

To AN BORD PLEANÁLA

Re : Dublin Mountains Visitor Centre
Montpelier Hill/Massy's Wood

Ref:JA0040 PLANNING APPLICATIONS

From :Andrew Davidson, former member planning group South Dublin An Taisce, former Councillor Derry City Council, retired Solicitor

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A.

I have just been for a walk on Montpelier Hill in the September afternoon sun with Purdey our Red Setter dog. We are both now relaxed and unwound and are as convinced as we ever have been that present plans proposed to build a visitor centre on the side of the hill with a three tiered car park will destroy for good what is a wilderness of peace and quiet.

Below this area is Massy's Wood which, being below the Military Road, does not have the great views of Montpelier Hill but has what's left of an old estate incorporating walled Gardens, ancient walks and a stream all rather overgrown. 100 acres of mainly deciduous trees and paths which are used every day by many just to get a little peace and quiet – and some very pleasant exercise.

Just over a year ago the word was out that South Dublin County Council had done some kind of deal with Coillte, the owner of most of the area, to take over. The main shock was a proposal to build a modern block on the side of Montpelier Hill together with a bridge across into Massy's Wood.

A group of us did what we could to find out what deal had been done, what exactly was proposed and so on with a view to informing locals and anyone interested what was going on. We met very few open doors and that is how it has remained until the present planning application was made in late July 2017.

From the outset it has remained clear to our various groups that our Council intended to spend large amounts of public money promoting their plans. They also set about minimalist consultation with some of the interested parties and none at all when they could organise it. I personally can vouch that I attended a 2 day exhibition of plans, and signed before leaving when asked to do so on the basis that this would entitle me to be invited to future consultation as it took place.. This never came about and it seems to me that my signature may have been counted with others when the Council wished to indicate numbers in favour of the proposed buildings and carparks – nothing could be further from my position relating to the actual buildings and carparks

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proposed which are of a scale and type totally inconsistent with the proper planning and sustainable development of the particular area.

I include here a copy of a letter from me to the Irish Times Monday, April 17th 2017 which was published on that date

HELL
NO!

Save the Hellfire
Published by Grainne Corcoran April 17th 2017

#savethehellfire #thinkagain

THE IRISH TIMES

Tue Apr 18 2017

NEWS SPORT BUSINESS OPINION LIFE & STYLE CULTURE

Letters Editorials Columnists An Irishman's Diary Opinion & Analysis Martyn Turner

Keeping calm at the Hellfire Club

Sir, - Jim Callan (April 10th) ends with a plea: "Let us make the hilltops open accessible and welcoming for everyone." Michael McCarthy (April 3rd) says "this is a place of restorative calm, woodland pathways, mountain streams and muddy puddles, just now crowded with frogspawn. I have been getting away here from the built-up city every week since I first came to live in Dublin in 1968".

The project to create a visitors' centre at the Hellfire Club in the Dublin mountains, being promoted by South Dublin County Council officialdom at vast financial cost both locally and centrally will, if permitted by An Bord Pleanála, in the words of a local councillor "destroy the hillside".

If this is the result environmentally the biodiversity of the area and plentiful wildlife will be destroyed and the essential habitats will disappear under concrete, tarmac and drains. Footfall may increase in that tourists may be lured in to spend money in the centre on food, drink and "Hellfire nugs".

Those of us who regularly visit both Massé's Wood and Montpelier Hill believe the area is to be made accessible and welcoming for everyone precisely because it at present provides for people looking for "restorative calm", animals requiring fast disappearing habitats, children needing space and new experiences, elderly wanting gently sloping pathways and not least teenagers with backpacks and tents hoping for a little springtime excitement.

Claire Redmond (April 3rd) expresses it neatly: "nobody needs a visitor centre to enjoy this wonderful amenity; in fact one would only take from the beautiful natural surroundings". Yours, etc.

8 462 people reached

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B.

Planning is one of the fundamental basic processes of an ordered and civilised society. It's importance for the future of our society cannot be undervalued so when the very major change such as the present proposed "Dublin Mountains Visitor Centre "development is introduced the widest possible consultation and transparency locally surely must be undertaken. In this instance an Bord Pleanála carries out scrutiny both in detail and in the round – that is in essence whether the plan is a good idea at all – and its decision is not open to an appeal. It is submitted therefore that the decision of the Bord should be ultra cautious in seeking a balance between the implications for proper planning and development in the area concerned, the likely effects on the environment and a commercial tourist scheme which can be narrowed down to "g" in the public notice of application: "Construction of a visitor centre comprising two buildings (one single story and ~~two~~ ^{ONE TWO} story) side-by-side at an elevation of circa 300 m on the hellfire forest property, with a combined gross floor area of 980 m² accommodating the following uses/spaces: audio Visual/exhibition facility (101 m²), education room (55 m²), cafe with seating area (17.5 m²), server re open brackets 36 m²) and kitchen (60 m²), Ramblers lounge (43 m²), retail (45 m²), kiosk (27 m²), toilets (66 m²), facility management offices (55 m²), and associated reception, circulation, plant and storage space is; and possibly "c" also: "construction of a "tree canopy walk/pedestrian bridge" over the R115 to link the trial networks of the two properties, without "Bridge house" at the Hellfire "end of the bridge"

Without the buildings referred to at "g" what's the most destructive development would no longer be required e.g. "the installation of a new watermain line and sewage pipe under the R115 from the Hellfire property to the existing watermain and public sewer network" referred to at "f". It is further submitted that were this sewage work etc to be carried out absolutely the whole area between where public sewers now end and the application site would then become available for suburban development. The Bord's decision therefore could if in favour of the proposal totally overturn the area in terms of its present highest zoning (HA) . It is impossible to comprehend how a scheme of such scale proposed by a body entrusted itself with such important decision making powers relating to planning could be put forward.

C

Notes on a lecture from Neil Jackman, Abarta Heritage, at Shankill school 19th of August 2017

Archaeology of Montpelier Hill (Hellfire Hill)

The value to us of this introduction to the archaeological potential of this area probably remains

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to be seen in terms of the current planning application by SDCC to An Bord Pleanála. This is mainly because it was very limited by the council in that the area of the dig was two relatively small patches in the area directly behind the building known as the hellfire club. The duration of the dig was little more than a month. However in that time from such a small area conclusions drawn by the archaeologist are of potential major significance in the context of Neolithic history. This is in the expert's words possibly indicative of the probable presence of undiscovered ancient burial grounds possibly containing stonework with art design and designs also of ancient times. The guesswork at present seems to indicate these ancient times at over 5000 years!

Surely it should be unthinkable armed with this expert opinion that a major development requiring major disturbance of large sections of Montpelier Hill would be put forward at all and more particularly proposed by South Dublin County Council, the council being itself a planning authority.

The ancient landscape which includes the 18th century Hellfire club building has been owned for and behalf of the Irish people since 1988 by Coillte and before that by government departments, Irish since 1922 and British before that from Elizabethan times. It is an area of recent historical significance in an Irish/British context from the late 18th century when the Military Road was built to try to help contain Irish rebellion in 1798. The potential destruction without very much deeper and more thorough archaeological enquiry of apparently extensive signs of earlier – much earlier – human activity is not acceptable.

This of course is not to say that all of the thinking leading up to the South Dublin County Council planning application is totally without merit. In the circumstances it is clearly not thought through logically or with adequate enquiry regarding the potential the ancient landscape may well contain for future generations.

D

I quote hereunder from the most recent South Dublin Development Plan with the intention of bringing focus on language used by that planning authority. In essence it is the scale of the proposed building and extension of the parking space together with the proposed ancillary requirements – drainage and Road alterations – that worry me the most. All this is to take place in an area with the highest possible zoning protection which purports "to protect and enhance the outstanding natural character of the Dublin Mountains area"

(Open for consideration) 0.5.4 (page 44) zoning objectives

P.250 LHA 11

"It is the policy of the council that in order to preserve the unique character of the Dublin Mountains zone new building should be low rise, generally single story structures. Sensitivity in

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the setting and design of new developments in general will be required in the High Amenity Liffey Valley and Dublin Mountain Zones"

P 44 - "The category "open for consideration" includes uses which may or may not be acceptable depending on size or extent of the proposal and to the particular site location. Proposals in this category will be considered on their individual merits and maybe permitted only if not materially in conflict with the policies and objectives of the Development Plan and if they are consistent with the proper planning and sustainable development of the particular area."

It is hereby submitted that the language used in the quotes from South Dublin Development Plan 2016- 2022 is intended to create considerable standards to be met in terms of acceptability related particularly to siting and that this application for planning permission should be refused as it shows little enough sensitivity to the proposed particular area and is in no way consistent with the proper planning and sustainable development of the particular area. I submit that the bar should be set high in accordance with their own choice of words used, if language is to have true meaning at all.

I make the within submission to An Bord Pleanala objecting in the strongest possible way to the granting of planning permission herein , the proposed development being not only contrary to sustainable and proper development and principles of proper planning in the particular area but also being contrary to its own - that is South Dublin County Council's- Development Plan.

Signed: *Andu Jariel*
Dated: *20th September 2017.*



