

Barry Chambers,
Project Lead – Dundrum Central,
Land Development Agency,
Ashford House,
D02 VX67

February 28th, 2021

Dear Barry

The development of the Dundrum Central Mental Hospital (CMH) is hugely important to both the future vitality of the surrounding area but also in terms of its immediate impact on the local community. We are mindful of the housing and homelessness crisis and welcome the prospect of the necessary provision of social and affordable homes. However, as the locally elected representatives for Dundrum we have prepared a joint submission to emphasise our collective concerns with some of the current proposals.

Density

The proposed net density of upwards of circa 150 units per hectare is far in excess of the 35 to 50 units per hectare that is allowed on INST designated lands under Policy Res 5 in the current DLR County Development Plan (CDP). We acknowledge that the plan does allow consideration for increased densities on suitable sites but a density 3 times the general benchmark is unwarranted. The proposed density is also approximately twice that of the Shanganagh Castle development, the other main site where the Land Development Agency (LDA) is in the process of delivering homes; there the planned density is only circa 75 units per Hectare.

Additionally, the proposed density on such a large site amounts to an excessive amount of development concentrated within one community. The proposal to provide 1,300 units is excessive for the surrounding infrastructure, in particular the transport network.

Height

We welcome the principle articulated by the LDA of staggering height at the boundary to a higher level in the centre. However, the proposal for two 14 storey blocks in the centre and a 12 storey block in the 'Farm' quadrant, is completely out of keeping with the surrounding environment. Blocks of this height have no precedence in this part of Dundrum or the wider surrounding area and will look completely out of place on the skyline.

The Current CDP allows for heights of up to 6 storeys on sites such as the CMH and while Planning Authorities and An Bord Pleanala are required to have regard to Section 28 Planning Guidelines and any Specific Planning Requirements of the Guidelines, heights on new developments granted permission in the Dundrum, Ballinteer, Goatstown, Kilmacud, and Wyckham areas have not exceeded 9 storeys.

Preservation of Existing Residential Amenity

Section 4.3.1.1 Policy Objective PHP18 of the current CDP requires that there must be a balance between the protection of existing residential amenities and the established character of the surrounding area. Section 4.3.1.2 Policy Objective PHP19 requires that development must have due regard to the amenities of existing established residential neighbourhoods and should respect or complement the established dwelling type and character of the area. Chapter 12 of the CDP deals with privacy, the relationship of buildings to one another, including consideration of overlooking, sunlight/daylight standards and the appropriate use of screening devices. The LDA should also be mindful of Policy Objective PHP20: Protection of Existing Residential Amenity in the new Draft 2022 2028 County Development Plan.

Therefore, the LDA needs to ensure that there is a proper transition from the low-density single storey/two storey homes surrounding the CMH to the higher density and higher height proposed on the site. In that context the proposed building heights bordering existing residential communities should be reduced, should adopt a setback design, and have a more substantial transition zone.

Pressure on Transport Infrastructure

We have general concerns around the ability for the local transport infrastructure to cope with the additional demand. The Dundrum Road and the Goatstown Road, as main routes connecting the city to both the M50 and population of the Dublin mountains, will experience further congestion from increased usage. We acknowledge that the CMH development will only contribute a maximum of 430 additional vehicles, however it should be noted that this is a further incremental increase on top of additional traffic being contributed by multiple other ongoing developments also relying on these routes. There is also a lack of available space on many sections of Dundrum Road to provide for safe cycling infrastructure.

While we note the proposed number of car parking spaces, it must be strongly recognised that the main alternative to car usage in the area, the LUAS Green Line, is already experiencing dangerous overcrowding. The ongoing measures to increase capacity on this service will somewhat alleviate current demand. Unfortunately, these measures do not take account of the additional development that is planned along the line. Cherrywood, Clay Farm, Marmalade Lane, Green Acres and others will bring well over 10,000 additional households onto the Line. As these developments are all upline from the CMH development, the LUAS will not be a viable commuting option for the dwellers of these new accommodation units.

A full transport infrastructure assessment must be carried out and reference made to the forthcoming Dundrum Area Based Transport Assessment (ABTA). In addition, liaising with the Department of Transport and the NTA is highly recommended, particularly in relation to the decision to delay the Green Line Metro Upgrade for another decade, we would be very keen to receive comments on the above issues.

Access

We recognise the need for permeability through the CMH site, and acknowledge the challenges involved, however we share the concerns of residents about the negative impact of a new motor vehicular entrance on the amenity value of existing homes. We understand that no more than 430 car spaces are being considered, which is similar to the number of car spaces at Mount St Anne's which only uses one entrance onto the Milltown Road.

We urge the LDA to share with residents the access options they have explored already, and to engage proactively with them in a joint exploration of the exit/entrance possibilities, together with feasibility analysis of these options, with a view to finding a measure of consensus.

Notwithstanding the outcome of the above considerations, any additional entrance must only be one way for motor vehicles and must not be used at all by construction traffic.

Open Space

We welcome the amount and quality of public open space proposed and we expect that in the final masterplan these levels are maintained.

Community Gain

We welcome the proposal for a Community Centre and expect any integration of/or connectivity between the CMH lands and the adjoining residential area should include the development of enhanced sporting facilities/infrastructure for existing and future residents. The provision of

community facilities should also consider the recommendations for this area contained in the recent Dundrum Community Cultural and Civic Action Plan.

We also welcome the opportunity the Hospital Building presents for innovative community-based usage.

Downsizing Opportunities

The wider Dundrum area has an aging population but very few options for older people to downsize to suitable properties in an area they are familiar with. This development offers the opportunity, maybe in the 'Farm' quadrant, to meet this demand. A suitable portion of the development should be set aside for homes specifically designed for older people, as this in turn will increase the supply of family homes in the area.

Respect for the County Development Plan

The current CDP is one that has been drawn up by local Councillors with the support of professional planners in DLR. It represents the democratic wishes of the local community and outlines the nature of the environment that we wish to reside in. It allows for increased densities and heights and meets the requirements for facilitating population growth as demanded through the regional guidelines. We acknowledge the requirement to align with national planning guidelines and the need to address housing and affordability issues. While this site may support heights greater than six storeys and densities higher than 50 units per hectare it must not be developed without due respect to the surrounding neighbourhoods.

We are confident that a development with reduced density and building heights to those proposed can successfully respect the existing community and built environment while making a significant contribution to housing needs, affordability, and the increased vitality of this part of Dundrum.

We expect you will take on board the concerns we have outlined above and the many submissions you have received from the wider community. We look forward to further engagements with you prior to the finalisation of the Masterplan.

Regards

Cllr. Shay Brennan

Cllr. Sean McLoughlin

Cllr. Anne Colgan

Cllr. Peter O'Brien

Cllr Daniel Dunne

Cllr Jim O'Leary

Cllr. Anna Grainger