AN BORD PLEANÁLA

ABP
19 MAR 2020

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The Secretary
An Bord Pleanala
Marlborough Street
Dublin 2
18 March 2020

Dublin Mountains Visitor Centre JA0040

Dear

It has become a tall order for us locals to continue almost 3 years on to cope with this process and its twists and turns. We are faced with another three volumes of expensive argument apparently intended to get permission for a preposterous scheme to convert a wild relatively unspoiled area to one that is covered partly by tarmacadam with modern buildings and a steel bridge. It has to be obvious to reasonable members of an Bord Pleanala that destroying the natural habitat enjoyed by so many species of biodiverse wildlife in favour of tourists' information (interpretive centre) and some kind of restaurant facilities for them again is appalling. The proposers of this change South Dublin County Council in an agreement with Coillte, have from the outset avoided meaningful consultation locally and are abusing the democratic mandate they have from the people to look after and maintain a valued resource so close to our capital city and yet still so relatively unspoiled that thousands visit voluntarily weekly and daily to enjoy the fresh air, water, scenery, wildlife and outdoors. The fact that this environmental disaster is promoted by our local council and paid for therefore by us indirectly is totally undemocratic.

Our disappearing biodiversity is particularly obvious to those of us whose span on the planet stretches back to the 2nd World War period. We grew up in a much more rurally based society where there were plenty of fish in rivers, grubs and insects in the air, birds nesting In trees and hedges and so on including frogs, bees, newts, all kinds of wildlife in fact now so much rarer and in decline in terms of species.

A planning authority with endless access to finance is in this case making an application following a private agreement with another state organisation to a third state body South Dublin County Council, Coillte to An Bord Pleanala. The present suggestion is that the Applicant should put in place a survey to without bias persuade ABP in its survey that the proposed project will have no adverse effects (*inter alia*) on designated SACs and SPAs locally. Quite frankly it is impossible to see how such a survey could not be seen to be a pure example of conflict of interest and is therefore worthless. As it happens there is acknowledgement within the survey itself self that mitigation is required. The mitigation proposed in the survey is minimal at best (signing mainly) but also the appointment of an ecologically qualified Clerk of Works to "advise". Ludicrous, and with no chance of being in a position to enforce any

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suggestions. Besides if, as proposed, tourists from cruise ships are brought to this area they would have no comprehension of such signs never mind locals who already completely ignore existing signs anyway (e.g. dogs to be kept on leads!)

Further information requested by An Bord Pleanala has not been furnished relating to Appendix 3 Merlin survey reports AA/N I S/2019 pages 17/18.

This concludes *inter-alia* that there was "only one sighting " of a Merlin and that "this is likely to have been a bird foraging from a nest elsewhere." One might think on reading this that they would say this wouldn't they? The conclusions reached continue "Given the lack of other sightings and no signs within the study area and the intensity of the study effort, it is reasonable to conclude that Merlin did not breed within the study area in 2019". It is submitted by this writer that the one sighting of a Merlin might just as easily have been used to prove the opposite i.e. that the Merlin did breed within the study area but then that is not in this instance what they're being paid for. A conflict of interest here is obvious, the surveys done are inadequate at best, confused and misleading at worst.

Why did ABP not simply refuse permission rather than ask the applicant for further information? An Bord Pleanala is and was from the outset here in a position to reject as inadequate the applicants chaotic approach to justification on environmental grounds of the original proposal including protected habitats for a variety of wildlife not to mention a peaceful and beautiful relaxing place for the people inhabiting a still biodiverse and relaxing part of South County Dublin. Surely the applicant has failed again to deal reasonably with the request ABP for further information?

ANOTEW Davidson

Mount Venus House Rathfarnham Dublin D16E429

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