

Michael Fewer Dip Arch F.R.I.A.I. (ret)

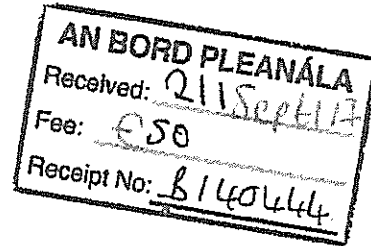
15 Glendoher Road, Rathfarnham, Dublin 16

The Secretary

An Bord Pleanála

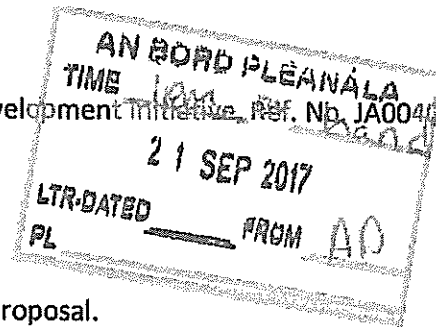
64 Marlborough St

Dublin 1



Date: 13<sup>th</sup> September 2017

RE: Dublin Mountains Visitor Centre-Strategic Development Initiative Ref. No. JA0044



Dear Sir,

I would like to object to the above development proposal.

I submit that this development is ill-conceived, poorly realised, and contrary to sustainable development and the principles of proper planning. It is also contrary to the SDCC's own Development Plan, its objectives and policies, and in terms of current land-use /zoning of the area. It is clear, on examination of the submitted documents, that the proposal is unsustainable in its present form, and seriously detrimental to the overall ecology and environment of the area.

I wish to comment on the above proposed development under the following headings:

- Zoning
- Ecology
- Archaeology/Architecture
- Sustainability/Amenity
- Traffic
- The broader issue of development in the Dublin/Wicklow mountain area.

#### Zoning

- The development covers two zones, one zoned as a high amenity area and one zoned for agriculture.

- Under the terms of the development plan, facilities such as cafés and restaurants in a high amenity area are only considered in the context of using existing premises. This is not the case here. The reference to the view from the site having a 'wow factor', as alluded to in the proposal, sums up the cultural deficit of the proposal. The 'view' out over Dublin and its Bay, referred to in the proposal, exists, and always has: this development will do nothing to improve it. There are a number of more appropriate sites on the surrounding areas for an 'interpretative centre', all with views, such as the former gymnasium building at Ticknock, the heritage house at Orlagh, or even the Glencree Reconciliation Centre, approved as a visitor centre in 2007-2008. Consideration should also be given to nearby established centres such as Tallaght or Rathfarnham. Rathfarnham, at the beginning of the Military Road that gives access to the mountains, is the most ideal for such a development, possibly in Rathfarnham Castle, but this of course is not in Dublin South County. It seems clear that the site selection process was limited, rushed and blinkered, with insufficient local consultation, and little reference to, or co-operation with, the adjacent local authorities on such an important matter, a matter that has broader implications than just Dublin South County's unwise urge for a 'keynote development'.

### Ecology

- The EIAR readily admits that the proposed changes will be permanent, and moderate or greater, in terms of severity of impact. The ecology of this already vulnerable and neglected area needs appropriate protection and upgrading, not severe impact. The EIAR is generally deficient, and in terms of the potential impact of this development, seriously inadequate. Uninformed lip-service is paid to the ecology of the area, consisting of not much more than an incomplete list of fauna, with no analysis of fauna status or potential risks to fauna, other than the admission that red squirrel drays being destroyed, and badger setts removed.

### Architecture/Archaeology

- The EIAR in the proposal makes it clear that the site has significant potential (page 196) and is considered comparable to some world heritage sites - Stonehenge is mentioned at page 200! Despite this, the development proposed completely ignores potential and actual archaeological sites on the hill that I have pointed out in my writings and my correspondence to the councillors (particularly the possibly Bronze Age site on the eastern slopes, see on next page, covering the east slopes with buildings, car parks, and a myriad of new paths and tracks.

### Sustainability/Amenity

- I have lived in this area for over forty years, and have researched and written two books about it, one on the Wicklow Military Road, and the other about Hellfire Hill, so I believe I know a little about the area. The Dublin and Wicklow Mountains require no 'gateway', as the development is referred to by the applicants. It is my considered opinion that the vast majority of 'visitors' (I use the term much used by

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the applicant) drive up the Military Road ( the R115) and pass by Hellfire Hill with no interest in stopping there. They are intent on reaching the broader and beautiful mountain wilderness that is a little more than a kilometre farther on, and using the glorious promenade that is the Military Road to carry on to Glendalough. I don't believe that the establishment of a new restaurant/café with associated carparking, toilets, etc. will attract sufficient 'visitors' to make it economically sustainable. There is, a couple of hundred metres from the proposed development site, a very successful, small scale, privately-owned café, with carpark and toilets; it would be seriously impacted by any new development.

SEP 2017

LTR DATE: FSCW



The eastern slope of Montpelier Hill, taken in the early 1950s before tree planting. A number of possible archaeological sites can be seen, particularly the earthen ring below the standing stone that still exists on the direct path to the top.

- I understand that SDCC have neither a Biodiversity Plan nor a dedicated Biodiversity Officer. Hellfire Hill and Massey's Woods have been long neglected by Coillte, whose husbandry of the lands has been abysmal, up to and including the present. I could find no indication of any meaningful study having been carried out of the existing biodiversity, or any indication that, after the development takes place, a continued monitoring of and care for, these very vulnerable landscapes.
- References in the application to the intention to 'preserve' the landscape and fauna/flora ring hollow: such a physical development/constructed footprint on a landscape cannot but destroy the natural semi-wilderness that exists there. We know that the existing ecology, from the tiniest insects to the more visible plants and animals, will be permanently obliterated, with untold far-reaching effects on the rest

of the hill, beyond the damage to the squirrels and badgers that the applicant admits will occur.

- It is becoming accepted that tourism development, without adequate and appropriate control, can be seriously destructive of what it is trying to sell.

#### Traffic

- The R115 is a winding, and very scenic country road, enclosed by woodland and the occasional house, leading out onto the Featherbeds. Roads like this, so different to the fast, broad, frenetic urban carriageways of the city, are a joy to follow, and an important and restorative amenity in themselves.
- SDCC has consistently limited development in this area because of the limitations of the existing road infrastructure and the overall environment, yet they now propose to attract an exponential increase in traffic.
- To deal with this traffic they propose reducing the width of the existing winding road by the inclusion of a footpath and a cycle lane.
- On this fundamental matter alone, their application must be seen as a non-starter.

#### The broader issue of development in the Dublin/Wicklow mountain area.

- The Dublin and Wicklow Mountains, of which Hellfire Hill and Massey's Woods are a small but important part, are a geographic unit, the long term sustainable and sensitive management of which requires an in-depth and comprehensive study by all the relevant local authorities, in co-operation. This piecemeal development should not be considered until after such a comprehensive study is carried out; it is, at best, premature and ill-advised.

I enclose the appeal fee of 50 euro.



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