

Case No. 313220

Re: Proposed SHD development on the Site Incorporating Old Dundrum Shopping Centre known as Old Dundrum Village Centre and Adjacent properties to the west of Main Street, Dundrum, Dublin 14

Dear Madam/Sir:

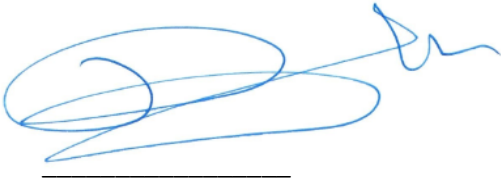
I, Bronwyn O'Donnell, live in Delbrook Manor, Ballinteer with my family and I object to the proposed Dundrum development referred to above, on the following grounds:

1. The proposed development, comprising 95% residential use with 5% non-residential use, on a site zoned as "Major Town Centre" (MTC) with the accompanying land use objective "To protect, provide for and improve major town centre facilities" **constitutes a Material Contravention of the zoning objective** as set out in Table 13.1.11 of the Dun Laoghaire Rathdown County Development Plan 2022 - 2028 and supported by policy objectives throughout the development plan, including the Core Strategy, Retail Strategy, Enterprise & Employment Strategy, Housing Strategy and the Special Local Objectives pertaining to the site as identified on Zoning Map 1. The policy context for the site requires that other uses, such as residential, will be at an appropriate ratio where they are complementary to the main employee-intensive and multi-functional use and shall not conflict with the primary land-use zoning objective. The proposed development fails to satisfy this policy requirement. The proposed development would, therefore be contrary to the proper planning and sustainable development of the area.
2. The **proposed development is premature pending the adoption of the Dundrum Local Area Plan** providing a detailed approach to the multi-functional and sustainable development of the Dundrum area, including this site. A grant of planning permission in this instance would set an undesirable precedent for the ad-hoc and piecemeal development of Major Town Centre (MTC) zoned lands that could prejudice the future regeneration of such lands in accordance with national and regional policy objectives to target significant future growth (housing and employment) into brownfield lands within the M50 corridor and along public transport corridors. The proposed development, would, therefore, be contrary to the proper planning and sustainable development of the area
3. **The proposed development fails to meet the criteria set out in 3.2 of Specific Policy Requirements 3 as set out within the Urban Development and Building Heights Guidelines for Planning Authorities (2018).** The is located partially within and adjacent to Dundrum Architectural Conservation Areas and in very close proximity to buildings listed in the Record of Protected Structures of the Dun Laoghaire Rathdown Development Plan 2022 - 2028. The proposed development fails to successfully integrate into or enhance the character and public realm of the area, having regard to the excessive height, scale, massing and bulk of the development, its monotonous design, the topography of the site and the proximity of domestic scale residential development in Sweetmount Avenue, proximity to protected structures and the Dundrum ACA and the existing landmark structure of exceptional architectural merit, the Luas Overbridge. At the scale of the city and given the topographical

and architecturally sensitive constraints in and around the site, the proposed development would not successfully integrate with existing development in the vicinity and the demolition of buildings of architectural interest within the ACA would have a significant negative impact on the ACA representing a loss of the late nineteenth century building fabric in this part of the main street. The proposed development, would, therefore, be contrary to the Ministerial Guidelines and would be therefore contrary to the proper planning and sustainable development of the area.

4. Having regard to the design, scale, bulk and height of the development, to its proximity to site boundaries, **the proposed scheme would be overbearing** when viewed from adjacent residential properties and would seriously injure the residential amenities of adjoining properties through undue levels of overlooking, overshadowing and noise impacts. In addition, the development **would have an adverse visual impact** on Sweetmount Avenue due to its bulk and scale in close proximity to the road and to the excessive height, scale and bulk and extensive nature of the façade at the road/western frontage. The proposed development would be contrary the National Planning Framework and Ministerial Guidelines, which promote innovative and qualitative design solutions and would seriously injure the amenities of property in the vicinity. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
5. **The proposed development is seriously substandard with regard to the residential amenities of future occupants** in terms of the incorporation single-aspect north-facing units; single-aspect 3-bedroomed units, a high percentages of single-aspect units with a high number of single-aspect units facing a busy road corridor i.e. Dundrum bypass; a significant number of units failing to achieve daylighting standards with robust accompanying compensatory measures; excessively long internal communal corridors with no natural daylight or ventilation; poor quality of amenity for ground floor residential units where private balconies and internal rooms are positioned directly adjoining public spaces with no defensible space provided and a significant deficits of public and communal amenity spaces. The proposed development would fail to provide for an adequate standard of residential amenity for future occupants of the scheme and would, therefore, be contrary to the proper planning and sustainable development of the area.
6. **The proposed development is seriously deficient (between 23% and 25% shortfall in minimum required quantities) in communal and public amenity spaces.** The spaces are also substandard in quality with restricted widths, experiencing excessive overshadowing, and inadequate buffers provided between the public and communal spaces. The public open spaces are not highly visible or easily accessible by the public from the main street and due to the topography of the site, their layout and functionality is seriously compromised. The “Urban Design Manual – a Best Practice Guide” issued by the Department of the Environment, Heritage and Local Government in 2009, to accompany the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas includes key criteria such as connections and inclusivity. At the neighbourhood level it is considered that the proposed development has failed to successfully address the criteria of connections and inclusivity. The development is therefore considered to materially contravene the development plan in relation to the provision of public and communal open space to serve the proposed apartments. These issues have not been addressed in the applicant’s Material Contravention Statement or mentioned in site notices and the subject application therefore does not meet

the requirements of section 8(1)(a)(iv)(I) of the Planning and Development (Housing) and Residential Tenancies Act 2016 (as amended). The Board therefore cannot invoke section 37(2)(b) of the Planning and Development Act 2000 (as amended) in this instance and is precluded from granting permission

A handwritten signature in blue ink, consisting of a large, stylized 'B' followed by a series of loops and a final flourish.

Bronwyn O'Donnell