

13, Beech Lawn,

Dundrum,

Dublin 16

Reference: 313 220 - Old Dundrum Shopping Centre

016 N251
AN BORD PLEANALA
LDG- 071051-2022
ABB 052629-27
09 MAY 2022
Fee: € 20 Type: cheque
Time: 3:45 By: @hand

Dear Sir / Madam,

I wish to object strongly to the planning permission for the Hammerson - Alliang S.H.D. plans for Dundrum Village.

My objections are as follows:

- This planning is a material contravention of the zone, in that it is 95% residential with virtually no provision for civic, community and cultural services.
- There is no open or recreational facilities for up to 3,000 more people, in a small area.
- The "community" atmosphere of Dundrum village, where I have resided for the past 42 years, will be destroyed - no small artisan shops, no market square, no plans for seating and planting as is the case now - thanks to the work of local groups and Dun Laoghaire Rathdown County Council.
- The old cottages in the main street, designated Architectural Conservation Area, are, according to the plans, to be demolished.

- The overall height and density of the planned development is overbearing, will 'dwarf' the Luas bridge. The planned height of the residential blocks on the main street will be completely out of keeping with the surrounding low-rise houses.
- "The development is overwhelming in height, scale, massing and bulk". Refer to Frank McDonald's article on page 17 of the Irish Times (7/5/2022)
- Traffic has always been a major problem in Dundrum. Traffic reports invariably mention very heavy traffic on the Dundrum Road.
- Is the infrastructure capable of supporting this proposed development? Sewage, water pressure etc. etc.
- Transport. For the past number of years the Luas and bus service in Dundrum are under severe pressure, especially during 'rush hours' in the morning and evenings.
- Will an ambulance / fire engine be able to access and drive through the village of Dundrum?
- It will take eight years to construct the proposed development. The traffic in Dundrum and surrounding areas will be chaotic before, during and after the construction.

- Fear of flooding. Flooding can occur when the ground is compacted. This could pose a major problem if there is an underground car park.
 - Are there relevant services for the increased population? For example - creches, schools, library, park, open spaces etc. etc.
 - An application for 111 apartments has been made at Somerville House, Dundrum Road. If granted, this will have an impact on traffic etc. etc.
 - A housing development will be constructed on the site of the old mental hospital, Dundrum Road. This will have an impact on traffic etc. etc.
- Dundrum. I hope to continue living in spirit, full of young families with a vibrant atmosphere. I agree that the present site of the old shopping centre needs to be developed. My wish is that the new development will comprise a mix of low rise apartments, no more than four storeys, a combination of duplex houses and larger houses which can be homes to young families rather than have a transitory population which will more than likely be living in

rented apartments owned by investors. There is an adequate supply of these in the Dundrum area, with some vacant rental properties demanding exorbitant rents. This is not my wish for the future of Dundrum.

I hope that 'An Bord Pleanála' will reject this planning permission outright.

I have written this letter of objection for the future of my child, grandchild and generations to come so that they can enjoy the 'village of Dundrum'.

Yours sincerely,

Catherine Lynch

P.S. I visit Airfield Farm regularly. I cannot help but notice many apartments in the process of being built. These apartments are on the periphery of the farm. Aesthetically, they are very displeasing. When these apartments are occupied, there will be a huge impact on the traffic in Dundrum and all services already mentioned.

Numerous people tell me that they have great difficulty using the Luas. Many of the trams are beyond full capacity when they arrive in Dundrum. The commuters have to allow many trams to pass before they can enter a carriage safely. As one is aware, a lot of the population continue to work from home. However, when they have to present themselves at work, this difficulty with using the Luas will be exacerbated. We are encouraged to leave our cars at home and use public transport. We have all these problems with public transport and now we are presented with the proposal of the development in the old Dundrum Shopping Centre!!

I attach a copy of Frank McDonald's article on page 17 of The Irish Times (7/5/2022) I urge you to read same. Frank McDonald is a former environment editor of The Irish Times. I also attach a cheque for €20 - payable to 'An Bord Pleanála' as payment for my letter of objection.

Yours sincerely, Catherine Lynch



Dundrum the latest example of upended planning system



Frank McDonald Opinion

Negative impacts of tweaking planning system to facilitate financialisation of housing will be felt for years to come

Dundrum used to be a crossroads village on the way to Enniskerry and the Dublin Mountains. Its first shopping centre – a very basic L-shaped block set in an extensive surface car park – was opened in 1971 to cater for residents of new housing estates in the vicinity. More than three decades later, it was transformed forever by Dundrum Town Centre, one of the largest indoor retail meccas in Ireland.

Now it's set to be engulfed by a gargantuan development of 881 apartments in 11 blocks, rising from five storeys on Main Street to nine-12 storeys along Dundrum Bypass. It would also include a 16-storey "landmark gateway" tower, at the northern end of the old shopping centre's 3.5-hectare (8.7-acre) site, that would compete with the 50m-tall pylon of the William Dargan Luas bridge for prominence on the skyline.

The real irony is that this "strategic housing development" (SHD) scheme was submitted directly to An Bord Pleanála by Hammerson Allianz on April 5th, less than four weeks after Dún Laoghaire-Rathdown County Council formally adopted its new county development plan for the next six years – and thus pre-empts one of its principal objectives: to complete the preparation of a statutory Local Area Plan for Dundrum.

The new county plan specifically refers to the old shopping centre site and lays down a series of objectives aimed at ensuring that its future development would include a community, cultural and civic centre for Dundrum. It also states that "building heights alongside Main Street must be sensitive to the original streetscape, in keeping with its character, scale and candidate Architectural Conservation Area [ACA] status".

Hammerson Allianz is seeking permission to demolish "all existing buildings on site" apart from a row of three houses known as Glenville Terrace. These would include several buildings on



Main Street that contribute to the character of Dundrum, which the developers claim are "in a poor state of repair" and/or "not functionally compatible with modern commercial use" as well as standing in the way of achieving a "new high quality cohesive streetscape".

Yet the proposed replacement five-storey blocks would present a jagged building line along the west side of Main Street, recreating on a larger scale the "disjointed streetscape" that they cite as a justification for getting rid of most of the existing buildings – even though these are specifically mentioned in the county council's November 2021 "character appraisal" and detailed mapping of Dundrum's proposed ACA.

According to London-based Grid Architects, who have designed it all for Hammerson Allianz, "the vision is to deliver a contemporary and vibrant place to live, underpinned by the re-establishment of the traditional shopping thoroughfare along Dundrum Main Street [and to] create new public spaces within and through the [old shopping centre] site, alongside a series of connected and landscaped courtyard developments".

Minimal provision

It would be impossible to overstate the scale of this scheme, which comes with a gross floor area of 88,442sq m – not far short of one million square feet. The vast bulk of it (95 per cent) would be residential, comprising a mix of one-, two- and three-bedroom apartments, with minimal provision of car parking (320 spaces) as well as a foodstore, creche, three cafe/restaurants and 10 retail units, mostly on Main Street.

Hammerson Allianz's planning consultants, BMA, say the density of new housing is justified on the basis that there are only 47 residential units within the overall site embracing Dundrum Town Centre, including the Parochial House of

Holy Cross Church. Thus, the provision of 881 apartments on the old shopping centre site "will help to redress a significant deficit in residential use... and produce a more vibrant town centre".

Dún Laoghaire-Rathdown's architects' department was deeply dubious about the "homogenous height, massing, scale and repetitive nature" of the four five-storey blocks proposed for Main Street. As for Grid Architects' phalanx of much taller buildings along Dundrum Bypass, even with breaks to provide new routes through the site, the view was that this would present a "monolithic face" to the west.

High hopes have been dashed

Not long after Hammerson acquired the old shopping centre in 2016, a group of civic-minded local people inspired by community place-making initiatives in the US set up Imagine Dundrum to campaign for a balanced development of the site, including residential, office, retail and leisure uses, "with a civic, community and cultural centre at its heart". Their high hopes have been dashed by what is proposed.

Clr Anne Colgan (Ind), who chairs Imagine Dundrum, is overwhelmed by

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sadness and regret that UK-based Hammerson failed to engage with the group on how best to redevelop the site, and now they were faced with this "gigantic" scheme that its planning consultant, Brendan Buck, said would "alter the site in a profoundly negative manner" and "look relentlessly large" from many viewpoints in and around Dundrum.

It was probably inevitable, however, that Hammerson would avail of the unrivalled opportunity of progressing it as an SHD application direct to An Bord Pleanála just before the shutters came down on this fast-track route to secure permission for a scheme that would almost certainly be refused outright by Dún Laoghaire-Rathdown County Council because of its overwhelming height, scale, massing and bulk.

Lucrative build-to-rent

What's happening in Dundrum is the latest example of how Ireland's planning system has been upended – firstly by Simon Coveney's introduction in 2016 of legislation to permit all housing schemes of more than 100 units to go direct to An Bord Pleanála and, secondly, by Eoghan Murphy's mandatory ministerial planning guidelines in 2018 promoting high-rise construction as well as lucrative build-to-rent (BTR) developments.

All of this was done at the behest of the property lobby and directly resulted in the free-for-all mania that has gripped the planning process in recent years, with an army of architects, planning consultants and others involved in the aptly named Planning-Industrial Complex earning huge fees from drawing up and arguing for high-rise housing schemes – usually in defiance of democratically adopted city and county plans.

The negative impacts of tweaking the planning system to facilitate the financialisation of Irish housing will be felt for years to come, leaving us with a legacy of dense, expensive rental housing schemes. And while the Hammerson Allianz plan to remake Dundrum is not billed as BTR, its imposition on the area will be no less severe if it is waved through, like so many other overblown high-rise schemes, by An Bord Pleanála.

Anyone wishing to do so can make their "observations" to the board by close of business on Monday next, May 9th. The ABP reference number is 313220.

Frank McDonald is a former environment editor of The Irish Times

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