

ABP 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

09/05/2022

Dear Madam/Sir,

I am a medical doctor living in Dundrum village and working in Dublin city centre. I am both a GP and a health regulator. My concerns regarding the proposed development come from my interest in population health and well-being, and the sustainability of our housing. I have watched in horror at the regulatory failure that has resulted in Irish homes being turned into a mechanism for profit for foreign investors, with an extremely negative impact on the health, quality of life and livability of our residents.

Oversupply of 1-2 bed rental apartments already exists in Dundrum and DLR/Dublin. I

moved to Dundrum village in 2014, thinking the very high cost of my home would be off-set by the convenience of transportation options in the area. I was so wrong. Since the extension and join up of the Green/Red Luas, it is simply not possible to board a tram between 7.30 & 9am at Dundrum station as they are all full upon arrival, I have a similar experience in the evenings. The 44 and 61 buses to town sit in a permanent traffic jam from Dundrum Luas Bridge to the city centre, there are no bus lanes. The 14 bus travels away from town and then meanders West before eventually turning towards the city centre. It is a fallacy that the area is served by good quality transport. Most people now use their cars instead which has resulted in serious congestion and poor air quality in the area. I now have to cycle to work, despite there being no safe cycling infrastructure on the Dundrum Rd. These problems have worsened in recent years due to the building of yet more BTR apartment blocks in the immediate area (E.g. Fernbank, Herbert Hill) and the county in general. The residents of these blocks tend to be transient residents, and due to the high rental prices, generally work in the city centre. The social cohesion of our neighbourhood has already been damaged by having so many empty apartments here daily. There are no people in them, there is no life around them. It doesn't make any sense that the existing apartment blocks were not built in the city centre, nevermind provision of yet more of this homogenous soulless housing. I have no issue providing homes for a diverse array of people who need them in the area, but this is not a scheme for humans. This is a scheme of small shoe boxes, simply designed for maximum profit. This scheme will not sort the housing needs of families, older people or those with disabilities. It is a fabrication that this scheme of so many small one bedroom apartments will bring any vibrancy to Dundrum. It is yet another homogenous development providing yet more unsuitable accommodation for most who need it and will contribute nothing to help our homelessness crisis. Given the gargantuan scale of the proposed development, it will also take almost a decade to complete, larger family homes are needed long before then. A smaller scale residential development above a vibrant social and retail development will bring longterm employment opportunities, as well as family homes.

Regulatory failure

Virtually the whole town of Dundrum was originally sold to one developer, this should never have happened and amounted to serious regulatory failure. Inevitable economic downturn and speculation on land by the subsequent owner has meant that much of our town has been let become derelict. Designation of this proposal as a SHD is yet another regulatory failure. The applicant has no interest in Dublin, Dundrum or its residents. It has cynically timed an application as a SHD, but has no interest in provision of homes. The only strategy is maximum profit for towers of shoeboxes that provide for no social cohesion and this will permanently negatively

impact the area and the county. We have seen this already happen in areas such as Sandyford, Aitken's Village, Belarmine, Clarehall etc. There are significant social problems in these areas now due to the building of large masses of apartments, but no provision of services, shops, sustainable transport etc. Are we just going to repeat the failure that is the movement of tenement residents to Tallaght again, decades later? Why is the city being turned into a doughnut shape with no high rise in the city centre where employment/services exist, only to build ugly sporadic towers in the suburbs where decades of poor traffic planning is evident? In the centre of Dundrum village will we be looking at unfinished shells akin to the eyesores of Sandyford when regulators finally realise that we have oversupplied 1 bedroom apartments to foreign investors? There is nothing strategic about more apartment towers, family homes are needed in Dundrum, such buyers have been locked out of purchase of same due to regulatory failure. If this development is so strategic, surely a mix of resident types can live here. If so, where will the children who live in these tiny shoe boxes play? Where will the older residents gather? Where will their pets be facilitated? How does a single parent afford to live in Dundrum? What is in this strategic development that will improve the lives of a mix of age groups? Do we only provide housing for those who can afford thousands per month in rent?

We need diverse family units of mixed ages and backgrounds to bring life back to Dundrum. We need children and older people to have a safe place in our village. Not more transient professionals renting here briefly, with no interest in improving our town or contributing socially.

Is Dublin to become a city centre full of hotels with tourists looking for the city's vanishing character, and suburbs full of tower apartments blocks and no vibrancy? Is that what ABP is willing to facilitate? Where has the leadership gone?

The original developer had promised substantial community facilities if granted permission to purchase the whole village. None of these were ever realised due to profiteering and lack of regulatory oversight. The current owners proposal to build all the apartments first over 8 years and then build the retail units, makes me very sceptical that they will ever build those retail units. In that almost decade, we will have a building site and no reason for anyone to visit Dundrum. Why would we allow this?

In addition, it was clear that the developer did not wish the public to be able to easily view the plans so they could see what is proposed. The website was virtually unusable, and excluded anyone that didn't have good internet literacy from commenting. Given the MTC location and scale of the plans, this should not have been permitted from a regulatory perspective. The timeline for submission of comments was also too short given that this proposal is availing of the ill-judged SHD designation.

Overall, Dundrum village has been allowed to degrade due to significant regulatory failure for decades and this cannot be further compounded by granting permission to this awful monstrosity.

Contravention of Major Town Centre zoning of Dundrum village.

Without having any understanding of land zoning, common sense would tell anyone that replacing a large village centre shopping hub that provides employment and services such as grocery, post office, cafes etc with 95% residential apartment tower blocks, will immediately destroy the vibrancy of this town. If we wouldn't raze Grafton Street to do this, why would be raze Dundrum to do this? The provision of ?10 retail units is a pittance in a MTC. Where is the employment opportunity for residents and locals to come from? Where will these residents find

services they require such as florists, newsagents, book shops, playgrounds etc. Where is the green and seated space for humans in these concrete tower plans? Where is the community centre to enable social bonding and provide a social outlet for all sectors of society? Where is the new library to aid social cohesion and increase literacy? Where is the hotel to hold your 30th birthday party in or entertain friends from out of town? You certainly won't fit guests in your 1 bedroom SHD apartment given their sizes. Where is the public swimming pool? Where is the park for residents to exercise? Why would we allow a reduction in retail units on the main street of a MTC? It would be an upside down decision to turn the only other MTC in DLR into 95% residential application. Why would anyone come to a MTC that is 95% poor quality residential tower blocks? Do we want Dundrum village to die so that an investment fund can make more profit? What is the role of ABP in allowing or preventing the death of our villages? Do we want the social problems that were seen in Ballymun and Tallaght because tower blocks and poor quality housing predominated, with no provision of services?

Local tax payers have contributed significantly to the County Development Plan and the Local Area Development Plan, none of which will now be realised if this scheme is granted permission as is currently planned. Instead we will have to forever live with an almost 1 million square foot expensive residential development where services are currently provided.

Scale, design and appearance of development

The proposal appears to be an experiment in pushing the boundaries of regulation of building standards and planning, not the provision of strategic and human-friendly housing. There is no planning precedent for an ugly, overbearing narrow 16 storey tower which will completely change the appearance of this small friendly village that sits at the foot of the mountains. It is higher than even city centre buildings and indeed the ugly Sentinel Building shell in Sandyford, it will dwarf the pleasing architecture of the Luas Bridge as it overlooks it. The design of the other blocks is also ugly, completely lacks imagination, is not sympathetic to the local architecture (Pembroke cottages and a Carnegie building). They are joyless structures designed to maximise profit alone and resemble cheap Soviet era architecture.

How will residents even fit furniture into the rooms in the 16 story block, given the wedge shape it is being squeezed into. The historic and village-style cottages of Main St will be replaced by joyless 5 storey buildings, creating a dark corridor. The silo layout with no open areas and green spaces will create wind tunnels, as the prevailing SW winds sweep down from the mountains and through the corridors created by the proposed apartment tower blocks. This is exactly what has happened in Sandyford and it is a miserable place for humans to be. Where are the trees, grassy areas, shrubbery, water features that we need for carbon capture and pollinators? Where are the rooftop gardens and solar panels? Dead concrete tower blocks will provide no humans for the developer's desired economic activity.

Dundrum village is one of the few remaining attractive villages in Dublin and it was my understanding that some of the historic Main St buildings are designated as an Architectural Conservation Area in the County Development Plan 2022-2028. Will we destroy our heritage yet again due to poor planning and be ridiculed about this in years to come like we did with our Georgian terraces?

Quality of the residential accommodation

The applicant made it very difficult to accurately view the plans. However, it seems that many of the apartments will have very little floor space, be north facing, or have only one window which faces down onto the congested and polluting Dundrum Bypass. It looks crowded with opposing apartments sitting on top of one another with no sense of space. It also isn't clear how well integrated with the surrounding village this accommodation will be, at present they look like

miserable silos. Why would we enable this sort of miserable accommodation? What will it do to the physical and mental health of residents? Do we wish to store up future antisocial behaviour problems instead of providing comfortable homes for our residents?

The applicant is cynically trying to get permission prior to the publication of the imminent Dundrum LAP

"It is anticipated that the Draft Dundrum LAP will be progressed post adoption of the County Development Plan" and a focus on the LAP preparation will be on enhancing the multifunctional nature of Dundrum Town Centre (7.5.2) as per Policy Objective "RET4: Major Town Centre".

Granting permission for a 95% residential development will not enhance the multifunctional nature of Dundrum Town Centre.

In conclusion, if we care anything for the humans who will live in Dundrum village, there is no way the developer should be allowed to proceed as proposed.

Yours sincerely,

Dr Anna Cunney

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