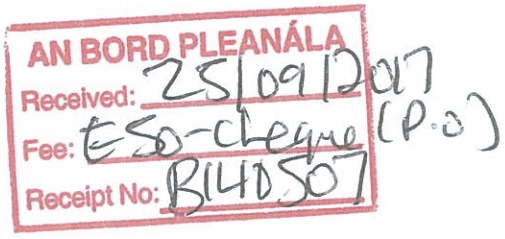
The Secretary
An Bord Pleanala
64 Marlborough St
Dublin 1

Date:

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: Anne McCluskey

My Address 11 River View

Old Bawn, Tallaght

D24WN7V

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 why I think An Bord Pleanala should refuse planning permission for the above development

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

Yours Faithfully,

Anne McCluskey

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 the outstanding view will change the area from an amenity for public use to one the public consumes, to the detriment of the environment and ultimately future generations of residents and visitors. It is unsustainable and incompatible with SDCC's development plan. There exist a number of sites on the surrounding areas with prominent and spectacular views with existing buildings, e.g. Ticknock, Orlagh, Glencree.
- 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. Development of the area would also endanger the small pond where frogs have spawned for very many decades.

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 this, it is intended that stairways be put in the middle of this archaeologically sensitive site.

- 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. This would fundamentally shift the use of the area to consumers in an environmentally unsustainable way.
- 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 evidence of partnership with other local authorities and no conherent plan thinking.

  E.g. One: Within Wicklow County Council Area there is Glencree; 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.
- 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: This area is well used but poorly managed as a historical and environmental amenity. Development of several different car parks, walking and cycling paths from Tallaght, Rathfarnham and Dundrum and walking paths from bus routes would open this up for sustainable tourism and for the burgeoning local population. Development of restaurants and commercial units on this site is incompatible with this amenity.

Ref-JA0040;

We object to South Dublin County Council's proposal to develop a Dublin Mountains Visitor Centre as I believe it to be unwarranted in scale and scope. We also hold that its impact on sensitive wildlife habitats would be negative and permanent.

Our family are frequent users of Monpelier Hill/ Hellfire club and Massey's walking in either or both at least once a week all year round, regardless of season. We have worked in the area since 1982 and have walked and cycled throughout the area from when it was entirely rural. We have walked and cycled throughout the area for over thirty years; Templeogue, Firhouse to the Hellfire Club, through its development and onto now when it is a centre of major suburban expansion.

We both work with disadvantaged young people and we have brought many school and youth groups from west and south Dublin to the Hellfire and Massey's Woods over the past ten years. We annually chart the life cycle of the frog, easily visible and accessible in the small pond along the walking trail. We often see red squirrel, deer, birds of prey, jay and many birds, sadly no longer common in much of south Dublin because of urbanisation. We believe that development of the visitor centre on the scale that is proposed, especially the c980 sq visitor centre is grossly excessive in such a sensitive and valuable landscape.

We welcome the proposal to develop a monitored car park, shuttle bus service, cycle paths and access walking path for visitors to the area but we wish to strenuously object to the construction and location of a commercial visitors' centre. We believe that this will fundamentally alter the nature of the amenity to one that is to be consumed rather than enjoyed and protected.

Current difficulties with anti-social behaviour and littering of the area will almost certainly increase with facilitated greater access. We believe that protection of this natural and historically significant amenity can be better and more affordably provided with an emphasis on development for users rather than consumers. We believe that priority should be given to development of this area as an area of significant natural beauty and historical interest for Tallaght and South Dublin's young and diverse population. We believe that extension of bus services, particularly routes numbers 65b, 15 and 49 and walking paths from various points along those routes would open the mountains to visitors and to local residents and develop it as an amenity without destroying its wilderness appeal. Thus wheelchair and pushchair accessible paths, managed car parking facilities over a few smaller areas rather than one extensive car park and public toilets would enhance the area and preserve most of our wonderful mountains and forests.

Anne McCluskey & Colm O'Brien, 11 River View, Old Bawn D24WN7V