



An
Bord
Pleanála

Observation on a Strategic Housing Development application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's
name

Myles Balfe

(b) Observer's
postal address

14 Castle View, Dundrum, Dublin 16.

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

N/A

(b) Agent's postal
address

N/A

Postal address for letters

3. During the process to decide the application, we will post information and items to you **or** to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

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The agent at the postal address in Part 2

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Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation on.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

313220

- (b) **Name or description of proposed development**

Old Dundrum Shopping Centre/Dundrum Main Street

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Dundrum Main Street

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write. You can also insert photographs or images in this box.

(See part 6 – Supporting materials for more information.)

Introduction

Thank you for providing an opportunity to review these development plans. Having read them, they leave me highly concerned about the future of Dundrum. My main concerns relate to:

- Environmental impacts during construction.
- The imagined group who will live in this facility (young professionals).
- Lack of attention to the needs of young people in Dundrum.
- Lack of attention to the needs of older people in Dundrum.
- Inadequate parking in the development leading to impacts on parking and residences in the area.
- The size and scale of the development and its likely destructive impact on the village of Dundrum.
- Lack of planning for the additional facilities and services that will be needed.
- Lack of attention paid to existing research on what Dundrum people want for this site.

Environmental impacts during construction

I am highly concerned about the environmental impact that construction on this site (anticipated to last eight years at least) will have on residents and wild-life in the area. My son is 3 years old. He will be at least eleven years of age by the time that this site is developed if the plans for it are approved. During that time he and other children in the area will be exposed to continual- and hazardous- dust and other airborne materials that result from demolition and construction on the site. I note that the construction plan contains details about managing asbestos. Effectively a decade of his and other young children's' lives will be spent exposed to potentially extremely dangerous materials generated by this site. That is not taking into account the health risks that will come from huge and dangerous construction vehicles moving through the area. These vehicles are not only dangerous, they will cause significant disruption in terms of noise, nuisance and severe inconvenience. This site is in the middle of a built up residential area- it is not a new site where construction vehicles can easily get in and out of. Traffic in Dundrum will be gridlocked for close to a decade, significantly impacting residents and businesses in the area. I note that the plans will be attempting to get the following equipment in and out of the Dundrum Bypass entrance: rigid and articulated trucks; bulldozers; excavators; rock drills; crusher machines; screening machines; rock breakers; concrete vibrators; Generators; Compressors Tower Cranes; Mobile Cranes; Concrete Delivery Trucks;

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Hoists; Fork Lifts. I was extremely alarmed to read that structural vibrations from the site might impact other properties in the area and that “there are measures employed to reduce vibration” but not, for what I could see, to eliminate it.

Additionally I note that the plans make no reference to the site’s development on local wildlife, such as birds, foxes and badgers, all of which live in the area. Furthermore I think that it is highly likely that concrete dust and other aerosols will make their way into local waterways.

Furthermore, I was concerned to read that 13%-16.7% of the site (two figures are given) appear to be at flood risk, though the plans note that “it is submitted that avoidance of development in the Flood Zone B lands in this instance” is not necessary. If I was someone spending my life savings on a property (especially at the prices that are being proposed- see next section)- I would not be happy to read that my property was built on a Flood Zone B area. Especially given that Climate Change will lead to increased Black Swan weather events and unpredictably intense rainfall in the future. Sites need to plan for the absolute worst in terms of rainfall because the absolute worst is highly likely to happen within the next decade.

The imagined users of the site

I think that one of the key lines in all of the documents is in the Statement of Consistency and Material Contravention. This document states that “the nature of the tenure anticipated in the proposed development [has] a strong emphasis on young professionals”.

I note that the Irish Times has reported:

<https://www.irishtimes.com/business/commercial-property/hammerson-puts-42-6m-price-tag-on-88-dundrum-apartments-for-social-housing-1.4850141>

that three-bed-room apartments in the site will be €788,741, two-bedrooms will be €567,708 and one bedroom apartments will be €385,301. According to the CSO, in 2018 the median salary in Ireland was €36,095. That means that the three bed-room apartments on the site will be about 21 times the median Irish salary. The one-bedrooms will be 10.67 the median Irish salary. I struggle to see who will be able to afford these apartments other than the most elite socio-economic groups. I don't see how apartments at these prices can remotely be said to be contributing to solving Ireland's housing crisis. Rebuilding Ireland-Action Plan for Housing and Homelessness 2016 state that there need to an increased output of housing to "meet demand at affordable prices". Similarly Housing for All- A New Housing Plan for Ireland (2021) notes that "increasing affordability" is key to solving Ireland's housing crisis. No one apart from a very privileged few will be able to afford those prices.

I note that the Irish Times reported that there is a "disturbing disparity" between prices at this site for social housing compared to other developments in the area:

<https://www.irishtimes.com/business/construction/disturbing-disparity-in-social-housing-prices-at-dundrum-projects-1.4852055>

I think that most things in the plans stems from (and mainly make sense in light of) the design assumption that the development will be for elite young professionals. Young professionals are typically imagined as office workers who lead a highly urbanised lifestyle and have no real commitments. They are imagined to lead a type of 'weightless' existence. They only exist in the present, do not age or get sick, and their circumstances do not change through time. Young professionals have two key functions: to consume; and to be consumed for their resources. They do not need services or facilities.

Unfortunately, as a group they do not actually exist outside of the imagination of marketers. Real people are much more complicated, and have complicated needs and concerns- ones that their living situation and environment needs to be able to address.

Lack of attention to the needs of young people and children

A key aspect of young professionals is that they are typically imagined as not having children or families. The childcare facilities in the plan (one crèche) makes sense in terms of this idea; but does not make sense otherwise. Having one crèche of the proposed size, for a development of this size, seem to be totally inadequate. The size of the crèche is based on the fact that "1 bed units should not generally be considered to contribute a requirement for childcare provision".

However one thing that Ireland learned from the last financial crash, and in fact the last several years, is that all types of people and households can easily end up living in accommodation that was designed with another group of people in mind- especially as housing is becoming more and more expensive.

There is a somewhat blasé statement in the plans that if there is excess demand for the crèche then people in the complex will be able to obtain childcare in the surrounding area- "the assessment also considered the fact that there are a number of

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other facilities in the general area existing and the following facilities are listed on the DLR Childcare Committee database”. This ignores the fact that in some cases there are (at least) 1 year + waiting lists from some creches in the area, so the local area is already at capacity. I also note that despite the plan’s focus on encouraging walking, some of the creches that they list to provide additional capacity can only be reached by car.

Lack of consideration for play areas and facilities for young people

There is some general references made in the plan to play areas for children but there is no large scale dedicated playground for children or play areas for teenagers included in the designs, such as skate parks, or even things like youth cafes. The documents note that the development will include “suitable play opportunities for all ages of the calculated child population within the proposed residential development”, which would seem to be a restrictively small number of children (especially if they are figuring on mainly housing young professionals with no children). This development is effectively replacing the public sphere of Dundrum village. It needs to be able to provide amenities for everyone in the community. Dundrum in fact is currently is almost a ‘play desert’ in its lack of amenities and facilities for young people. The lack of attention paid to children’s needs is especially interesting given that many of the images in the design document have images of young children, e.g.:



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I note that Article 31 of the UN Convention on the Rights of the Child highlights that state parties “shall encourage the provision of appropriate and equal opportunities for cultural, artistic, recreational and leisure activity” for children and young people.

Lack of attention paid to existing research on what existing members of the Dundrum community want.

I note that Imagine Dundrum conducted qualitative research with the local community in 2017 to find out what they wanted from a revitalised Dundrum. I note that a key theme in the research was that people did not want “a commercial, high-rise anonymous place...not just high-rise apartments”. Rather people wanted a range of housing types, especially geared towards families and older people, that would in turn preserve Dundrum’s history and “keep the character and scale of the village” alive.

Lack of planning in relation to services

Additionally, there is no reference in the plans as far as I could see to considering implications of the proposed development on local services, such as schools and healthcare services (who are often used most by the young and the elderly). This only makes sense if again, the idea of the development is to house single, childless office workers who are in their twenties- and who will never grow old, want children or want to start families. Otherwise, it is a major oversight not to consider this.

Some Dr.s surgeries in Dundrum are not taking on any new patients because they are already at capacity. Schools already have long sign up times. The proposed development will therefore have a major (and likely negative) impact on over-stretched local capacity in these areas. The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas note that “no substantial residential development should proceed without an assessment of existing schools capacity or the provision of new school facilities in tandem with the development”.

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They similarly note that there should be consultation about “the provision of healthcare facilities in major new development areas”.

There is also no consideration given to the equally large development at the nearby Central Mental Hospital, and how the combined addition of thousands of additional people in the area will impact on local services, both now and in the future.

Parking and transport

I note that the plans will have 373 car parking spaces and 17 motorcycle places, which is far less than one car parking space per apartment. I note that the plans themselves acknowledge that the parking areas as “at a low level of provision”. I note that if the DLRCCC Development Plan (2016-2022) contains guidelines that, if applied, would allow for 881 car parking spaces on the site. I have to say that I was shocked to read that the plans say that one solution to the lack of parking on the site is “the availability of circa 3,500 parking spaces within the existing Dundrum Town Centre”. Dundrum Town Centre is a paid parking facility (3 euro per hour). As such I think that is likely that either people in this facility, or people visiting them, will end up parking all across the local area, such as in Sweetmount or Castlevue, at great disruption to the local residents. Despite the plan’s focus on sustainable transport and proximity to the Luas, I thought that it was very interesting that they note that “a high proportion (circa 16%) of residents at the new residential development will use the Luas to commute to their place of work” (p.21 of the Transport Assessment Document). How are the other 84% going to get to work?

This in turn gets at a contradiction in the plans. The density of the development is being justified because of its proximity to the Luas. And yet the plans themselves seem to indicate that they do not think that most people will use the Luas?

I note that the plans say that the development “reduces reliance on the private car”. This is not what the plans do. People will still need to rely on cars for many trips, especially if they have children. In fact, the plans themselves acknowledge this in that they intend to provide spaces on site for “car share schemes”. What the plans effectively do is reduce the opportunity for many tenants to park on site. I note that the entrance to the facility will be at Dundrum Bypass. Dundrum bypass is frequently gridlocked at certain times of the day such as rush hour (especially when it is raining). People trying to get on to the site at these times (when they are returning home) will intensify this gridlock.

I note that the plans say that the Luas has the “capacity to accommodate the proposed development”. However does it have the capacity to accommodate the proposed development plus all of the other developments that are being built in the area? Luas traffic is not quite yet at pre-pandemic levels, but it is getting there. At certain times of the day you have to crush on the Luas at Dundrum, if you can get on at all (again, especially at morning rush hour). Adding an extra 1-2 thousand office workers (though again the plans seem to think that only a tiny fraction of young professionals will use the Luas?) trying to get on at the Dundrum Luas stop seems to me to be concerning, to put it mildly. It is only going to get worse in the years ahead. The plans themselves note that they have absolutely no idea what future demand for the

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Luas will be, noting “it is not known whether levels will return in the short to medium term”.

Monolithic buildings and destruction of architectural heritage

In general the new buildings along the main street will have a uniform and monolithic presence on the street. The proposed height is 3-5 stories which is benchmarked against Usher house next to the Luas Station. It notes that buildings alongside the Bypass will be much higher and that the tallest building will be 16 stories, or equivalent to the top of the Luas Bridge. It is noted that “at this location the building can act as a wayfinding point when approaching Dundrum from the North”.

There are a few points to note here. Firstly, the way that this benchmarking is done is called Kurtosis sampling. This is where you benchmark against the most extreme point in a sample. If the heights were benchmarked against the median height along Main Street you would be saying that the new buildings would need to be about 3 stories maximum in total. So the statement that “four storeys above retail is not an excessive scale of building for the proposal on Main Street” is simply not accurate.

It is noted that “four storeys above retail...will not feel high rise and will feel an appropriate scale”. This is a subjective statement. Where is the evidence to back this up? Whatever about how someone thinks it feels, it clearly looks high rise in the pictures. It will black out quite a lot of light on the street.

The new shopping centre creates a wind tunnel along the bypass and this would I think be intensified by the new buildings; I also think a wind tunnel could be created in the main street.

The idea that a 16 story tower will act as a wayfinding point if you are coming from the North is also nonsensical as the Luas bridge already serves this purpose. Furthermore, a 16 story building is so tall that you cannot effectively take it in. I also find it strange that a 16 story building is even being considered in a suburb where the average height of buildings is two storeys.

I note that the Urban Development and Building Heights Guidelines for Planning Authorities from 2018 states that “historic environments can be sensitive to large scale and tall buildings...Planning Authorities must determine if increased height buildings are an appropriate typology in particular settings”. In a situation where the average height of a building in the area is close to two stories I do not see how the height of many of these tower blocks (not just the 16 story one) could be said to be an appropriate typology. **None of them are the appropriate height for the area.**

Overall, the maximum height of any tower blocks in Dundrum should be several stories, there should be much fewer of them, and the maximum height of buildings along the main street should be 2-3 stories if Dundrum’s heritage is not to be totally annihilated. The Urban Design Manual provides a list of key criteria against which these types of proposed developments need to be assessed, including if “the development seems to have evolved naturally as part of its surroundings” and “appropriate increases in density respect the form of buildings and landscape around

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the site's edges". A reasonable person would have to conclude that 9-16 story buildings do not respect a built environment where the average height is 2 stories. Effectively, what is being proposed is levelling Dublin's architectural, social and cultural heritage to build an IFSC 2.0 or a Ballymun 2.0- but in the middle of a residential Dublin village.

Lack of future planning

I would also note that the focus on one bed-room apartments in the plans does not make sense. The pandemic has shown that many individuals now want to work from home. However to work from home effectively you need space, especially if there are two or more of you living in the apartment. One bedroom apartments on this scale are a relic of a pre-pandemic life and ways of working. We have already moved into a new world now, one that people's home and housing situations need to be able to support.

Relatedly, many people that I know of in the Dundrum area are working from home at least several days of the week. Their homes are also their places of work. The construction on this site, if it goes ahead, will cause considerable disruption to people's working days. I note that the plans are seeking permission to do construction work from 7-7 Mon. to Fri. and from 8-2 on Saturdays. Not only will this destroy people's quality of life in the area and their right to the peaceful enjoyment of their own homes, it will significantly impact their ability to work from home themselves. It is important to realise that that construction on the site will not just disrupt business on the Main Street, it will disrupt business activity occurring right throughout the suburb that it being conducted in home offices, living rooms etc. This might be different if the site was remote, but it is in the middle of a built up, mature residential suburb. Construction times on this site need to be far more limited.

Lack of consultation

I would also note that there has been a lack of consultation about these plans. Neither I nor anyone else on my street has been approached by the developers or architects about this scheme in advance of the plans being submitted.

Conclusion

To summarise:

- I think that this development will have a significantly negative impact on local services that are already at capacity.
- The development is likely to lead to significant disruption to residents in the area over the longterm through things like site tenants and site visitors having to park in residential streets. There are no where enough car parking spaces on site.
- The development of this site (8 years) will cause significant disruption and health risks from things like aerosols and dust and the movement of large and dangerous vehicles to the Dundrum area over a decade long timeframe. And that is if there isn't another financial crash in the meantime- I note the half-finished tower blocks in Sandyford. I also note that planning is being sought

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“in the current climate of a housing crisis”. However it is difficult to see why, if planning is being sought to address an acute crisis, why permission is then being sought for a decade long timeframe. Huge numbers of Apartments in places like Cherrywood will have come onstream before this development is ever built.

- In fact over the longer-term a key housing challenge will be to house a rapidly increasing population of older people (who according to Project Ireland 2040 will make up 23% of the population by 2040). Is building innumerable tower blocks for young professionals the way to deal with the coming major housing challenge of the 2030s, when the development will be completed? The answer is clearly no. I note that one of the ways that the plans will allow people to age in place is by having “shower and bathrooms designed to accommodate future installation of grab rails”, which is not particularly adequate in light of the housing/ageing timebomb that is coming down the line.
- The plans do not offer any facilities for the local community. There needs to be medical facilities; sports facilities; libraries; parks; facilities for young people etc. The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas state that “planning authorities should seek to ensure that facilities for social and cultural use, such as community centres, and personal and community development, such as resource centres, are available”. Similarly I note that the Dun Laoghaire Rathdowne County Development Plan 2022-2028 notes “the need to integrate housing with the provision of supporting community and social infrastructure...[such as] meeting halls and community centres, along with schools, health centres, doctor surgeries, libraries, community playgrounds, day care facilities for older and disabled people”.
- I note that the DLR County Development Plan 2022-2028 states that ““any future redevelopment of Dundrum Village Centre (Phase 2) shall provide for and retain a range of complementary non-retail uses including - but not limited to - employment, restaurant, leisure, entertainment, cultural, community and civic uses - to supplement that already provided for within the wider Dundrum Town Centre.” The current plans do not meet these guidelines- at all- in my view.
- I note that the Report on Community Facilities in the Dundrum Area (2018) found that there was “inadequate capacity in the area to service the needs to community”. That was the existing community, let alone the new community of two thousand plus people being put in the middle of it via the proposed development –plus the thousands of even more people from all of the additional developments.
- The plans are based on magical thinking about the nature of the people who will be living on the site and their needs (no need at all for a car for example).
- The buildings- all of them- are far too tall for the architectural area that they are in, and there are far too many of them. Dundrum village as such would not exist after the plans commence. You will be left with a shopping centre and some tower blocks. Dundrum already has one of the highest density

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population areas in Ireland. The built heritage of the area, which goes back over one hundred years, will be destroyed.

- The apartments on this site need to be offered for sale on the private market. Dundrum does not need any more build to let tower blocks, which will create a large permanently transient population in what was once Dundrum village. Rather than community, these types of facilities facilitate social disorganization and atomization. I note that the Dundrum Local Area Plan from 2018 states that there is already a “significantly higher proportion of rented properties in Dundrum compared to the State average”. We need to be creating affordable homes that people can own and live in long-term and put down roots in, eventually passing those homes on to their children. I mention this given the repeated focus in the plans on sustainability and developing community. I would also note that there is currently actually quite a strong sense of community already in Dundrum, but one that is under threat from these plans. The Journal.ie, for example, did a profile on Dundrum in 2018 noting “the village main street lined with cottages is still very much alive, and there’s a real community”. These plans will pose a threat to that.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

If your supporting materials are physical objects, **you must send** them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Remember: You can insert photographs and similar items in part 5 of this form – Observation details

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic housing observation **only** is €20.
- strategic housing observation **and** oral hearing request is €70

Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

Please note you will have to pay the correct **additional non-refundable fee** to request an oral hearing. You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

☐

No, I do not wish to request an oral hearing

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Final steps before you send us your observation

9. If you are sending us your observation using the online uploader facility, remember to save this document as a Microsoft Word document or a PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

The National Adult Literacy Agency (NALA) has awarded this document its Plain English Mark. Last updated: November 2020



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Initials		Initials	
Date		Date	

Notes