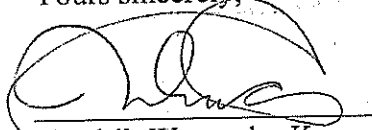
- The development objectives of the proposed project are unclear and ambiguous as insufficient distinction is made between: (i) the objective to manage visitor numbers and (ii) the objective to create a recreational hub at this location.
- Neither Massy's Wood nor the Hell Fire site would benefit from 'enhancing the visitor's experience' or 'widening its appeal' and the evidence for this statement in the summary of the EIAR is lacking.



- Alternative options to achieve the development objectives have not been properly considered because a woodland management strategy to deal with a growth in visitor numbers but not create a recreational hub, was not included.
- A significant flaw in the EIAR looking at alternatives is the lack of distinction between on-site and off-site visitor centres where off-site visitor centres are provided at a location some distance from the actual resource in order to protect that resource.
- The carrying capacity of the receiving environment is inadequate to accommodate the increase in visitor numbers that would arise from the creation of a recreational hub. This is best illustrated by the vulnerability of Massy's Wood and the significant pressures in terms of visitors that would arise from the overall growth in visitor numbers combined with the improved access to Massy's Wood for pedestrians.
- The existing road is unsuitable to carry the projected volumes of traffic and its character will change from a rural road to a suburban access road requiring a footpath and public lighting.
- Having regard to the length of time that the proposed tree planting will require to mature and the size and height of the proposed buildings and footbridge walkway, it is considered that the proposed development would have a detrimental impact on the visual amenity of the rural area.
- The choice of a location or locations for recreational facilities in the Wicklow National Park and Dublin mountains, should be considered at regional level rather than at the level of South Dublin County Council.

Please direct all correspondence to the undersigned.

Yours sincerely,



Hendrik W van der Kamp.

