

**Date 4<sup>th</sup> May 2022**

**Case reference: TA06D.313220**

**Reference 313220 – Old Dundrum Shopping Centre, Main Street, Dundrum**

Site incorporating the old Dundrum Shopping Centre known as Dundrum Village Centre and adjacent properties to the west of Main Street, Dundrum, Dublin 14. ([www.dundrumvillageshd.ie](http://www.dundrumvillageshd.ie))

Dear Sir / Madam,

We wish to lodge a submission regarding the above referenced Dundrum Village SHD application. We are long-time residents of Dundrum, both of us having been born and raised in the locality and we have been lucky enough to be able to set up home here and raise our own family in Dundrum. We are local business owners and run an Architectural practice.

We are concerned at the potential impact this proposed development will have on the character and vitality of Dundrum Village. We believe the proposed development does not take on its responsibilities. We wish to herein set out our observations on the proposed development. We would ask that you consider these points in your appraisal of this proposed development.

**ZONING**

The proposed development is located in a very central location in Dundrum and has a zoning status in the current Dún Laoghaire-Rathdown County Council, County Development Plan, 2022-2028 as a "Major Town Centre" within the County. The zoning objective is Objective MTC "To protect, provide for **and-or improve** major town centre facilities".

DLR DP 2022-2028, Chapter 7, Table 7.2 states the overall strategy for Dundrum as being

*"Old shopping centre and adjoining lands – to include appropriate level of complementary non-retail uses and activities in respect to **community, cultural and civic uses. Public realm upgrade of Main Street.**"*

This clearly set a requirement for a high degree of mixed use, for the provision of "entertainment, leisure, cultural and civic uses" and for improvements to the public realm. This is further stipulated in the DLR County Development Plan, 2022-2028 (Special Local Objective 114 and 8).

Specific Local Objective #114 *"To ensure any future redevelopment of the Old Shopping Centre site addresses the need for the provision of a future Dundrum Community, Cultural and Civic Centre facility, which also integrates into a **civic square/plaza area.**"*

Specific Local Objective #8 *"To ensure Dundrum develops beyond just a retail shopping destination. Any future redevelopment of the old shopping centre lands shall provide for residential use and a range of complementary non-retail uses including - but not limited to - employment, restaurant, leisure, entertainment, creche facilities, remote working hubs, cultural, community and civic uses – to supplement that already provided for within the wider Dundrum Town Centre."*

The proposed development fails to provide or cater for these objectives and has very limited provision of retail, entertainment and other essential facilities, as required by the "Major Town Centre" zoning. No substantial provision has been made for civic, cultural and community facilities, spaces and services vital to serve those who will come to live in Dundrum Village, as well as the rapidly expanding population in the immediate area. The proposed development will be 95% residential with a much reduced level of retail or commercial units on the Main Street. It intends a significant growth in the residential population and at the same time a reduction in the provision of the town centre facilities to cater for them. As it stands, the proposed development will not add to the "vitality and viability" of the Village area as a whole.

In addition, there is no civic square or plaza provided at the heart of Dundrum, which is the second major urban centre in the County. The main proposed public open space is to be situated behind Holy Cross church. The Opinion issued by An Bord Pleanála (ABP) on the original proposed development, Case No. TC06D.311553, issued on 14/01/22, questioned this proposed open space – including its smallish size, its location, problems with disabled access and possible overshadowing by surrounding buildings. They also commented on the lack of adequate "passive surveillance" from neighbouring buildings.

**HEIGHT, SCALE AND DENSITY**

The proposed development is for 11 apartment blocks, some of 5 storeys on Main Street West, others between 8 and 12 storeys, and one rising to 16 storeys at the northern end opposite

Sweetmount Park. The massing of the proposed development will dwarf both Dundrum Main Street and the Luas Bridge and seems fully contrary to good quality urban design.

The receiving environment on the Main Street is a predominantly two storey, Architectural Conservation Area and the environment to the rear, adjacent to the Dundrum bypass, is predominantly a low-rise, low-density, suburban environment. The proposed development will be hugely overbearing and visually intrusive in its receiving environment. It will be very out of keeping with the historic character, scale and streetscape of Dundrum Village. The overwhelming scale and mass and the low quality design of the proposed development will greatly detract from the visual amenity of this historic place.

The Opinion issued on 14/01/22 by An Bord Pleanála (ABP), Case No. TC06D.311553, stated that the heights and massing of the proposed buildings pay little attention to integration with the existing and predominantly 2-storey environment of Main Street. The Bord recommended to the developer to "further consider" the planning requirement for respecting the character of Main Street (refer to the DLR County Development Plan, Specific Local Objective #9). It also raises questions about the appearance of the whole "highly visible" development when viewed from a distance, and its impact on existing residential properties close by.

*Specific Local Objective # 9 "To ensure that any future redevelopment of the old shopping centre lands, and adjoining /nearby properties on Main Street, take cognisance of the character and streetscape of the Old Main Street, and maintain where appropriate, and possible existing buildings and/or facades. Building Heights alongside Main Street must be sensitive to the original streetscape, in keeping with its character, scale and Architectural Conservation Area status."*

#### **QUALITY OF DESIGN**

The Opinion issued by An Bord Pleanála (ABP) referred to above, expresses concern about the overall design, especially the visual impact of the building materials, finishes and landscaping proposed, and queries how well they will contribute to an "inclusive people-friendly neighbourhood".

It is our opinion that the design is extremely ordinary and more typical of a large, out of town, greenfield location. Given that this is a "Major Town Centre" within the County the design needs to contribute significantly to the visual amenity. The existing streetscape has many buildings with high quality detailing and materials (some of which have been allowed to deteriorate by the applicant). Any future development on this central site on the Main Street must reflect the importance of Dundrum as the second "Major Town Centre" in the County both in terms of the quality of the design and in the quality of the materials used. To proceed with the proposed development would be a missed opportunity for Dundrum and for the County. We request that the Bord demand a genuinely high-quality design response to this sensitive and important site and a response which will add to and create a new Dundrum to be proud of and to be enjoyed by future generations.

An Bord Pleanála suggested that the proposals require further consideration of the quality of the "residential amenity" of the whole development, referring to the current official design standards for apartments as they relate to single aspect and north-facing apartments. In particular, there are issues of light and shade, especially in the "communal open spaces" within the development.

Given all of the above, we request that the Bord ask the developer to fully reconsider the application; ask does the proposed development add to and enhance the character of Dundrum and the local area; and does it do so to the highest standards of urban design. The proposed development is clearly contrary to the most reasonable consideration of the suburban realm, architectural character and community amenity aspects of the Development Plan. It is these aspects of our "Village" that matter most to the citizens of Dundrum and to how Dundrum is enjoyed by the people.

We have confidence in the Bord and look forward to a decision which considers and caters for the needs of the citizens of Dundrum and the County.

Yours faithfully,



John D. O'Keeffe, FRIAI and Helen O'Keeffe

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