



Cllr. Oisín

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GLENCULLEN-SANDYFORD

Draft Dundrum Local Area Plan 2023

Submission to Public Consultation

21st July 2023

Dear Planning team,

Thank you for the opportunity to make a submission to the Draft Dundrum Local Area Plan 2023. I am making a submission as a local councillor for the adjacent Glencullen-Sandyford Local Electoral Area and as a resident of adjacent Ballinteer.

I am broadly in favour of the Draft Dundrum Local Area Plan and I have made some suggestions for improvement and clarity in this submission.

I have grouped my submission, below, by the following topics:

- **Housing:** I broadly support the plan to facilitate the sustainable development of over 2,000 homes within this relatively small geographical area of approx. 2,000 homes.
- **Community and Place:** the objectives and recommendations in the plan can deliver a more coherent and well-served community with a strong sense of place in Dundrum and the surrounding areas including Ballinteer, Rathfarnham, Balally and Sandyford.
- **Mobility:** with increased population and increased economic comfort comes mobility challenges, with people needing their cars increasingly being delayed and obstructed by those who have do other options. The mobility measures in the plan LAP reasonable, with a greater emphasis on providing safe, comfortable and reliable routes for people to walk, cycle and wait for public transport.
- **Climate Biodiversity & Flooding:** great to see this being taken seriously within an LAP.

If you would like to follow up on anything in this submission, please feel free to reach out to me on ooconnor@cllr.dlrco.ie or 0876065648.

Kind regards,

Councillor Oisín O'Connor
Glencullen-Sandyford area

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Housing

Improved housing provision

I welcome the estimated 2,000 new homes that the plan sets out to enable. I note that it wouldn't be possible to come anywhere close to this number of homes if it weren't planned to be mostly apartments. The proliferation of apartments in Dundrum and Ballinteer over the past decade have increased the life and vibrancy around the area and has been very welcome.

To provide the right kind of housing, leadership needs to be provided by the council as the Planning Authority. I strongly welcome the provisions to include the following positive and constructive measures in the Dundrum LAP:

- Emphasis on right-sizing/down-sizing apartments and specifically designing for older people and people with disabilities.
- A high quality mix including a generous provision of 3 bed apartments.
- Housing near to existing and newly planned infrastructure, amenities and services.
- The encouragement of the development of "Living above the shop" opportunities is welcome.

Changes

I would like to see an objective in the the Local Area Plan around providing a well-defined mix of rental and sale in all larger developments.

More should be done to identify appropriate living above the shop locations and outlining what measures will be encouraged to enable property owners to overcome the existing barriers to provide this.

There should be an emphasis in the plan on planning requirements on particular sites that enable the development of adjacent sites. E.g. helping to resolve access issues and fire safety issues that prohibit development in tight urban spaces at the moment.

It's not entirely clear from Figure 2.16 what built form is encouraged on the Dom Marmion site but it appears to be bare in the eastern corner. As this corner is next to the Luas line, it

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could have another 3-4 storey residential building to maximise yield from this site and I would like to see this mentioned in the plan.

To indicate the long-term potential for more housing to be built in Dundrum, I would like to see more opportunity sites listed in the plan, to include:

- Dundrum Office Park surface car park
- Tesco Dundrum surface car park
- Flyefit building including surface car park
- Surface car park and under-utilised buildings at Dundrum Luas station off Taney Rd

Encouragement should be given in the plans for the development of car-free or car-lite residential developments, especially on sites where provision of car parking is impractical. The plan should encourage applications where arrangements have been made for "off-site parking" so that some car parking at existing car parks can be made available for residents of new car-free developments.

Implementation and Monitoring

It's great to see strong requirements making housing delivery conditional on providing the kinds of infrastructure improvements that new and existing residents and visitors to Dundrum need. Particularly that the park facing onto Main Street should be opened prior to occupation of 50% of the residential units on the site.

Community and Place

Urban design

The objectives around urban design on all 4 key development areas is very welcome. I particularly welcome:

- Objective PR3, for planting and urban greening.
- Objective OSC7 to provide a public park facing Main Street within the old shopping centre site
- Objective OSC8 for street character around the old shopping centre site including a pedestrianised street running right through it as far as Ballinteer Road.

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Improvements I would like to see:

- Under OSC 7, the small community park facing Main Street on the old shopping centre site the objective should include some natural play area.
- As part of the public realm and key development site objectives, in public spaces and on-street, there should be provision of age-friendly play and art spaces. E.g. fixed chess boards, a boules court, a table tennis table. See below example of chess boards in Waterford.



- Public realm/urban design objectives should include the undergrounding of overhead wires and other services like utility boxes and bins.
- Public realm objectives should include that sign poles, traffic light poles and other street “clutter” should be kept to an absolute bare minimum.
- There should be a public realm objective for the front of the Carnegie Library, which protects it as an amenity while allowing the narrow 3m-wide bus gate to operate.
- With a reduction in roundabout/junction sizes especially along Wyckham Way, more space will be available for public realm, seating, low key play opportunities. I would ask that this is realised and includes taking some private areas in charge in order to make them more public-facing. An example is the below junction at Sandyford Road/Overend Way. The red line is a very rough sketch of space the new junction will take up and the blue shapes are where there could be opportunities to open up more space to the public.

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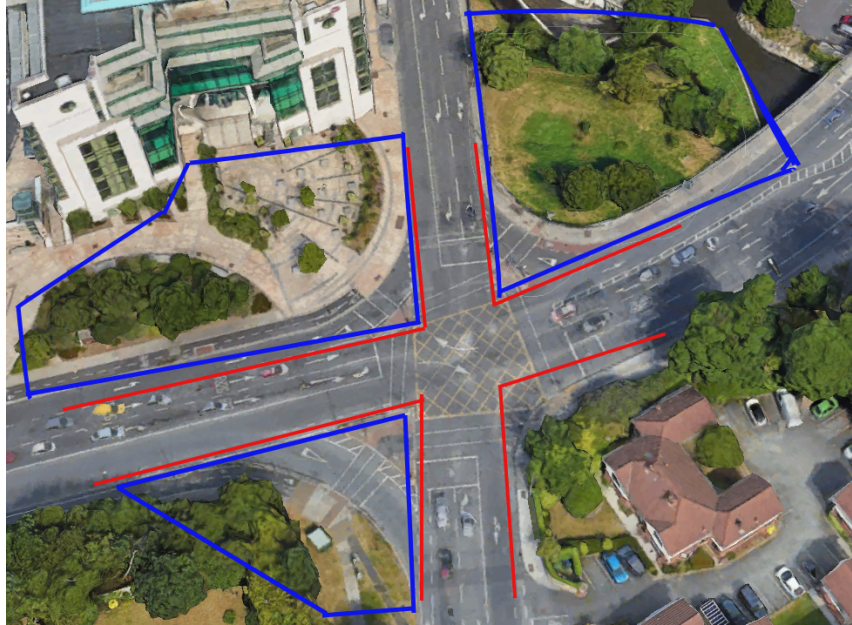
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- Public space to the high quality of the Myrtle Square in Dún Laoghaire should be provided for in Dundrum. See below.



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Community Infrastructure

I welcome the new library and community facility at the north end of Main Street next to Waldemar Terrace. I think it will be a great use of the space. The council should seek to bring the Waldemar Terrace buildings, the mystery building next to the Luas lift and Usher House into public ownership to increase the potential space both within the community facility and space around it. I note that there is no indication of what height the community facility is proposed to be but just a reference to the Building Height Strategy. Some indication should be given in the plan as to what the Building Height Strategy indicates for this kind of building in this location.

Dundrum is a Town

Dundrum has many characteristics of a village and a lot of that should be kept so I welcome the provisions in the plan to retain that unique character. At the same time, it needs to be accepted at some point though that Dundrum is a town on a level with Dún Laoghaire or Bray. The Irish government as far back as 2009 defined a medium-large town as one with a population between 5,000 and 20,000. The Local Area Plan boundary had a population of over 5,000 way back in 2016 before a number of since-completed developments were occupied. Dundrum is well and truly and should be described as such.

Childcare and Education

I welcome the objectives to provide childcare facilities at 4 locations: Dom Marmion car park site, the CMH site, the old shopping centre site and Fernbank.

I particularly welcome the policy objective to provide a childcare facility in Fernbank. There is already one permitted and built but no occupied and it should not be allowed to change to other uses given the ongoing need for more childcare facilities.

I welcome the emphasis on continuing use of the former Notre Dame site for education use. The campus should be modernised in order to cater for the the existing permanent school on site.

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Schools and future schools inside and just outside the plan area¹ should be supported, particularly their open spaces. Open spaces attached or available for use by schools should be protected to ensure that a wide variety of out of classroom activities can be incorporated into learning.

Tourism

Dundrum has great untapped tourism potential. As a base from which to explore the Dublin mountains, for competitive cycling enthusiasts to do “Stephen Roche” tours, for shopping, for the built and natural heritage and for Airfield which is growing into not just a national but an international exemplar of an urban farm.

The need for a hotel in Dundrum must be expressed more strongly in the LAP. It should be a requirement to build a hotel as part of the old shopping centre site. This is an absolutely vital part of tourism for Dundrum and the opportunity shouldn't be missed. The hotel in Dundrum should provide dedicated overnight cycle parking facilities suitable for people on cycle touring holidays.

Heritage and Conservation

I welcome the entire chapter 8 on Heritage and Conservation and the 22 policy objectives contained in it.

Mobility

General

I strongly welcome the general approach of the plan to prioritise sustainable and efficient transport modes such as walking, cycling and public transport over private car driving. That doesn't mean that driving shouldn't be provided for in the plan, as some amount of driving private cars, commercial vehicles and public service vehicles will be needed to sustain the town.

¹ Holy Cross NS, Taney NS, Gaelscoil na Fuinseoige, Our Lady's NS, Ballinteer ETNS, St Tiernans, Goatstown-Stillorgan ETSS, Goatstown-Stillorgan ETNS. Noting that there also around a dozen more schools near the plan area.

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I particularly welcome;

- Objectives DLAP24-30 that lay out the principles for sustainable transport in the area.
- Objectives T15 & T16 to upgrade the Wyckham Way roundabouts and the Sandyford Rd/Wyckham Way junction
- The provision of bus gates, narrowed carriageway widths and one way roads in order to achieve the space necessary to prioritise public transport, walking and cycling.

Driving private cars

It's clear from this plan that there is an acceptance that many people will still continue to drive cars to Dundrum. I welcome the acknowledgement that a certain amount of driving will be necessary for some people some of the time, while at the same time the plan lays out a pathway to not let this get in the way of the majority of people who will access Dundrum by walking, cycling or public transport into the future.

I strongly welcome Objective T13 to provide more disabled parking bays in Dundrum and to integrate "age-friendly" car parking spaces as a more flexible option. Transport planners should, however, not seek to merely replace the former with the latter. An increase in both is required and apart from loading bays, should be the only parking spaces available on Main St.

I welcome the provisions that aim to reduce the through-traffic that doesn't stop in the village. This kind of traffic adds nothing to the village only congestion and is a disruption to people who are driving to Dundrum for their private business or as commercial drivers.

I note that with full roll-out of measures in this plan, there would still be in excess of 3,000 car parking spaces within walking distance of Dundrum Cross. Efforts should be made by the council to engage with car park owners in the area to encourage the provision of low cost, priority car parking spaces in the car parks for people with reduced mobility (who may or may not qualify for a blue badge). These spaces could be located near entrances so as to minimise the need for people with reduced mobility to navigate car parks or long walkways.

Public transport

I completely agree with the provision of some form of bus gate on Ballinteer Road. It will greatly facilitate quicker bus journeys, particularly of the A2 and A4 due to be introduced as

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part of Bus Connects. It's great that these buses will each run at 12-15 minute intervals most of the week.



I have a number of comments to make about the Ballinteer bus gate in order that it is implemented well:

- I'm unsure if there are scheduled buses going west through the bus gates. A well thought out routing of the A2 & A4 buses should be developed to get more benefit for bus users out of the bus gate.
- The bus gate would work best if it was part of a later phasing of the roll out of the ABTA recommendations and in sync with new residential development in Dundrum. This should be made clear in the Local Area Plan to provide clarity to people around Dundrum who may be fearful that this change is imminent when it in fact isn't.
- The roll out of the bus gate should include detailed local engagement with people to outline their various options for accessing the village either without a car or along clearly marked alternative routes. For example, the drive from the Ballinteer roundabout to Dundrum House is currently a 1 minute drive but with the bus gate would be a 4 minute drive (add times to both to consider traffic congestion), and this should be clearly communicated to local people as part of the roll-out. Campaigns to encourage bus use in advance of the roll out of the bus gate should also be considered, as should programmes to help people to try out e-bikes.

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- Consideration should be given to coordinating bus frequencies with the NTA so as they are responsive to local need once the bus gate opens. E.g. if the first bus on a Sunday morning doesn't arrive to bring people from the surrounding areas to mass on time, then people may rightly question the validity of the bus gate. These issues should be addressed in advance of the bus gate going ahead.

Other feedback on public transport:

- Electric charge points and driver welfare facilities should be made available at the planned bus interchange facilities.
- "No idling" rules should be in place for buses at the planned bus interchanges, to require drivers to switch off fossil fuel burning engines when waiting. While buses will be electric in the coming years, this should be in place during the intervening period to reduce air pollution and noise pollution.
- Access to bus gates and other bus priority measures should be via retractable bollards and should only be open to buses and emergency services, not taxis.
- Bus stop locations: Considering visitors to the church or businesses around Dundrum Cross, the bus stops for people leaving Dundrum to go towards Ballinteer and Nutgrove should be much closer to Dundrum Cross than they currently are.

Active travel

I strongly welcome the emphasis on this in the plan and on making it safer and more comfortable to walk and cycle local journeys.

The 2016 Census counted 83.56% of people in the Dundrum, Churchtown and Ballinteer areas were under the age of 64. Apart from the 0-4 year olds who made up 6% of the population, the rest of the under 64s should be given every incentive to walk or cycle from local journeys of less than 15 minutes. I ask for this as someone with a child under 10 and a local parent over 60 who want to be able to cycle safely for as many journeys as possible, freeing up road space for others and staying active themselves - a situation which applies to people of all ages right across the area.

As part of the transport recommendations, all footpaths should be a bare minimum of 2m wide. If this isn't possible, the space should come first from the road, then from cycle path widths. A concerted effort should be made to keep footpaths clear of obstructions, street

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clutter and illegal parking activity. Illegal parking on footpaths should be made nigh on impossible by design solutions, on the basis that the continuing low enforcement will continue.

I welcome the objective to provide mobility hubs at Dundrum and Balally Luas stations. The Balally Mobility Hub should be pursued with the relevant car park owner as soon as possible rather than waiting for the planning process to take its course over time. Many more people from the surrounding areas would cycle to the Luas if the risk of bike theft was significantly reduced, which is one benefit of the

Given the need to retrofit high quality and quantity cycle parking, any planning applications that are made to amend any existing developments should be required to meet the DLR Cycle Parking Guidelines standards 2018 for the whole development. Larger existing developments that look for planning permission to extend or change anything should be required to a Cycle Audit and a Mobility Management Plan to ensure any development helps Dundrum reach its sustainable transport potential.

There are residences within the plan area that don't have gardens or other spaces to store bicycles. There should be an objective for communal bike stores in Dundrum with priority given to people without bike storage. Existing multi-unit developments within the plan area that don't have bike parking that meet the DLR Cycle Parking standards 2018, should be guided by an objective that repurposing of basement space to secure bike parking will be encouraged.

There needs to be specific transport objectives to improve access under the Dundrum Luas underpass and across the Windy Arbour Luas station, particularly for cycling, buggies and people using mobility aids.

I welcome the Objectives DBP4 and DBP5 to improve pedestrian and cycle infrastructure at Dundrum Business Park including secure cycle parking facilities. This kind of policy objective should also apply more generally to all significant nodes of employment.

Deliveries

There is a need for specific objectives around enabling commercial deliveries and logistics.

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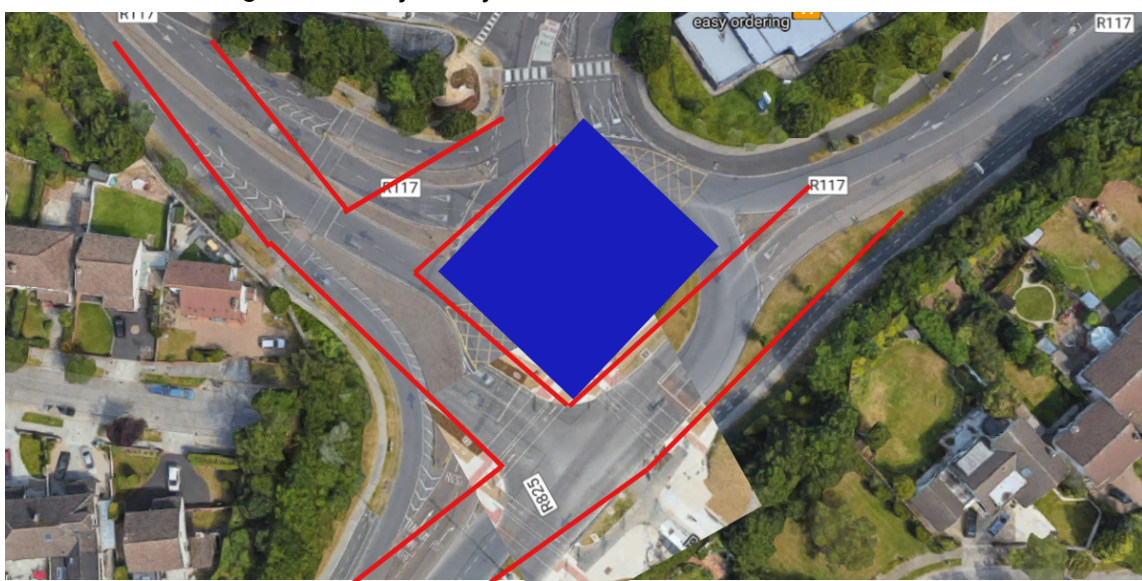


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There should be a last-mile hub² developed in the plan area and suitable locations should be identified in the LAP itself. The purpose of the last-mile logistics hub would be to minimise the heavy vehicles that need to use the village Main Street for deliveries, especially as space will be at a premium. The location identified should be capable of being accessible from the M50 without needing circuitous journeys on local roads.



I would like to propose one potential area for a last-mile logistics hub. Above I have superimposed the size of the Drummartin Rd/Lower Kilmacud Rd junction onto the existing roundabout at the top of the Dundrum Bypass for scale. The red outline shows what could be the extent of the road. The blue box is the large amount of space left over that would be ideally placed for a last-mile logistics hub. Trucks would mostly arrive from the M50 or Sandyford. This would enable them to skip the village, the one way system and the bus gate.

Within the village, there is a strong need to provide dedicated space for delivery mopeds and cyclists to park and wait for their pick-ups. This issue is particularly acute at Dundrum Town Centre by the cinema, where the footpath can be blocked by up to 10 mopeds at a time.

² A last-mile delivery or logistics hub is a central location where goods can be dropped off by larger goods vehicles and then delivered the last mile by smaller more efficient vehicles or collected by the customer

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The loading bay on Sandyford Road at P Macs is used all throughout the day and the evening. Provision should be made for longer loading bay operating hours.

Taxis

When planning out the provision of taxi ranks in Dundrum, consideration should be given to rapid EV charging points which taxi drivers may need when on long shifts.

“No idling” rules should be in place at taxi ranks to require drivers to switch off fossil fuel burning engines when waiting at the ranks.

Climate, Biodiversity and Flooding

Climate adaptation

If everything in the plan is done, the area of Dundrum will be much more adaptable to the impacts of climate breakdown. The existing heat islands in the form of tarmac car parks and wide roads with little greenery would leave us ill prepared for increased average temperatures.

Biodiversity

I'm particularly enthused by the objectives to deculvert the Slang river as much as possible and to focus on wildlife corridors. A planning application on Blackglen Road in Sandyford was rejected recently for not catering for the wildlife corridor in the design and I look forward to the same high standards in Dundrum.

It's fantastic to see re-wilding encouraged in the plan. Nature doesn't just solely exist for human enjoyment and there should be sites in the plan area that are left to nature with little to no human disturbance.

Flooding

Flooding is a major issue around Dundrum and I'm delighted that it's being taken particularly seriously in the Local Area Plan, particularly using nature based solutions and Sustainable Urban Drainage Systems.

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Energy

I strongly welcome the detailed analysis done on energy needs in the community, including an objective to support initiatives of Sustainable Energy Communities within Dundrum, such as Dundrum 2030.

District heating features in the plan and I believe should be central to all major planning applications made within the plan area. I believe that Policy Objective DLAP37 should be changed as follows:

“~~Support~~ **Require** the development of district heating networks and the utilisation of waste heat recovery, *where feasible*”.

A similar requirement should be made for solar PV panels.

There should be a policy objective to support the use of excess wind energy in new developments. E.g. the EnergyCloud initiative to heat hot water tanks when there is excess wind energy on the grid.

Corrections

- On page 62, reference is made twice to “Finlay Park” but I believe this to be meaning Finsbury Park.
- On page 90, reference is made to childcare opportunity sites in Figure 4.3, but this should refer to Figure 3.3.

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