

South Dublin Conservation Society
c/o 4 Plasóga Choill Rua,
Cill na Manach,
Tamhlacht
Baile Átha Cliath 24

The Secretary
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

AN BORD PLEANÁLA	
TIME <u>16.40</u>	BY <u>Aerd</u>
25 SEP 2017	
LTR DATED _____	FROM <u>Sm</u>
PL _____	

AN BORD PLEANÁLA	
Received:	<u>25/9/2017</u>
Fee:	<u>€50-cash</u>
Receipt No:	<u>B140515</u>

24th September 2017

Re: Case Ref. PL06S.JA0040 - Proposed Dublin Mountain Visitors Centre and all associated works, by South Dublin County Council.

Dear Madam/Sir,

Please find enclosed the sum of fifty euro (€50.00) being the required fee for this submission.

We object outright to the proposed new build Dublin Mountains Visitors Centre on the side of Montpelier Hill. Not only because of the reasons that we state below but also that this Project is in contravention of South Dublin County Council's own County Development Plan (P. 173 of the South Dublin County Council Development Plan 2016 -2022 states that development in the mountain area is to be such as to minimise visual impact). The zoning for the proposed development area is 'High Amenity Dublin Mountains, HA-DM, To protect and enhance the outstanding natural character of the Dublin Mountains Area'. Under this zoning category a restaurant/café and a shop are only permitted in existing buildings.

Viable alternatives were dismissed due to reasons which are not the primary purpose of having a visitor centre in the first instance. In the case of the former stable buildings of Kilakee House (Located on the Killakee Road) the argument was that there would not be a good view from it, that it would not have a 'wow' factor which is completely unnecessary for a visitor centre. That is not the purpose of such a building. The majority of such buildings do not have a pretty view – that is left to the heritage item itself, such as in this case the view from the top of Montpelier Hill, or in other cases the view of a fine house or a natural landscape or an archaeological landscape. A refreshment, accommodation and interpretive facility could be developed at these former stable buildings as a joint project between South Dublin County Council and the owner (s) of these property.

The applicant for the former stable buildings of Kilakee House (dower house and stables, Ref. SD08A/0411) was refused permission back in 2008 to renovate and convert these buildings into three holiday homes. This use was considered inappropriate due to it being residential. This was not the only reason for the refusal (there were heritage concerns which could be addressed) but it was stated in the pre-planning meeting with the Area Planner in 2006 that a restaurant / B&B / guesthouse would be accommodated. Such a proposed use (restaurant / B&B / guesthouse) would be perfect for providing facilities for the Dublin Mountain Project. A restaurant or café would provide refreshments for visitors and the accommodation would be an extra asset as a starting point for longer distance walkers. The other outbuildings on site could be renovated or rebuilt (depending on their heritage value) to serve as an interpretive facility. There is space at the back of the property

for additional parking which could be linked through to the existing Coillte owned Hellfire carpark and the whole area secured with good lighting and cameras.

PP235/06 Pre planning took place with the Area Planner on the 13/06/2006. Applicant advised that a proposal to convert a stables and dwelling to a mental health centre would not conform with the zoning objective for the area and that a restaurant / B&B/guesthouse would be accommodated.

Regarding catering for sewage, one can take the café at Timber Trove across the road as an example of what can be catered for on site. This café is already very busy a lot of the time and has been recently expanded in capacity. Indeed, it should be an advantage to have a second café next door to help spread the custom if the envisaged increase in visitor numbers comes to pass. The two premises would complement each other. The café at the former stable buildings of Kilakee House could have a strong healthy eating theme, in keeping with the walking element of the Project, such as that provided by the Happy Pear, in operation at the Round Tower Project in Clondalkin. Obviously if the former stable buildings of Kilakee House were brought into use then it would be expected that the highest standard sewage treatment facility would be installed for it.

A missed opportunity for another alternative visitor centre location was the potential to buy Orlagh College on Gunny Hill. Again the apparent need for a 'wow' factor view seemed to be the overriding reason for not purchasing this property, even though there actually is quite a good view from the main room that was used as a chapel that could have been converted to a café. Objections to a car park being obtrusive could have easily been overcome with earthen bunds and planting and footpaths not suitable for wheelchairs could be resurfaced. There is already an accommodation block, perfect for long distance hikers, and lots of other space for all types of relevant usage, such as an exhibition area, seminar room and offices for the Dublin Mountains Partnership Project. An arrangement could have been made with local landowners to have a trail going up from the back of the property to the nearest part of Coillte land to join up with the existing trails.

At the public consultation days in the Tallaght Stadium Council representatives assured that there would be a sewer pipe put in solely to serve this property and that no other property could connect to it, nor would it open up the area to development. On examination of many planning applications in the immediate area it is apparent that the properties on the Kilakee Road use septic tanks, biocycle systems, etc. and are not connected to a main sewer pipe. The nearest point where there is an existing main sewer is about two kilometres away following the road, at Woodstown Village. Is it truly acceptable and viable to spend considerable money (a figure of €2 million has been mentioned) on running a sewer pipe from there to Montpelier Hill to serve one property, the interpretive centre and café? This poses the threat of opening the area to further development, something which is currently prohibited under the current South Dublin County Development Plan, except for local, rural need. It can be very readily imagined that the installation of this pipe, potentially in a culvert much larger than needed for the 1,500mm pipe, will be a trojan horse for future development.

Pressure could be brought to bear on decision makers that both housing and development levies are needed and thus land may be rezoned above the existing elevation limit of 125m under such emotional pressure, ultimately destroying what makes the area so attractive at the moment. Another possibility is the construction of large, expensive mansion-like properties, another potential eye-sore. Either development possibilities won't do anything for the housing crisis in terms of

catering for those most in need. The starting price of Phase 2 of nearby Dodderbrook in Oldcourt was €390,000, hardly an affordable amount for the average income family.

In a recently published study in the Science journal it was shown that buildings with large glass windows pose a serious threat to bats as the smooth surface of the glass disrupts their echolocation system. (<http://science.sciencemag.org/content/357/6355/1045>, also see this article in New Scientist: <https://www.newscientist.com/article/2146716-bats-crash-into-windows-because-of-a-glitch-with-their-sonar/>). The large glass windows of the proposed visitors centre, being in such a prominent, open position on the hillside, are very likely to pose such a threat to the local bat population. This is another reason why putting the Visitor Centre at this location is a very bad proposal.

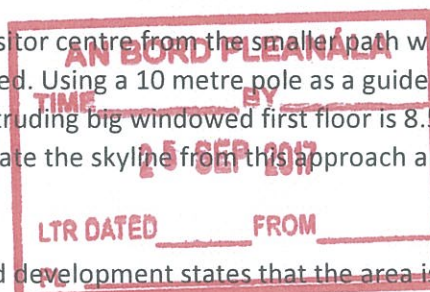
Conspicuous by its absence is a photomontage of the visitor centre from the smaller path which zig-zags up near to where the building is proposed to be sited. Using a 10 metre pole as a guide (the tallest element of the building is 10 metres and the protruding big windowed first floor is 8.5 metres) it could be seen that the building will completely dominate the skyline from this approach and will stand out in a most obtrusive way.

The Environmental Impact Assessment for the proposed development states that the area is assessed to be a site of great archaeological significance, like others which are classified as World Heritage Sites (EIA page 200). The wider archaeological area is a megalithic cemetery. Positioning the visitor's centre halfway up the hill would be very intrusive on this landscape and would be very close to the nearest known archaeological feature.

In the Landscape Character Assessment of South Dublin County by Minogue and Associates with Aegis Archaeology, Michael Cregan and Geoscience Ltd. on page 51 it is stated that the "Dublin uplands is a nationally important prehistoric landscape, both in the Neolithic and Bronze Ages- see report by Ní Lionáin and Davis (2014). They use 150m contour as mark of upland region and so it is applied here." To quote the latter report (p. 48-49): "the entire southern portion of the study area, i.e. the Dublin Uplands, and for the most part above the 150m contour, has been designated as a prehistoric relict landscape, due to the high concentration of megalithic monuments and its continued use into the Bronze Age. In particular there is a preference for this location to be used for funerary and ritual activity throughout both periods. Three out of the four types of megalithic monument found in Ireland are present in this landscape, which should be considered of national importance." (Ní Lionáin and Davis 2014, *The Dublin Uplands – Past, Present and Future*. Dublin; South Dublin County Council and Dún Laoghaire Rathdown County Council.)

With the above point in mind, we would urge An Bord Pleanála to take cognisance of the findings of the recent High Court Judgement – Record No. 2015/696/JR – Colm Moore and The Minister for Arts, Heritage and the Gaelteacht and Charterland Limited – with regard to the fact that due to the number of national monuments within close vicinity of the location being proposed for this Visitor Centre and due to the whole area as being deemed a prehistoric relict landscape, any development requires ministerial consent. Without that, the planning consent is invalid under the National Monuments (Amendment) Act, 2004.

The Department of Arts, Heritage and the Gaelteacht recently acquired lands that are located nearby to the location of this proposed development (Featherbed/Glenasmole) with the view of them being annexed into the Wicklow Mountains National Park. Again, we would urge An Bord Pleanála to take cognisance of the fact that there is no current management plan in place for these new publicly



owned lands and until such time there is a management plan drawn up for the managing of visitor numbers, protecting biodiversity, etc., as well as access into the Wicklow Mountains National Park this proposed Visitor Centre development is premature in nature and may serve no purpose at all.

Other archaeological sites are sensitive to how they position and develop their visitor centres. Rathcroghan Visitor Centre is situated in the village of Tulsk in County Roscommon and visitors must travel to the archaeological features. In fact, it is extremely difficult to build anything near the Rathcroghan ringforts as that landscape is rightly protected. Lough Gur Visitor Centre, County Limerick, is a recreation of pre-historic buildings which fit in well with their surroundings rather than standing out from them. Another example is the award-winning Hill of Uisneach Visitor Centre, County Westmeath, including a refurbished old cottage, which fits into its surroundings on the edge of the immediate archaeological landscape and doesn't try to stand out or dominate the landscape. The 'wow' view is left to that seen from the 'royal palace' ringfort. The Burren Centre, Kilfenora, County Clare is a modest proportioned building in keeping with neighbouring buildings in the village. The Céide Fields Visitor Centre, County Mayo, tries to sit in to the landscape where it could have made full use of a stunning view of the sea but that was left to be seen from the archaeological site itself.

All these above points show how inappropriate it is to put a new build visitor centre in such a prominent position high up on the side of Montpelier Hill. It would be far better to utilise the of the former stable buildings of Kilakee House which could be readily refurbished. It is to be noted, much to the detriment of heritage which is such a hugely important part of Ireland's tourism, that funding from Fáilte Ireland for tourism-related structures is only available for new buildings, not renovation of old buildings. This is a disgraceful discrimination, given the large amounts of money involved. It no doubt skews the direction of certain tourism developments, such as that proposed by South Dublin County Council, towards new buildings because the money is more easily obtained, rather than examining and selecting the most suitable development route taking all issues into consideration.

Due to the unusual nature of this proposed development and the potential of it to do irreversible harm to the landscape and set a highly undesirable development precedent, we see it as essential that an oral hearing take place and request that one be arranged, under Section 134 of the 2000 Act, to ensure that every point made in submissions and possibly others by experts are fully explored before a final decision is made.

We would urge An Bord Pleanála to refuse planning permission for this proposed development as this Project is not consistent with the *proper planning and sustainable* development for the area. And that South Dublin County Council is failing in its duty to role in protecting the natural environment and built heritage of the Dublin Uplands/Mountains.

Yours sincerely,



Pádraig MacOitir

On behalf of the South Dublin Conservation Society