

Ardnagle  
Mossvale  
Dundrum Road  
Dublin 14  
D14 P7F7  
7 May 2022

An Bord Pleanála  
64 Marlborough Street  
Dublin D01 V902

**REF: 313220**  
**OLD DUNDRUM SHOPPING CENTRE, MAIN STREET, DUNDRUM**

To Whom it May Concern,

I would like to make an Observation on the above major Strategic Housing Development Proposal application.

Myself and my siblings grew up in Dundrum where our parents purchased our family home almost 60 years ago. Our late mother, Rita O'Connell (nee Nolan) was born in Pembroke Cottages, Dundrum and the family subsequently moved to 7 Main Street, Dundrum where she lived until she got married. Our mother ran a grocery store at 7 Main Street for several years.

Our maternal grandfather, John Nolan operated the forge in Dundrum which was subsequently operated by his son, our Uncle, Terry Nolan. Another Uncle, Jim Nolan was a local and very well known historian who wrote several books on the history of Dundrum.

A lot of our family still live in the area so we are very familiar and closely attached to Dundrum.

The major Strategic Housing Development proposed by Hammerson-Allianz in Dundrum Village is, in my opinion, a gigantic monstrosity of almost 1 million sq ft which is overwhelming in height, scale, massing and bulk. The proposed development is completely at odds & NOT in accordance with the proper planning and development of the area.

In their Statement of Consistency and Material Contravention Statement the Planners acting on behalf of Hammerson-Allianz declare (and readily admit) many Material Contraventions of the Dun Laoghaire Rathdown County Development Plan. They

attempt to justify this on the basis of the need for housing without demonstrating in any clear or specific way how their proposed development will meet this need. It is certainly not clear that Hammerson, a UK Retail Developer or their financier Allianz actually intend to develop out this site to meet this need. It is more likely that the intention is to maximise density on the site by taking advantage of the SHD process.

I strongly object to this proposed major SHD development for the following reasons:

**1. This is a Material Contravention of the MTC (Major Town Centre) Land Use Zoning of the Site.**

I understand that only a very small proportion of all Dun Laoghaire Rathdown County Council Area is zoned MTC. The proposed SHD development is 95% residential. This is a critical wasted opportunity. Although residential land use is permitted in principle under this zoning, Major Town Centre implies a balanced mix of retail, entertainment cultural, civic and community facilities, spaces and services. It is ironic that Hammerson, a UK Retail Developer has not proposed a more visionary and imaginative scheme. I note that BMA Planning on behalf of Hammerson Allianz have not declared a Material Contravention in relation to Land Use Zoning in their Statement of Consistency – which appears to me to be disingenuous.

**2. Excessive reliance on Material Contraventions of specific Local Area Objectives in the DLRCoCo Development Plans**

BMA Planning have declared a very high number of Material Contraventions in their Statement of Consistency which I believe is unacceptable and makes a mockery of the entire process. They are attempting to massively increase the density of development allowed on the site & obtain permission for a scheme which is completely out of keeping with the proper planning and development of the area – which would result in the following:

- 3. 881 apartments in 11 blocks totalling almost 1 million sq ft ( 88,442 sq m)**
- 4. 16 storey tower block** higher than the 50m tall pylon of the Luas Bridge
- 5. Nine 10-12 storey blocks along Dundrum Bypass** which would have a profoundly altering effect on the physical environment. They would present an overwhelming monolithic and homogenous face to the west and result in significant overlooking, overbearing and overshadowing.
- 6. Four 5 storey blocks fronting Main Street. This is 2.5 storeys above buildings on opposite side of Main Street. Larger blocks can be seen behind which would result in cumulative massing.** Homogenous height, massing and scale and repetitive nature. Jagged building line. Insensitive and out of keeping with surrounding streetscape.
- 7. Contravenes local area objectives such as the provision of a community, cultural and civic centre for Dundrum and that building heights along Main Street must be sensitive to the original streetscape in keeping with**

**its character, scale and designation as an Architectural Conservation Area.**

- 8. Proposed Public Space is hidden behind the Church. No opening up of Main Street is proposed.**
- 9. This application is premature and should be refused pending completion of a statutory Local Area Plan for Dundrum which is a principal objective of the DLRCoCo Development Plan.**
- 10. The transport and services infrastructure in the area will be unable to cope with a development of this scale.** Already the surrounding road network is severely congested and dangerous particularly at the Luas Bridge intersection. Often cars cannot clear the intersection coming from lower Dundrum to either turn right up to St Nahis/Churchtown or to go straight ahead towards the subject site. It is extremely dangerous from a public health & safety point of view. The addition of 320 more car spaces will exacerbate this. The Luas is already overcrowded at peak times and commuters cannot board at Dundrum or Balally station. The proposed number of bicycle spaces will also pose a health and safety risk due to the limitations of the surrounding network. There are already water pressure & drainage problems in the area. Irish Water have stated that they need to lower pressure from time to time due to the age & condition of the pipe network. The addition of 3,000 more residents, as proposed, will again exacerbate these infrastructure pressures.

It is clear from an examination of the proposed mix of apartments and their inadequate sizes that this is not a genuine attempt to address housing need. It does not cater for the needs of young families or older down sizers. It certainly does not justify the excessive use of Material Contraventions of the proper planning & development of the area.

I would suggest that a more effective way to address housing shortage would be to sell this site to the Local Authority to ensure the correct needs are met.

Thank you for considering my observation.

Yours faithfully

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**Paula O'Connell**