

To: An Bord Pleanála

From: Rachel McConnell, 8 Mayfield Terrace, Ballinteer, Dublin 16, D16 C429

I am opposed to the Hammerson-Allianz SHD plans for Dundrum Village Site (case number 313220) incorporating the old Dundrum Shopping Centre known as Dundrum Village Centre and adjacent properties to the west of Main Street, Dundrum, Dublin 14, for the following reasons:

### **1. Contravention of Major Town Centre Planning Zoning**

The objective of MTC zoning is *“to protect, provide for and/or improve major town centre facilities”* and Chapter 14 (Specific Local Objectives) of the DunLaoghaire Rathdown County Council Development Plan 2022-2028 clearly states one of its objectives to be:

*“8. That any future redevelopment of the old shopping centre lands, Dundrum shall provide for residential use and retain a range of complementary non-retail uses including - but not limited to - employment, restaurant, leisure, entertainment, cultural, community and civic uses - to supplement that already provided for within Dundrum Major Town Centre”*

The proposed development by Hammerson-Allianz neither provides for nor improves town centre facilities nor does it retain a range of complementary non-retail uses. It takes away the current facilities and replaces them, almost entirely, with high rise residential accommodation. 95% of this plan is apartment accommodation. I believe this to be a contravention of the definition of MTC zoning and contrary to the DunLaoghaire Rathdown County Development Plan 2022-2028.

### **2. Negative impact on historic Main Street**

The Hammerson-Allianz SHD plans for the Main Street of Dundrum are not in keeping with the historical integrity of the street and will adversely affect the visual impact of this established setting.

Map 1 of the DunLaoghaire Rathdown County Development Plan 2022-2028 identifies two areas of architectural importance on the Main Street ; one as an “Architectural Conservation Area” and the other as a “Candidate Architectural Conservation Area” while a large area of the remaining buildings on the Main Street is identified as “Proposed Candidate Architectural Conservation Area”. In the document of Proposed Amendments to the DunLaoghaire Rathdown County Development plan 2022-2028, a new item to Section 11.4 (Architectural Heritage) is added as follows: *“iii. Ensure the design of developments on lands located immediately adjacent to such groupings of buildings [Nineteenth and Twentieth Century Buildings, Estates and Features] addresses the visual impact on any established setting”* (11.4.3.3 page 218). Moreover, Chapter 14 (Specific Local Objectives) of the County Development Plan 2022-2028 clearly states one of their objectives to be

*“9. To ensure that any future redevelopment of the old shopping centre lands, takes 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 and Candidate Architectural Conservation Area status”.*

The construction of 3-5 storey apartment blocks on the Main Street is not in keeping with the beautiful and historic Pembroke Cottages and Glenville Terrace or any of the other historical buildings on the street and will adversely affect the visual impact of this established setting which is

a feature, not only of Dundrum Village but of the South Dublin architectural landscape. The plan does not respect the Specific Objectives of the Dunlaoghaire Rathdown County Development Plan or amendments to it.

### **Height Architecture, Urban Design:**

The Hammerson-Allianz SHD plans offer a “Landmark” building of 16 storeys in height. The Urban Development and Building Heights Guidelines for Planning Authorities Consultation Draft 2018 states in section 3.2 “... *the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria: At the scale of the relevant city/town*

- *The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.*
- *Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views....”*

The Hammerson-Allianz SHD Plans are excessively high and will neither enhance the character of Dundrum nor integrate successfully into it. Instead they will overshadow and dwarf an already established landmark, the Luas Bridge, which marks and celebrates the coming together of our past, the old Harcourt Street Line and the future, the Luas.

The current infrastructure is already at capacity; the Luas is full at peak times and the cycling infrastructure into Dublin City is near to non-existent. People will still turn to their cars and there simply is not the capacity for more cars on the roads around Dundrum. Long queues are a regular occurrence down the Dundrum By-pass and Wyckham Road during the morning and evening rush hours and at weekends. There are no bus corridors, so buses get delayed too.

In conclusion, I recognise and appreciate the need for more housing and would welcome a redevelopment that smartens up the old shopping centre lands. The Hammerson-Allianz SHD plans for a high-rise development, with little or no facilities provided, is inappropriate, unsuitable and not in keeping with its surroundings. We can do better for Dundrum and its future residents. It is a backward step. Please reject this proposal in favour of a more sustainable, community-based plan. During the Pandemic we learnt some important lessons about the importance of community and sustainable living and gained an appreciation of the importance for good local spaces. This development ignores those important lessons and is a missed opportunity.