

Pearse Cassidy, 16 Old Rectory Park, Dundrum, Dublin 14

Reference number: 313220
Development: Old Dundrum Shopping Centre, Main St. Dundrum

My name is Pearse Cassidy. I am a Structural Engineer. I also have qualifications in Highway Engineering and briefly worked in road design. I live in 16 Old Rectory Park, Dundrum. I'm from this area- I grew up here. My back garden faces south west, overlooking the Dundrum LUAS stop/LUAS Bridge. My house has a fabulous view of the Dublin Mountains (see photos below). This proposed development, particularly the 16 storey 58.7m high tower block, will overlook my back garden and severely injure my view.



This proposed development, if allowed, will be a disaster for Dundrum. Fundamentally it wants to demolish half of our village and replace it with apartments. The proposed development is totally out of character with the village. The scale of it will overwhelm Dundrum. It will wipe out the small retailers. It will mean that Dundrum will never have a civic centre, places where people can meet as a community, relax and enjoy each other's company and enjoy their village. Dundrum will have nothing going for it. It has a huge shopping mall. But this has no soul, It is not a local centre and it won't be around in 50 years time.

The William Dargan (LUAS) Bridge

This planning application states that it is "establishing a landmark 16 storey building at the northern most point of the site", i.e. beside the William Dargan bridge. They want to build a 58.7m high concrete structure that they are calling a landmark, which will be higher than the William Dargan bridge (LUAS Bridge) (50m) which is itself a landmark for not just Dundrum but also for Dublin city. In the Dublin mountains there is a scenic spot located near the Ticknock Road called 'the Dublin Point of View'. (See photos next page)



The landmarks that are visible from this spot are etched into a piece of stainless steel at the location. One of the landmarks highlighted is the William Dargan (LUAS) Bridge. The view is enjoyed by anyone who stops to look out over the city. If this development is allowed then this famous Dublin landmark will no longer be visible from the mountains.

Main St. Dundrum

From the Holy Cross Church, this development proposes a 19.225m high, 5 storey building fronting the Main St. for approximately 276m of street and a 58.7m high 16 story building for 49m of the Main St. at lower (north) end of Dundrum. The street curves and is, on average, 17m wide. A development of this height so close to the street will give a sense of enclosure. The Dept. of Transport's Design Manual for Urban Roads and Streets (page 69) recommends a building height to street width ratio of 1:3. For a 17m wide street, such as Main St. Dundrum, the height to the eaves of the buildings on either side should be no more than 5.6m (equivalent to the height of the eaves of a regular 2 storey house). These 5 storey buildings are 21.3m high, almost 4 times greater than the recommended height.

This proposed development says that it will have a *“new public street running on a north-south axis through the site and a series of new public spaces located between the 4 zones and which facilitate new street connections to Main St.”* Note that this so-called “street” is elevated. It sits directly on the roof of a car park. It will have to have areas (not shown on any of the drawings) of the deck set aside for cross ventilation for the car park immediately below. This so-called “public street” will be on private property and therefore is not public at all. It is pedestrian only. It cannot accommodate cars, lorries, fire tenders, ambulance vehicles. There's no direct access to the Dundrum By-Pass from this “street”. This so-called “street” passes under block 2C. The northern and southern ends are dead ends. The so-called open space at the northern end won't get any direct sunlight due to the curvature of the site and the height of the surrounding buildings. The so-called “Church Square” has been shoe-horned into the south-western corner of the site, completely enclosed on all sides. It will have an 8 storey apartment block on its north side, the church and parochial hall on its east side, a bridge abutment on its' south side and is elevated 3.9m over the busy By-Pass on its' western side. Furthermore there is an enormous

existing 7 storey apartment building (Dundrum View) sitting up on the By-Pass' western embankment overlooking the location.

I grew up in this area. I have wonderful memories of the old Dundrum shopping centre. I recall everyone's excitement when it opened in the 1970's. I bought my first ever record there for 50p. This old centre is still, for me, and many like me, the 'Dundrum Shopping Centre'. The centre is dilapidated. It has suffered from lack of investment. It has been neglected and allowed to become run down.

Notwithstanding, it serves a retail function. This proposal will see the end of 24 existing retail businesses, replaced by 12 retail units. It does nothing to augment or sustain the retail character of Dundrum. On the contrary, it will rip the retail heart out of Dundrum Main St. The following retail businesses will be gone:

Lidl
Polonez
Dealz
Matt Britton Carpets
Dominic Smith electrical
An Post
KBC Bank
Veterinary Surgery
Dundrum School of Music
Insomnia
Relish food store
Mulvey Flooring
Noel Reid Men's Clothing
Eurofone
Diep Noodles
L'Ombre hairdressing
Dr. Accupuncture
The Barbers Cabin
Day Break newsagents
Essence Patisserie
The Best Barber
Irenes Flowers
Havana Therapy
The Christmas tree store (former Mulveys hardware)

Dundrum Main St. starts at the By-Pass junction, at the northern end of the village. As you walk up the western side of Dundrum Main St., according to this proposal, you will first pass a "Parcel Office", next to a "Bicycle Storage Room", then there's a recessed "Lobby" before you reach the entrance to the first retail unit, the "Food Store". So you will have walked 50m on Main St. before reaching the first retail unit. You will have to walk another 60m along the Main St. before you reach the next retail unit (330.3m²). You will then have to walk another 40m before you reach the third retail store (165m²). Furthermore you won't be able to access this shop from the Main St. because its' entrance is off the Main St. So, with this proposal, having walked 150m up the western side of Dundrum's Main St., you will only have passed the entrances to two shops. This is wrong. It goes against the recommendations in

the Department of Transport's Design Manual for Urban Roads and Streets, for high frequency retail access and frontage type (page 72). Moreover there's no room on the (western) footpath for soft landscaping and street furniture. We will actually lose the existing street furniture and hedging/planting that is opposite Peter Marks (see photo next page).



What's more, as you walk down this footpath from the village you will no longer be able to see the LUAS Bridge and the Dundrum Library. (See Main St views below).



This development is going to be a massive lump of concrete in the heart of Dundrum village. It will be visually overbearing, obtrusive and incongruous on the streetscape. It fails to successfully integrate into the existing architectural character of the village.

The County's Development Plan objective for the development of this zone is to "protect provide and or improve major town centre facilities". (objective MTC). The Development Plan sets out the following specific local objectives for any development of the old shopping centre lands:

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.

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.*

Objective 10: *To retain, improve and encourage the provision of sustainable neighbourhood infrastructure facilities.*

Objective 11: *To Support the recommendations of the Dundrum Community, Cultural and Civic Action Plan (CCCAP). The CCCAP have identified a need to develop of a Civic and Cultural Hub including Civic Offices, multifunctional community, cultural and exhibition space (a public square/plaza and place for gathering for civic events) in Dundrum Town Centre. The CCCAP advises that currently Dundrum Village has no frontage or activity onto Main Street and there is a lack of any significant focus or counterpoint attraction at the northern end of the street.*

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*

Objective 123: *To ensure that, as Strategic Regeneration Sites, residential provision on the Central Mental Hospital Site and the Old Shopping Centre site will provide for a balanced mix of housing tenure, including affordable homes, and an acceptable mix of larger flexible units, and lifetime adaptable homes to ensure balanced, sustainable communities in Dundrum.*

Objective 124: *Permeability through all developments on the west side of Main Street should ensure pedestrian/ cycle links between Main Street and the Dundrum By-Pass*

This proposed development completely ignores these objectives. It doesn't provide any civic centre facilities. It doesn't provide any civic square or plaza at the northern end of Dundrum's Main St. On the contrary it wants to construct a 16 storey concrete building and one retail store at this end of the street. It's a development which turns its' back to Dundrum Library, isolating it even more from Dundrum village. Page 148 of the Dún Laoghaire Rathdown County Development Plan states that *Dundrum has a vital social, community, cultural, civic and employment function that needs to be protected in any future development. Any development shall be designed so as to enhance the creation of a sense of place.* Dundrum, the second largest town in the county has no centre. This proposed development does not provide one. Page 151 of the Development Plan identifies:

- *The need to ensure an appropriate balance of retail and non-retail uses is achieved in Dundrum Major Town Centre, taking account of the centre's requirement to serve the day to day needs of its local catchment.....*
- *The provision of a pedestrian-friendly and traffic-calmed environment along Dundrum Main St, with particular care being paid to paving materials, modern public lighting, hard and soft landscaping and street art. There is a particular need for improved soft landscaping along the Main Street.*
- *Any redevelopment shall be in keeping with and sensitive to the character and scale of the adjacent streetscape on Main St.....and should seek to strengthen visual connections with same.*
- *The development of a new community, cultural and civic hub that consolidates and expands the existing facilities and services in Dundrum. The hub should both encourage more activity on Main St. and diversify the range and extent of uses within the Dundrum Major Town centre area. The hub should be of an appropriate scale to serve the needs of Dundrum's current and future population.*
- *The reinstatement and strengthening of the urban fabric along Dundrum Main St.....This applies especially to the northern edge of Dundrum Major Town centre where a lively and mixed commercial presence is required.*
- *The requirement that a new development should be cognisant of the extended Dundrum Architectural Conservation Area and respect the traditional and established character of Dundrum Main St.*
- *The requirement that a new building interventions shall respect and take cognisance of the existing established scale, materials and character especially of the Main St and the residential amenity of the surrounding area.*
- *The need to examine the provision of open space areasin the (Dundrum) area.*

This development will not provide the permeability for pedestrian/cyclists as required in the Development's Plan objective 124. The two so called "public streets" traversing the site are elevated 6m above the level of the Dundrum By-Pass road and there is no access down to road level.

How is this proposed development going to improve and encourage sustainable neighbourhood infrastructure facilities? Where is the rain water harvesting? Where are the solar panels? Where are the wind turbines? I see a handful of electric vehicle charging bays on the lower ground floor when the majority or all of parking bays should have charge points. The government's target is to have one million electric vehicles on our roads by 2030. This development neglects this target.

This new development proposes to place three number of circular concrete building support columns from ground to first floor on the Main St. foot path. See drawing PL300- "Site Wide Contextual Elevations - Main St" Building 1C, 2C & 3C. Pedestrians will have to walk around these columns. This is a bad design.

This new development proposes to follow the fall on Main St. by stepping the footpath (6 steps) outside Building 1C rather than provide a constant fall. (See drawing PL300- "Site Wide Contextual Elevations - Main St"). This is a bad design.

LUAS

Dundrum is already densely populated. This development, at full occupancy, will add 2,768 people to the population of Dundrum. The LUAS is already over-subscribed and cannot cope at rush hour with the vast numbers. In order to get on the city bound tram at rush hour, some LUAS passengers in Windy Arbour and Milltown take the outbound LUAS past Dundrum to Ballally or Kilmacud, and wait there to get on the city bound tram. This absurd commuter behaviour is due to overcrowding.

The Dundrum By-Pass - a Corridor for Traffic

The existing traffic management plan to curtail traffic on Main St. Dundrum has resulted in overloading the By-Pass with vehicles. The Dundrum By-Pass is currently unable to cope with this extra traffic. 881 new dwellings/car owners living along the By-Pass will increase traffic on the road. Page 84 of the DLR Development Plan states "*There may be some specific areas of the County where higher densities, which would normally be encouraged by virtue of proximity of the site to public transport corridors, cannot realistically be achieved as a consequence of other infrastructural shortcomings – such as the capacity of the local road network*".

There are currently no houses on the Dundrum By-Pass. No one lives on it. Nobody walks up or down it- It has no soul, it has no life. It is not safe to walk alone on Dundrum By-Pass after dark. The "new" Dundrum Shopping Centre has made this worse because it does not overlook the By-Pass. Instead it backs onto it. Currently no one will hear your cries for help on this stretch of road. Therefore I would welcome a residential development anywhere along this road. However this proposed development won't bring people onto the By-Pass. If you look at the Site Plan at Lower Ground Floor, drawing no. PL009 you will see that the entire (road) level is a car park with uninhabited units at ground level facing the By-Pass. These uninhabited units mainly consist of Plant Rooms, Substations, Loading Bays, Cycle and Bin Stores. Allowing this development will make a bad road, worse. The Architects who designed the "new" Dundrum Shopping Centre missed a golden opportunity to bring life to the Dundrum By-Pass. Likewise the Architects for this development are making the same mistake with their design. The Irish Government's Design Manual for Urban Roads and Streets states that "*streets should not just be a corridor for traffic, but rather should be places in which people want to live and spend time.*" There should be shops, crèches, post offices, cafes, restaurants, banks, street furniture, public open spaces along this road. But there's nothing. The proposed development is looking to put a new public open space known as "Church Square" at the back of Holy Cross Church, between the church and the By-Pass. But this open space will be 3m above the By-Pass. They say that they will connect this space to the By-Pass with a stairs which according to the plans will spring from under the adjacent overpass. But why would anyone want to use this stairs? It leads to a By-Pass void of people, void of life. The area under the overpass where this stairs is

located is dark, cold and beside a dirty bridge abutment. It will become a 'public toilet'. The elevated public open space above, known as Church Square will not bring people down onto the Dundrum By-Pass. The road will still be dead, void of pedestrians and life. This is a pity.

This development will see a throng of tall buildings along the By-Pass' northern end. The By-Pass road cuts into the ground. The view from the road will be imposing and towering. The curved row of tower blocks facing west will present a monolithic face, overwhelming the narrow By-Pass.

The Dundrum By-Pass is far too narrow. Wide vehicles such as busses cannot use the road without crossing over the white line forcing oncoming traffic into the adjacent cycle lane (see By-Pass photos next page).



The By-Pass urgently needs to be widened, before a cyclist is hurt or worse, killed. This development proposes to build almost right out to the property line. It leaves no room for widening the road.

Parking

This proposed development will provide 52 parking spaces for their Food Store and single retail unit under block 1A. Currently in the 'old' Dundrum Shopping centre site there are 290 car parking spaces. 190 of these are to the eastern side of the centre, while 100 are to the back of the centre, the western (By-Pass) side. There are another 170 parking spaces behind Mulvey's old hardware store and the Holy Cross church. These 460 (290 +170) spaces will be gone. This is a 90% reduction in the number of parking spaces in Dundrum village. This will kill retail businesses in the village.

Are there a sufficient number of parking spaces being provided for the residents of these 881 new apartments? If not, then the residents will park in the surrounding roads and streets bringing them into conflict with the existing residents. Dublin does not have the public transport infrastructure where people, particularly families, can do without having a car, especially at weekends when they need to go retail parks or bring their children to sporting activities.

Building Architecture

Paragraph 3.17 of the Dept of Environment's Design Standards for New Apartments, states that ideally 3 bed apartments should be dual aspect. Many 3 bed apartments in this proposed development are single aspect e.g. Unit 143 (Block 1B), 251 (Block 1C), 482 (Block 2C). The Standards states that North facing single aspect is only allowed when it faces a significant amenity such as a public park. In this proposed development many of the apartments are North facing single aspect. This is not permitted according to paragraph 3.18 of the Design Standard. They do not overlook any significant amenity and are overshadowed by surrounding buildings. For example low level units 297 & 298 in Block 2A are single aspect North facing. They also directly opposite block 1B, which is only 15m away. In these instances, the architect has tried to be clever by kinking the external wall. Section 12.3.5.1 of the DLRCC Development Plan states that *the use of windows indents or kinks on single external elevations in apartment units, which are otherwise single aspect apartments, is not considered dual aspect and these units will be assessed as single units*. Notwithstanding, the apartments are north facing. The kink doesn't change the orientation of these units. It won't bring any direct sunlight into these apartments.

Section 12.3.5.2 of the DLRCC Development Plan states that a *minimum clearance distance of circa 22m in general, is required, between opposing windows in the case of apartments up to three storeys in height*. In this proposed development they have distances of between 13.5m between blocks 3C and 2A, 16.5m between 2C and 2B, 8.4m between 2A and 2C, 14.2m between 1B and 2A, 16.7m between 2B and 3A, 8.3m between 3A and 3C, 14.5m between 3b and 4A and 11.1m between block 4B and the Parochial House, which is listed as a protected structure in the DLRSS Development Plan. This proposal is totally at variance with the Development Plan.

Table 12.8 in section 12.8.3.1 (page 284) of the DLRCC Development Plan requires a minimum public open space of 15% of the site area. The area of this site is 35,335m²; 15% = 5,300 m². The only meaningful open space on this site is the (private) open space referred to as Church Square. This open space covers an area of just over 4,000m², i.e. 11.5% of the site area. Therefore it does not meet the minimum requirement for public open space in a development.

Conservation of Dundrum's built heritage

This proposed development will see the demolition of four one hundred year old houses on Dundrum's Main St. despite them being designated as an Architectural Conservation Area (ACA) in the Dun Laoghaire Rathdown County Development Plan. The houses are:

The house that was the 'old' Joe Daly Bicycle Shop (D14V8K8).

No.4 Glenville Tce (D14E261)

No.13A Main St (D14A0Y0)

No.13 Main St (D14P2X8)

Joe Daly's old bicycle shop was where former Tour de France winner Stephen Roche bought his first racing bike. Page 220 of the Development Plan states that *it is*

a Policy Objective to ensure that any new development within an ACA or immediately adjoining an ACA is appropriate in terms of the proposed design, including scale, height, mass, density, building lines and materials. This proposed development drives a coach and horses through this Policy Objective. Destroying these buildings would be an act of wanton vandalism and an affront to Dundrum's built heritage.

The external fabric of the building that was the Joe Daly Bicycle Shop remains in good condition despite suffering years and years of neglect by its owner (of itself a deplorable act). (See Joe Daly shop next page).



The wide overhang of the roof (eaves) is very characteristic. (The roofs of the buildings opposite are similar). The window sills are solid granite and in perfect condition. The external first floor is red brick veneer- also in excellent condition. The corners have special rounded brick constructed in a Flemish bond. This is a very rare feature, not normally seen on old buildings in Ireland. The building also has a distinctive brickwork corbel between ground and first floor that follows the perimeter of the building. This feature makes the building unique. The cast iron Victorian gutter hopper is also original and in good condition.

The attention to detail and craftsmanship in the exterior brick façade of No.13 Main St. (Havana Therapy) is wonderful. (See No13 Main St. photo below).



The Victorian architects who designed this masonry and the bricklayers who built it were accomplished craftsmen. The mixture of red, white/fawn and black brickwork features are fabulous. The coping on the shop front and at below roof eaves is distinctively Victorian. The coping consists of a course of coal-black stretchers below a course of protruding saw-toothed red bricks that, in turn, support a course of Flemish bonded fawn coloured bricks.

The Victorian architects, engineers and builders who put so much work into the design and building of these decorative façades wanted to ensure that Dundrum remained an attractive village. They added cultural value to the village.

There are three 'Protected Structures' at the Northern end of the Dundrum Town Centre, St.Nahi's Church, the Dundrum Library and Dundrum's Old Railway Station. All three are within a radius of 130m from the proposed. The Library is only 50m away from this 58.7m 'sky-scraper'. Page 217 of the Development Plan states that *it is a Policy Objective to ensure that any development, modification, alteration, or extension affecting a Protected Structure **or its setting** is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout, and materials.*

Both the Dundrum Library and Waldemar Terrace will be in the shadow of this 58.7m high, 16 story tower block from mid-day onwards. See drawing PL300- "Site Wide Contextual Elevations- Main St". The library is a protected structure and the houses on Waldemar Tce were built over a hundred years ago.

The Parochial House and Holy Cross Church are both listed in the county Development Plan as "protected structures". This development proposes to build a 24.3m high, 7 story (over basement) apartment block 27.637m away from the wall of the protected church and a 22.7m high, 6 story apartment block 10m away from the wall of the protected Parochial House. Note: 32 balconies in these apartments directly overlook the back yard of the Parochial House.

Allowing this development would make a mockery of the Irish planning guidelines.

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