

Hendrik W van der Kamp, MScEng, FIPI, MIEI
Town Planner
1, Woodstown Court
Knocklyon
Dublin 16

Tel: 087 2020387 E-mail: hwwvanderkamp@eircom.net

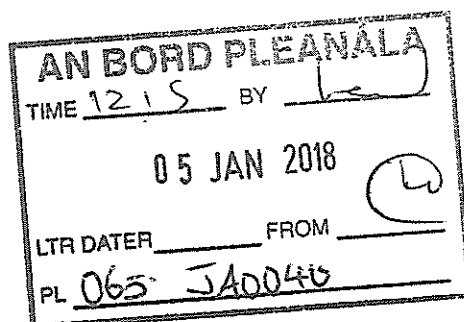
Further Submission to An Bord Pleanala

Submission to An Bord Pleanala relating to the further information submitted by South Dublin County Council to An Bord Pleanala regarding the proposal by South Dublin County Council to provide a proposed Dublin Mountains Visitor Centre. The proposed development is located at the Hell Fire and Massy's Wood forest properties in the Dublin Mountains. The planning authority reference number is JA0040.

This further submission is made on behalf of 'Concerned Residents of Killakee', c/o Paul Feenan, 'Hammond House', Killakee, Rathfarnham, Dublin 16.

Contents

	Page
1 Introduction	2
2 Ambiguous Objectives	2
3 Inadequate Carrying Capacity	3
4 Pragmatic Choice of Location	3
5 Proposal is not Policy Led	4
6 Traffic	4
7 Inaccurate References	5
8 Conclusions	5



1 Introduction

I have been instructed by my clients 'Concerned Residents of Killakee', c/o Paul Feenan, 'Hammond House', Killakee, Rathfarnham, Dublin 16, to make a further submission on the proposal by South Dublin County Council to provide a proposed Dublin Mountains Visitor Centre at the site of Coillte's Hell Fire and Massy's Wood forest properties in the townlands of Mountpelier, Killakee and Jamestown in South Dublin. The planning authority reference number is JA0040.

By letter dated 4th December 2017, An Bord Pleanála acknowledged receipt of further information on the project. This response document was prompted by a request for further information on a number of matters relating to the effects of the proposed development on the environment¹. In addition, the response document also includes detailed comments on the matters raised by parties that had made submissions to An Bord Pleanála, incl. the submission made on behalf of the 'Concerned Residents of Killakee'.

This further submission specifically responds to the comments made in the response statement on the issues raised by the 'Concerned Residents of Killakee' in their earlier submission.

2 Ambiguous Objectives

The further information document is a lengthy and detailed document.² On page 32 it states the following: ...*"The submission by the Concerned Residents of Killakee questions the fact that the development has multiple objectives, stating that the objectives are therefore unclear and ambiguous. We submit that the multiple objectives of the project are complementary, and that this is a strength of the project, not a flaw. The proposals are intended to benefit the widest range of existing and potential users, and benefit the site's heritage resources."*

From this statement it is clear that it is an explicit objective to create an international visitor attraction located at the Hell Fire and Massy's Wood resource in the Dublin mountains. My clients utterly and strongly reject that such a project at this location would be in accordance with the proper planning and sustainable development of the area. The suggestion that these objectives are complementary is incorrect. These are separate objectives resulting in different appropriate planning solutions.

It is accepted that some measures are necessary to accommodate the increase in visitor numbers to the Hell Fire site in particular. (As stated previously, the pressures on Massy's Wood are much less of a problem and would in fact be increased by the proposed footbridge connection.) Management problems arising from increased visitor numbers in relation to car parking or inadequate walking routes can be achieved with a policy of woodland management that would not make the area into an international tourist attraction. Such a realistic alternative to the proposed development should have been considered separately in the EIAR.

¹ Letter from An Bord Pleanála addressed to South Dublin County Council dated 9th October 2017.

² *Further Information Response in support of an 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 Development of the: Proposed Dublin Mountains Visitor Centre, November 2017.*

The proposed development serves two separate objectives: (i) to manage an increase in visitor numbers and (ii) to create a recreational hub and visitor centre to attract tourists and international visitors. While the need to manage an increase in visitor numbers is accepted, the objective to create a visitor hub for international visitors is not.

3 Inadequate Carrying Capacity

It was stated in the original submission by the Concerned Residents of Killakee that the carrying capacity of the receiving environment is inadequate to accommodate the increase in visitor numbers that would arise from the creation of a recreational hub. This is best illustrated by the vulnerability of Massy's Wood and the significant pressures in terms of visitors that would arise from the overall growth in visitor numbers combined with the improved access to Massy's Wood for pedestrians. It is also illustrated by the traffic consequences arising from the proposed development, i.e. five coach parking spaces and a shuttle bus operating seven days per week at a frequency of each half hour at least.

The response to further information makes no reference to these arguments at all. A table in the appendix lists the issues raised by each party that made a submission to An Bord Pleanála and in the case of the Concerned Residents of Killakee 'carrying capacity' is listed as one of the issues raised and is cross-referenced to sections 10.0 and 12.4 of the response document. However, section 12.4 does not exist while section 10 does not once mention the term 'carrying capacity'. In fact, a word search shows that the term carrying capacity is not used at all in the response to further information statement.

The response statement does not address the core principle of sustainable development, i.e. the 'carrying capacity' of Hell Fire and Massy's Wood resources to accommodate an international visitor centre. The statement fails to address the concerns raised in the original submission.

4 Pragmatic Choice of Location

Section 12.0 of the response document sets out reasons why the site is chosen for the international visitor centre. These reasons can be summarised as follows:

1. Proximity to the city
2. Roads can be improved
3. Quality of the site
4. Existing visitor facilities are inadequate
5. Current problems of traffic congestion
6. Public ownership
7. No significant environmental impacts.

Reasons 1 and 2 are flawed. If anything, the proximity to the city requires protection and management of visitor numbers rather than increasing these. The proposed road works will result in a suburban appearance and a loss of the current crisp edge and contrast between the city footprint and the Dublin mountains area. Any widening of roads will compromise this. Reason 3 is flawed because the combined values of views, landscape, archaeology, cultural heritage are exactly reasons why the site

should not become a tourism visitor centre. Reasons 4 and 5 can be addressed by a woodland management strategy and are not reasons to increase visitor numbers further.

The choice of this location for an international visitor centre appears to be primarily based on the proximity to the city, location within the South Dublin local authority area as well as ownership of the lands. These limitations result in a flawed rationale for choosing this location.

5 Proposal is not Policy Led

The response document states that ...*"the proposed development is entirely policy driven."*³ This is not accepted because the South Dublin County Development Plan has not included this development project as a development plan objective at this location.

The County Development Plan states the following objective in relation to tourism infrastructure: ...*"To support the development of a visitor facility in or adjacent to the High Amenity – Dublin Mountains zone (HA-DM), subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services."*⁴ It does not state a location of such a visitor facility. Indeed, investigation of the relevant map of the county council development plan reveals that at the Hell Fire and Massy's Wood location the map indicates objectives to preserve a view or prospect, protect a monument and protect several of protected structures. These objectives are all aimed to preserve and protect what is there at present, there are no objectives shown to develop an international tourist facility The zoning objective is *'HA - To protect and enhance the outstanding natural character and amenity of the Liffey Valley, Dodder Valley and Dublin Mountains areas.'*⁵

The proposal is not in accordance with the county development plan because a project of this scale and magnitude and with corresponding impacts on the landscape, should be indicated as a development plan objective.

6 Traffic

The submission states in relation to traffic concerns that ...*"No specific technical arguments or queries were made"*... and that ...*"the proposed site at Hell Fire Wood was carefully selected as the most suitable location for a visitor centre in the Dublin Mountains mainly because of the relatively close proximity to the edge of the urban area so as to minimise the extent to which additional traffic will be drawn onto the fairly narrow and steep roads in the mountains, while enabling a true sense of altitude to provide spectacular views across Dublin City and the northern end of the Dublin*

³ *Further Information Response In support of an 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 Development of the: Proposed Dublin Mountains Visitor Centre, November 2017, p.26.*

⁴ *South Dublin County Council Development Plan 2016-2022, Objective ET5.3, page 76.*

⁵ *South Dublin County Council Development Plan 2016-2022, Map 11 and 11A.*

and Wicklow Mountains massif.”⁶ This suggests that irrespective of the limited carrying capacity of the resource, the location is chosen because of the proximity to the city.

The existing road forms part of the original Military Road and is therefore of historic significance. This road is unsuitable to carry the projected volumes of traffic and its character will change from a rural road to a suburban access road requiring a footpath and public lighting.

7 Inaccurate References

A number of inaccurate references are made in the table in the appendix. For example, the visual impact topic refers to section 15.9 which is not included in the text. The submission states in the Table in Appendix A ‘inadequate consultation process’ as one of the objections by the Concerned Residents of Killakee. However, the word ‘consultation’ does not appear in the original submission and the adequacy or otherwise of the consultation process is not an issue of significant concern to my clients. The ‘alternatives’ topic refers to section 15.2.2 but this section refers to floor areas and is not relevant. The carrying capacity topic refers to sections 10.0 and 12.4. However, section 12.4 does not exist and the term ‘carrying capacity’ is not used anywhere throughout the text. Similar errors and inconsistencies in cross-referencing have been noted in relation to the comments from other parties. It is difficult to respond having regard to the scale of errors in the table.

Visual Impact	See Section 10.2 & 15.9	No section 15.9 in text.
Inadequate Consultation Process	See Section 17.0	Issue not raised in original submission.
Visitor Centre Alternatives	See Section 15.2.2	Section not relevant.
Carrying Capacity	See Section 10.0 & 12.4	No section 12.4 in text

There are a number of disturbing errors in the cross referencing table that is provided in the appendix. These errors make it difficult to respond adequately to the issues raised.

8 Conclusions

- **The objective to create a tourist facility and recreational hub at this location is flawed and not complementary to the objective to manage the increase in visitor numbers.**
- **The response statement fails to address the concerns raised in the original submission in relation to the inadequate carrying capacity of the area incl. Killakee Road (as part of the Military Road a historic road) to accommodate the projected increase in visitor numbers.**

⁶ *Further Information Response In support of an 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 Development of the: Proposed Dublin Mountains Visitor Centre, November 2017, p. 25.*

- The choice of the location for a tourist visitor facility is primarily based on the proximity of the site to the city. This is a flawed rationale.
- The proposed project has not been included in the development plan as a development objective.
- The existing rural road will change to a suburban character road.
- The response statement contains cross reference guidance. However, this is incomplete and partly in error.

