

The Secretary
An Bord Pleanála
64 Marlborough St
Dublin 1

AN BORD PLEANÁLA	
Received:	21/9/2017
Fee:	€50 cash.
Receipt No:	B1A0460

Date:

AN BORD PLEANÁLA	
TIME	15.16 BY hand
21 SEP 2017	
LTR-DATED	_____ R/M SR.
PL	_____

RE:

Development	Dublin Mountains Visitor Centre-Strategic Development Initiative
Location	Hellfire Club/Montpelier Hill/Massy's Wood
Applicant	South Dublin County Council
Reference Number	JA0040

Dear Sir,

I would like to object to the above development.

My Name is:

Rodney W. Senior

My Address is:

32 CRANNAGH CASTLE
RATHFARNHAM
DUBLIN 14

I submit that this development is contrary to sustainable development, principles of proper planning. I also contend it is contrary to the SDCC's Development Plan, including its objectives and policies. I believe that it is a development which is both contrary to the current land-use/zoning of the area and which is also unsustainable/detrimental to the overall ecology/environment of the area.

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

Enclosed please find a payment of EUR 50 in respect of the Objection Fee.

Yours Faithfully,

Rodney W. Senior

21/9/17

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Reasons to Object

I wish to comment on the above referenced Development under the following headings and in the order set out below:

- **Zoning**
- **Ecology**
- **Archaeology/Architecture**
- **Sustainability/Amenity**

Zoning Issues

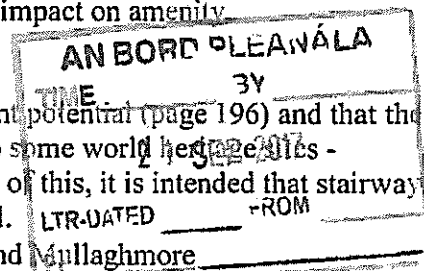
- The development is in a high amenity area which is also in close proximity to agricultural zoning. The prospects (view etc.) are also protected.
- Cafe/restaurants are only to be considered in the context of existing premises. This is not the case here. The reference to this site being necessary for a "wow" factor is something which is not recognised in planning law. It is subjective and the reality is that there a number of sites on the surrounding areas with a good if not a spectacular view. E.g. Ticknock/Orlagh/Glenree are all existing buildings/developments with acknowledged and prominent views.
- Given that the EIAR readily admits that all proposed changes will be permanent and primarily will be moderate or greater in terms of severity of impact - it is essential that utmost care be taken.
- We have serious concerns regarding the site selection process – too narrow with some sites ignored and not an independent process.

Ecology

- The EIAR is generally deficient in respect of ecology. The mapping of bird and mammal life generally is either non-existent (in the case of birds) or vague/incomplete (mammals). It is also noteworthy that in relation to biodiversity there is no real sense of Massy's Woods as being fully separate from the Hellfire.
- There can be no argument over the serious impact upon the ecology. SDCC is clearly ready and willing to sacrifice protected species and their habitats e.g. Red Squirrels, Badgers etc; that this destruction will be undertaken simply for a commercial use - coffee shop/restaurant is simply disproportionate and clearly a massive over-intensification of use which will also significantly impact on amenity.

Architecture/Archaeology

- The EIAR makes it clear that the site has significant potential (page 196) and that the site at Montpelier Hill is considered comparable to some world heritage sites - Stonehenge is mentioned at page 200. Despite all of this, it is intended that stairways be put in the middle of this archaeological material.
- It should be noted that at places like Newgrange and Mullaghmore interpretative centres are placed some distance away from the actual site that is being interpreted or in a nearby town/village so as to maximise the economic potential e.g. Rathfarnham Village or Tallaght Village where public transport is already provided for. We further note the general comments below in relation to the actual centre in any event. The site has no real public good/interpretative value. It is primarily a restaurant. All of the public spaces are seen as being of commercial value.



Sustainability/Amenity

- A large part of the funding is coming from Failte Ireland funds which are aimed at large scale commercial activities. Sustainable in that sense is clearly linked to financial sustainability.
- The Business Plan and Planning Statement make conflicting references as to the importance of commercial activity.
- The reality is that a threefold increase in visitors will be sought. There is no Woodland Management Plan or other ongoing control/monitor to ensure the sustainability of the existing environment. The precise references to the types of tourist sought (*Culturally Curious* and *Social Energisers*) in the business plan contrasts markedly to the issues within the ELAR in relation to Biodiversity etc.
- It is extremely worrying that SDCC have no Biodiversity Plan in place and they have no dedicated Biodiversity Officer unlike other Dublin Local Authorities.
- There has been significant confusion demonstrated by SDCC and Coillte to date. They have sent letters to Wicklow County Council and Dun Laoghaire Rathdown County Council about engagement but never once looked to engage with them to find a more suitable site in the whole range of the Dublin Mountains. There is no sense of partnership with other local authorities and no joined up thinking.
 - E.g. One: Within Wicklow County Council Area there is Glenree; it was approved as a visitor centre in 2007-2008
 - E.g. Two: Within DLR County Council there is Ticknock, a vacant site (former Total Fitness Gym) with amazing views which is within a 5 minute, minibus ride of Ticknock/Three Rock. We note that Glenveigh National Park uses a similar 'park and ride' approach to their national park.
- References to preserving the landscape and fauna/flora sit beside the reality of significant negative impacts on the overall environment and visual panorama and the planned destruction of habitats of protected animals -red squirrel and badger. Archaeology that is compared to Stonehenge and World Heritage Sites will be intersected/overridden by stairs for the purposes of tourism.
- SDCC has consistently limited development in this area because of the limitations of the road infrastructure and the overall environment and now plans a threefold increase in footfall - most of which will be casual tourism with no real vision for real education and sustainable development.

Additional Reasons/Comments:

1) IMPACT ON THE PRIVACY etc OF LOCAL RESIDENTS. (A ^{NOT} WITHIN TERM OF ENVIRONMENTAL IMPACT ASSESSMENT REPORT (ELAR) in the ELAR).
2) DANGEROUS POSSIBILITY OF UNCONTROLLED, UNREGULATED COMMERCIAL DEVELOPMENT.
3) I REQUEST AN ~~AGREE~~ HEARING ORAL IN THIS MATTER BY AN BORD PLEANALA.
Rgds Rodney W Sewell
DIRECTOR DARWIN HOUSE MANAGEMENT

