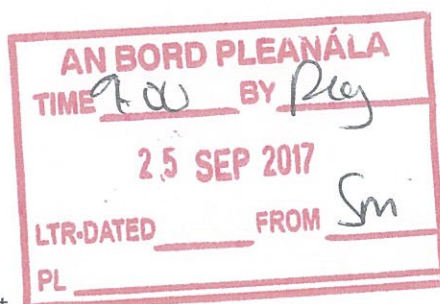
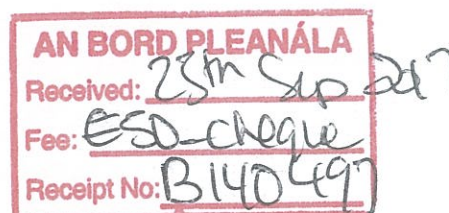


Irish  
Georgian  
Society



An Bord Pleanála  
64 Marlborough Street  
Dublin 1



Date: 25<sup>th</sup> September 2017

Re: Application 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 'Dublin Mountains Visitor Centre' development at Coillte's Hell Fire and Massy's Wood forest properties (totaling c.152 ha) in the townlands of Mountpelier, Killakee and Jamestown in South Dublin. Development is also proposed along stretches of the R115 and R113 regional roads connecting the site to the urban area of Woodtown and Ballycullen to the north.

An Bord Pleanála Ref.: PL06S.JA0040

Dear Sir,

The Irish Georgian Society of City Assembly House, 58 South William Street, Dublin 2 wishes to make a submission on Application 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 'Dublin Mountains Visitor Centre' development at Coillte's Hell Fire and Massy's Wood forest properties (totaling c.152 ha) in the townlands of Mountpelier, Killakee and Jamestown in South Dublin (ABP Ref. PL06S.JA0040). To that end, we enclose payment in the sum of €50.00, as payment of the submission fee.

Much of Ireland's most distinguished architectural heritage is to be found in its landscapes, whether it be National Monuments or protected structures, ecclesiastical buildings and ruins or country houses, whether grand or modest in scale. What is distinctive for all of these structures is their siting and setting. Their associated lands and/or demesnes had been designed, elaborated, planted and inhabited to enhance the setting. Rivers, loughs, hills, magnificent valleys and mountains are all engaged and embraced whether as framed views or as elements within the designs.

The gardens and designed landscapes of the 17th through to the 19th century were extensions of the plan of the house, to be experienced through all the senses as one inhabited outside spaces

or moved along walks or rides. House and landscape were often a single coherent design. Ancient monuments and sacred places along with ruins and churches have been engaged in a visual dialogue across the land with country houses and their designed landscapes, each renewing their importance and redefining their significance.

In the attendant landscapes of country houses, ancient woodlands have been greatly valued. Individual groups of trees, avenues, boundary zones and new woodlands have been planted for both utility and amenity value. They have created microclimates, providing shelter for buildings and productive land. They have heightened the experience of the setting, and they have composed views, framing significant natural and manmade features. Natural watercourses and features were augmented with man made versions for utility and beauty and water was managed for supply and productivity in a way that contributed to the landscape. These landscapes, large and small, along with the fields enclosed with walls or banks and planted with hedgerows that now contain mature trees, all coalesce to make collective creations of singular importance.

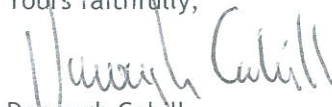
However, the application does not include any comprehensive analysis of the historic landscape (including the designed landscape of the Massy estate). It is critical that any development of these lands be informed by a comprehensive assessment of the sensitivities and significance of the historic landscape. Failure to ensure that an analysis of the historic landscape forms the basis for the design of the proposed development would seem to be odds with the objective of the proposed development to provide for heritage interpretation.

Moreover, in the absence of a comprehensive assessment of the likely impacts of the proposed development on the historic landscape and on the relationship of the historic structures on the site to their landscape setting, it is respectfully submitted that the Environmental Impact Statement is not consistent with the requirements of the *Guidelines on the Information to be Contained in Environmental Impact Statements* prepared by the Environmental Protection Agency (2002) and is not adequate to facilitate An Bord Pleanála in undertaking an Environmental Impact Assessment of the proposed development within the meaning of the Directive.

In conclusion, the Irish Georgian Society submits that it is critical that any development of the Coillte's Hell Fire and Massy's Wood forest properties be informed by a comprehensive assessment of the sensitivities and significance of the historic landscape and of a thorough assessment of the impact of the development of that historic landscape on the setting of the protected structures.

Please do not hesitate to contact us if we can be of any further assistance.

Yours faithfully,

  
Dohough Cahill  
Executive Director IGS

