

The Secretary  
An Bord Pleanála  
64 Marlborough St  
Dublin 1

Date: 19 SEPTEMBER 2017

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:

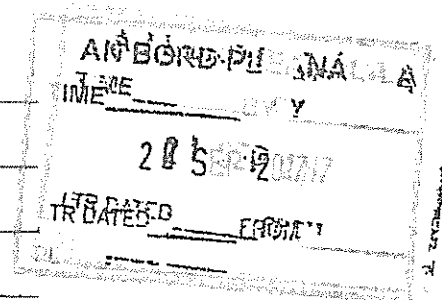
CYRIL BOYD

My Address is:

SYCAMORE LODGE

KILMAKEE ROAD

DUBLIN 16



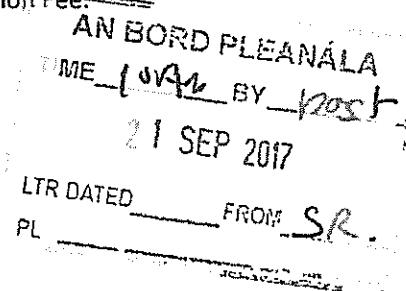
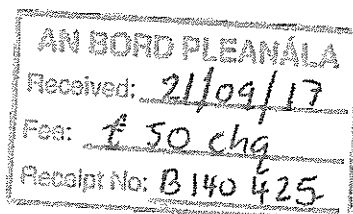
I submit that this development is contrary to sustainable development, principles of proper planning. I also contend it is contrary to the SDCC's Development Plan, including its objectives and policies. I believe that it is a development which is both contrary to the current land-use /zoning of the area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





## 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; SDCG 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.

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### 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 EIAR 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:

SEE ATTACHED COMMENTS

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## ROADS

I HAVE LIVED AT MY CURRENT ADDRESS ON KILLAKEE ROAD SINCE 1992. I KNOW THE LOCAL ROADS VERY WELL. THEY ARE STEEP WINDY NARROW DANGEROUS RURAL ROADS. THEY ARE LETHAL WHEN WET OR FROSTY AS USERS UNDERESTIMATE HOW MUCH TIME IS REQUIRED TO SLOW DOWN WHEN TRAVELING ON STEEP DOWNHILL STRETCHES.

THEY ARE TOTALLY UNFITABLE TO CATER SAFELY FOR THE ADDITIONAL TRAFFIC THE PROPOSED DEVELOPMENT IS INTENDED TO GENERATE.

### REGULAR

THE NEAREST PUBLIC TRANSPORT LINKS TO THE PROPOSED DEVELOPMENT ARE THE 15 AND 158 BUS TERMINALS AT BALLYCULLEN AND THE LEAS STOPS AT EITHER TILLAGHT OR DUNDUM. REALISTICALLY VERY FEW PEOPLE ARE GOING TO HIRE ON FOOT TO THE PROPOSED VISITORS CENTRE FROM THESE LOCATIONS. IT IS TOO FAR AWAY AND EVEN IF THEY DO WALK THEY WILL BE USING HILL AND LIMB CLIMBING UP GUNNY HILL OR KILLAKEE ROAD OR MOUNT VENUS ROAD. THESE ARE EXTREMELY DANGEROUS ROADS FOR PEDESTRIANS.

SO THE VISITORS WILL PRIMARILY BE ARRIVING BY CAR OR BUS. THIS WILL VERY SIGNIFICANTLY INCREASE THE TRAFFIC ON THE LOCAL ROADS AND LEAD TO SERIOUS TRAFFIC CONGESTION AT BUSY TIMES. THESE ROADS ARE VERY NARROW AND DANGEROUS TO AN EXTENT FOR THE EXTRA TRAFFIC AND CARS THIS PROPOSED DEVELOPMENT WILL ATTRACT ON TOP OF THE EXISTING VISITORS TO HELLRAVE, LOCAL RESIDENTS, THE COMMERCIAL TRAFFIC GENERATED BY O'KELLY'S SAWMILL / TIMBERTONE, HIKERS, HOBBY CYCLISTS, JOGGERS, HORSES, WORKERS WITH THEIR DOGS AND CHILDREN, SKATE BOARDERS, THE SERIOUS RBERS

Sunny I also forgot the HEAVILY LOOSEN FORESTRY LOBBIES HURTLING DOWNHILL.

Cyclists with ~~train~~ <sup>startles</sup> on these roads, ~~seem~~ riders and the occasional ~~stray~~ deer and stray sheep, cattle and horses and free range hens and the cars and tour buses accessing the Wicklow / Dublin Mountains further up. As things currently stand without the visitor centre there are significant delays and congestion at weekends and bank holidays when the weather is fine.

I'm informed by the local council that they intend to put a footpath on one side of Killakee road and a cycle lane on the opposite side of the road. They intend to do this without widening the road at all except for a narrow stretch of 100 metres. This will narrow the road space available for cars, lorries, buses with inevitable consequences.

I'm not a road traffic engineer but I do possess common sense and have long experience of using these roads. The proposed road changes are grossly inadequate and they will be many more fatalities and life changing injuries suffered on this stretch of roads if the proposed development takes place and it is ~~not~~ anticipated in the plans.

Memorials on sides of Killakee road and Sunny Hill already.

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## HIGH AMENITY ZONING

IT CAN BE REASONABLY ARGUED THAT THE PROPOSED DEVELOPMENT IS A RESTAURANT / CAFETERIA DISGUISED AS A VISITOR CENTRE. THE SEATING, CATCHING, FOOD SERVICE AND NECESSARY TOILET FACILITIES CONSTITUTE A MAJOR PART OF THE PROPOSED DEVELOPMENT. THIS WILL BE LOCATED IN AN AREA WITH AN EXISTING HIGH AMENITY ZONING.

RESTAURANTS OR CAFETERIAS MAY ONLY BE CONSIDERED IN THE CONTEXT OF EXISTING PREMISES IN AN AREA ZONED HIGH AMENITY. THIS IS CLEARLY NOT THE CASE HERE.

I WOULD BE FLABBERGASTED IF A SIMILAR PROPOSED DEVELOPMENT THIRPWAY UP OTHER "WOW" LOCATIONS SUCH AS CROGH PATRICK OR MOUNT ERVEN OR MOUNT SPANON OR NEARER TO HOME AT THE SUBURBS IN WICKLOW WOULD BE PERMITTED IN A HIGH AMENITY AREA.

THERE ARE PRECEDENTS WHERE PROPOSED DEVELOPMENTS OF VISITOR CENTRES / INTERPRETATIVE CENTRES AT LUGGANA IN WICKLOW AND MULLAGHMORE IN THE BURREN WERE EXPLICITLY AND OPENLY DENIED PLANNING PERMISSION.

WHY SUCH THE PROPOSED STRUCTURE HELD AS A HIGH AMENITY ZONING REF EIRNÁLA NOT PLANNING AUTHORITY?

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## PUBLIC GOOD

I APPRECIATE THAT THE FUNDING OF A PROPOSED DEVELOPMENT IS NOT A FINANCIAL ISSUE PER SE BUT THIS PROJECT IS BEING FAST TRACKED THROUGH AN BOGD PLEANALA DIRECTLY ON A "PUBLIC GOOD" BASIS

IT IS REPORTED TO COST €15 MILLION AND THIS FACILITY IS PROJECTED TO BE LOSS MAKING FOR THE NEXT 10 YEARS.

THE "PUBLIC GOOD" WOULD BE FAR BETTER SERVED BY ALLOCATING THESE MONIES TO OUR HEALTH SERVICES OR TO ALLEVIATING THE PUNISH OF THE HOMELESS WHERE THERE IS A REAL FINANCING CRISIS. THIS PROPOSAL IS A WASTEFUL SQUANDERING OF SCARCE PUBLIC MONEY.

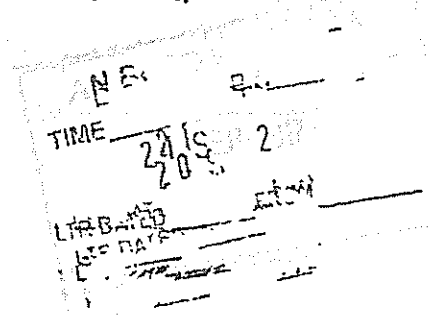
THE THREE BODIES INVOLVED IN THIS PROPOSED DEVELOPMENT - SOUTH DUBLIN COUNTY COUNCIL, BOGD FALTE AND COLLITE ARE ALL STATE OWNED AND RELY ON THE TAXPAYER TO FUND THEIR ACTIVITIES BE IT IN THE FORM OF GRANTS, LOCAL PROPERTY TAXES, BUSINESS RATES OR GENERAL TAXATION OR THE INITIAL STATE INVESTMENT IN OUR FORESTS.

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## Maisy's Wood

My family and bees have had the pleasure many times of walking through Maisy's Wood and following the path of the Killarney Stream.

After heavy rainfall the stream becomes a roaring torrent, surging downhill through little gorges and waterfalls. In winter after a fresh fall of snow it is wonderful to walk over the pristine snow - your tracks the only imprints in the snow.

With cold force winds the wind howls through the trees, branches loudly creaking with the strain. When the bluebells arrive they cover the forest floor like a carpet. In late autumn after the leaves have fallen the kids easily hide themselves under the foliage.

All the time there bird song, the noise of the stream, the distant sounds of happy children and bees playing echoing in the forest, the occasional appearance of a red squirrel, the sight in a clearing of a red kite circling high in the sky.

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THE COMMON THEME SURROUNDING ALL THESE  
WONDERFUL EXPERIENCES IS THAT MARY'S WOOD IS  
LARGELY UNSPOILT AND WILD. YOU FREQUENTLY  
DONT MET ANYBODY FOR LONG STRETCHES OF  
YOUR WALK. YOU CAN ENJOY NATURE IN  
ALL ITS GLORY AND ISOLATION. ITS WHAT  
MAKES IT A SPECIAL PLACE

I'M SORRY BUT YOU DONT NEED TO ~~USE~~ USE A  
VISITOR CENTRE TO EXPERIENCE THIS.

I FEAR THAT WITH A LARGE INFLUX OF  
VISITORS MARY'S WOOD WILL LOSE ITS UNIQUE  
CHARM.

" YOU NEVER KNOW WHAT YOU HAVE GOT UNTIL ITS GONE  
THEY TORE UP PARADISE AND SET UP A PARKING LOT "

THANK YOU FOR TAKING THE TIME TO READ THE SUBMISSION.

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