



Imagine Dundrum

Draft County Development Plan Submission

April 2021

www.imaginedundrum.ie

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Draft County Development Plan Submission

Overview

1. Welcoming the Development Plan Vision

Imagine Dundrum welcomes the Development Plan Vision, and the inter-related five Strategic County Outcomes. We welcome the recognition of the intrinsic links between climate resilience, planning policy, mental and physical health, green space, and community infrastructure.

Implementation of the Plan, especially in relation to Development Management, must be measured robustly against these outcomes, as provided for in Chapter 15.

The group also welcomes the strong commitment to the concept of neighbourhood, and the use of this concept in relation to Development Management. The emphasis on Placemaking and on community, as underpinning values and principles, is also particularly welcome.

2. The focus of this submission

The main focus of this submission concerns the future of Dundrum Village and its environs. The submission therefore concentrates on the Chapters of the draft County Development Plan that have most relevance for and potential impact, directly or indirectly, on Dundrum. The Chapters commented on are:

Chapter 3: Climate Change

Chapter 4: People, Homes and Places (together with related material in Chapter 12, Development Management, Appendix 2: Draft Housing Strategy and Interim HNDA

Chapter 5: Transport and Mobility

Chapter 7: Towns, Villages and Retail Development

Chapter 8: Green Infrastructure and Biodiversity

Chapter 9: Open Space, Parks and Recreation

Chapter 10: Environmental Infrastructure and Flood Risk

Chapter 11: Heritage and Conservation

Chapter 14: Specific Local Objectives

The submission makes a number of proposals aimed at strengthening the potential impact for Dundrum of the new County Development Plan. In this regard, the Group refers back on some matters to proposals made in our initial submission to the 'Have Your Say' document ([available here](#)). The submission also makes some proposals that are county-wide, but which will benefit Dundrum.

3. General matters

A need for new post-pandemic thinking: Given the way the pandemic has reshaped all our lives, there needs to be a statement in the Plan to the effect that planning guidelines and standards must take account of new thinking emerging from the experience of 2020-21. For example, the Open Space needs of the DLR population have in some areas clearly outstripped provision.

Proposal 1: To add a statement re post pandemic thinking to Table 1.4 Creation of a Climate Resilient County and in Chapter 3.

Neighbourhood concept: As noted, Imagine Dundrum welcomes the strong commitment in the draft County Development Plan to:

‘Embed the concept of neighbourhood into the spatial planning of the County by supporting and creating neighbourhoods and ensuring that residential development is delivered in tandem with the appropriate commensurate enabling infrastructure, including access to sustainable neighbourhood infrastructure, sustainable modes of transport, quality open space and recreation and employment opportunities’ (PHP 4.1.1. Overarching Policy Objective PHP1. P67).

Proposal 2: Add the term “community building to this section as follows:

‘Embed the concepts of neighbourhood and community building into the spatial planning of the County...

We look to see this principle carried through into all aspects of the County Development Plan, and in particular in its application to the Development Management Process.

Placemaking

The emphasis on Placemaking in the draft Plan is welcome. However, the concept of place-making is not the generally accepted one. In the draft County Development Plan, place-making is seen as something the County Council will do *for* citizens, rather than *with* them.

Proposal 3: That a definition of placemaking be included amended along the following lines in 4.4, p92:

‘Placemaking is the **process through which we work together to shape our public spaces**. Rooted in community-based participation, Placemaking involves the planning, design, management and programming of shared use spaces.’ (rethinkurban.com/placemaking).

A child and young-person friendly county

In our earlier submission, Imagine Dunderum said ‘It is a matter of concern to Imagine Dunderum that planning policy at national and local level takes limited account of the particular needs of children and families, apart from formal playground provision in Apartment Guidelines.’

While provisions relevant to children and young people are addressed in general across specific sections of the draft County Development Plan (e.g. playgrounds, play, library facilities) we ask that the needs and interests of children would be given a distinct heading in the Chapter 4 on People, Homes and Places, referencing how Place must address the needs of this population group.

Proposal 4: That children’s interests be explicitly covered in the County Development Plan and that proposals for urban design and placemaking, movement, social and community facilities, open space and recreation, are drawn together under one heading in Chapter 4 as well as appearing in the relevant sections of the Plan.

CHAPTER 3: CLIMATE CHANGE

Overview and welcome for key policies

Imagine Dundrum welcomes the stated intention that ‘climate thinking’ must become integral to all aspects of planning and decision-making under the auspices of the new County Development Plan.

The DLRCC development Plan must reflect the ‘Climate Action and Low Carbon Development (Amendment) Bill 2021’ and as stated in the Bill – Local Authority Development Plans will align with their Climate Action Plan. These local Climate Plans must be updated every five years.

Welcome for Specific policies

Imagine Dundrum strongly supports **3.4.1.1. PO CA5 Energy performance in buildings** and welcomes this objective of high levels of energy conservation and use of renewable energy for both new and existing buildings.

Imagine Dundrum also strongly supports **3.2.1.3. PO CA7 Construction materials** and welcomes the intention to utilise ‘structural materials ...that have low to zero embodied energy and CO2 emissions’.

Imagine Dundrum strongly supports **3.4.4.1 Urban greening** (Policy Objective CA17) - which is extremely relevant to Dundrum in the light of forthcoming redevelopment.

We support these principles for the whole County (not just new builds) and specifically for Dundrum.

Proposal 5: New SLO Map 1: That PO CA5, CA7, CA 17 must be fundamental to the redevelopment of the Old Shopping Centre and other buildings in Dundrum Village.

The urgency of climate change

The draft Plan acknowledges climate change as “the greatest global challenge of our time”) but fails to communicate the urgency of the situation. International experts have warned that the current decade offers our last chance to avert catastrophic global heating, and the Irish Government has declared a “climate emergency” in 2019.

Proposal 6: That the language of Chapter 3 would more strongly reflect the urgency of climate action.

Proposal 7: That the draft CDP acknowledges clearly that County-level targets and plans will need to be strengthened once the new Climate Bill is enacted, and the subsequent, more ambitious, national Climate Action Plan put in place. That the CDP will also align with the DLRCC Climate Action Plan. The Climate Action and Low Carbon Development Bill 2021 requires each local authority to update their Climate Action Plan every five years.

Proposal 8: That the County Development Plan commit resources to ensuring that essential methodologies specifically for integrating 'climate change issues' into the Development Plan process (p.53) and for quantifying GHG impacts of spatial planning policies (3.2.3 CA3) are developed and made available as rapidly as possible as without them the Plan's climate related intentions cannot be realised.

Proposal 9: That clear definitions of "sustainability" and "sustainable growth" should be included in Chapter 3 - and an acknowledgement that even 'compact' forms of development and improved transport infrastructure etc. may have undesirable impacts on the environment.

CHAPTER 4: PEOPLE, HOMES AND PLACES (including CHAPTER 12: DEVELOPMENT MANAGEMENT; Appendix 2 DRAFT HOUSING STRATEGY; Appendix 5: BUILDING HEIGHTS STRATEGY)

Overview

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 Chapter 4 in relation to housing, public realm, community facilities and healthy placemaking.

We refer here to some key matters that are dealt with across a number of sections of the draft County Development Plan (Chapter 12, Development Management, Appendix 2 and Appendix 5), and which have particular significance for Dundrum Village.

Building heights in general

Imagine Dundrum welcomes the statement that ‘Building height, footprint, form, site coverage and compactness determine the density of an area. However, high density does not necessarily require high-rise buildings; tall buildings are only one possible model for high density.’ {Appendix 5, p9).

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).

Height and Climate Action

In the light of the publication of the Climate Action and Low Carbon Development (Amendment) Bill it is important that the Development Plan will align with the climate action plan. This means that all buildings must be built to be as energy efficient as is practical. This will favour buildings of limited height in the County generally, maybe up to ten stories. Various studies have shown that skyscrapers may have higher carbon footprints than smaller buildings.¹ A study by Arup showed that a skyscraper has about double the carbon footprint of a ten- storey building.

¹ Various studies have questioned the energy efficiency of tall buildings and as a result of the recent Climate Bill there must be a 50% reduction in GHG emissions by 2030. Research published in the ‘International Journal of High-Rise Buildings, June 2015, Vol 4’ concluded that four storey courtyard development was the most energy efficient. The authors considered nine

Embodied carbon emissions are an important driver of climate change.² These can account for up to 75% of a building's total emissions over its lifespan. However, there is no requirement in current building regulations or planning policy for emissions to be calculated over the life expectancy of any development.

Proposal 10: Appendix 5 section 5. Performance based criteria at County Level. Insert new criterion:

Proposals must demonstrate maximum energy efficiency to align with climate policy. Building height must have regard to the relative energy cost of higher buildings and expected embodied carbon emissions over the lifetime of the development. The latest building energy efficiency studies should be considered when proposed development is submitted.

Height and Affordability

Imagine Dundrum notes the data provided in the draft County Development Plan regarding the serious affordability issue facing families wishing to buy or rent in the county (Appendix 2). We note also the significant body of data highlighting the higher costs of higher/taller apartment buildings, and the unaffordability of such developments for potential residents/families in this county.³ This is a matter of serious concern in Dundrum, with its growing population.

Proposal 11: Appendix 5 section 5. Performance based criteria at County Level. Insert new criterion:

Proposals must demonstrate how any proposed building height impacts on the affordability of units in the development, having regard to the County Development Plan Housing Strategy.

different configurations from a 215 story building with 2000 residential units at one extreme and 2000 dispersed suburban homes at the other. Other research backs up the idea that tall buildings are not as energy efficient. UCL Energy Institute in London analysed electricity and gas bills for 611 office buildings in the UK and one of their conclusions was that high – rises of 10 stories or more used 76% more electricity per square foot than buildings of 5 or less stories (Energy Use and Height in office buildings. Building Research and Information Vol 46 2018).

² The Carbon footprint of Construction. Report for Politicians and Policy-makers, Architects Action Network, February 2021.

³ SCSi The Real Costs of New Apartment Development: Analysis of Apartment Development and Viability. https://mk0societyofchag3d3v.kinstacdn.com/wp-content/uploads/2021/01/SCSI_RealCostofNewApartmentDelivery_final.pdf

Building heights in Dundrum

Imagine Dundrum notes with concern that Dundrum is the only part of the County without a local plan policy base to guide future building height, at the time of the draft County Development Plan (Building Heights, Policy Approach, 4.) aside from its general status as a Major Town Centre.

We note that as a Major Town Centre, Dundrum ‘should be considered for increased height in line with the requirements of the Guidelines.’ However, we must point out that the vast bulk of the MTC land falls within the boundaries of Dundrum Village, including Main Street and the old Shopping Centre. As such, we look to the LAP to ensure the protection of the character of Main Street and to manage the impact of surrounding development in line with that character.

In light of impending and current development, Imagine Dundrum calls for the urgent preparation of the Dundrum LAP, so as to bring order and logic to housing development in Dundrum and surrounding areas, and particularly to building heights.

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

Building heights along Main Street Dundrum

We particularly welcome the role for the Dundrum LAP as set out in the draft County Development Plan in relation to Main Street: ‘The upcoming Local Area Plan will provide more specific guidance for building heights in the town particularly on what is called the Town Centre phase 2 site taking cognisance of the need to protect the existing character of the Main Street while providing for stepped back buildings of scale’. We support this approach to deciding on building heights along Main Street.

Proposal 12: To amend SLO 9 as follows: To add the words in red below:

‘To ensure that any future redevelopment **in Dundrum Village, including** on the old shopping centre lands, takes cognisance of the character and streetscape of the Old Main Street, and maintain where appropriate, and possible existing buildings and/or facades. Building Heights alongside Main Street must be in keeping with the original **relatively low-rise** streetscape, in keeping with its character, **scale** and Candidate Architectural Conservation Area status.

Housing mix and housing tenure in Dundrum

Imagine Dundrum welcomes Policy Objective **PHP26** which provides that it is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and interim HNDA and any future Regional HNDA. (p87).

Size of units

We especially welcome the acknowledgement that in order to foster community and build sustainable neighbourhoods, an acceptable proportion of larger flexible housing units is needed, and that lifetime adaptable housing will be promoted in all new residential developments (p88/89).

In this regard, Imagine Dundrum welcomes the provision in **Chapter 12, Development Management** (p231), that in built up areas, developments will be required to have a minimum of 20% of 3-bed units. This provision will go some way to address the needs of families in Dundrum for homes where they can remain as the family grows.

Housing for older people and people with disabilities

Imagine Dundrum strongly welcomes Policy Objective PHP29, and the emphasis on housing options for older people and people with disabilities, including the provision of specific purpose-built accommodation, assisted living units and lifetime housing, and adaptation of existing properties, promotion of ‘aging in place’ opportunities for ‘downsizing’ or ‘right sizing’ within their community. In sections 2.3.2.5 and 12.3.9.1 there is a welcome emphasis on ‘age friendly housing’. These options are especially needed in Dundrum, given the age profile of the local community.

We note the provisions in Chapter 12 Development Management 12.3.3.1. that a planning application in its site and/or floor plans must ‘clearly identify proposed units that:

Are designed and located having regard to the needs of older people and/or persons with a disability.

Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes.

A statement outlining how the scheme has been designed for the needs of older people/ or persons with a disability and or lifetime homes’

However, it is unclear to us how these provisions create any onus on a developer to deliver any number of these needs/homes. Furthermore, the implementation of these policies is in our view compromised by the proportion of high- -cost build to rent apartments, mainly one and two-bed units, especially in the Dundrum LAP area, and a lack of affordable housing.

Proposal 13: That the County Development Plan in Chapter 12 should propose a requirement to have a stated minimum proportion of homes that meet the needs specified above, reflecting the proportion of older people and people with disabilities in the population.

Proposal 14: NEW SLO Map 1 for Dundrum.

That in the redevelopment of the Old Shopping Centre, as a Strategic Regeneration Site, a proportion of residential units, to be agreed with the Planning Authority, will provide for lifetime adaptable homes, homes built to Universal Design Standards, and Supported Accommodation and that the proportion will be set down in the forthcoming Local Area Plan.

Tenure mix

We note that the text on PHP 26 (p89) states that ‘over proliferation of a single housing tenure’ should be avoided by ‘a balanced mix of private, build-to-rent, and social housing to accommodate the needs of a mixed and balanced community.’

There isn’t a definition of ‘proliferation’. In addition, the description of a balanced mix is unduly restrictive in our view in referencing ‘private, build- to - rent, and social housing, and in particular the reference to the build-to-rent scheme as if it is a tenure. This description is especially important as it forms the basis on which the Planning Authority will assess a planning application (Chapter 12 Development Management).

Proposal 15: That in PHP 26, p89, and in Chapter 12 Development Management, the description of tenure mix be amended to read ‘a balanced mix of units and unit sizes providing for home ownership, home rental and social housing to accommodate the needs of a mixed and balanced community.’

Proposal 16: That the County Development Plan should indicate the approach that will be taken to measuring ‘proliferation’ and embed this definition in Chapter 12, Development Management.

Proposal 17: Imagine Dundrum believes the County Development Plan should state the need for arrangements for formal inter-agency agreements to facilitate supported housing for older dependant people and people with disabilities, to ensure an integrated approach between DLR and the HSE.

CHAPTER 5: TRANSPORT AND MOBILITY

Overview

In broad terms, Imagine Dundrum welcomes the provisions of the draft County Development Plan in relation to Transport and Mobility.

We welcome 5.5.2 Policy Objective T11: Footways and Pedestrian Routes which will seek to maintain and expand the footway and pedestrian route network to provide for accessible, safe pedestrian routes within the County in accordance with best accessibility practice. (Consistent with NPO 27 and 64 of the NPF and RPO 5.3 of the RSES). The progress made thus far in Dundrum Village in this regard is welcome.

Imagine Dundrum has engaged proactively with the NTA in relation to recent Busconnects proposals which in our view are detrimental to the future of Dundrum Village and contrary to T11. This matter will be taken up more fully in our submission in relation to Chapter 7 as it relates to Dundrum.

We welcome 7.5.2.1 Policy Objective RET4 which states ‘It is a Policy Objective of the Council to maintain the two Major Town Centres – Dún Laoghaire and Dundrum – as the primary retail centres in the County and to support their evolving multifunctional role. The vitality of the towns will be enhanced by their mixed-use nature. In addition to retail, these centres must include community, cultural, civic, leisure, restaurants, bars and cafes, entertainment, employment and residential uses. Development shall be designed so as to enhance the creation of a sense of place.’

In relation to 5.4.7 Policy Objective T9: Rail Stations/Luas Stops which refers to improvement and further development of railway stations and Luas stops in the County, Imagine Dundrum wishes to re-iterate concerns already raised with DLR County Council regarding the condition of the Luas Station in Dundrum.

Proposal 18: New SLO Map 1: That the Dundrum Luas Station will be significantly upgraded and that the detailed design proposals are incorporated into the Local Area Plan for Dundrum.

CHAPTER 7: TOWNS, VILLAGES AND RETAIL DEVELOPMENT

Overview

Imagine Dundrum welcomes the strong focus in this Chapter on the towns and villages in Dun Laoghaire Rathdown. We welcome the shift in focus to multifunctional centres that cater for community needs and infrastructure as well as retail and housing development.

Imagine Dundrum especially welcomes the policy commitment to ensuring the developments will ensure high quality public realm and sense of place, the need for retail development to have regard for the unique character of our towns and villages and provide a distinct sense of place (7.2.3.3).

The emphasis on placemaking and on enhancing the unique character of Main Streets is particularly welcome as Imagine Dundrum had made a strong case for this emphasis in our submission to the Issues Paper preceding the preparation of this draft Local Area Plan.

Imagine Dundrum notes that the Local Area Plan will be the primary means of guiding new development and looks to the council to urgently bring forward the LAP for Dundrum.

Imagine Dundrum particularly welcomes the content of Policy Objective RET4 Major Town Centres, as it refers to Dundrum.

We note in particular all the elements of the strategy for Dundrum as set out 7.5.2.1 pages 145-147 including the following:

The development of a new community, cultural and civic hub that consolidates and expands existing facilities and services in Dundrum. The new hub should both encourage more activity on Main Street and diversify the range and extent of uses within the Dundrum Major Town Centre area. The hub should be of an appropriate scale to serve the needs of Dundrum's current and future population, based on a detailed assessment of the area.

The proposal for an extended Dundrum Architectural Conservation Area (refs Chapters 7 and 11) is particularly warmly welcomed. It represents a very positive commitment on the part of DLR County Council to conserve and protect the heritage of the Village – an objective that has been a priority for Imagine Dundrum over several years.

Imagine Dundrum wishes to bring forward a number of proposals to add to the policy provisions in Chapter 7.

Nomenclature relating to Dundrum

The terminology relating to Dundrum has improved considerably since the publication of the consultation document 'Have Your Say'. There is now consistency in the references to Dundrum Town Centre Shopping Centre, the old Dundrum Shopping Centre, Dundrum Main Street.

There remains a difficulty however. The only term that relates to Dundrum appears to be the zoning term Major Town Centre. There is no entity called Dundrum Village in the draft CDP. There is one reference (7.4.2 bullet point 1) to Dundrum as ‘the Town’. We recognise the difficulty. However, there is a need for Dundrum to be a place, and for its name and identity to be clear.

In our submission to the initial consultation, Imagine Dundrum proposed, that, in addition to the clarifications which have been adopted in this draft, the name Dundrum Village would be used to refer to the historic Main Street and the old Shopping Centre, including Waldemar Terrace and the Carnegie Library areas. The term ‘Dundrum Town’ would include the area within the MTC designation (but see Proposal 20 below) and the Dundrum Town Centre Shopping Centre.

Proposal 19: That the nomenclature referring to Dundrum would be further clarified in order for Dundrum to have a clear identity and referred to as follows:

That Dundrum Village consists of the Main Street and the old Shopping Centre, including Waldemar Terrace.

‘That ‘Dundrum Town’ consists of Dundrum Village and the Dundrum Town Centre Shopping Centre.

Need to define/describe the boundaries of the Dundrum MTC

Dundrum is covered by the MTC zoning in the draft County Development Plan. **However, there is no clear definition or description of the boundaries of the MTC.**

In Chapter 7 (7.4.2) Core Shopping Areas, the core shopping area for Dundrum ‘corresponds to the MTC Zoning objective for the Town (sic) and includes the area between Main Street and Dundrum Bypass and from Waldemar Terrace to Wyckham Way’. However, in Map 1, the MTC Zoning appears as going farther north than Waldemar Terrace.

Proposal 20: That the boundaries of the Dundrum MTC are clearly described in the County Development Plan as well as shown on a map.

William Dargan Bridge Redevelopment

The draft CDP (p147) refers to the need for comprehensive redevelopment of the William Dargan Bridge Undercroft, Usher House and Waldemar Terrace.

While welcoming this intent, Imagine Dundrum wishes to note the following:

- Waldemar Terrace and Usher House are in private ownership
- P&T building is a state owned building
- The roadway at Waldemar Terrace is in use as a bus interchange

- The area is one of the options proposed in the CCCAP for the Civic Centre
- The area fits within the terms of reference of the Area Based Transport Study being carried out for Dun Laoghaire Rathdown County Council

Imagine Dundrum has, as part of our Busconnects submissions, made proposals in respect of this area.

Proposal 21: The future of this important gateway to the Village should be clarified in advance of the publication of the County Development Plan.

Bus traffic on Main Street

The draft CDP (p148) proposes that ‘future bus routes in the area should be considered in the context of the traffic volumes on Dundrum Main Street and the potential to increase the utilisation of the Dundrum Bypass in this regard.’

Imagine Dundrum is concerned about this equivocal approach. Given the commitment in the draft CDP to pedestrian walkways and improved cycle network, pedestrian friendly and traffic calmed environment on Main Street, Dundrum Main Street cannot sustain two- way traffic or significant bus traffic on Main Street.

Proposal 22: That the text be amended to read ‘future bus routes in the area should be considered in the context of the traffic **capacity** on Dundrum Main Street and the potential to increase the utilisation of the Dundrum Bypass in this regard.’

Living over the shop

Additional residential uses including Living Over the Shop are envisaged for Dundrum MTC (p147). As suggested in Imagine Dundrum’s original submission, there would be scope in the redevelopment of the old Shopping Centre, and, in particular, any retail redevelopment along Main Street as part of the wider redevelopment project, to design in opportunities for living over the shop (as distinct from reuse of existing premises) from the start. This would require own door provision as well as other design features.

Proposal 23: The option of Living Over the Shop as a new design form, and not only a re-use, should be provided for in this Chapter, and in Chapter 12 Development Management (12.3.8.9), in relation to Dundrum redevelopment, as well as more widely.

Connectivity

Effective use of the Bypass for bus and other traffic management on Main Street is dependent on permeability through the redeveloped old Shopping Centre.

Proposal 24: New SLO Map 1: Permeability through all major developments on the east side of Main Street should ensure pedestrian/cycle links between Main Street and the Dundrum Bypass.

Public realm improvements

Proposal 25: New SLO Map 1: In the context of any redevelopment of the Old Shopping Centre, that power lines on Main Street will be under grounded.

CHAPTER 8: GREEN INFRASTRUCTURE AND BIODIVERSITY

Overview

Planning and health policy: Imagine Dundrum welcomes the integration of health policy into the planning process as referenced in the introduction to Chapter 8., drawing on the National Planning Framework.

We would wish to see this vital inter relationship cutting more explicitly across all aspects of the County Development Plan, and particularly in the Chapters on Parks and Open Spaces, and Chapter 12 Development Management.

Increasing citizens' awareness: Imagine Dundrum is also pleased to see the recognition of the necessity for “increasing awareness among all sections of the population of the importance of the County’s green infrastructure, landscape, and biodiversity” (draft CDP p 155)

Green Infrastructure

The overall vision for green infrastructure is very welcome. We wish to restate our recommendation in our 2020 submission to the ‘have your say’ consultation document, which was as follows:

“**The urban environment**, and the public realm within it, should not be excluded from Green Infrastructure thinking. The Plan should highlight how the County’s urban/ built areas can become key nodes in a County-wide network of green places and spaces.”

‘Specifically, a redeveloped and ‘greened’ Dundrum could be a node/ hub in the Green Infrastructure of the West side of the County (ID 2020 3.2.1). It is on or near many proposed green routes and can link to waterways and parks.’

Proposal 26: New SLO Map 1: A redeveloped and ‘greened’ Dundrum should be a node/ hub in the Green Infrastructure for the West side of the County, with links to proposed green routes, waterways and parks.

Biodiversity

Imagine Dundrum welcomes the excellent overall intentions of the draft CDP, and the aims and objectives of the forthcoming DLR Biodiversity Action Plan 2021-26 but considers there should be greater acknowledgment of the starting point: the crisis caused by Ireland’s overall failure to protect its biodiversity over the last two or three decades (despite international, EU and national commitments to do so.

In particular, we wish to underline the vital importance of involving citizens in protecting nature **and wish to restate** the recommendation from our 2020 submission (3.1.9):

“To restore, protect and enhance the County’s natural assets, citizens must become active custodians of our environment. The Council must go beyond citizen education, and promote practical citizen involvement in developing, maintaining and monitoring the growing green infrastructure, and in protecting our biodiversity. “

In relation to **biodiversity audits of brownfield sites before development** (ID 2020 3.1.10) and given the likely scale of new developments (especially in and around Dundrum), and the requirement to prioritise brownfield and infill sites for development, Imagine Dundrum recommends incorporating this requirement into the new Biodiversity Action Plan.

CHAPTER 9: OPEN SPACE, PARKS AND RECREATION

General

Imagine Dundrum welcomes the fact that the current Open Space Strategy (written in 2011) is to be reviewed and *asks* that open space requirements in built up areas of the County be re-considered in the light of the pandemic lockdown experience, and an ever-increasing population.

We wish to reiterate our view that the link between between spatial planning and health policy (as in our 2020 submission 3.1.4.) should be made more explicit in the County Development Plan.

The Plan overall assumes more building and greater urban density in next 6-year period – but we wish to emphasise again that quality of life and overall health will be undermined unless adequate open space is provided for all citizens (ID 2020 3.1.5.)

Inclusive design

Imagine Dundrum has requested green open spaces would be (inter alia) inclusive in design. We propose that this emphasis on inclusive design needs to be much stronger in the County Development Plan. At present the reference to inclusivity is in 9.2.1.2. PO OSR 2 where it is defined as being ‘accessible’ and ‘at a convenient distance from...home and/or...work’ and in broad terms in 9.3.1.1 (Open Spaces should be inclusive).

Proposal 27: That the concept of inclusive design in relation to Parks and Open Spaces will be more fully developed, and will include a broad range of facets of inclusive design in these spaces (e.g. providing for age, gender, disability).

Reimagining and fully utilising green amenity space

Imagine Dundrum looks to the County Development Plan to acknowledge that there is a huge need in sub-urban surroundings of Dundrum Village (ID 2020, 3.2.3) to reimagine and more fully utilise green amenity space, beginning with an audit of these spaces.

The core of Dundrum is seriously lacking in open space of any kind but has many such assets which could be extremely beneficial to local people if the spaces were more fully utilised, drawing on new and creative thinking, for example, small playgrounds, community gardens, seating, teenage spaces.

Proposal 28: That the County Development Plan should provide that all existing green amenity space will be the subject of audit, and will engage with residents to bring forward proposals for fuller uses of green amenity spaces.

The role of trees in new development (and redevelopment!)

Imagine Dundrum welcomes the development of the new County Tree Strategy and supports the ‘urban forest’ approach, especially for Dundrum (ID 2020 3.1.3). We wish to restate our recommendation for integrated tree planting to be a prerequisite for planning decisions on new developments.

Play, especially urban play

In our 2020 submission (3.3.1) Imagine Dundrum urged ‘wide perspectives on play in the new Plan, reflecting the potential of the urban space to provide play opportunities for children and young people’. We welcome Policy Objective OSR 13, which provides for play facilities and nature-based play throughout the county. We particularly welcome the understanding that play is not a concept that is limited to children but extends to teenagers, adults and older people, and that these needs will be facilitated in public parks and open spaces.

We are concerned however that in 9.4.1.1 (Sports and Play), play appears to be defined as participation in sport.

Proposal: That 9.4.1.1. be reviewed to reflect the wider understanding of play elsewhere in the draft CDP.

Descriptions and definitions of Public Open Spaces

In our 2020 submission, Imagine Dundrum drew attention to the need for clarification of the terms in relation to public open spaces.

In the draft County Development Plan, Table 9.1 the Hierarchy of Public Open Spaces is set out clearly. The types of public open space are described ranging from Greenways through regional parks, to Civic spaces. This appears clear. However, the terms ‘public open space’ and ‘open space’ are used interchangeably throughout 9.2. and this is confusing. Is ‘public open space’ the same thing as ‘open space’?

The confusion is compounded by the material in Chapter 12 Development Management. 12.8 sets out Open Space and recreation requirements for planning applications. Here the hierarchy (12.8.2) is for Open Space as the higher order term. In this section, the term ‘Public open space’ is introduced which is a subset of Open Space. ‘Public open space’ in this section is different from Public Open Space in 9.1.

12.3.1.1. relating to design criteria (bullet point 12) is an example of the provisions which particularly requires to be clarified.

Proposal 29: That the terminology applying to various forms of public/open space in Chapter 9 and Chapter 12 be revisited and a new terminology be devised in which the terms are distinct with distinct meanings and without duplication in differing contexts.

Public open space requirements for residential development

The public open space requirement for residential development is dealt with in Chapter 12. It proposes (12.8.3.1) that where it is not possible to provide the public open space requirements, the Council may seek a Development Contribution under s 48 of the Planning Act 2000, which will be used to provide open spaces in the vicinity.

Imagine Dundrum has particular concerns about this provision, while acknowledging that it is provided for in national guidelines. However, we wish to establish what constitutes ‘the vicinity’?

We draw attention to all the commitments in the draft CDP to neighbourhood, sustainable community. We argue that families living in apartments need play and open space for children where they live and not at some remove. Where densities are raised in apartment development proposals at the expense of the open space, this should not be acceptable to the planners.

Proposal 30: That every development will be required to manage density so as to provide the required public open space as part of the development.

CHAPTER 10: ENVIRONMENTAL INFRASTRUCTURE AND FLOOD RISK

Overview

Imagine Dundrum welcomes and endorses the move away from waste management to the focus on the circular economy and reuse/ recovery/ recycling (10.3.2.1)

We strongly support DLR plans to expand recycling facilities and support new recycling businesses – we note the urgent need to improve the range of materials that can be collected for reuse or recycling within the County/ Eastern Region. We ask again that the County would develop plans for severely reducing the use of plastic in all forms and reflect this intent in the County Development Plan.

Water pollution

In our 2020 submission, Imagine Dundrum proposed monitoring road runoff into rivers (especially the Slang) as it can be a serious cause of pollution. Draft CDP 10.4.3 PO EI17 refers to DLR complying with national and EU directives etc. DLR will endeavour (not 'will) to "improve the water quality in rivers and other water-courses, including ground water'.

Air pollution

Imagine Dundrum has asked for monitoring of air pollution on Main Street and Bypass (ID 2020 3.2.4) noting the threat to health, proximity to schools. We wish to see this provision in the forthcoming Local Area Plan.

Light pollution

In our 2020 submission (3.2.4) Imagine Dundrum sought a review of current programme of LEDs replacing older street lamps. We proposed adapting programmes in line with expert advice (national dark sky scientific group). We proposed trial of lower lighting, and reconsideration of all-night lighting. We note that **10.4.2. PO EI 16** is weak, stressing only good design and minimising light spillage.

Proposal 31: That the County Development Plan will adopt a stronger policy on light pollution, which takes into account the serious impacts on biodiversity and human health of inappropriate night-time light levels. In the short term, a review of the current programme in line with expert advice and best practice should be undertaken.

CHAPTER 11: HERITAGE

Overview

Imagine Dundrum welcomes the policy framework contained in the draft County Development Plan in relation to the conservation and protection of heritage buildings and protected structures.

Candidate ACA Proposals for Dundrum

Imagine Dundrum especially welcomes the proposals for most of Main Street Dundrum to be designated as a candidate ACA. We propose in the interests of a complete and comprehensive approach, that that the proposed candidate ACA on Main Street should be extended on the street front so as to join with the existing ACA on the east side and the candidate ACA on the west side.

We wish to propose that the process of moving the buildings on Main Street, and at the junction of Ballinteer Road and Main Street, which have been a candidate ACA since 2016, will be collectively progressed to full ACA status as a matter of urgency.

We also welcome 11.4.2.6 Policy Objective HER18: Development within a Candidate Architectural Conservation will be assessed having regard to the impact on the character of the area in which it is to be placed.

With regard to Waldemar Terrace, which is not included in the proposed candidate ACA area, we wish to draw attention to the fact that It is by far the best example of wiggling, a uniquely Irish way of pointing cheap bricks, in the area and maybe in the DLR CoCo.

Proposal 32: That the Main Street Proposed Candidate Architectural Conservation Area be extended on the street front to join with the existing ACA on the east side and the cACA on the west side.

Proposal 33: That the candidate ACAs in Dundrum be moved to full ACA status as a matter of urgency.

Proposal 34: That consideration be given to finding ways of protecting and preserving the fine example of wiggling at Waldemar Terrace.

CHAPTER 14: SPECIFIC LOCAL OBJECTIVES

Overview

In the course of this submission, Imagine Dundrum has proposed a number of additional Specific Local Objectives for Dundrum. These are drawn together below.

Chapter 3: Climate Change

Proposal 5: New SLO Map 1: That PO CA5, CA7, CA 17 must be fundamental to the redevelopment of the Old Shopping Centre and other buildings in Dundrum Village.

Chapter 4: People, Homes and Places

Proposal 12: To amend SLO 9 as follows: To add the words in red below:

'To ensure that any future redevelopment **in Dundrum Village, including** on the old shopping centre lands, takes cognisance of the character and streetscape of the Old Main Street, and maintain where appropriate, and possible existing buildings and/or facades. Building Heights alongside Main Street must be in keeping with the original **relatively low-rise** streetscape, in keeping with its character, **scale** and Candidate Architectural Conservation Area status.

Proposal 14: NEW SLO Map 1: That in the redevelopment of the Old Shopping Centre, as a Strategic Regeneration Site, a proportion of residential units, to be agreed with the Planning Authority, will provide for lifetime adaptable homes, homes built to Universal Design Standards, and Supported Accommodation and that the proportion will be set down in the forthcoming Local Area Plan

Chapter 5: Transport and Mobility

Proposal 18: New SLO Map 1: That the Dundrum Luas Station will be significantly upgraded and that the detailed design proposals are incorporated into the Local Area Plan for Dundrum.

Chapter 7: Towns, Villages and Retail Development

Proposal 24: New SLO Map 1: Permeability through all major developments on the east side of Main Street should ensure pedestrian/cycle links between Main Street and the Dundrum Bypass.

Proposal 25: New SLO Map 1: In the context of any redevelopment of the Old Shopping Centre, that power lines on Main Street will be under grounded.