

4 Redwood Lawns,  
Kilnamanagh,  
Tallaght,  
Dublin 24.

The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1.

07-01-2018

AN BORD PLEANÁLA	
TIME _____	BY _____
08 JAN 2018	
LTR DATER _____	FROM _____
PL 065: JA0040	

Re: Proposed Dublin Mountains Visitor Centre at Killakee Road, Rathfarnham.  
Bord Reference: 06S.J0040

Dear Secretary,

We wish to make the following Observations and Submissions in response to the Further Information response by South Dublin County Council.

Yours sincerely,

Hilary Wallner

~~Dwd Conn~~

Sinead Ni Bhrain

Dermot Connolly

Jonathan Bay

RESPONSE TO FURTHER INFORMATION SUPPLIED BY  
SOUTH DUBLIN COUNTY COUNCIL.

Re Proposed Dublin Mountains Visitor Centre off Killakee Road, South Dublin.

An Bord Pleanála Reference Number : 06S.JA0040

We believe that both Appendices namely Appendix A-DMVC Summary of Submissions and Appendix B-DMVC Responses Biodiversity Theme to this report should have been paginated to assist readers in understanding this report.

Should An Bord Pleanála decide to grant permission for the proposed development against our recommendation to refuse permission we would urge Bord Pleanála to condition in the requirements and desirable changes sought by the Department of Culture Heritage and the Gaeltacht and Inland Fisheries Ireland.

Having read Appendix B, we are dismayed to see references from the applicant to an “ecological clerk of works” who seems to be a scarce species and it is not clear what qualifications he/she will have. There is also to be a “preconstruction survey” which will involve a “contractor's ecologist” (See Page 11 of the Response to Further Information). Who is that person and what role will he/she have in relation to this project? We are concerned that all these layers of activity will result in a very uneven approach to serious nature conservation issues.

#### 10.2 VISUAL IMPACT :

We note the reference to Dermot Deering on pages 21/22 of the response to Further Information supplied by South Dublin County Council. We disagree with the statement made on Page 22 that “Visibility and prominence does not imply an effect that is adverse, and the visitor centre must be seen as part of an integrated architectural and landscape composition involving the reimagining of the slopes of Montpelier Hill as a permanent broadleaved woodland with a new building sensitively nestling within the trees acting as an invitation to visit.” This represents the triumph of imagination over reality.

#### 11.0 ROADS, TRANSPORTATION AND TRAFFIC IMPACTS :

This section concludes (Page 25) with the claim that that the proposed site at Hell Fire Wood was chosen as the most suitable location yet neglecting to inform us that it was the only one available from the South Dublin County Council/Coillte “partnership” but concludes with the claim that “while enabling a true sense of altitude to provide spectacular views across Dublin City and the northern end of the Dublin and Wicklow Mountains massif.” This view will be primarily over Dublin City.

#### 12.0 PRINCIPLE OF THE DEVELOPMENT AND POLICY SUPPORT :

In short the argument advanced here can be summarised as “The proposed development is entirely policy driven”. Given the unequal “partnership” relationship between the 3 parties South Dublin County Council will have to bear almost all the costs with little chance of recouping any of these costs unlike Coillte which provides the land for free but recoups all other costs from the outset. It is strange for the applicant's to be claiming that :

“As a result of the existing use there are problems with the site including traffic congestion and parking problems, erosion of trailst ,vandalism of architectural heritage and deterioration of heritage through active management and anti-social behaviour-all of which can be successfully addressed by improved site management, which will be directly facilitated by the development.” The reality is likely to be more complex and there are problems there that the applicant is unable to solve such as providing directional powers for the voluntary DMP Park Rangers.

RESPONSE TO FURTHER INFORMATION SUPPLIED BY his SOUTH DUBLIN : Page 2 :

12.1 COMPLIANCE WITH PLANNING POLICY AND ZONING OBJECTIVES :

We note that the applicant has not addressed the point made in our submission to An Bord Pleanala of 25 September 2017.

This is clearly contrary to previously commissioned reports such as that of Landscape Character Assessment produced by Minogue&Associates as a draft report for South Dublin County Council in May 2015 who warned on Page 90 regarding Landscape Character Assessment Area 4 River Dodder to Glenasmole Valley that its Landscape Capacity to absorb further development was : NEGLIGIBLE. Key characteristics of the landscape are HIGHLY VULNERABLE TO DEVELOPMENT. Development would result in a significant change in Landscape Character and should be AVOIDED if possible.

