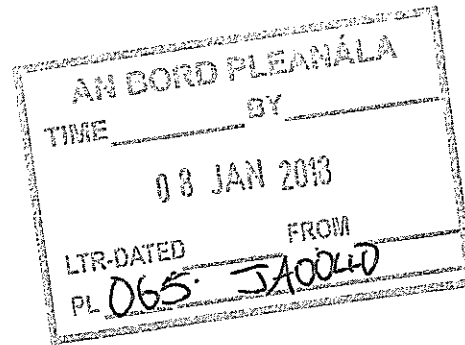


The Secretary
An Bord Pleanála
64 Marlborough St
Dublin 1



Date: 6th January 2018

RE:

Development	Dublin Mountains Visitor Centre-Strategic Development Initiative
Location	Hellfire Club/Montpelier Hill/Massy's Wood
Applicant	South Dublin County Council
Reference Number	06S JA0040

Dear Sir,

I would like to object to the above development.

Our Names are: Aisling, Pat and Jasmine Howard

Address is: 13 Chestnut Grove

Ballinteer

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 below a list of additional reasons why I think An Bord Pleanála should refuse planning permission for the above development

Yours Faithfully,

Aisling, Pat and Jasmine Howard

Reasons to Object

I wish to comment on the further information for the above referenced Development under the following headings and in the order set out below:

Zoning - Ecology - Archaeology/Architecture - Sustainability/Amenity

Zoning Issues

The applicant has not addressed the concerns raised in the original submissions in relation to this project. It remains being a development that is overscaled and inappropriately located.

The applicants claim (12.1) that the zoning AH-DM is "for guidance only" and therefore justifies the breaching of conditions throughout this application.

- 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/Glencree 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

SDCC have not undertaken any additional site survey work prior to submitting their additional information and as such I stand by original submission. A two day walk-over does not constitute a scientific examination of evidence and data'.

7.1 OVERVIEW (Further Information Response)

"The multidisciplinary walkover survey was carried out over a two-day period by experienced, professional ecologists. This was sufficient time to walk the entire site and undertake the surveys. While records of transect routes were not kept, surveyors verified that all areas of the site were covered by the survey."

As defined under s. 177T of the 2000 Act (as amended) an NIS constitutes a

"...statement for the purposes of Article 6 of the Habitats Directive, of the implications of a proposed development, on its own or in combination with other plans or projects for one or more than one European site, in view of the conservation objectives of the site or sites" and shall include " .. a report of a scientific examination of evidence and data, carried out by competent persons to identify and classify any implications for one or more than one European site in view of the conservation objectives of the site or sites". An Bord Pleanála as the Competent Authority carrying out the appropriate assessment on these cases should be provided with documentation based on the appropriate information. This would include any survey work results, baseline studies and further analysis and assessment of the effects of the proposed development on a European site(s).

In absence of such An Bord Pleanála should refuse the proposed development

- 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.

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.

Sustainability/Amenity

SDCC have not earnestly considered the likely consequences for proper planning and sustainable development in the area in which it is proposed to situate the development. A full description of proposed development including details of construction and operational phases and impacts, likely emissions and/or discharges, phasing, and any mitigation measures proposed are not included in the further information submitted by SDCC.

- 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 Laoighaire 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 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. 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.

No Traffic Management Plan

The carrying capacity and safety of road network serving the proposed development has not been tackled. The present diffusion of local traffic generated by the recent closure of Edmondstown Road due to urgent improvement works raises questions about the carrying capacity and sustainability of the road network serving the immediate locale. Concerns are also posed by concurrent housing sprawl, as exemplified by ongoing developments in Stocking Lane and Ballycullen Road - the two main thoroughfares to Montpelier Hill. Given that the proposed development's projected visitor numbers would be accompanied by a substantial increase in private and public transport and place further pressure on narrow, well-established rural routes, a traffic management plan and details pertaining to construction and operational phases are essential.

