



HAVE YOUR SAY

**Dun laoghaire-Rathdown
County Development Plan
2022-2028**

**Submission from
Imagine
Dundrum**

February 2020

Submission from:

Imagine Dundrum

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Introduction

Overview

Imagine Dundrum welcomes the opportunity to make a submission to the pre-draft consultation for the revised County Development Plan 2022-2028. In this submission, our focus is on those aspects of the County Development Plan that are likely to have most relevance for Dundrum Village and its immediate surroundings :

1. People, Homes and Places (including Housing)
2. Sustainable Movement and Transport
3. Green County; Play and Recreation
4. Retailing and Major Town Centres
5. Built Heritage
6. Climate Action and Energy Efficiency

We are at a key moment in the decisions and processes that will determine the future of Dundrum. The redevelopment of the Village offers an unparalleled opportunity to restore Dundrum's original strong identity and focus, and renew it as a uniquely thriving and attractive place. The County Development Plan, along with the Dundrum Local Area Plan, will have a major influence on the outcome, not only for current local residents, workers and visitors, but for many years to come. It is vital that they support and enable the best possible future Dundrum.

Dundrum in the County Development Plans

The current and future County Development Plans will provide the crucial framework for the redevelopment of Dundrum Village, and hence will significantly determine the future quality of life of its rapidly expanding and changing population. At present, Dundrum's situation is poor – while it has been designated the second major town within DLR County, it lacks almost all the facilities and services appropriate to this status, including a civic centre as the focus for community life. The Plan for 2022-28 has the potential to address these deficits.

Imagine Dundrum urges in particular that the specific elements relating to Dundrum Village in the original Dundrum Urban Design Framework of 2003, which have already been incorporated into the current Development Plan, and the specific requirements of SLO 149 and 150, be retained in their entirety in the Plan for 2022-28.

Guiding principles for the County Development Plan 2022-28

Imagine Dundrum welcomes the consultation document's emphasis on sustainable communities and placemaking as key drivers of the revised County Development Plan. It is our view that **wellbeing and quality of life** should also be explicit values, underpinning all aspects of the Plan, and enabling the provisions of the Plan to be measured against them.

A further guiding principle, now that DLR County Council has adopted its *Climate Action Plan 2019-2024*, is that **climate thinking** becomes integral to all aspects of planning and decision-making under the auspices of the County Development Plan.

Placemaking and community engagement

Imagine Dundrum understands placemaking to mean that local people and communities are fully involved and engaged in the design of their own place. We ask that this principle be endorsed by Dún Laoghaire Rathdown County Council for the future stages of local and County Plan-making.

Planning focus: a village and a neighbourhood

While recognising that the County Development Plan has overall a whole of county focus, Imagine Dundrum considers that high quality village and neighbourhood thinking is critical to the quality of life of residents and communities, and therefore that attention needs to be paid to specific localities and their unique characteristics.

Currently, the development focus in relation to the critical area of housing is predominantly on individual Strategic Housing Developments and apartment buildings, and national guidelines take minimal account of neighbourhood considerations. However, sustainable communities cannot be achieved without a high standard of planning at the level of villages and neighbourhoods/localities. We therefore look to the County Development Plan to place **a new emphasis on this level of planning**, in order to protect and support local communities as they change and develop.

Imagine Dundrum wishes to see the provisions of the *Urban Design Manual: A Best Practice Manual*¹, with its strong focus on neighbourhood urban design retained fully in the provisions of the County Development Plan.

Lifecourse planning

The distinct needs of differing segments of the population – children and young people, families, older people, people with disabilities – should be visible in all key aspects of the County Development Plan, in order to ensure a planning response that meets those needs. A “health-in-all” approach, with joined-up, inter-departmental and inter-professional working supporting genuinely citizen-centred planning could be a valuable feature of the next County Development Plan.

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¹ Department of Housing, Environment and Local Government (2009)
://www.housing.gov.ie/sites/default/files/migrated-
files/en/Publications/DevelopmentandHousing/Planning/FileDownload,19216,en.pdf

1. People, Homes and Places

1.1 General principles

Imagine Dundrum welcomes the focus on sustainable communities and community wellbeing as the driver of all aspects of the County Development Plan, but particularly the provisions in relation to housing, public realm, community facilities and placemaking. This focus on community wellbeing needs to be explicit and visible across all aspects of the County Development Plan.

The policy of promoting sustainable community-friendly development must translate into specific neighbourhood/locality development policy across a range of aspects including housing, public spaces, public realm and community facilities. The provisions of the *Urban Design Manual: A Best Practice Manual*², which focuses strongly on neighbourhood urban design should be retained in the provisions of the County Development Plan.

The development of a proactive and strategic housing policy over the next 6 years will mean concentrating on increased density (but not necessarily increased building heights) in areas of the County adjacent to public transport links, good pedestrian and cycling facilities and reducing the need for car use. Careful planning will be crucial to avoid increased pressure on housing costs over the next 6 years, when the population of the County is expected to increase by 23,000-27,000.

It is also critical that all future development should adhere to a climate change strategy designed to substantially reduce the production of greenhouse gases (GHGs) in the County.

1.2 The County Development Plan and housing provision

Ensuring that housing provision is geared to the needs of the local population is a critical element of the County Development Plan.

1.2.1 Residential development in urban villages

Imagine Dundrum strongly supports the provision in the current Development Plan (Policy RES 15,p45) regarding housing provision in urban villages, which provides for a variety of dwellings by type and size to accommodate families with different needs, and proposes a mix of apartments, terraced houses, and other house types. Managing this variety should be the role of the **Local Area Plan**, supported by the County Development Plan.

Imagine Dundrum also strongly supports the provision (RES 15, p46) that the character of existing villages should be protected or enhanced by any new development.

Imagine Dundrum does not support Departmental Guidelines which frustrate the fundamental concepts of local placemaking and neighbourhood development.

² Department of Housing, Environment and Local Government (2009)

[://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownload,19216,en.pdf](http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Planning/FileDownload,19216,en.pdf)

Recommendation: That the County Development Plan 2022-28 retains and strengthens Policy RES 15 in the current CDP.

1.2.2 Brownfield development, density and building heights

Imagine Dundrum recognises the policy objective of using brownfield/infill sites to promote compact development and higher densities, and to maximise land use in the area. However, **these developments must positively contribute to and integrate with the existing built environment and respect the residential amenities of neighbouring properties.** We welcome the recognition (p24??) that this type of development can raise legitimate concerns about the impact on the existing residents and amenities, and want to state clearly our serious concern that new planning guidelines for apartment developments, and particularly for Build to Rent developments, make this essential placemaking approach difficult if not impossible.

Recommendation: The County Development Plan should require from developers and planners a neighbourhood-focused approach to the development of brownfield sites, to enable their successful integration into existing environments and communities. **It cannot be an approach that addresses a single development in isolation from its neighbourhood context.** We look to the County Development Plan to put in place policies that embed the neighbourhood/locality-based approach to brownfield development.

In particular, the County Development Plan should set down the requirements for the way in which a brownfield development will interact with the public realm. Where the site sits alongside a Main Street, as in the case of Dundrum Village and the old Shopping Centre site, the alignment of the development and the Main Street must contribute fully to the enhancement of the public realm.

In this regard, we point to the provisions of the national policy document 'Quality Housing for Sustainable Communities'³ and the *Urban Design Manual* mentioned above, which set out key principles for the design of the interface between development sites and their context:

The detailed design of urban space requires careful attention to the building line and three-dimensional building mass that helps create the character of streets, places, neighbourhoods and squares.

According to these policy documents, aspects to be considered include making open space, creating edges, attending to building size and scale, enhancing the public realm and making safe places.

Density and building heights

Imagine Dundrum is aware of the recent government guidelines in relation to building heights. We see the issue of the height of buildings adjoining and linking to Main Street Dundrum as especially significant for the future of the Village. We welcome the statement in the Building Heights Strategy which says that the main determining factor in setting heights 'will not be the heights established in recent and proposed developments...but...*the need to create a good piece of urban development that knits successfully with the surrounding area...*' This statement also refers to the impact on adjacent residential properties, the proportions of the building in relation to the street space, and the creation of a legible, permeable and sustainable layout.

³ <https://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/Housing/FileDownload%2C1979%2Cen.pdf>

Densification of housing is clearly necessary in the DLR context, but this need not mean high rise, though national planning policy and guidelines suggest otherwise, as they do not seem to give serious consideration to the alternative option of **high density, low rise apartments and other housing**. This approach can combine optimal land-use with the social benefits of suburban living (as, for example, in the Netherlands).

In our view, residential buildings of six to eight stories in Dundrum should be considered only where they will be in harmony with the other building in the immediate area.

Recommendation: Imagine Dundrum wishes to see the retention of the current approach to new development (CDP, RES 3, p37), which requires consideration to be given to densities, layout, separation distances and open space in order to sustain the overall character of an area.

Recommendation: The County Development Plan should require that, in urban villages in particular, the option of high density, low rise housing development should be prioritised.

In the case of Dundrum, an additional SLO should be included in the Plan stipulating that building height policy must be sensitive to the original streetscape in Dundrum Village, and so allow no more than 2/3 stories at street level, with the possibility of scaling up to higher buildings behind these, particularly towards the Dundrum by-pass.

1.2.3 Providing housing choice for all stages of the life cycle and an appropriate mix of housing types

As an extension of a neighbourhood/locality-based approach to development, Imagine Dundrum looks to the County Development Plan to ensure that the approach to housing development in an area (and specifically in Dundrum) reflects the particular population mix in the area.

It is only by adopting this neighbourhood/locality-based approach rather than a county-wide approach that there can be an appropriate provision for housing choice and a life cycle approach. An evidence-based approach should build on data that take account of the sub-population groups whose housing needs require to be met in an area. These groups include young households, established families, older people, single people,

Older people's housing needs

Imagine Dundrum looks to the County Development Plan to respond to the particular housing needs of older people in the County, and especially in the Dundrum LAP area, where the proportion of older people is higher than in DLR, and significantly greater than in the state as a whole, by ensuring that there is in the locality a continuum of housing types and tenures that can respond to the changing needs of the older population.

We support the views in the research paper 'Housing for Older People: Thinking Ahead'⁴ which examines in detail the range of housing options needed in order to create genuinely age friendly communities, and underlines the essential role that the County Development Plan must play in securing the continuum of housing to meet the needs of older people.

The research highlights the following:

⁴ (2016) <https://www.housingagency.ie/sites/default/files/publications/35.%20Final-Report-Housing-for-Older-People-Dec-2016.pdf>

- The serious implications of the rise of the private rented sector for a growing segment of older people, with limited pension provision, and the risk of rising levels of homelessness among this group in the absence of planned approaches to housing for older people;
- The need to adopt the concepts of 'Universal Design', 'Lifetime Homes' and 'Lifetime Communities' as an integral part of housing planning;
- The need for an integrated housing/care model, as part of a 'Spectrum of Care' approach, which in turn requires joined up working between the local authorities and health services;
- The need for mandatory housing provision for older people in new housing stock.

The report proposes that County Development Plans and Local Area Plans should incorporate planning for ageing, especially with regard to future housing development, combined with public transport needs. The report says:

Here too lie elements such as leisure, culture, and the provision of local services in creating environments. It is also at this level that urban design plays its most crucial role in creating environments that are suitable and accommodating for an ageing population. Finally, planning has a role to play in the design of individual new houses and housing developments, from their location (and the creation of age-friendly location criteria) to their footprint, aspect, layout, tenure mix and affordability⁵

Imagine Dundrum strongly supports this view, with particular reference to Dundrum Village which is particularly well suited to the provision of a range of housing types and tenures for older people, including Lifetime Housing and units to which older people in the area can downsize, provided there are units available for them to purchase.

We note that the Department of Housing, Planning and Local Government's Policy statement, Options Paper for Housing for Our Ageing Population⁶ refers to the provision of sustainable housing to meet the needs of all citizens as a key strand of county development plans, and proposes that it will 'In partnership with industry, introduce measures to ensure that over a five year period delivery is increased to ensure that 30% of all new dwellings are built to incorporate universal design principles to accommodate our ageing population'

We note also the recommendations for age friendly housing developed in partnership between Fingal County Council, the Centre for Excellence in Universal Design in the National Disability Authority, Age Friendly Ireland and the County and City Management Association and ask that the County Development Plan would incorporate these in planning policy.⁷

Recommendation: That the new County Development Plan retains the core objective that all housing developments, including apartments, contain an acceptable proportion of larger flexible units that provide for sustainable and viable long term options as part of the 'Lifecycle Approach' (Policy RES7, p40, CDP) and that the 30% universal design target is included in the Plan.

Recommendation: That the new County Development Plan will include a Special Local Objective for Dundrum, requiring the provision of a range of Universal Design housing and other age friendly

⁵ Ibid, P55

⁶ Government of Ireland Housing Options for Our Ageing Population.

<https://assets.gov.ie/9398/ca553fa753b64f14b20e4a8dcf9a46ab.pdf>

⁷ [https://www.fingal.ie/sites/default/files/2019-](https://www.fingal.ie/sites/default/files/2019-04/10_ways_to_create_adaptable_and_age_friendly_home_march_2019.pdf)

[04/10_ways_to_create_adaptable_and_age_friendly_home_march_2019.pdf](https://www.fingal.ie/sites/default/files/2019-04/10_ways_to_create_adaptable_and_age_friendly_home_march_2019.pdf)

typologies in the redeveloped Old Shopping Centre site and in all housing developments in the environs of Dundrum, drawing on good practice recommendations noted above.

1.2.4 The need for affordable housing

The need for affordable homes in the County is well established. It is clear that the County Development Plan must make provision for a huge increase in the availability of affordable homes. The Dundrum area is especially lacking in affordable housing. While Imagine Dundrum recognises the wider policy and political context that impacts on affordability, it is nonetheless essential that the County Development Plan will address the key issue of affordability as part of its housing strategy.

Recommendation: That the County Development Plan sets out the strategy to be adopted in order to provide affordable housing at the level needed to respond to the need in the County, and especially in Major Town Centre areas and urban villages.

1.2.5 Housing tenure

The consultation document asks the question as to where Build to Rent and Shared Accommodation typologies should be located in the County. Imagine Dundrum believes that there is no scope for either of these housing types in Dundrum and surrounding environs. It is essential that housing development in urban villages like Dundrum promote the development of settled rather than transient communities.

The number of build-to-rent schemes is already excessive in DLR, particularly in the Dundrum LAP area. Older residents in the area who are considering downsizing do not generally want to move into rented accommodation, but there is a marked shortage of smaller properties and apartments for sale in the area. The lack of properties for downsizing results in a lack of family houses for young families, forcing them out of the area. This is a topic that needs discussion at local regional and national levels. In addition, if Build to Rent models were to predominate, this would result in a monopoly of high rent provision, in an area already suffering hugely from the lack of affordable homes.

Recommendation: That provision of affordable homes to purchase in all new developments in the County, but particularly in Dundrum, will be a policy in the forthcoming County Development Plan.

1.3 An age-friendly county

The consultation document asks how the forthcoming CDP should support an age friendly County. Imagine Dundrum believes that the CDP should provide a strong and explicit policy framework for planning to meet the needs of older people across all aspects of the Council's remit, but especially in the areas of housing (as proposed above), public realm, community supports and community services.

We note National Policy Objective 29 in the National Planning Framework that 'Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections

supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.⁸

The urgent need for housing types to provide for a range of needs of older people has been suggested above in the section of this submission dealing with housing, but the issue of supported housing needs special mention here:

Recommendation: Supported housing provision may need a joined-up approach between Dun Laoghaire Rathdown and the Health Service Executive. Imagine Dundrum believes that the County Development Plan should outline arrangements for formal inter-agency agreements to facilitate supported housing for older people and people with disabilities.

Imagine Dundrum welcomes the fact that Dún Laoghaire Rathdown County Council has signed the *Dublin Declaration on Age Friendly Cities and Communities*.⁹ Several aspects of the Declaration are especially relevant to the County Development Plan, and then should be transposed into Local Area Plans:

- **Adopt measures to develop urban spaces and public places that are inclusive, sharable and desirable to all**, including older people, and ensure that publicly used buildings promote the dignity, health and well-being of users of all ages, and are fit for purpose to meet the changing needs of an ageing society.
- **Promote and support the development of neighbourhoods and communities for all ages that are diverse, safe, inclusive and sustainable**, and that include housing for older people that is of the highest quality.
- **Promote the participation of all**, including older people, in the social and cultural life of their community by making available a diverse range of events and activities that are accessible, affordable and tailored to be inclusive of them and promote their integration into the community. This should include the promotion of intergenerational activities.

Recommendation: The County Development Plan should include a specific section outlining how the plan process will provide for an age friendly county

1.4. A disability-friendly county

Imagine Dundrum proposes that the County Development Plan should not confine its focus on an inclusive County to a consideration of an age friendly County.

Recommendation: that the County Development Plan will make explicit provision for a disability friendly county, and that the policy should be reflected in all Local Area Plans.

In the case of Dundrum Village, the redesign of Dundrum Village offers opportunities to take advantage of up to date technology in the design of disability friendly environments.¹⁰ We urge Dun Laoghaire Rathdown County Council to invest in making Dundrum Village a model of best

⁸ <http://npf.ie/wp-content/uploads/2017/10/Ireland-2040-Our-Plan-Draft-NPF.pdf>

⁹ https://extranet.who.int/agefriendlyworld/wp-content/uploads/2014/05/Dublin_Declaration_2013.pdf

¹⁰ <https://www.theguardian.com/cities/2018/feb/14/what-disability-accessible-city-look-like#comment-112226104>

international practice and the most welcoming and hospitable place for children and adults with disabilities and older people.

1.5 A child- and young-person-friendly county

It is a matter of concern to Imagine Dundrum that planning policy at national and local level takes limited account of the particular needs of children and families, apart from minimal formal playground provision in Apartment Guidelines. We note, for example, the virtual absence of any national design or planning requirements that reflect the unique needs of families with children within apartment complexes.

The *UN Convention on the Rights of the Child* includes the following rights: ¹¹

Article 12 – A right to be heard and taken seriously in all matters affecting them; -

Article 15 – A right to gather and use public space, providing no laws are broken; and –

Article 31 – A right to play, rest, leisure and access cultural life. In essence, this is a right for children to participate in places, linking participation in process to participation in outcome

*'If children are not designed into our cities, they are designed out. This means that they are deprived of contact with the material world, with nature, with civic life and with their own capacities.'*¹²

Design Guidelines for apartments and apartment complexes should take account of the particular needs of children in the design of internal spaces, storage, and living space, safety and access to both internal and external spaces, play and open space, as well as key public realm provisions.

The County Development Plan could include and integrate play policy provisions, and expand on how this policy translates into play provision at neighbourhood level. This policy could reach beyond formal playground provision, to include uses of public open spaces/play spaces, in line with best current thinking. ¹³ (See section 5 of this submission re play and recreation)

Recommendation: that children's interests be explicitly covered in the County Development Plan's proposals for urban design and placemaking, movement, social and community facilities, and other sections, as well as in relation to open space and recreation, a key area of interest for children and young people.

The County Development Plan should incorporate the key aspects of child friendly provision in urban settings and neighbourhoods, in the public realm, within apartment complexes and within apartments, having regard to best current thinking regarding child friendly urban spaces.

The County Development Plan should adopt a policy requiring all apartment developments to adopt internal child/family friendly design, and in public/communal spaces.

1.6 A family-friendly county

Imagine Dundrum wishes to see a focus in the County Development Plan on family friendly planning and urban design. This focus is missing from national, regional and local plans.

¹¹ Child Friendly Planning in the UK

<https://www.rtpi.org.uk/media/3608757/childfriendlyplanningintheukareview2019.pdf>

https://issuu.com/citiesforplay/docs/child_friendly_high_density_neighbourhoods

¹³

As more families come to live in highly urbanised settings in DLR, it is our view that urban planning can address the specific needs of families, and parents.

We appreciate that this provision may be covered indirectly in provisions relating to walking, cycling, play, and community facilities. However, we are still of the view that the County Development Plan could bring a valuable focus on the needs of this particular population group.

1.7 Community amenities and community support facilities

The consultation document poses a number of inter-related questions regarding community facilities, which all bear on the need for the CDP to underpin planning for sustainable communities. The questions raised concern protection of community amenities, community support facilities, an age friendly county and the promotion of healthier places to live.

The policy commitment to social and community facilities in Dún Laoghaire Rathdown is set out clearly in the current County Development Plan, which speaks about ‘developing and supporting sustainable neighbourhoods into the future throughquality social and community infrastructure.’ Imagine Dundrum broadly supports the policies set out in Chapter 7 (p155) of the current CDP and would wish to see this policy approach replicated in the new CDP. In addition, the list of relevant policy documents needs to be updated to include, for example, the *UN Declaration on the Rights of People with Disabilities*, which came into force in Ireland in 2018 ¹⁴ and the Government’s policy statement *Housing Options for Older People*.¹⁵

With regard to community support facilities, two matters in particular require attention: affordable child care/early education and supported housing for older people are of particular interest and concern to DLR residents, and are essential elements of sustainable communities.

Imagine Dundrum is concerned at the reference (p158, CDP) to the role of the Council as being confined to the reservation and securing of sites in relation to key public services delivered by other agencies. While this land reservation is essential, it is surely also essential in the interests of sustainable communities that there would be strong joint policy and strategic planning with the relevant authorities to ensure that these essential services can be delivered adequately and appropriately.

A Civic Centre at the heart of Dundrum Village

In our submission to the draft Local Area Plan for Dundrum, Imagine Dundrum sets out the case for a new Civic Centre and modern library at the heart of the Village. The location of this centre, which would co-locate key council services, is critical. It needs to be central to Main Street in order to serve its key purpose as a focal point for a resurgent Village.

The strong case for this provision was made in our submission to the CCCAP consultation and is attached at Appendix 1 to this submission. Imagine Dundrum recommends that this provision be incorporated into the next County Development Plan if not already provided for in the meantime.

¹⁴ UN Declaration on the Rights of People with Disabilities, <http://nda.ie/Disability-overview/Legislation/UN-Convention-on-the-Rights-of-Persons-with-Disabilities.html>

¹⁵ Government of Ireland: Housing Options for Older People (2019) https://www.gov.ie/en/publication/ea33c1-housing-options-for-our-ageing-population-policy-statement/?referrer=wp-content/uploads/2019/02/housingoptionsforanageingpopulationeng_web_compressed.pdf/

Recommendation The County Development Plan should revise SLO 149 as follows: That any future development of the Old Shopping Centre (Phase 2) shall provide for and retain a range of complementary non-retail uses including, but not limited to employment, restaurant, leisure, culture.

The redevelopment of the Old Shopping Centre Site shall include a Civic Centre incorporating a new Dundrum Library, in order to strengthen the civic services for Dundrum as a Major Town Centre and as an essential focal point for the Village and the wider local community.

The wider Dundrum area

With regard to the provision of community facilities for the wider Dundrum area and environs including Ballinteer, the outcome of the pending Cultural, Community and Civic Action Plan should provide a blueprint for the provision of these essential facilities over the life of the County Development Plan.

1.8. The public realm and urban design

The consultation document does not have a specific section dealing with public realm/urban design, although some related matters are covered in the Green County section, where our submission addresses some key aspects of public realm relating to children and play. Our submission to the Issues Paper for the Local Area Plan makes detailed proposals regarding the public realm in Dundrum Village.

In relation to the public realm and Dundrum in particular, Imagine Dundrum wishes to refer to 1.3.4.10 (p28) in the current CDP. This section draws on the 2003 Urban Framework Plan to set out a series of provisions and initiatives for a liveable Dundrum Village area. We support these provisions and expect that they will be fully addressed in the forthcoming Dundrum LAP.

However, Imagine Dundrum strongly recommends that the following provision in 1.3.4.10 be excluded in both the forthcoming LAP and any related provision in the new CDP:

To facilitate increased penetration by buses as part of the Quality Bus Network, with particular emphasis on improved orbital routes linking Tallaght – Dundrum – Dun Laoghaire

Imagine Dundrum has made detailed submissions to the Council and NTA regarding the essential need to reduce bus traffic on Main Street Dundrum, and to manage the proposed Interchange at Waldemar Terrace, to ensure that Dundrum Village does not become, in effect, a bus corridor. This would frustrate the Council's stated intent regarding a sustainable Main Street that is pedestrian and cycle friendly, as well as child and older person friendly. (see Section 2 below).

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2. Sustainable Movement and Transport

2.1 The key role of Main Street Dundrum

Like few other places, streets are a public stage where life unfolds. From town parades and trick-or-treating, to markets and public gatherings, they're where we celebrate and come together with our neighbors. They're where we bump into friends, and one of the few places where we routinely encounter people who are different from ourselves. They're where people have gathered to protest injustice for centuries. That's why Project for Public Spaces has advocated for the idea that streets are more than just a means of mobility. Streets themselves are critical public spaces that can lend richness to the social, civic, and economic fabric of our communities.¹⁶

2.2 Protecting Main Street Dundrum for the community – a response to the Busconnects proposals

Imagine Dundrum welcomes the provisions in the current County Development Plan which reflect and respect the central social and community role of the Main Street, and the content of the recent DMURS quality audit for streets (2019).

However, we have for some time been seriously concerned at the potential impact of BusConnects proposals for bus traffic through Dundrum Village, which would frustrate the County Development Plan provisions and run counter to the Council's stated objectives and to best practice principles.

Imagine Dundrum made a substantial submission to NTA regarding BusConnect proposals, and we have met with NTA and Council officials to explore ways of avoiding the potentially negative impact of current proposals. However, since that meeting, further BusConnects proposals would serve worsen the position. Our original submission has been updated to reflect this, and we continue to seek to engage with the NTA.

Our current submission is included in full as **Appendix 2**, but a summary and rationale are provided here:

Summary of Imagine Dundrum's response to the Busconnects proposals for Dundrum

Imagine Dundrum's overall aim is that *'the future Dundrum will be a place which respects and reflects its unique history and heritage, and is a thriving, attractive and welcoming place for everyone in the local community, those who work here and its many visitors.'*

Key to achieving this is creating a pedestrian-friendly environment on Main Street, which requires good traffic management, and prioritising the needs of pedestrians and cyclists. Unfortunately, in reality there has been a recent intensification of bus traffic through the Village, while BusConnects proposed re-organisation and re-routing of bus services into and out of Dundrum have the potential to create a totally unacceptable level of bus movement through the Village.

¹⁶ Project for Public Spaces <https://www.pps.org/article/8-principles-streets-as-places>

It is our view that the draft BusConnects plan of October 2019 requires significant reworking, and so Imagine Dundrum has put forward alternative proposals for the management of bus traffic through and in the environs of the Village. They cover the management of bus traffic through Main Street and environs, and the arrangements for a Transport Hub at the North end of Main Street or on the East side of the Luas. We believe our proposals are reasonable, and not contrary to the broad BusConnects objectives.

Planning rationale for Imagine Dundrum's alternative proposals

Proposals for bus traffic through and around Dundrum must take full cognisance of the provisions and intent of the DLR County Development Plan, the proposed Local Area Plan for Dundrum and the likely impact of the redevelopment of the Old Shopping Centre which runs along Main Street.

The County Development Plan 2016 – 2022 (1.3.4.10 Dundrum) proposes among other things:

- *Provision of a pedestrian-friendly and traffic calmed-environment along Main Street*
- *Provision of significant additional off-street and underground car parking.....to facilitate the complete removal of surface parking from Main Street*
- *The provision of cycle facilitiesand additional cycle parking.*

In addition, **SLOs No 149 and 150** in the CDP state that any new development must:

- (a) take[s] cognisance of the character and streetscape of the Old Main Street, and*
- (b) provide for and retain a range of complementary non-retail uses, including... cultural, community and civic uses.*

The Urban Design Framework for Dundrum, incorporated in the current County Plan outlines the Council's existing (2003) Urban Framework Plan for Dundrum, which has not been superseded. (See the Plan Section 1.3.4.10) Much of that Framework Plan is close to Imagine Dundrum's own thinking:

- *The redeveloped old Shopping Centre site should include 'internal town squares or open spaces', as well as appropriate residential accommodation and cultural amenities.*
- *A renewed Main Street will include: retention of historic buildings; filling in gaps in the streetscape; using building styles and materials which reflect its distinctive local character; increased 'connectivity' using walkways and footbridges; community amenities in Sweetmount Park; and a focal point and 'gateway' to Dundrum, in the area around the Luas bridge.*

Recommendation: All plans for bus traffic management in and around Dundrum must be developed against the background of these wider objectives for the Village and specifically for Main Street. In particular, the detailed planning objectives for a pedestrian friendly and cyclist friendly Main Street will have strong implications for overall traffic management including bus traffic, and their achievement must take priority.

Main Street should be a one-way street with traffic flow from South to North. Nonessential or unnecessary traffic should be discouraged from using the Main Street and there should be no on-street parking with the exception some parking for the disabled. Bus traffic should be limited to those buses for which there is no alternative route, these would include the Airport Coach.

Two-way cycle lanes should be provided on the Main Street as should associated cycle parking.

The bus/Luas interchange should be located close to the Dundrum Luas station and the pedestrian access to the station be redesigned to provide a safe and accessible access for all, including those

with a disability including those in wheelchairs, It should also be accessible to the blind and partially sighted, the elderly and those with baby buggies or with young children.

We believe that land on the site of Waldermar Terrace and that of the old telephone exchange as well as the land beneath the Luas bridge should be considered for use in accommodating the bus/Luas interchange. The flow of buses should be such that that access is available to and from the Dundrum Bypass and Taney Road.

The speed limit on Main Street should be reduced to 30kph.

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3. Green County

3.1 General Considerations

3.1.1. Our changing knowledge and awareness of the natural world and human impacts on it must influence all future planning and decision making.

The consultation document '*Have Your Say*' rightly lists our County's rich heritage of landscape, coast, natural and built heritage, and highlights the Council's many achievements since the drawing up of the *DLR County Development Plan 2016-22*. It is also a reminder of the vital importance of continuing the work of planning and implementing a comprehensive Green Infrastructure plan for the County, as outlined in that Plan's Appendix 14.

Since the current County Development Plan was adopted, the Council has developed and adopted in 2019 its first ***Climate Change Action Plan***¹⁷. **This Action Plan must now serve as the fundamental framework and point of reference for all initiatives relating to natural heritage, biodiversity, open space, parks and broad environmental management.**

Also, in the last five years, there has been a sharpening general **awareness of the growing biodiversity crisis** across all species of flora and fauna, requiring focused research and well-thought-out action to prevent greater losses as well as preserve existing natural strongholds across the County.

So, while it is correct to underline the instrumental or 'asset value' of the natural world to human health and well-being ('eco-health' thinking¹⁸), and consider this dimension in planning decisions, it is time to enlarge this frame of thinking, and consider the natural world also in its own right, along with the resulting duties of care it imposes on human decision-makers and on communities.

3.1.2. The urban environment as part of green county planning

Imagine Dundrum recommends that the urban environment, and the public realm within it, should not be excluded from Green Infrastructure thinking. Rather, the Plan should highlight how the County's urban/ built areas can become key nodes in an County-wide integrated network of green places and spaces.

With imagination, the identification of best practice internationally, and the involvement of citizens, a great deal of **greening** - essential both for human health and for preventing major biodiversity loss - can be achieved in urban environments. Green roofs and green walls can be added, and small natural oases, for plants and insects especially, established in the most unpromising urban settings.

3.1.3. The vital role of trees in new developments

Imagine Dundrum is convinced that, with imaginative design, there need be no conflict between buildings for people and the incorporation of trees in new developments such as the redevelopment of Dundrum - and **recommends** that a proper integration of the two be a central requirement for planning decisions.

¹⁷ NB And this Climate Action Plan's targets for decarbonising must now become more ambitious in the light of the most recent scientific understandings, and the short period available to avert the most serious consequences.

¹⁸ www.eco-health.ie, the UCD based research project on 'Ecosystem benefits of Green Space for Health'.

The importance of trees is now widely recognised, and the County has a well-developed *Tree Strategy* on which to build. It can be shown that the long-term benefits for communities and society as a whole outweigh short-term costs, while initiatives like New York's High Line demonstrate for growing appropriate species of trees and shrubs in relatively shallow ground.

3.1.4. Green open space planning

Green open space is fundamental to community health and wellbeing, and these considerations should be central to all planning processes. Recent research suggests that for this to happen effectively, **planning policy needs to link with health policy** in a transdisciplinary health-in-all approach.¹⁹

3.1.5 Public Open Space

Imagine Dundrum notes the varying terms in use in relation to open space, and the different ways in which these are described and defined. For examples:

- In the CDP (p204), there are definitions of Public Open Space, communal open space and private open space.
- However, in the CDP(p205), 'Public Open Space' 'is described in a footnote as referring to all areas of open space within a new development (be that public (?), taken in charge, communal, semi-private or otherwise) that is accessible by all residents/employees of the development and in certain cases may be accessible to the wider general public. '
- Section 4.2.2.1 of the current CDP sets out a hierarchy of what is referred to variously as public open space and open space, and which includes parks of various kinds, and is clearly different from the public open space defined above.

These terms cause some problems in understanding what exactly is the policy of the Council in respect of different forms of public space, open space, communal space?

Design principles for green open space would usefully be explicit in the new County Development Plan. These principles include multifunctional use, enhancement of urban greening to mitigate noise and air pollution, facilitating local biodiversity and sustainable drainage, and inclusive in design, catering for all age groups.²⁰

Recommendation: That the new County Development Plan use a set of definitions that state clearly the separate meaning of the several terms in use in the current CDP: Public Open Space, Open Space, Open Green Space, Communal Open Space, Communal Space – and set standards and policies in respect of each of these.

Recommendation: That the term 'Public open space' is not used to include communal space within apartment developments that is intended for use by the residents, even where these spaces may be accessed by the public.

¹⁹ Scott, Mark (2020) ESRI Conference. *How can we enhance people's use of outdoor public space for health and wellbeing?* https://www.esri.ie/sites/default/files/media/file-uploads/2020-01/ESRI_ECO-Health_SCOTT_compressed%20images.pdf

²⁰ Scott, Mark (2020) ESRI Conference. *How can we enhance people's use of outdoor public space for health and wellbeing?* https://www.esri.ie/sites/default/files/media/file-uploads/2020-01/ESRI_ECO-Health_SCOTT_compressed%20images.pdf

Recommendation: That Public Open Spaces (as defined in the current CDP) be distinguished from and defined separately from public spaces so that the relationship of public open space and public realm should be clear.

3.1.6 Public space and apartment guidelines: retaining the focus on community wellbeing

The consultation document asks how should we meet the need for public open space with the low requirements set out in the Department of Housing's apartment guidelines. Imagine Dundrum notes with concern the challenge posed as to how the significantly lower provision in Departmental apartment guidelines than that provided for in current CDP provision can be squared with considerations of healthy living, placemaking, identity, as well as availability of ground for soft Sustainable Drainage System measures.

Since 75% of permitted housing units in the County are apartments, this Departmental restriction on (so called) public open space within apartment complexes poses a significant threat to the overall wellbeing of communities into the future, as well as a challenge to key strategies for climate action at County level.

The proposition that many problems in relation to housing and climate change can be solved by greater housing density is simplistic, and fails to take into account considerations for community health and well-being. In the absence of such a holistic approach, planning provisions risk laying the foundations for long term social problems: *Simply put, living closer together will not work – will not lead to increased quality of life – without a robust and healthy public realm.* ²¹

Recommendation from Imagine Dundrum: that the new County Development Plan set minimum public open space standards /green spaces (*see below re request for clearer definitions*) at a neighbourhood/locality /full site basis, and that apartment developments cannot result in reducing the area/neighbourhood/whole site open space below the minimum standard for the neighbourhood/area/whole site.

In addition, we recommend that the County Development Plan stipulate that space on roofs or higher stories of apartment blocks should not qualify as 'communal open space'.

3.1.7. Institutional lands

In this county, institutional lands form a substantial part of green space.

Recommendation: Imagine Dundrum recommends that the provision in the current CDP in relation to open space provision on institutional land be retained as is.

3.1.8. Providing resources for citizen awareness and engagement in 'green practice'.

Recommendation: the new County Development Plan must include resources and mechanisms for increasing citizen awareness and engagement, as a key element in achieving a green and resilient DLR County.

Just as the *DLR Climate Action Plan 2019-24* underlines the importance of information dissemination and communication with citizens, the County's rich natural heritage can best be protected and enhanced by more widespread understanding and active involvement of its citizens. In recent years,

²¹ On Building Places that give a community its identity and knit us together:

<https://www.citylab.com/equity/2013/07/sustainability-and-urban-commons/6200/>

good communication has taken place around the pollinator-related initiatives and during consultations held on park developments, but much more needs to be done.

Two areas where the Council has taken a lead, and where increased public information and education will yield future benefits, are the 'slow to mow' policy and gradual reduction in pesticide use, and the development of green drainage systems to mitigate flooding. Individual home-owners could be encouraged by the Council to garden for the benefit of insects including pollinators, and could be strongly discouraged from creating new hard paving areas around their homes.

3.1.9 Citizens as active custodians of our environment

Imagine Dundrum recommends that, in the light of the climate and biodiversity crises, increased Council resources are devoted to effective means of providing opportunities for active involvement in the growing green infrastructure. We should not just be 'consumers' of Council-provided parks, greenways, open spaces and watercourses, but actively participants in their development, monitoring and management (e.g. riverbank clean-ups, aftercare for newly planted trees.)

All of this will be especially important in the redevelopment of the Dundrum Village area, where imaginative 'greening' of the new built environment, in consultation with the local community, will be vital to a healthy and sustainable urban village outcome.

3.1.10. A note on the ecological possibilities of 'brownfield' sites

While it is clearly appropriate to utilise sites designated as 'brownfield' for needed new development, this designation may not always mean ecologically poor – since abandoned buildings and long-undisturbed vegetation can be rich habitats for a variety of wildlife, especially plant and insect life.

Recommendation: in the interests of the County's green infrastructure, all such brownfield sites should be sensitively surveyed and assessed at the start of any process of planning for development.

3.2 Specific Issues – A Dundrum Focus

3.2.1 Green infrastructure – Dundrum as a key hub/ node in the network for the West County

Imagine Dundrum welcomes the inspiring vision and programme of work for a comprehensive network of green corridors for wildlife and greenways for walkers and cyclists covering the whole County. (Appendix 14 of current County Development Plan)²²

We recommend that, as part of the planned redevelopment of Dundrum Village, its possibilities as a hub or focal point in this green network should be given serious attention.

Dundrum is on or near many of the proposed green routes, and offers opportunities for linkages both with routes following the waterways (Slang/ Dodder) and routes leading to the parks on the

²² NB It would be valuable if the Council could make easily available the report reviewing progress on the Green Infrastructure for the County..

fringes of the rural mountain area (Fernhill, Fitzsimon's Wood, Marlay Park). Airfield urban farm is a significant and well-used local resource, could also be linked.

In this spirit, Imagine Dundrum's initial proposals for the new Dundrum Village included a bridging park spanning the Dundrum bypass and linking the redeveloped central village area with Sweetmount Park.

Apart from the health benefits for local residents of designation as a 'hub' connecting with green corridors on the West side of the County, there are opportunities to **extend the County's tourism planning to include Dundrum as a 'gateway to the mountains'.**

3.2.2. Green design must be integral to the new Dundrum Village

The Village area which is the core of Dundrum is characterised by a serious 'green deficit'. Over the last 15 years it lost significant planting, notably the mature trees dividing the old shopping centre car park from Main Street. (And it was only with difficulty that one of the large mature trees on the Pye lands was retained near the Mill Pond in the new shopping centre development.) There are no small green spaces at all in the public realm.

Recommendation: All plans for the Village redevelopment must include the return of trees and other plants to the built environment, both in the public realm and in whatever residential and other developments are proposed. In addition, there is a need for 'pocket parks' and possibly small play areas to be incorporated in public areas.

In addition, serious consideration should be given to the 'de-culverting' of the waterways in the Village area. (In 2018, UCD Architecture Masters students envisaged the stream flowing through the centre of the new residential development on the old shopping centre site.)

3.2.3. Re-imagining and fully utilising green 'amenity spaces' in the suburban surroundings of Dundrum Village.

While the core of Dundrum itself lacks green open space (and little more can be introduced), the immediate surrounding suburbs, built in the 1960s and '70s, are mostly characterised by generously sized open spaces. However, these can be barren of planting other than areas of grass, and most lack obvious amenities such as seating, pathways and play areas. Meanwhile the population profile of these housing estates is changing as younger people and families replace the original home-owners.

Imagine Dundrum recommends a comprehensive audit of all such spaces, and a re-thinking of their uses, for the greater benefit of residents in the immediate locality and for the County as a whole.

In consultation with local residents, who should become active custodians of these spaces, many of these sterile spaces could be re-designed to become much better contributors to human and natural well-being. They might incorporate: small play areas for children and hang-out spaces for teenagers; seating; sensitive planting of native trees and shrubs to increase bio-diversity; even mini-community gardens. The community-building effects of such a strategy would be substantial.

3.2.4. Tackling pollution in the Dundrum area

(i) **Light pollution** is a growing problem, particularly in built-up areas, and it is only recently that the seriousness of its negative impacts on human health and on biodiversity (including plants as well as birds and invertebrates) have been fully recognised. Unfortunately, DLR Council's programme of replacing older street lighting with LED lamps for energy-saving purposes, has in some cases contributed to these damaging impacts.

Imagine Dundrum recommends that DLR Council, in line with current research and best practice elsewhere²³, review and adapt its current programme of replacing old suburban street lighting with over-bright LED lamps, and reconsider their all-night-long timing in suburban areas.

New building in the redeveloped Dundrum Village and the established suburbs in the immediate hinterland could be perfect pilot projects for such a new programme.

Public education is also needed on this aspect of protecting biodiversity, so the Council should consider how to discourage the over-use of inappropriate home security lighting and decorative lighting (from both the energy-saving and light pollution point of view.)

(ii) Air pollution : the news report (19/02/20) of the endorsement by all 4 Dublin Councils to the 'Breathelife' campaign, which commits them to meeting WHO air quality guidelines by 2030, is very welcome.

In the same week, the Centre for Research on Energy and Clean Air (CREA) 2020 report²⁴ has quantified the costs of air pollution globally in terms of human health and productivity (3.3% of global GDP, far outweighing the costs of rapid carbon reduction strategies).

Dundrum's air quality is already under threat from continuous motor traffic on Main Street and the Dundrum Bypass, and this could be compounded if inappropriate new bus plans are implemented.

There are currently 3 primary schools within easy walking distance of Main Street, with children crossing it and walking along it en route from home to school. In the context of 'Green County' thinking, human health and well-being - and especially that of our children - must be prioritised over optimising traffic flows.

Imagine Dundrum recommends that the Council link with the Environmental Protection Agency in order to commission careful measurement of air quality on Main Street, the Dundrum bypass and in the immediate environs, and to make appropriate plans urgently if pollutants exceed EU recommended levels.

(iii) Water pollution

Dundrum's local waterways are in danger of pollution from run-off from main roads.

Again, measuring and monitoring are essential – and the design of 'green streets' and SuDS features in the redevelopment of Dundrum can be a major benefit in this respect, by restricting run-off to the River Slang from main roads and also from the M50.

²³ See www.darksky.ie . Dark Sky Ireland's latest briefing paper, not on the website, is attached as Appendix 3.

²⁴ Centre for Research on Energy and Clean Air, "[Quantifying the Economic Costs of Air Pollution from Fossil Fuels](#)" (2020)

3.3 Play and Recreation

The consultation paper asks how should play opportunities be improved for children and teenagers.

3.3.1 The urban setting as play spaces

The provision of play and recreation opportunities for children and young people within their neighbourhood is an essential element of building sustainable communities. In this regard, Imagine Dundrum looks forward to the publication of the DLR Play Policy.

As noted in the Imagine Dundrum LAP submission, the health and wellbeing of citizens generally, but especially children, should be at the centre of the planning principles that guide the future planning for Dundrum Village. As a guiding principle, health and wellbeing considerations, especially for children and young people, will place a strong focus and priority on open space and recreation, environmentally friendly, sustainable and safe environments, and the need to create a child-centred place to live, play and go to school

We wish to make the following observations and recommendations in relation to play and recreation:

Play provision needs to look well beyond the formal playground provision especially in urban, built-up areas, with limited access to space for formal playgrounds and at a distance from parks.²⁵

Imagine Dundrum supports the thinking set out in the following:

*...the whole built environment can offer a critical play and learning opportunity for children...Landscaping, planting and community art installations, for example, can offer children considerable play value. Play areas can be embedded in the way we design and plan for public space, transforming the way to school into a learning opportunity, or polluted and unsafe sites into vibrant assets. A combination of formal and informal play solutions can cultivate a greater sense of place, allow fuller play experiences and reap substantial benefits for children, their families and their communities.*²⁶

Recommendation: Imagine Dundrum recommends that the new County Development Plan would adopt a wide perspective on play that reflects the potential of the urban space to provide play opportunities for children and young people.

3.3.2 An intergenerational approach to play and recreation

Spaces that can serve the recreational needs of young people and older people have much to offer, in terms of maximising the use of space, and providing for intergenerational engagement. A lifecourse approach to green open space provision would take account of the differing generational needs, including walking paths. This approach is especially useful in Dundrum, on account of the generational diversity and the distance from formal parks.

Recommendation: That the CDP would take account of generational needs in planning provision for play and recreation.

²⁵ [Sukanya Krishnamurthy Reclaiming spaces: child inclusive urban design](https://www.tandfonline.com/doi/full/10.1080/23748834.2019.1586327)
<https://www.tandfonline.com/doi/full/10.1080/23748834.2019.1586327>

²⁶Real Play Coalition. Reclaiming Play in Cities <https://www.realplaycoalition.com/reclaiming-play-in-cities-report/>

3.3.3 Access to school facilities

Schools have significant open spaces and both external and internal recreational facilities. In many cases, these facilities have been funded by tax payers. These facilities should be fully available to their local community when not in use for students, especially during school holidays.

In the case of new schools, the recreational facilities should be community facilities, accessed by the school rather than the opposite.

Recommendation; That Dun Laoghaire Rathdown County Council should enter into an agreement with the Department of Education and Skills regarding the joint ownership of open space in the case of new schools, and arrangements for community access to facilities in existing schools.

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4. Retailing and Major Town Centres

4.1 General policy objectives

Imagine Dundrum agrees with the general policy objectives as set out in the Issues Paper (p34). In particular, we support the objective of promoting town centre vitality and promoting quality urban design.

Recommendation: The objectives (Consultation Paper, bullet point 4, p.34) should include encouraging access to retailing by cycling and walking, as well as public transport, as set out in the current County Development Plan (p3.2.2.1. 84).

4.1.1 Balanced provision

We agree that significant over provision, which would place more marginal locations under severe pressure, and undermine sustainability driven policies aimed at revitalising town centres (current CPD, p84) should be avoided.

Recommendation: That this approach to avoiding over provision be retained in the new County Development Plan.

4.1.2 Context specific retail strategy

Imagine Dundrum believes it is essential that the retail strategy is applied in a context specific manner, having regard to the location and its character. The retail strategy should be a clear and integral part of Local Area Plans.

Recommendation: The principle that the retail strategy should be applied in a context specific manner should be included in the policy objectives.

4.1.3 Integrating social and cultural facilities with retail provision

We agree that retail provision can play an important role in placemaking, and support social integration, strong sustainable neighbourhoods and commercial activity, provided vital cultural and community facilities are also in place, in order to address the full spectrum of community needs.

4.2 The Core Strategy in respect of Dundrum: a source of confusion

Imagine Dundrum acknowledges the Core Strategy, which designates Dun Laoghaire and Dundrum as Major Town Centres (Issues Paper, p.17), in keeping with the current County Development Plan.

However, the nomenclature in use in relation to Dundrum in this section of the Consultation Paper and in the County Development Plan as a whole is a source of confusion and requires amendment.

The following terms are used:

- Dundrum Town Centre (MTC): referring to the designation of Dundrum within the core strategy.
- Dundrum Town Centre (DTC): referring to the Shopping Centre opened in 2005.

- Dundrum Town: This heading is used Consultation Paper (p.35) with text referring to the Shopping Centre (DTC) and so-called Phase 2, with the implication that these two constitute Dundrum Town.
- The Consultation Paper (p35) describes 'Dundrum Town Centre and its environs' as the focus of the Local Area Plan.
- The current County Development Plan (CDP, p.87) refers to the Dundrum Town Centre (without qualification) as stretching from Waldemar Terrace to Wyckham Way and from Main Street to the Dundrum Bypass.
- The County Development Plan (p28) also uses the term 'Dundrum Town Centre (Shopping Centre)'
- Dundrum Village is never referenced, though Main Street is mentioned once.

Recommendation

- Dundrum (MTC) should be the term used to refer to the totality of the geography included in the Major Town Centre designation
- Dundrum Village should be used as the term to refer to Main Street and the Old Shopping Centre
- The terminology of Phase 2 should be dropped – Phase 2 is not a place
- DTC be used only to refer to the 2005 development.
- Dundrum Village should have specific planning focus in the new County Development Plan

4.2 The Urban Village

Our starting point in addressing the question of retail development, as well as several other questions posed in the Issues Paper, is to propose that the **sustainable Urban Village concept** (CDP, p.45) should be a distinct driver of key aspects of the next County Development Plan, including retail development.

Recommendation: Imagine Dundrum recommends that the new County Development Plan should use this concept in a proactive way and develop specific policies that support sympathetic planning for all of the County's urban villages.

We are strongly of the view that a Village, as in the case of Dundrum Village, can be an integral part of a Major Town Centre designation, but at the same time must be treated as the unique place that it is or has the potential to be.

In their research on urban villages in the UK²⁷, the researchers identify six characteristics which might define a village within a larger city – small and intimate, spatial identity, traditions and collective memory, designed for social interaction, locally driven and locally responsive, functional. Unique.

Recommendation: That the urban village concept should be explicitly addressed in an integrated way in relation to retail, transportation, housing, social infrastructure and all other key planning strands.

²⁷ Scanlon, K., Sagor, E., Whitehead, C., & Mossa, A. (2016). *New London Villages: Creating community*. London: The London School of Economics and Political Science. Available from <http://www.lse.ac.uk/geographyAndEnvironment/research/london/docs/FINAL-Villages-report-28.06.2016.pdf>

4.3 Mixed use development: What should be the appropriate mix of uses in a town centre?

This question is posed in the consultation paper. In the context of Dundrum as an urban village, it is our view that 'mixed use' must incorporate the following:

Balanced retail and residential

Provision for both retail and residential units on Dundrum Main Street, will be needed in order to bring back the Village as a place where people live and where there is a viable community.

We believe this can be achieved by having a policy of requiring 'Living Over the Shop' arrangements to be explicitly required in any new or redeveloped units on Main Street. By designing in living arrangements as an integral part of retail shops on a street, the problems which beset the existing Living Over the Shop scheme can be addressed, and new opportunities created to bring a population back to the Village, to the benefit of both commercial and social life.

Essential public/civic spaces

A proper balance must be struck between residential, commercial and public/civic spaces in Dundrum, both on the Main Street and in the overall development, restoring the original qualities of Dundrum Village.

Facilitating independent businesses

The kind of retail provision that are very well suited to an urban village setting is the local, independent business; in order to ensure authenticity in the commercial landscape, and a thriving day and evening social and commercial life, an urban village also needs a strong focus on café/restaurant provision.

Casual trading such as farmers' markets should be facilitated as part of the overall retail policy for a village or town, linked to public realm design and supported by the Local Area Plan.

Respecting the streetscape and its context, scale and history

In the context of an urban village, and where there is a need to conserve existing buildings or streetscapes, the approach to retail must be a joined up which reflects and respects the character and streetscape of the Street, including the local historical and cultural landmarks, and maintains a style and scale of building in tune with the unique character of the Village.

Shopfront design guidelines should ensure that shopfront design and signage respect the context and streetscape, and should be provided as an Appendix to the County Development Plan

Ensuring inclusion and access

In order to ensure that people with mobility needs are facilitated, access matters should be addressed both in the public realm aspect of the streetscape, and in the retail and restaurant provision.

As part of the overall approach, the County Development Plan needs to ensure that as part of the public realm planning, basic facilities such as public toilet facilities and accessible toilets for people with disabilities are an integral part of the provision in towns and villages.

4.4 The forthcoming Plan should include policies that support improvements to streetscapes and place-making in our Towns and Villages

The consultation paper poses the question as to what policies the forthcoming Plan should include that support improvements to streetscapes and place-making in our Towns and Villages.

Imagine Dundrum views this important question as having relevance well beyond the retail and including all aspects of public realm development (*section 8, County Development Plan: Urban Design*). However, there is no section in the Issues Paper referring to public realm/urban design.

Recommendation: Imagine Dundrum proposes the following policies in relation to retail ,to support improvements to streetscapes and place making:

- A requirement for a percentage of retail properties to incorporate ‘living over the shop’ provisions
- A requirement that businesses include café/restaurant provision as well as retail provision
- Integration of leisure, recreation, cultural and civic facilities into the fabric of the town or village
- Provision of Design Guidelines to underpin shopfront planning permission.

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5. Heritage

5.1 An Architectural Conservation Area for Dundrum Village

Dundrum - Rathdown as a whole is not endowed with many major built heritage sites and so it needs to conserve as much as possible, including Dundrum Village and Dundrum Castle.

Consequently Imagine Dundrum is resubmitting, as part of its contribution to the pre-draft consultation for the County Development Plan 2022-28 the application we first made in 2017 for Architectural Conservation Area status status for Main Street, and for the assessment of the Dundrum crossroads area, which currently has 'Candidate ACA' status.

The protection afforded by such status would enable the unique character and architectural heritage of the street to be retained and enhanced, in line with SLO 150 of the current County Development Plan, which states: *'To ensure Phase 2 of the Dundrum Town Centre takes cognisance of the character and streetscape of the Old Main Street'*.

Dundrum Main Street, and the area around the intersection of Ballinteer Road, Main Street, Upper Kilmacud Road and Sandyford Road, is one of the areas in Dún Laoghaire-Rathdown which exhibits a distinct character and qualities based on its historical built form and layout. Such distinctive character comes from the cumulative impact of an area's buildings and their setting, and areas such as this are an expression of local heritage and community identity, thus contributing greatly to the quality of our lives. While there will always be changes in areas such as this, its special character is of great value and eminently worthy of protection.

The crossroads/ intersection area is already a candidate ACA (see DLR County Development Plan 2016-22) and it would make sense to assess the crossroads and the Main Street for ACA status at the same time in the DLRCC Development Plan 2022 -2028.

The *Planning and Development Act 2000* provides the legislative basis for the protection of such areas by facilitating their designation as Architectural Conservation Areas (ACAs). Under Part iv Section 81 an ACA is defined as a place, area, group of structures or townscape, taking account of building lines and heights that

- (a) 'Is of special architectural, historical, archaeological, artistic, cultural, social or technical interest or value, or
- (b) Contributes to the appreciation of protected structures.'

The aim of the ACA designation is to guide any changes within the area and to ensure that future development is carried out in such a manner that it is sympathetic to the special character of the area. **This will be vital in the case of Dundrum and the planned redevelopment of the Village area.**

Imagine Dundrum is therefore including its 2017 application in full at Appendix 4 of this document.

Recommendation 1: That Dundrum Main Street be included as an Architectural Conservation Area in the DLRCC Development Plan 2022-2028 if not already progressed via the Local Area Plan.

Recommendation 2: The candidate ACA around the Dundrum Crossroads in the DLRCC Development Plan 2016-2022 should be progressed to full ACA status at the same time as an assessment of the Main Street candidate ACA (*for details, see Appendix 4 below*) for inclusion in the new Development Plan.

6. Climate Action and Energy Efficiency

6.1 Overview

Climate change is a major threat to continuing human civilisation and this is recognised by most countries as a 'Climate Emergency'. This means that there has to be a rapid reduction in carbon intensity in the economy. The report, *A Profile of Local Government Climate Action in Ireland* written by LGMA (Local Government Management Agency) highlights the work done by Local Authorities in dealing with this emergency. There are many good actions being undertaken by local authorities including DLRCC, but clearly not enough is being done to keep global temperatures below 2C never mind 1.5C as recommended by the IPCC.

There is more work being done on adaptation rather than mitigation by local authorities at the moment especially flooding.

Recommendation: The new County Development Plan needs to get the correct balance between climate action and other aspects of the Plan. Due to the climate emergency, all aspects of the Plan must prioritise climate action, and any actions or plans supporting it. Any developments or plans that do not demonstrably lead to a decrease in the production of greenhouse gases (GHGs) should not be allowed to proceed.

The DLRCC Climate Change and Action Plan 2019-2024 is a good start to reducing emissions and enabling adaptation, but there needs to be much more ambitious both at local authority level and nationally.

Recommendation: All planning and development should adhere to strict guidelines that aim to reduce the GHG emissions in the county by more than the 40% reduction planned to occur by 2030. This target should be increased to 50 – 55% reduction in GHG emissions.

Transport is an area where big improvements can be achieved especially by encouraging cycling, improving pedestrian facilities and encouraging more public transport nationally and locally. The public should also be encouraged to use e-bikes and e-scooters

While Dun Laoghaire Rathdown has invested in cycle facilities and cycleways, many of these warrant upgrading before they could be regarded as of a sufficiently high standard, or at a standard that would encourage parents to allow their children to cycle. White lines separating cycle lanes on narrow roads or ending abruptly need to be eliminated and cycleways separated from traffic by plastic poles (eg O'Connell Street) or other barrier to prevent cars parking and driving on cycleways. Improved comprehensive and safe cycle facilities cannot be introduced while also giving priority to motorists. A policy to enhance cycling facilities throughout the County should be a key part of the Development Plan.

Recommendation: a key part of the Development Plan must be an audit of existing cycling facilities to identify those most in need of upgrading, and the rapid introduction of greatly improved, comprehensive and safe cycling facilities. The current prioritising of motor vehicle traffic must be reversed in favour of pedestrians and cyclists, for everyone's health.

Housing: the climate emergency and the need to rapidly reduce carbon emissions demands substantial changes to standards for new house building.

No new houses and other buildings should use fossil fuels either for heating or food preparation., and should be either be NZEB (near zero energy buildings) or Passive House standard, with heating derived from heat pumps. All cooking equipment should be electrical.

Imagine Dundrum notes that DLRCC has plans to retrofit social housing to a higher energy rating, and this plan should be carried out urgently.

New commercial developments

Recommendation: The new County Development Plan should stipulate that all new commercial developments should aim to be carbon neutral at least. Some of these developments could be negative energy developments if they produced electricity from PVC (photovoltaic cells) on their roofs. The aim should be to sell excess electricity to the grid when not needed in the future when facilities are available.

Recommendation on circular economy thinking: there should be an emphasis in the plan on encouraging all developments to adhere to the principals of the circular economy. One aspect of this that the plan should emphasise is the elimination of waste materials and energy as much as possible.

APPENDIX 1



Dundrum Community,
Cultural and Civic Action
Plan Consultation

Submission from
**Imagine
Dundrum**

October 2019

Preface

Imagine Dundrum warmly welcomes Dún Laoghaire Rathdown County Council's initiative to appoint consultants to prepare a *Community, Cultural and Civic Action Plan for Dundrum*, and the group is delighted to offer this submission as part of its contribution to this important process.

The redevelopment of Dundrum Village offers an unparalleled opportunity to restore Dundrum's original strong identity and focus, and to renew the central area as a uniquely thriving and attractive place, with all the facilities and services worthy of the second major town in this County. In addition, the current dynamic growth of Dundrum's population makes the formulation of plans for the provision of strong civic, cultural and community dimensions to the future Dundrum essential to its future success as a pre-eminently liveable urban village.

The document that follows sets out the background to this submission, first sketching the history of the *Imagine Dundrum* group and its strong links across the wider local community, and its development of a policy framework highlighting the need for a wide range of facilities and services at present notable by their absence.

The submission outlines those aspects of existing formal County planning policy, and broader Government thinking, which strengthen the argument for a radical transformation of the locality in the spirit of contemporary thinking about 'placemaking' and about meaningful involvement of the local community, which are vital determinants of social cohesion, inclusion, and creativity.

Based on the group's own research and thinking, along with substantial community consultation over more than three years, this *Imagine Dundrum* submission makes the case for a new Civic Centre and library at the heart of the Village area, to act as a hub for a wide range of new and upgraded services and facilities, all set within a revived and characterful Main Street and surroundings. More detail, and a sketch of a range of possibilities for such a centre, is provided in section 3.

As highlighted in its submission to the pre-draft consultation for the *Dundrum Local Area Plan*, *Imagine Dundrum* wants to emphasise above all the importance of planning and designing – of both buildings and services – for everyone in the community, and of specifically considering the needs of and possibilities for children, young people, senior citizens, those with disabilities and those from minority ethnic backgrounds. If this is done, Dundrum could be a role model for genuine inclusivity in a suburban neighbourhood!

Imagine Dundrum hopes that the consultants will find these proposals helpful to their thinking, and that there will be an opportunity for discussion and exploration as the consultative process develops.

*

Imagine Dundrum, September 27th 2019

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1. THE BACKGROUND TO THIS SUBMISSION

Imagine Dundrum

Imagine Dundrum is a coming together of a group of local residents of Dundrum and surrounding areas. We are working together for the renewal of Dundrum's core built environment, with the aim of bringing a strong community voice to the decisions that will shape our home place for generations.

We have been working since 2016 in close collaboration with the local community, local businesses, the developers of the old Shopping Centre in Dundrum, Council officials and public representatives to help shape the future of our Village in the best possible way for all.

Dundrum's recent history

Following the large-scale housing expansion of the 1960s and 1970s, the Dundrum area developed a strong new sense of community and locality, based around its historic village core. In recent years, however, local people have experienced a sense of loss resulting from the progressive and visible down-grading of much of our local environment.

Significant change came from Dundrum's designation as a Major Town Centre, the construction of the new shopping centre and the bypass. Then, during the recession years, we witnessed the gradual physical deterioration of our Main Street as a whole. As a result, we have lost a unique place with an individual character and living history, which had nurtured social cohesion and a sense of belonging for local residents.

Imagine Dundrum members are convinced that these lost qualities can be restored to Dundrum, with good planning, sensitive awareness of the social and community dimensions of urban redevelopment, and adequate and timely consultation with local communities and businesses.

Dundrum needs a Civic Centre and other facilities

The main focus of this submission is on Dundrum Village, as the centre of a growing population and the second major town in the county of Dún Laoghaire Rathdown, and on the developments needed to make Dundrum a thriving, attractive and welcoming community in which to grow up, visit, work or grow old. We want to see fully adequate civic, community and cultural facilities at the heart of the redeveloped Dundrum Village, believing that these facilities are essential to creating a sustainable community as the population continues to grow and diversify.

In particular, we are advocating for a Civic Centre as a new and strong public focus for the Village and the wider surrounding area. The case and vision for this Civic Centre is the main theme of this submission.

We fully recognise also the need for significant additional social, community and recreational facilities in this growing area. We favour an integrated plan for these services, with the new Civic Centre at the heart of a network of facilities to meet the diverse range of community needs.

Community infrastructure: current challenges

The need for a well-planned and integrated network of community facilities and services across the Dundrum area was highlighted by Nexus Research Cooperative in a recent research report²⁸.

Although focusing on a smaller area than the DCCAP investigation, it noted: overall capacity issues; the geographical and financial constraints of local resource centres; the urgent need for well-staffed advisory/ information services; a lack of spaces for people to come together in self-organised interest or support groups; a similar lack of facilities for lifelong and community based learning. The research also identified deficits in supportive infrastructure such as affordable childcare, practical facilities (IT, photocopying etc.), the accessibility of buildings and their availability at evenings and weekends.

The Nexus report highlights especially the lack of coordination among existing facilities and activities – a prerequisite for creating a service for the whole community. Its valuable research-based information gives a clear sense of direction for the new initiatives that will be needed to create fully adequate community services for the whole of Dundrum.

Cultural activity and community wellbeing

A core function of Dún Laoghaire Rathdown County Council is the promotion of community wellbeing. Cultural activities are an essential to the achievement of wellbeing in an area, as the current *dlr Arts Development Plan 2016-2022* clearly states:

*The Council views the Arts as an important service ... for those who live in, work in and visit the County. It...believes in their intrinsic value and the contribution they make to the wellbeing and quality of life of the County.*²⁹

As the recent Arts Council England reports shows, access to cultural activities really matter to people and communities. The findings of that report show that arts and culture ³⁰:

- **Promotes wellbeing** – 65% of people think that arts and culture are good for well-being, and 36% think arts and culture are “essential to life”. People who attend a wide range of arts and cultural events are more satisfied with their lives than those who do not (even when accounting for other factors that influence life satisfaction).
- **Attracts a variety of people to live and work in an area** – 44% of people who remained in an area and 43% who moved to an area cited arts and culture as an important factor in their decision – equal to the numbers of people citing schools. These figures were not affected by the type of job a person had, suggesting that arts and culture can help to attract a broad range of residents and workers to an area.
- **Helps build communities** – 49% of people think attending arts and cultural events helps them feel part of a community, with 68% thinking these events are very important for fostering community feeling.
- **Supports high streets** – Arts and cultural organisations are helping to fill the gap left as retail moves away from high streets. By offering unique experiences, these organisations are helping to

²⁸ Report on Review of Community Facilities in Dundrum Area, October 2018

²⁹ DLRCC Arts Development Plan 2016-22, p.9

³⁰ http://press.artscouncil.org.uk/press_releases/arts-council-england-report-shows-how-public-value-arts-and-culture/

attract visitors and increase footfall, promoting high streets as attractive places to live, work and visit.

There is Irish government commitment too: Fine Gael's 2018 overarching policy and vision document, *Taking Ireland Forward Together*, specifically emphasises the role of culture in urban regeneration:

*Throughout Ireland, cultural activity is a powerful driver of life and wellbeing. Cultural productions can play an important part in the regeneration of urban Ireland, whether through music, drama, dance or other forms of performance. We will facilitate this through finance and mentoring for the development of existing and new centres for cultural activity, comprising of spaces for both creatives and wider arts and community groups, as well as performance and exhibition space.*³¹

This commitment is most welcome and clearly relevant to the current situation of Dundrum.

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³¹ https://www.finegael.ie/app/uploads/2018/11/TakingIrelandForward-RoO2_lowres.pdf

2. CONTEXT: THE TIME IS RIGHT

Dundrum's status: the second County Town, and poised for renewal

The status of Dundrum as the second Major Town Centre in Dún Laoghaire Rathdown, its designation as a Metropolitan Consolidation Town, the growing population, and, in particular the increasing level of densification of residential provision in the area are all critical parts of the context for the Action Plan for Community, Cultural and Civic facilities in Dundrum.

The imminent redevelopment of the old Shopping Centre, along with the forthcoming Local Area Plan for Dundrum, offer huge potential to create well designed public space in the village, with a Civic Centre integrating civic, community and cultural dimensions at its heart.

A supportive local planning and policy context

Several features of Dún Laoghaire Rathdown's planning and development provisions provide strong supporting context for Imagine Dundrum's proposals:

The County Development Plan 2016-2022: *Imagine Dundrum* has welcomed the commitment in the County Development Plan not just to reviving a moribund retail area but also to restoring and re-energising it as a living community and a satisfying urban environment for locals and others.

We particularly welcome **Special Local Objective (SLO) 149**, which provides that the redevelopment of the old Shopping Centre must provide for a range of cultural, community and civic uses. This provision provides the strong planning imperative to support the case for a Civic Centre in that location.

We also welcome **SLO 80**, which looks to the potential for Dundrum College of Further Education, located at the centre of Main Street, to be part of strong links between the education, community and business sectors. A good example of this collaboration exists in Bray Co. Wicklow, where the new building for the College of Further Education was successfully integrated as an 'anchor service' into the civic centre, which also includes health services, a theatre, gallery space and coffee shop all situated around a multi-purpose central plaza.

The forthcoming **Dundrum Local Area Plan (LAP)** will also be an essential context for civic, community and cultural facilities. We believe the LAP offers an opportunity to create a sustainable, modern, thriving Dundrum that effectively blends the Village's rich past and heritage, its unique character and its present strengths, with its future as a modern urban village.

Dundrum Village: A unique placemaking opportunity

Imagine Dundrum regards the research and practical principles adopted by the global placemaking movement, exemplified in the 'Project for Public Spaces', to be the ideal conceptual framework for the next stage of development of Dundrum Village .³² In summary,

Placemaking inspires people to collectively reimagine and reinvent public spaces as the heart of every community. Strengthening the connection between people and the places they share, placemaking refers to a collaborative process by which we can shape our public realm in order to maximize shared value. More than just promoting better urban design, placemaking facilitates

³² <https://www.pps.org/category/placemaking>

creative patterns of use, paying particular attention to the physical, cultural, and social identities that define a place and support its ongoing evolution.

In keeping with the placemaking ethos, we suggest that civic, cultural and community planning for Dundrum is not only about buildings. The Dundrum Community, Cultural and Civic Action Plan must be rooted in a vision for Dundrum Village, and in particular, the Main Street, and in a clear sense of how a Civic Centre will contribute to, and be an integral part of the creation of our re-energised urban village. A vibrant street is itself a community facility, bringing people in and bringing them together. We look to the Action Plan to adopt an imaginative, placemaking approach to Main Street, linking with the placemaking focus of the forthcoming Dundrum Local Area Plan.

Fundamental principles

Imagine Dundrum offers the following placemaking guidelines to underpin the Action Plan, drawing on the principles we adopted at the start, which remain at the core of our work. We, and all those we have consulted over the last three years, want to see:

- **A thriving Dundrum Main Street**, which reflects and respects the character and streetscape of the old Main Street, including its local historical and cultural landmarks, and maintains a style and scale of building in tune with the unique character of the Village.
- **A proper balance between residential, commercial and public/civic spaces in Dundrum**, both on the Main Street and in the overall development, thus restoring the original qualities of Dundrum Village.
- **A substantial public focal point providing for cultural, community and civic uses and forming an integral part of Dundrum's redevelopment**. This will strengthen and support community life and ensure its sustainability.
- **A Dundrum which is a connected environment, pedestrian- and cycle-friendly**, with easy movement between its different parts, with open and green areas, and smooth links to public transport.
- **A thriving place where small and medium-sized local, independent business are encouraged and provided for**, to ensure authenticity in the commercial landscape, and a thriving day and evening social and commercial life.
- **A renewed Dundrum that is inclusive, open and accessible to all** - including older people, children and young people, people with disabilities and the widest range of residents, workers and visitors.
- **A sustainable, future proofed Dundrum**, showcasing the highest environmental and energy efficient standards in its design, construction and maintenance.

Imagine Dundrum: leading strong local support for a renewed Village and Civic Centre

Imagine Dundrum has from its beginning in January 2016 been guided by the placemaking ethos, and has adopted a collaborative approach, which has built a strong network of community and civic engagement in thinking about the future of our Village.

Over the past three and a half years, we have brought together residents, businesses, local and national public representatives, and we have linked closely with Council officials. We had constructive engagement from the start with Hammerson, the company who will develop the old Shopping Centre and other parts of Main Street. We have consulted widely and deeply, connecting with children, young people, and people with disabilities, to ensure a shared vision for a truly integrated, inclusive and forward-looking Dundrum.

We are delighted that *Imagine Dundrum*'s **1,000 Voices** project, seeking signatures from local people in support of the fundamental principles listed above, and specifically their endorsement of the call for a Civic Centre in Dundrum, has reached its target, and we are now well on the way to securing a further thousand statements of support.

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3. IMAGINING A CIVIC CENTRE AT THE HEART OF THE NEW DUNDRUM

Imagine Dundrum sees the forthcoming redevelopment of the old Dundrum Shopping Centre as the perfect opportunity to restore Dundrum's unique village character, and to enhance it by the provision of a landmark Civic Centre forming a new and strong public focus for the Village and wider surrounding area.

As the second major County Town in Dún Laoghaire Rathdown, Dundrum deserves a Civic Centre befitting this status. Dundrum itself, already densely populated, is at the core of a large and fast-growing area, so that such a Centre will be essential for maintaining and enhancing a vibrant and sustainable community.

Imagine Dundrum's vision for the Civic Centre

Imagine Dundrum proposes a Civic Centre for Dundrum which will be a prominent building or set of interlinked buildings and surrounding public space, positioned at the heart of the Village. It will be the administrative hub for the whole area, with a modern library as a core facility, and will also house key local Council and other public services, all of which have the potential to consolidate and strengthen community. For the Civic Centre to be a true focal point, its optimum location will be within the re-developed site of the old Shopping Centre.

This landmark building or group of buildings, and its associated public space, will

- Provide access in an open, accessible, and inclusive way to services and spaces beneficial to the entire community;
- Host a wide range of cultural events and community activities alongside its civic functions;
- Enable collaborations with local and national cultural and educational institutions such as the Mill Theatre, ArtNetdlr, Mountains to Sea Festival (Dundrum is the gateway to the Mountains!), Music Network, the National Concert Hall, TCD Science Gallery, the National Gallery;
- Showcase sustainable, environmentally-friendly design and building techniques.

Siting the Civic Centre on a public space - a 'town square' or plaza - directly connecting to Main Street will be key to realising its potential in terms of the future of Dundrum Village and the closely associated surrounding area. Placemaking literature is very clear on this:

Traditionally, the center of most cities has been a 'commons', a civic space built according to democratic principles... In almost every case, major public and cultural institutions are located around the commons, forming a civic center of enormous practical and symbolic importance.

Libraries are the cornerstones of many civic centers. They may be joined by city halls, museums, government offices, churches, opera houses, courthouses, or any number of other public-minded institutions. With strong partnerships and a clear purpose, the people behind these buildings can breathe life into their shared public space--the commons--and create a vibrant, cohesive district. A fully-realized civic center

*proclaims the mission and identity of its institutions for all to see, so that the commons becomes a forum for public expression and a source of community pride.*³³

Core provisions in the Civic Centre³⁴

A modern library offering a range of library services and cultural activities

The National Public Libraries Strategy, *Our Public Libraries 2022*, describing the broad social functions of a contemporary library, captures exactly the aspirations and expectations of local residents for a new library within a Civic Centre in Dundrum Village:

A modern and well-resourced public library contributes to the social, economic and cultural wellbeing of communities.... It provides information, supports learning and culture and is a focal point for a growing number of public services. The library is a trusted space, integrated into the local community and accessible to all. It supports and facilitates education and skills development. Through the promotion of literacy supports, the library complements mainstream education and provides a space for children and adults to learn and develop. It is a resource for developing digital skills and literacy, it provides cultural and educational outreach programmes that empower communities, facilitates community cohesion, reduces isolation and contributes to pride of place. [p9].

The current Dundrum library, while much loved by residents, lacks the physical capacity to deliver this vision of a modern library – a vision that has been realised in other parts of the County, most notably in the Lexicon Library in Dun Laoghaire. It follows that a new library, with the requisite site space to deliver the key services, must be provided in Dundrum Village.

A library co-located with a 'one-stop shop' facilitating access to key public services

Imagine Dundrum envisages the Civic Centre as a space where the modern library as anchor service is co-located with the County Council administrative offices (at present housed in a relatively distant and inaccessible location). Other services, including voluntary services with a clear synergy with the Council's services, could also be housed there.

The concept of co-locating a modern library with other services and facilities has many potential benefits, especially for library members, including:

- Ease of access to services through a single point, particularly beneficial for older people and people with disabilities, especially those with mobility difficulties
- New partnership possibilities and possible cost-sharing
- Increased footfall for the library.

Alongside the Council Offices other local public services such as the Local Enterprise Office, Community Services, the Centre could usefully accommodate:

- A small-scale Tourism Office (none exists at present in Dundrum) signposting key tourist attractions across the county, as well as the wealth of heritage in Dundrum

³³ <https://www.pps.org/article/civiccentersolutions-2>

³⁴ A relevant example of a civic centre including a library, theatre, council offices, community advice hub, heritage and courtyard galleries and community services is that in operation in Solihull, UK. <https://www.solihull.gov.uk/thecore>

- Citizens Information Service, currently on the 4th floor of the Dundrum Town Centre
- A Post Office.

Cultural uses

Imagine Dundrum envisages a Civic Centre designed to accommodate a wide range of cultural activities including collaborations with local and national cultural institutions (see p.10 above). It would offer opportunities for author/ literary events, and for local artists and performers across a wide range of arts practices.

A commitment to community-building must involve the inclusion of minority ethnic and people from the 'new communities' living in and around Dundrum. Making space in a Civic Centre for a wide variety of **multi-cultural arts activities** drawing on their diverse traditions and experiences would be a welcoming and an enriching addition to the cultural dimensions of the Centre and could form a distinctive aspect of Dundrum's offerings within the wider County. A number of avenues could be explored, such as an intercultural partnership with the Islamic Centre based in Clonskeagh, or linking with the active locally-based group which promotes performance of Indian classical music.

Protecting and promoting Dundrum's heritage

One of the distinguishing features of Dundrum as a suburb or neighbourhood within Dún Laoghaire Rathdown County is its long and well-documented history. A relevant cultural use for new public spaces – or possibly for the Carnegie Building (see below) - would be to house a **museum of local history**, bringing together the rich and well-researched materials already available with a 'citizens' collection' drawing on local residents' family treasures, diaries etc. This could be the fruit of a sustained community history project, which would be beneficial in many ways: contributing to a strong local sense of belonging, and involving the active participation of senior citizens and possibly local schools and youth organisations. The Dun Laoghaire Rathdown Council Archive could also find a home in Dundrum's cultural spaces.

Multi-use community spaces

There is a serious lack of community and public meeting spaces for the current and future population of the Dundrum area, and a huge dependence on the generosity of private providers, especially the local Churches. It is vital that the new Civic Building be designed to add to the stock of community space, by providing flexible spaces for gatherings and meetings.

External public space for local events (farmers markets etc)

In the earlier part of this submission, *Imagine Dundrum* made the case for an innovative and imaginative view of civic space as going beyond buildings to include a vision for the life of the community within which those buildings function.

An external public - and, crucially, publicly-owned - space has been part of *Imagine Dundrum's* thinking from the start, and has won wide public support. As illustrated in the architectural drawing which concludes this document, a key element in revitalising and animating Dundrum is a 'town square' or plaza/ market square associated with the Civic Centre and linking directly to Main Street, thus increasing the 'walkability' of the core Village area. Careful thought would need to be given to the provision of seating and possible features such as public art installations and water features – to create a space people will want to use and make their own.

This public square will create opportunities for outdoor events such as summer concerts and dance performances, art exhibitions (similar to Merrion Square), outdoor café space, and indeed a weekly farmers' market.

Recreational spaces for children and young people

The marked lack of recreational facilities in Dundrum for children and young people was highlighted in *Imagine Dundrum's* consultations with local primary and secondary students in 2018 (see our submission to the *Dundrum Local Area Plan* pre-draft consultation, December 2018). While the Council has provided some excellent teen facilities such as the Cabinteely Grainstore, these are not easily accessible for young people living in Dundrum. There are no children's playgrounds in close proximity to the Village area, and parents with young children have little choice but to travel by car to one of our local parks. This gap will become ever more evident as apartment living in the area expands greatly. Indoor recreational spaces for various age-groups, associated with the new Civic Centre, and small outdoor 'pocket parks' close to or within the Village area, could make a huge difference.

With imaginative thinking and design, we can ensure that the future adults of Dundrum are not neglected as our new community facilities are designed.

The Civic Centre at the heart of a network of community services

Alongside the facilities and services provided within the Civic Centre, it can fulfil an important function as the hub of the network of community and cultural services in the West of the County. The Civic Centre can be at the heart of an integrated plan for community and voluntary services in Dundrum itself, and a single point of accessible information about services in the County.

As identified in the Nexus report, there is a significant deficit in relation to the provision of up to date and accessible information for the public on the range of community and voluntary services locally, their catchment areas and target groups, venues and timetables. The Civic Centre can redress this through electronic 'signposting' to local services and facilities.

Links with the College of Further Education

Discussing the role of the County Council in relation to education, SLO 80 in the *Dún Laoghaire Rathdown County Development Plan 2016-22* refers specifically to Dundrum. Its aim is:

To facilitate, support and enhance educational facilities in the County, in particular the activities of Dundrum College of Further Education that will foster strong links between education, community and the business sector in the County³⁵

Both in terms of the built environment and in terms of service, the Dundrum College of Further Education occupies a central place in Dundrum Village, with an extensive street frontage and a substantial campus extending back from the Main Street.

Imagine Dundrum believes there is a great opportunity, closely aligned with the development of a Dundrum Civic Centre, to strengthen the links with the library and enhanced cultural offerings in Dundrum, to create a visible community/ life-long learning education campus in Dundrum, and to

³⁵ https://www.dlrcoco.ie/sites/default/files/atoms/files/cdp2016_section9.pdf

address the impact and utility of the site so that it can make a significant contribution to the future of the Village.

A new role for the Carnegie Building

The Carnegie library was founded 102 years ago, and is no stranger to multiple uses, having been a location for concerts, plays, ceilis, dances, and even serving as a school for a time.

This much-loved building must continue to serve the public, and can be an excellent addition to community spaces and facilities for activities such as youth services, community creche, delivery of outreach wellbeing and public health programmes under the 'Healthy Ireland' initiative. Meeting rooms and desk space, with practical facilities (access to the internet, photocopying etc.) are pressing needs for smaller community and voluntary groups, and such a service could be located in a renewed and modernised Carnegie Building.

4. KEY POINTS IN CONCLUSION

Location and physical context of the Civic Centre

As mentioned earlier (p.11), locating the new Civic Centre for Dundrum at the heart of the Village is critical. Its location will ensure that the Centre, and its associated open public space, together form a strong public focal point, directly connected to the Main Street, which will ensure 'permeability' and embed the new development solidly into the old Village context.

Strong linkage with the forthcoming Dundrum Local Area Plan

All planning for a Civic Centre and associated community facilities and services in Dundrum must be linked firmly to the provisions of the *Dundrum Local Area Plan*, in the interests of a citizen-centred, integrated approach.

In particular, it is hoped that the Plan will re-invigorate proposals made by DLR County Council as far back as 2003 (in their *Urban Design Framework* for Dundrum) for traffic calming, improvements for both pedestrians and cyclists, and overall improvement in the quality of the public realm. The work of the Project for Public Spaces underscores the importance of such an approach to the pedestrian experience when embedding a Civic Centre securely in its physical context

Surprisingly, the layout and atmosphere of many civic centers discourage people from getting around on foot. Even though offices, restaurants, shops, and cultural institutions may be located close together, a poor pedestrian environment makes them feel cut off from one another. In many cases, streets are simply designed to accommodate more and faster traffic than what's needed, which negatively affects perceptions of pedestrian safety.

And in conclusion ...

All sectors of the local population are ready for change, and excited by the possibilities it offers. We hope those with ultimate responsibility for planning and implementing will match this engaged community's wishes and vision for the future Dundrum.

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Suggestion for a Civic Centre building fronting onto a Town Square and linking directly to Dundrum Main Street (in foreground)

With thanks to Eamon Regan, Architect

Submission to DCCAP from Imagine Dundrum, September 2019

APPENDIX 2

Imagine Dundrum Submission

on

Bus Traffic Management on Main Street Dundrum

(Submission updated to take account of BusConnects updated proposal of October 2019)

1. The purpose of this submission

The aim of *Imagine Dundrum* is that *'the future Dundrum will be a place which respects and reflects its unique history and heritage, and is a thriving, attractive and welcoming place for everyone in the local community, those who work here and its many visitors.'* Making Main Street a pedestrian-friendly environment is key to achieving this aim and good traffic management must prioritise the needs of pedestrians and cyclists. In this submission on bus traffic, *Imagine Dundrum* is reflecting our wider thinking on the future development of Main Street.

The proposals in the draft BusConnects plan to re-organise and re-route bus services into and out of Dundrum, along with the recent intensification of bus traffic on Main Street, would, if they proceeded, create an unacceptable level of bus movement through the Village, contrary to Dun Laoghaire Rathdown County Development Plan provisions and to the best future for the Village.

It is our view that the draft BusConnects plan of October 2019 requires significant reworking. The aim of this submission is to make alternative proposals for the management of bus traffic through and in the environs of the Village. We believe the proposals are reasonable and that they are not contrary to the broad BusConnects objectives.

The submission sets out proposals for two matters:

- The management of bus traffic through Dundrum Main Street and environs
- The Transport Hub at the North end of Main Street or on the East side of the Luas.

2. Reflecting the County Development Plan 2016-2022 and local context

Proposals for bus traffic through and around Dundrum must take full cognisance of the provisions and intent of the DLR County Development Plan, the proposed Local Area Plan for Dundrum and the likely impact of the imminent redevelopment of the Old Shopping Centre which runs along Main Street.

The County Development Plan 2016 – 2022 (1.3.4.10 Dundrum) proposes among other things:

The provision of a pedestrian-friendly and traffic calmed-environment along Main Street

Provision of significant additional off-street and underground car parking.....to facilitate the complete removal of surface parking from Main Street

The provision of cycle facilitiesand additional cycle parking.

SLOs No 149 and 150 state: that any new development must:

(a) take[s] cognisance of the character and streetscape of the Old Main Street, and

(b) provide for and retain a range of complementary non-retail uses, including... cultural, community and civic uses.

The Urban Design Framework for Dundrum Included in the new County Plan is an outline of the Council's existing (2003) Urban Framework Plan for Dundrum, which has not been superseded. (see the Plan Section 1.3.4.10) Much of that Framework Plan is close to Imagine Dundrum's own thinking:

The redeveloped old Shopping Centre site should include 'internal town squares or open spaces', as well as appropriate residential accommodation and cultural amenities.

A renewed Main Street will include: retention of historic buildings; filling in gaps in the streetscape; using building styles and materials which reflect its distinctive local character; increased 'connectivity' using walkways and footbridges; community amenities in Sweetmount Park; and a focal point and 'gateway' to Dundrum, in the area around the Luas bridge.

Plans for bus traffic management must be developed against the background of these wider objectives for the Village and specifically for Main Street. In particular, the detailed planning objectives for a pedestrian friendly and cyclist friendly Main Street will have strong implications for overall traffic management including bus traffic, and their achievement must take priority.

3. Pedestrian-friendly Dundrum

Imagine Dundrum believe that traffic arrangements in Dundrum Main Street should be implemented to achieve the aims articulated above and to the highest modern standards. The Design Manual for Urban Roads and Streets (Department of Transport, Tourism and Sport) – DMURS – sets out the standards that designers are expected to achieve. DMURS '*presents a series of principles, approaches and standards that are necessary to achieve balanced, best practice design outcomes with regard to street networks and individual street*'.

DMURS sets out the user hierarchy that promotes and prioritises sustainable forms of transport and places pedestrians at the top of the hierarchy (Diagram opposite).

In order to ensure pedestrian safety, the footpaths should be of adequate width with adequate separation from vehicular traffic. With the public transport interchange on one end and a Major Retail Centre on the other end Main street is an area of high pedestrian activity which will further increase with the proposed largescale residential development on the Old Shopping Centre site. DMURS recommends a **minimum footpath width of 3m** in such situations. The footpaths should be free from clutter with minimum amount of appropriately placed street furniture, taking into account the needs of mobility impaired or visually impaired persons. Given the nature of the Street as a Village centre commercial and retail area, frequent controlled pedestrian crossing points are required.

To further ensure pedestrian and cyclist safety vehicle speed needs to be minimised. A speed limit of 30 km/hr, frequent raised pedestrian crossings and other traffic calming measures, such as chicanes, should be introduced on Main Street.

The removal of on-street parking (apart from a small number of on-street disabled parking spaces) is critical to contributing to pedestrian safety and in line with the aims of the CDP.

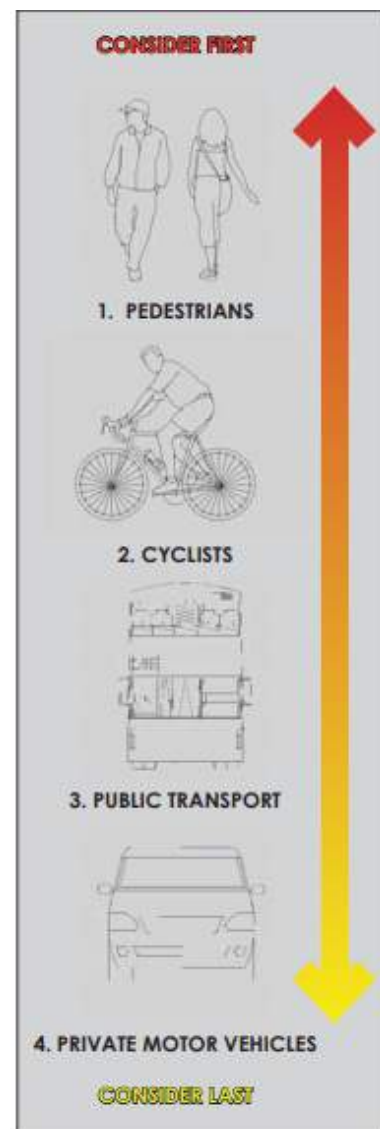
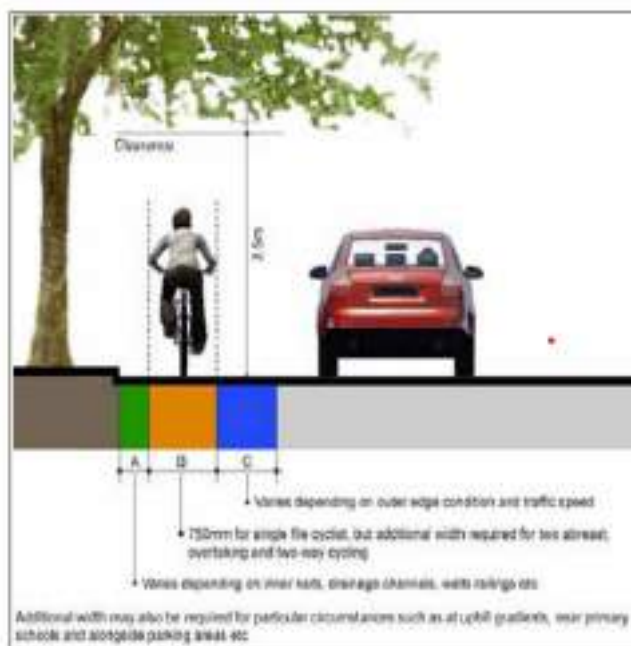


Figure 2.21: User hierarchy that promotes and prioritises sustainable forms of transportation.

4. Providing for cyclists in Dundrum



The Local Area Plan Issues Paper indicates that cycling into Dundrum is less than the county and national average. To improve this rate of sustainable transport use, Imagine Dundrum supports the provision of cycleways through Main Street Dundrum along with other cycling facilities (bicycle parking, signal control at crossings and junctions) as envisaged in the County Development Plan and Urban Design Framework for Dundrum. Cycleways in each direction, segregated by bollards for the vehicle laneway, designed and constructed to meet the requirements of the National Cycle Manual (Road Transport Authority) should be provided. Given the absence of any adequate cycleways on the Dundrum bypass it is likely that these will be heavily used and will need to be a **minimum width of 2m in each direction.**

5. Implications for bus traffic

The initial Bus Connect proposals would have resulted in a bus movement up or down Main Street every 2.3 minutes³⁶ and these proposals do not include some routes more recently brought on stream by TFI. In the October Bus Connect proposal the number of buses passing up or down Main Street has increased and the number of bus movements rises to 38 per hour which is an average of one bus every 1.5 minutes.³⁷ Imagine Dundrum do not believe that this frequency of movement is compatible with a safe and inviting environment for pedestrians and cyclists. The proposals are not compatible with the changes to Main Street that will be required to provide for path width and cycle lane provision as set out above.

To enhance the environment and improve pedestrian and cyclist safety the use of Main Street by private and public vehicles should be minimised - it should not be used as a through road for vehicles that don't need to be there. The removal of most on-street parking and the provision of off-street parking in the Old Shopping Centre development or on lands in public ownership will help achieve this while facilitating those who need to drive there to do business.

An *Imagine Dundrum* survey of Main Street³⁸ shows the general width between building lines is about 15.5m but there are several pinch points where the width is as narrow as 12.0m. With two footpaths of 3m and two cycle lanes of 2m there is hardly enough width for one lane of vehicle

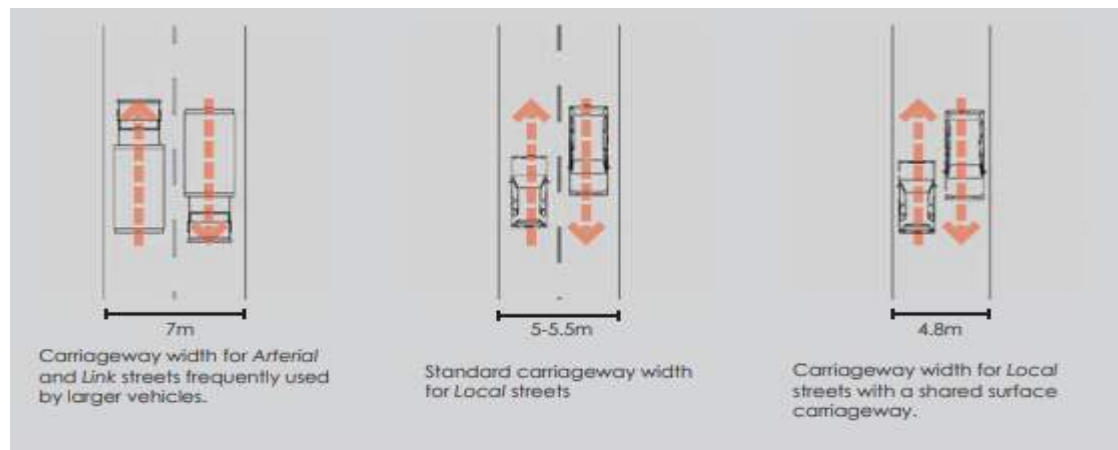
³⁶ The 2.3 minutes is calculated from the bus numbers and timetables provided in the BusConnect first proposal. To validate this calculation Imagine Dundrum undertook a physical count on buses passing up or down Main Street during three one hour periods, between 8 and 9 am, between 1 and 2 pm and between 5 and 6 pm during the first half of July, the results of which are contained at Appendix I.

³⁷ Appendix IV shows the latest proposed routing of buses through Main Street and the number of bus routes using the bus interchange

³⁸ Results of Imagine Dundrum's survey of Main Street Dundrum are contained at Appendix II

traffic let alone two. We do not believe that the standards for the No 1 and 2 priorities (pedestrians and cyclists) should be compromised to facilitate vehicular traffic.

DMURS at Chapter 4 sets out the standards for carriageway widths of streets and Imagine Dundrum submits that the appropriate width required for two way traffic which includes buses should be 7m excluding cycle lanes.



Source: Fig. 4.55 p102 DMURS

6. Bus traffic management proposal: One way traffic on Main Street

In the light of the need to accommodate pedestrian and cyclist provisions outlined above as envisaged in the County Development Plan, Main Street cannot support the proposed volume of bus and vehicular traffic.

The Dundrum area is heavily trafficked with North/South traffic between the city and Sandyford/Enniskerry and the M50 Motorway and East/West on major roads on both ends of Main Street. Provision is made for this traffic by the Dundrum Bypass and the Wyckham Bypass. Vehicular access should be mainly for those who live, work, do business in or require disabled parking close to services provided on Main Street and through traffic should be discouraged.

We therefore propose that the best option is to make Main Street one-way in a northbound direction, exiting onto Taney Road. It is proposed that the Airport Coach and the 175 route be restricted to the bypass with stops being provided where appropriate on the bypass and close to Balally.

Bus traffic from both Sandyford direction and the Ballinteer Road would travel Northwards on Dundrum Main Street to the Bus interconnect. In the reverse direction these buses would enter the Bus/Luas Interchange in Dundrum, exit onto Taney Road, and from there to Kilmacud Road going West towards Dundrum from where they can go left onto Sandyford Road or straight ahead onto Ballinteer Road as appropriate.

7. The Bus/Luas interchange

The proposed Bus/Luas interchange at the Dundrum Luas station is a welcome proposal and should contribute to the footfall on Main Street and thereby enliven the Street.

However, unless designed to a high visual standard, with the impact on the Village fully taken into account, the additional bus traffic at this interchange could be seriously damaging to the overall design standards for the Village.

If the interchange is to be located at the North end of Main Street it must be of high quality design and construction in keeping with its position as the 'Gateway' to Dundrum. The current access route to Dundrum Luas station from Main Street is poor quality and unsafe for pedestrians and must be upgraded. Some sketched feasibility options for the Bus/Luas Interchange are attached at Appendix III and described below.

Suggestions for Bus Interchange.

Option 1: Two – Way System.

The area around Waldemar Terrace and south of the Luas bridge is a bus only area at present. If the site of the telephone exchange became available the additional space could facilitate the movement of buses in two directions. Buses would enter this area either from Taney Road or from Main Street and exit the area onto Main Street or Dundrum Bypass. This option would allow sufficient space for bus movements and parking, as illustrated, adjacent to the Luas bridge. It would also allow for sheltered bus stops and would enhance the entrance to Dundrum if well landscaped with attractively appointed shelters and trees and shrubs.

Option 2: One – Way System .

Where the additional space on the site of the telephone exchange is not available the proposed system would be one way. A bus station/parking area is located adjacent to the south side of the Luas line. A bus lane runs from north to south along Dundrum Bypass south of the Luas bridge and turns into Main Street (where it exits onto the bypass) and buses enter the dedicated bus interchange from Main Street. They exit on to Taney Road by the present slip road connecting Main Street to Taney Road and head east up Taney Road or alternatively exit the bus interchange by a new slip road and head west on Taney Road. Again the interchange area can be designed to enhance the entrance to Dundrum.

Option 3: Alternative One – Way System

In this option the traffic which travels in the one way system from South to North on Main Street does not exit onto Dundrum Bypass but exits on to Taney Road using the present slip road to head east and head west on a new slip road. The buses travel on a bus lane from north to south along Dundrum Bypass and enter Main Street at its junction with the bypass. This section of Main Street is dedicated to buses and bicycles only. There is a cycleway on the south side of this section of Main Street. A bus station/parking area is located adjacent to the south side of the Luas line as illustrated. The buses exit on to Taney Road by the present slip road connecting Main Street to Taney Road and head east up Taney Road or alternatively exit the bus interchange by a new slip road and head west on Taney Road. Good design and landscaping could make this an attractive entrance to Dundrum.

Option 4: Placing the bus interchange on the East side of the Luas. This would allow buses enter and exit the interchange from Taney Road, and would have the advantage of removing the interchange entirely from the entrance to Dundrum and the bus stops would be at the same elevation as the Luas station.

8. **Summary Proposals**

- Main Street one-way in a northbound direction exiting on to the Taney Road.
- Bus traffic through the Village limited to essential routes
- Several bus routes restricted to the by-pass
- A speed limit of 30 km/hr
- Well-designed Bus/Luas interchange befitting the 'Gateway to Dundrum'

Appendix A

Measurement of buses passing up or down Main Street Dundrum during three specified one hour periods on three random midweek days in the first half of July.

1. Between 8.00 am to 9.00 am Tuesday 9th of July:
25 buses passed up or down. On average there was a bus passing every 2.4 minutes.
2. Between 1.00 pm to 2.00 pm Friday 12th of July:
26 buses passed up or down. On average there was a bus passing every 2.3 minutes.
3. Between 5.00 pm to 6.00 pm on Monday 15th July:
27 buses passed up or down. On average there was a bus passing every 2.22 minutes.

Appendix B

Survey of Main Street, Dundrum

Location	East Footpath	Road Width	West Footpath	Between Building Lines (East-West)
Maher's Terrace at Kilmacud Road Junction	3.5	9.15	2.6	15.25
NW Corner of Dundrum House	3.1	9.75	2.6	15.45
Former Xtra Vision Shop	4.8	13.8	3.3	21.9
North corner of TSB	2.9	7.6	2.1	12.6
Pedestrian Lights at Lidl	2.8	7.6	1.6	12.0
Callaghans No 8 Main Street	4.2	8.0	3.4	15.6
Bank of Ireland, Main Street	3.5	8.0	2.1	13.6
Waldemar Tce at Bus Shelter	3.7	9.0	3.0	15.7
	North Footpath		South Footpath	
Entrance Road from Bypass (at narrowest point)	4.7	9.0	3.3	16.3

Appendix C

Bus Connects Proposals for Dundrum Oct 2109 and the Implications for the frequency of buses passing up and down Main Street or using the bus interchange

The Bus Connect proposals for Dundrum circulated in Oct 2019 show some changes from the earlier proposals – some routes have been rationalised with some changes to frequency. Below is a table of routes that involve travelling on Main Street or using the interchange on the north end of Main Street.

Number	Route	via Main Street	Terminates Dundrum	Frequency mins	No of bus movements/hr
A2	Dundrum to Santry	Yes	Yes	10-15	12
11	Belarmine-Mountjoy Sq.	Yes	No	60	2
12	Enniskerry-Mountjoy Sq.	Yes	Yes	60	2
24	Dundrum-Poolbeg St	Yes	No	30	4
198	Glencullen-Dundrum	Yes	Yes	120	1
225	Dundrum-Dun Laoghaire	Yes	Yes	10-15	12
235	Dundrum-Rockbrook	Yes	Yes	120	1
Dublincoach	Dundrum-Airport	Yes	Yes	30	4
S6	Tallaght-Blackrock	No	via interchange?	10-15	12

There are 8 routes proposed to run on Main Street (including Dublincoach Airport Service that is not included in the BusConnects proposal) with a total of 38 movements per hour which is an average of 1 bus every one and a half minutes. There are 6 buses terminating at the Dundrum Luas Interchange.

If the S6 uses the interchange there will be 9 buses using the interchange with a total of 50 bus movements per hr.

APPENDIX 3

Best Practice Public Lighting

Dark Sky Ireland Report, by Prof. Brian Espey.

See overleaf.

BEST PRACTICE PUBLIC LIGHTING

DARK SKY IRELAND

PROF. BRIAN ESPEY



Executive Summary

The drive to reduce both costs and carbon production from public lighting is leading to the national adoption of more energy efficient light emitting diode (LED) lighting. Due to the longevity of LED lamps (typically 25 years), any equipment installed now will have a long-term effect, so we have a responsibility to implement the best choice in terms of lighting as well as its wider impact based on an informed balance of current evidence.

There are environmental and health impacts with high temperature LEDs containing more “blue-rich” light.

We promote the adoption of lower temperature (warmer colour) lighting, which provides the best balance of cost saving, road and personal safety through better balanced light and improved perception, as well as reducing environmental impact. We encourage both “trimming” (part-night lighting) and “dimming” policies to reduce the light burden in the night-time environment and, at the same time, produce significant cost savings.

Recommendations

These are in line with developing best environmental practice in other locations in the UK, across Europe, and globally and will make the most of the benefits of new LED technology. The following recommendations meet government obligations to reduce energy use, cost, and carbon emissions:

- Maximum energy can be saved through not lighting areas, therefore careful consideration should be given to evaluating the requirement for lit areas;
- Up to 30% savings are possible through careful lighting design;
- Current lighting installations are designed to maximum light level required, i.e. for maximum traffic. Timing and duration should be limited to when needed through “trimming” (also called “part-night lighting”) and/or level (through dimming);
- As light travelling close to, or above the horizontal, impacts strongly on the environment we recommend full cut-off lighting, with such lights having no light emitted above the horizontal, and with the minimum practical emitted within twenty degrees of the horizontal;
- Blue light in LEDs should be limited to warmer-coloured lighting (so-called “warm white” light, i.e. light with a Correlated Colour Temperature (CCT) at or below 3000K;
- The impact of existing “neutral white” light installations (i.e. lighting with CCT approx. 4000K) can be reduced by a reduction in the level of lighting, as described in UK British Standard 5489 which takes account of the influence of this light on night vision;
- Local authorities should have autonomy to reduce light levels or spectrum (such as the adoption of amber lighting) for the benefit of tourism, biodiversity and citizen wellbeing;
- A consistent local and national approach should be adopted so that lighting from national routes, for instance, does not undo the effects of improved local lighting.

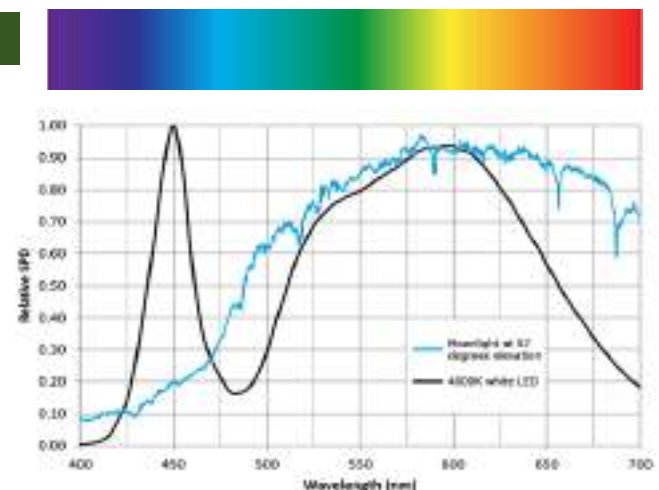


Figure 1 This figure shows a comparison between the intensity across the spectrum of a typical 4000K LED and that of the Full Moon when highest in the sky. The band at the top shows the colour at each point of the spectrum. Although it is sometimes said that such LED light is similar to moonlight, note that the LED output is significantly different in terms of both spectrum and intensity.

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PUBLIC LIGHTING

Visual perception

The purpose of street lighting is to permit better vision at night, while at the same time limiting the deleterious effect of the light itself, e.g. glare. Studies have shown that near-perfect colour discrimination is achieved for warm white lighting and does not improve significantly as the colour temperature is increased further.¹ On the contrary, the blue content of higher temperature lighting triggers contraction of the eye's pupil and subsequent dark adaptation time increases which can lead to poorer vision when passing beyond the lit area. Glare issues and eye response issues are even more important for older people.

Blue-rich lighting also scatters more in the atmosphere (e.g. the sky's colour is the result of scattered blue light from the Sun) and this scattered light affects darker regions nearby.

The best overall balance between visibility under all weather conditions, colour reproduction and glare has been found to be for LED light with a CCT of approximately 3000K.

Public Opinion

In conjunction with the Irish Times we have conducted a Citizen Science questionnaire which received 464 responses from Irish residents. Responses from city inhabitants noted changes in both night-time bird behaviour and the natural activity of insects, bats and foxes, with a moderate association between bird behaviour and the increase in local light over the recent past.² Elsewhere in Europe, residents report that public lighting was the most commonly identified source of light pollution and that commercial lighting was the most annoying source of light-at-night in a predominantly urban and educated sample with a high level of interest in astronomy (Lyytimäki and Rinne, 2013).

Safety

Anecdotally, current "neutral white" (CCT = 4000K) lighting is regarded as harsh and overly bright to the eye even when installed to the same level of lighting (lux level) as the units it replaces. The result is strong glare from the lighting source along with dark shadows, leading to higher contrast and lower lighting quality. Additionally, perceived safety correlates with better colour reproduction found in warmer white lighting as it is closer to a daylight balance. A major UK study has found that neither the move to part-night lighting nor dimming has had any impact on either traffic collisions or crime rates.³

Environmental

Ireland's nine bat species account for approximately one third of our native mammal species and are protected by law. Their insect prey, with a lifetime of one to two years, are particularly vulnerable to population changes and are strongly affected by the blue content of light. Larger declines in nocturnal insects have been seen relative to daytime species, though a recent study has implicated light pollution in the overall strong overall decline of all types of insects.⁴

Other diurnal species can also be affected by night-time light. For example, salmon will not pass a light barrier where the light intensity is comparable to full moonlight and are also sensitive to light at the blue end of the spectrum. Consideration should be given to the restriction of light level and duration in areas close to waterways, e.g. by rivers and on bridges and the use of warmer colour light. These waterways are also feeding zones for bat species.

The decline in biodiversity and insect populations was mentioned in a recent Dáil statement by the Minister for Culture, Heritage and the Gaeltacht when she expressed her commitment to encourage councils to maintain biodiversity. In the same statement she announced that the Government is creating a legal onus, or a biodiversity duty, on public bodies to have regard to policies, guidelines, and objectives to promote the conservation of biodiversity and the National Biodiversity Action Plan.⁵

Footnotes:

¹ Jin, H, Jin, S., Chen, L, Cen, S. and Kun, Y. 2015 "Research on the Lighting Performance of LED Street Lights With Different Color Temperatures," 7 (6), December 2015. <https://ieeexplore.ieee.org/document/7328247>

² <https://www.irishtimes.com/news/science/help-scientists-understand-the-influence-of-light-on-the-environment-1.3416898>

³ Local Authority Collaborators' National Evaluation of Reduced Night-time Streetlight (LANTERNS)

⁴ <https://doi.org/10.1016/j.biocon.2019.108259>

⁵ <https://www.oireachtas.ie/en/debates/debate/dail/2019-05-29/35/>

PUBLIC LIGHTING

Best Practice

In response to an American Medical Association report on the potential health impact of blue-rich lighting a number of major North American cities, including Montreal, San Diego and New York have abandoned plans to install 4000K LED street lights and instead adopted lamps with CCT of 3000K – or lower in some instances – which are endorsed by the AMA.¹ On the other side of the world, a number of New Zealand councils have installed warm white lighting of 3000K due to demand from citizens, with 2200K units in more environmentally sensitive areas.² The International Dark Sky Association anticipates that a move to 2700K lighting may become the norm over the next several years.³

As an example of costs due to correcting lighting issues, the City of Davis in California was half way through an LED street relighting initiative when forceful complaints from residents halted the project. After public review of several alternatives, the streetlights selected are lower brightness and, at 2700K, much warmer. As many of high-CCT luminaires had already been installed under the original plan, the additional cost to the city for retrofitting these was \$350,000.⁴

Concerns for the implications of blue-rich lighting are raised in the UK's Chief Medical Officer's report for 2017. This document dedicates a full page to light pollution and health, referencing LEDs and blue rich lighting with the following comment:

"Local authorities [in the UK] have been replacing mercury and sodium street lights with LEDs. If this is done purely on the basis of energy efficiency and cost, it is possible to end up with installations that may not be fit for purpose."

The widespread installation of LEDs has taken place in a relatively short pace of time due to the rapid development of light technology and without assessment for environmental impacts. UNESCO's Earth Charter states the prevention of harm before it happens *"is the best method of environmental protection. When knowledge is limited, apply a precautionary approach:*

- *Take action to avoid the possibility of serious or irreversible environmental harm even when scientific knowledge is incomplete or inconclusive.*
- *Place the burden of proof on those who argue that a proposed activity will not cause significant harm, and make the responsible parties liable for environmental harm."*



Warm White
3000 kelvin

Neutral White
4000 kelvin

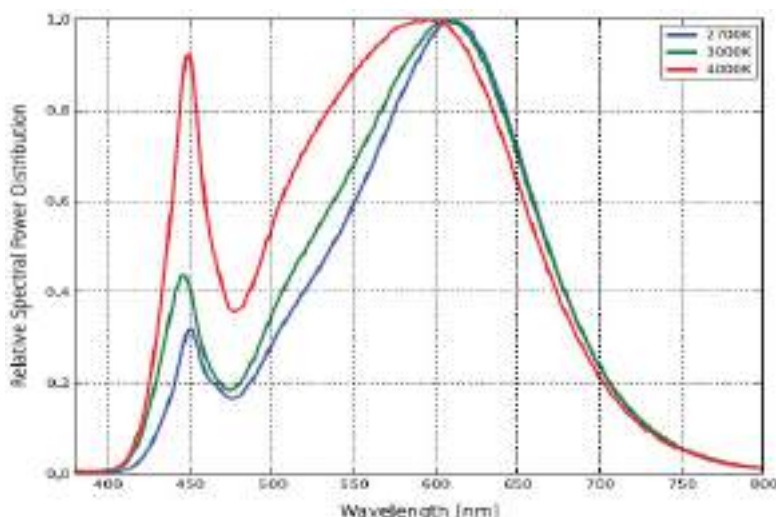


Figure 2 Adoption of 3000K lighting rather than 4000K results in a 37% reduction in blue light; moving to 2700K (suggested for more sensitive areas) provides a 48% reduction. The appearance of warm white and neutral white lighting is shown at night.

Footnotes:

¹ <https://luxreview.com/article/2017/02/will-tunable-street-lighting-first-silence-led-critics->

² <http://rnz.co.nz/news/national/403751/otago-to-get-lower-level-more-expensive-led-street-lights?fbclid=IwAR2pTb1TYyZLI6k0U7Vkb3QETA-iIH3XVPZuLyISWI0aNZLmHMK9IbxbMkg>

³ <http://darksky.org/our-work/lighting/lighting-for-citizens/3k/#list>

⁴ <https://www.lightshowwest.com/eco-effects-of-high-cct-led-lighting-outdoors-building-a-case>

PUBLIC LIGHTING

EU Practice

The EU Commission's Green Public Procurement (GPP) document is intended to advise decision makers on implementation once the decision is taken to install new lighting. In terms of lighting levels it adheres to the principle of "as low as reasonably achievable" (ALARA) and also recommends that warmer colour LEDs be installed to restrict impacts on wildlife and sky quality as well as potential effects on human health. The document also recommends the installation of LEDs with CCT values of 3000K or less. The document also states that potential impacts on wildlife and skyglow, as well as human health, are sufficient justifications to set restrictions on blue light.

At least five EU countries have either enacted legislation or are adopting practices that restrict both the amount and blue content of public lighting. Warm white light with a CCT of 3000K or less will be the advised upper limit across these jurisdictions, with even lower temperature lighting down to 2200K or less (similar to current high pressure sodium lighting) being required in national parks or other sensitive habitats. In the UK the lighting industry is moving away from 4000K lighting and to 3000K, and the lighting industry is likely to move to even lower values over the next few years.

Warm white LED lighting with CCT of 3000K has been installed in Ballycroy, Co. Mayo, and Mallow, Co. Cork and both locations have been positively received. Both Kerry and Mayo County Councils are planning warm white lighting of 3000K or less to protect their dark sky areas and promote sustainable tourism.

Practical Guidelines

The information outlined in this document can probably be best summarised using the guidelines produced by the EU COST Action Loss of Night Network (LoNNe) to combat light pollution and a precautionary standpoint suggests these are also good guidelines from the points of view of environmental and human health aspects as well as in terms of energy-efficiency:¹

1. Every light needs to be justifiable
2. Limit the use of light to when it is needed
3. Direct the light to where it is needed
4. Reduce the light intensity to the minimum needed
5. Use light spectra adapted to the environment
6. When using white light, use sources with a "warm" colour temperature (less than 3000K)

Summary

In 2017 the High Court recognised the constitutional right to protect the environment and the precautionary principle is enshrined as one of the fundamental principles of the European Union.² We have a global responsibility to reduce our carbon emission as well as save costs and our national strategy to reduce public lighting impacts relies on the changeover to LED lighting. What we must not forget, however, is that the actions to reduce both energy use and carbon output have been taken with the aim of protecting the environment, hence we should consider the potential environmental consequences of our choices in the long-term.

We therefore recommend the adoption of lower CCT (warmer) lighting, which provides the best balance between efficiency, safety, and environmental impact.

The introduction of the current LED lighting, with a growth in installed units from a few percent to 16% over the past four years has resulted in an increase in intensity and blue-rich content, is a phenomenal change which has an environmental impact.

As an island nation, movements from adjacent areas cannot replace damage to our native species so we have an imperative to protect them in situ.

Dark Sky Ireland strongly urges the use of warm white lighting with a maximum CCT of 3000K, and lower values in more sensitive areas such as National Parks and conservation regions.

Given environmental, health and economic imperatives the onus should be on justifying the installation or increase of lighting rather than justifying its removal.

In practical terms, we recommend the adoption of the recommendations of the Campaign to Protect Rural England³ which were developed from the responses of 83 local authorities. Lighting policy documents, including designation of environmental zones, should be developed by each authority to provide a practical framework and to address potential legal issues.

Footnotes:

¹ EU Collaboration on Science & Technology ES1204
<http://www.cost-lonne.eu/recommendations/>

² <https://www.ecologic.eu/1126>

³ Campaign to Protect Rural England "Shedding Light"
https://www.cpre.org.uk/wp-content/uploads/2019/11/Shedding_light_leaflet.pdf

APPENDIX 4 Main Street proposed ACA

Main Street - West Side

1. **Glenville Terrace** consists of three Victorian houses (Nos 1 – 3) built using red brick. The Environmental Impact Statement referring to planning application Reg. Ref.D08A/0231 (EIS) noted 'These three houses retain their primary external Victorian appearance and are an important component of the streetscape'. We think that this terrace is an important part of the character and streetscape of the Main Street. (EIS para 5.11.2.47 and 5.11.2.59, Figure 5.11.2.1 green and Plate 5.11.2.16;).



Glenville Terrace

North of Glenville Terrace

6. **Old Post Office** building north of Glenville Terrace and south of the shopping centre is a Victorian building that fits in with the character of the street. We are aware of the poor condition of this building but think it should be assessed for inclusion in the ACA. This building presents as a three bay two storey over basement red-brick Victorian building with a single storey over basement Georgian return (EIS para 5.11.2.60, picture below). We propose that this building be assessed for inclusion in the ACA.



Old Post Office

2. **South of Glanville Terrace** The first building is No. 4 Glanville Terrace (Shop) which is a three bay two story structure with a hipped roof. The next building is No 13 Main Street which has two shops extended towards the street. The structure is a two storey over basement, three bay Victorian building. The shop extensions (Irene's Florist and Havana Therapy) are of mixed quality but retaining the house will maintain the building lines and height of the street which are to be taken into account under Section 81 of the Act. No 15 Main Street is a two storey over basement, three bay Victorian structure with a shop front extended to the street (The Best Barber). These three buildings could be refurbished in the future. All three houses should be assessed for inclusion in the ACA.
3. **Main Street – East Side.** There are a number of buildings on this side of the street that are of interest and play a key part in maintaining the character and streetscape of the Old Main Street and Street in keeping with the intention of SLO 150.
4. Nos. 4-5 Main Street, a pair of Victorian houses converted to shops. No.4 has its upper facade rendered but may well retain its brickwork like No. 5, where it has been painted over. (EIS para. 5.11.2.71, Figure 5.11.2.1, green and Plates 5.11.2.2 and 5.11.2.24).
5. No 6 Main Street consists of three houses which are converted into businesses (Tax Assist Accountants, Sherry Fitzgerald and Oxfam). Although relatively modern they are in character with the rest of the East side of the street. (See picture below).



7. Nos. 8-9 Main Street. This pair of Victorian houses with decorative brickwork are converted to shops and No 10, a three-bay red brick house which has been converted into a bank. At No. 10, brickwork from ground level upwards can be seen at the north-west corner, behind the stone facing. (EIS para. 5.11.2.72, Figure 5.11.2.1, green and Plate 5.11.2.25-26).
8. Pembroke Terrace consists of three Victorian houses built in red brick with attractive stone decorations comparable to Glanville Terrace on the West side of the street although with differences in detail. Nos 14-15 Main Street, a five bay building of yellow brickwork with red brick decorations especially over the windows and door. These building have been converted to shops (EIS para. 5.11.2.73-74, Figure 5.11.2.1, green and Plate 5.11.2.28-29).

Conclusion: in putting forward this proposal, Imagine Dundrum is reflecting the concerns and hopes expressed by many of Dundrum's residents, who want the redeveloped Dundrum to remain a recognisable place, retaining its unique character and identity through the protection of the integrity of the original streetscape. We trust that this submission, proposing assessment of the Dundrum Village area for Architectural Conservation Area status, will be given serious consideration at the earliest possible opportunity by the relevant Council officials and elected representatives.

August 4th, 2017.