

The Secretary
An Bord Pleanála
64 Marlborough St
Dublin 1

16 Broadford Lawn,
Ballinteer,
Dublin 16.

AN BORD PLEANÁLA
TIME 15.17 BY Aerd
25 SEP 2017
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22 Sept 2017

AN BORD PLEANÁLA
Received: 25/9/2017
Fee: €50-charge
Receipt No: B140518

Ref: Hellfire Club & Massey's Wood Development. JA0040

Dear Sir/Madame,

I wish to submit that the planned development is contrary to good principles of planning and contravenes South Dublin County Council's (SDCC) latest Development Plan as well as other laws/regulations such as the EU Habitats Directive. Overall this plan is neither a sustainable development nor does it fulfil any of the obligations to protect the site.

For example:

- This is supposed to be an interpretative centre, but it grossly interferes with the very landscape/site that it intends to interpret by building a large building on the site.
- The entire planning proposal appears to hinge on a subjective term called the "wow" factor that is obsessed with raising the number of visitors to 300,000 which appears to be some sort of threshold for commercial success. Everything else is secondary and the words sustainable, education and science appear sprinkled throughout to add respectability. The plan is not driven by the need to protect wildlife, habitats, protected views, maintain free public access or enhance the nature experience or be part of any sort of wider plan of the Dublin Mountains other than a token (existing) trail connection to the Dublin Mountains Way.
- The interpretative centre and tripling of the car-park and placing this further up the hill takes from the site, has the potential to destroy permanently protected views and greatly intensifies usage on the site. The EIAR "traffic survey" appears flawed and later the numbers are used to "prove" the road network is adequate for 300,000 visitors which it is not. Later of course, the demand would be to widen the road and thereby set the precedent for modifying the character of the rural nature of the site and access road.

For the traffic analysis one of the busiest days of the year was picked in order to talk up the estimates for the present number of visitors. I know from experience on any sunny day in the summer traffic problems develop quite quickly on this road and the claimed capacity is not there and even less so for a tripling of traffic.

- The EIAR surveying of site wildlife and species counts is inadequate as very little time was spent physically on site and claims it only found one squirrel drey and implies there are no badgers on site, few birds of significance and little else. This appears to be a means to provide justification for any damage, permanent or otherwise done during construction. The implicit conclusion made is that nothing much was found, so no harm will be done. It appears to be a case of if you do not look too hard you will not find anything to worry

about. Yet habitats like this are not static things. Wildlife (e.g. otters, bats, badgers, birds) may reside some years and not others within or near the site. However greatly increasing disturbance, widening trails, increasing intensification will all contribute to ensuring they are driven out of the habitat permanently.

Given the goal is to increase the number of visitors to 300,000, this clearly represents a significant increase of disturbance to the habitats of the site wildlife and would drive them out of it.

It is the duty of the council under the Wildlife Acts 1976 & 2000, the Birds Directive 1979 and the Habitats Directive to protect these habitats and species.

Note: Table 6.6 listing the rare and protected species recorded within the hectads of the study area is missing from the EIAR.

- The EIAR acknowledges that the site has huge archaeological importance perhaps on the scale of Tara. This would suggest that rather than go ahead and pave over parts of the site with an interpretative centre and carpark, one should allow for a full and proper archaeological assessment. We do not want to repeat the cultural crime of Wood Quay in the 1970s again where Dublin City Council destroyed a great national treasure. Thus there is no real scope once the café/centre & carpark are constructed and site & trails laid out, to adapt to any archaeological findings that might be made and which could change the emphasis of the site. There is also the risk that construction could lead to further damage. Additionally boosting the number of visitors to 300,000 surely serves to increase the probability of even greater damage and lessen the ability to carry out archaeological works/surveys.

While the EIAR suggests it is unlikely there are any significant archaeological remains on the steep part of MontPelier, one should not rule out this possibility for the entire area lower down especially within Massey's Wood.

- The selection process for the site was suspect. There was a perfectly good site available at the early stage in the form of Orlagh House that was available for purchase and I believe the council was strongly advised to purchase but they did not. It is inexplicable that this was disregarded.
- The planning statement proposes installation of a sewer under the R115 road down to the main urban sewer network. Unfortunately this is like to vastly increase the pressure to open the entire area to residential and commercial development and regrettably the history of this country as documented in the Planning Tribunals of recent years, demonstrates that once this pressure arises no law, verbal statement or intent is able to stop the unstoppable. I do not even trust, as stated in the planning statement, that the diameter of the pipe will be reduced as this may be discovered later to be an "oversight" that they forgot to narrow it.

The digging up of the R115 in itself would effectively close off the area and access for weeks if not months and would be disruptive.

- The proposed 'tree canopy walk'/pedestrian bridge' or sky-bridge will interfere with the habitats of the protected Red Squirrel by 1) it's construction, 2) the constant noise and

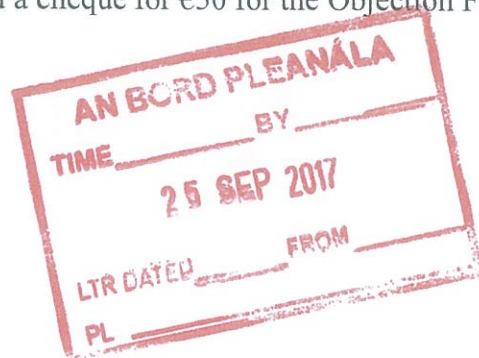
presence of large number of people within the habitat in the canopy of the deciduous trees in Massey's wood where I have seen red squirrels living/residing.

The sky-bridge is seen as a money earner and raises the conflict for the private operators of the site whereby if you pay to use the sky-bridge as part of the way to get to Massey's wood then surely many people will just walk across the road. To protect revenue, the obvious thing to do would then be to charge an entrance fee into the wood so as to increase or drive revenue towards usage of the sky-bridge. These are the realities of running this on a commercial basis and they conflict with the stated objectives of making this a public amenity. -i.e. the sky-bridge can result in a reduction of public access.

On this basis I request that An Bord Pleanála refuses planning permission for this application (JA0040).

I wish to request that An Bord Pleanála holds an oral hearing on this matter.

Enclosed please find a cheque for €50 for the Objection Fee.



Yours Faithfully

Terry Sommerville

