

An Taoiseach,
Government Buildings,
Merrion Street Upper,
Dublin 2.

24th February 2021

Re. Proposed Development on the Central Mental Hospital Site

Dear Taoiseach,

We write to you on behalf of a collection of Residents' Associations (RAs) detailed below. Between us, we represent c1410 households (c3,880 residents) and border the entire Central Mental Hospital Site, on which there is a significant development proposal under consideration by the Land Development Agency (LDA).

There is a very real and widespread concern amongst the residents we represent that the LDA is pursuing a very deliberate agenda and that it is not having any regard to our legitimate concerns.

We acknowledge that this significant site will be developed; indeed we understand the wider societal need for housing, and appreciate the attractiveness of the site as a location. In addition, we wish to set out the fact that our RAs want to work collaboratively and constructively with the LDA in finalising plans for the Central Mental Hospital (CMH) site; we strongly believe that this will result in the best outcome for all parties.

Each of our Associations is at various stages of engagement directly with the LDA, as each RA has specific concerns in relation to the current proposals (some of which are included in Appendix 3). However, there are several concerns emerging in relation to the current proposal which are common to all RAs:

- **Height:** In the context of the site's location in a suburban setting (not an urban setting as claimed by LDA) 14 storey structures are considered to be inappropriate by all RAs (see visuals in Appendix 3); It is our contention that 5/6 stories mid development and 2/3 stories at perimeter is the limit to what might be regarded as an appropriate height given the two-storey height of all neighbouring housing.
- **Density:** The surrounding suburban area has already seen over 1,400 units delivered (or in the process of being delivered (see Appendix 2). We believe it not feasible to construct an additional 1,300 units without significant infrastructure upgrades for the area. It is our view, particularly given the scale of developments in the area since 2018, that a development of 600-800 units would be more sustainable and appropriate as well as being consistent with the LDA's recent Shanganagh site.
- **Access / Traffic:** The area, with the already significant existing traffic volumes, busy roads and rat runs through housing estates are even now dangerous for our families. Dundrum Road is a hostile environment for Active Travel by pedestrians and cyclists, without the added pressure from the CMH development. We are strongly opposed to any proposal that will exacerbate these current issues. A holistic solution is needed, rather than something which will exacerbate an existing problem
- **Demands on existing infrastructure:** This development is the latest in a number of significant developments planned for the area, adding 1,300 units to what has already been delivered in the last 2 / 3 years (see Appendix 2). While there have been vague promises that additional bus capacity "will come", it should be noted that capacity on the existing Luas service has already been exceeded for a number of years. Commuters simply cannot access trams at Dundrum and Windy Arbour during peak morning and evening travel, and bus capacity is decreasing under the new BusConnects plan.

In normal times, traffic is often at a standstill on Goatstown and Dundrum roads. There are significant waiting lists for schools, GPs, the list goes on. Constructing a development of the scale proposed in advance of addressing infrastructure deficits creates a legacy of problems that existing communities and DLR CoCo will be left to deal with for years to come.

Of particular concern to many RAs is the manner in which the LDA is undertaking engagement. Based on the LDA's actions to date, the strong perception is that key decisions have already been made regarding the development and we feel that we are being "railroaded" through a box ticking process masquerading as an engagement exercise with the aim of producing something that works for the LDA, and not our communities. This is not an acceptable or democratic way of conducting business by an agency of the State.

We urge you to take on board the real concerns of over 1410 households (c3,880 residents). We ask that you contact the LDA and insist that they re-evaluate their approach to dealing with the RAs. We ask that the LDA re-engage with each RA in a solution-based manner to produce a development that assists in solving existing issues, rather than creating new ones. And if that requires significant amendments to design / development scale / access, or an increase in scope to address existing issues then so be it.

For our part, the RAs below will continue to endeavour to work collaboratively with the LDA to assist in developing solutions to challenges to ensure that the proposed Development works not only for the LDA, but also for our members, and our communities.

We await a timely response to this reasonable ask.

Yours sincerely,

Annaville/Dundrum Road RA, Roebuck RA, Mulvey Park RA, Frankfort Park RA, Rosemount RA, Highfield & Westbrook RA, Taney RA

cc

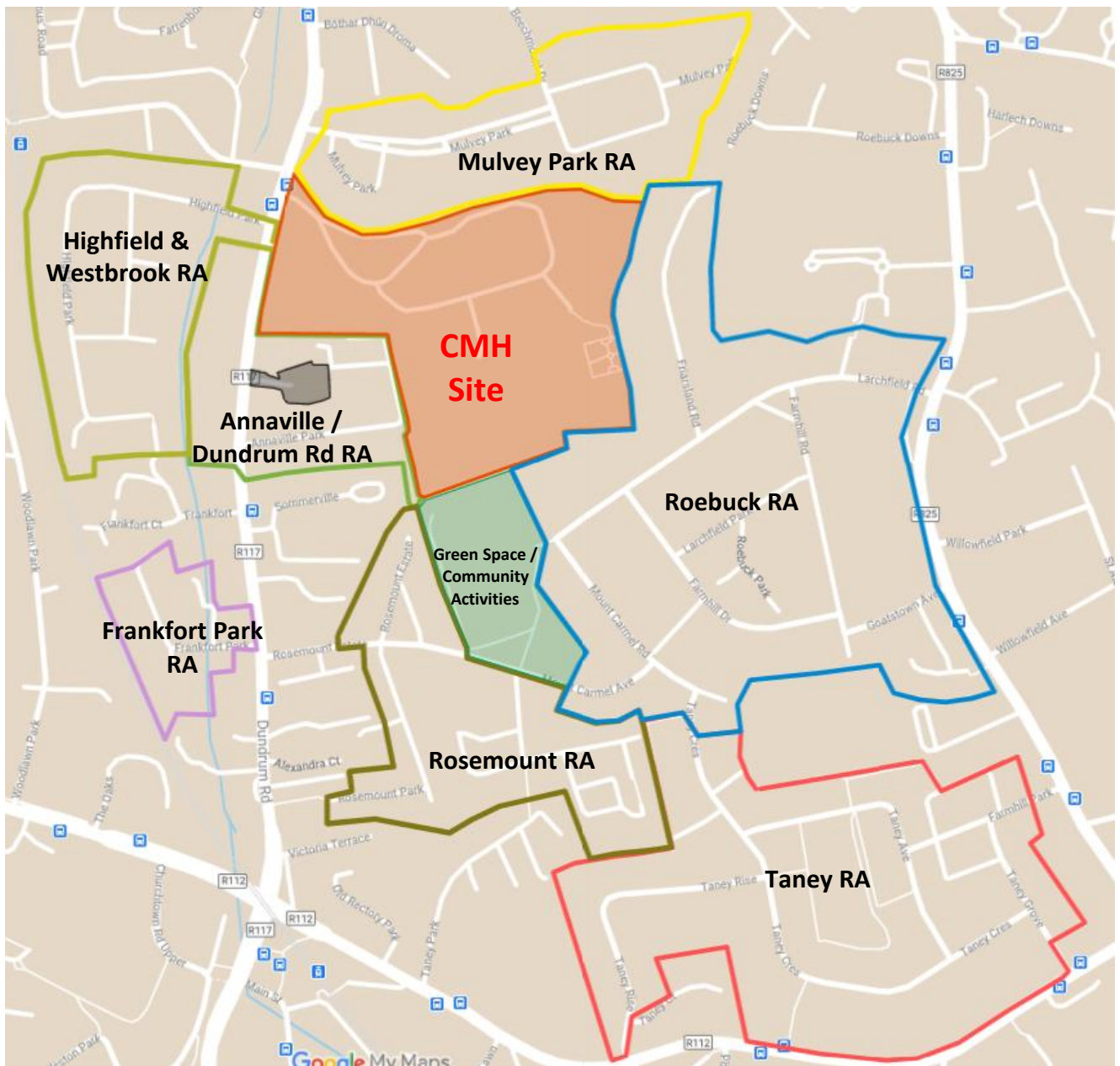
Minister Darragh O'Brien T.D., Minister Catherine Martin T.D., Minister Josepha Madigan T.D., Neale Richmond T.D.

Cllr. Jim O' Leary, Cllr. Anna Grainger, Cllr. Anne Colgan, Cllr. Shay Brennan, Cllr. Daniel Dunne, Cllr. Sean McLoughlin, Cllr. Peter O' Brien

John Moran, Chairman, LDA, Barry Chambers, Project Lead, LDA, Philomena Poole, Chief Executive, DLR CoCo, Catherine Keenan, Director of Housing, DLR CoCo, Robert Burns, Director of Infrastructure and Climate Change, DLR CoCo

Appendix 1

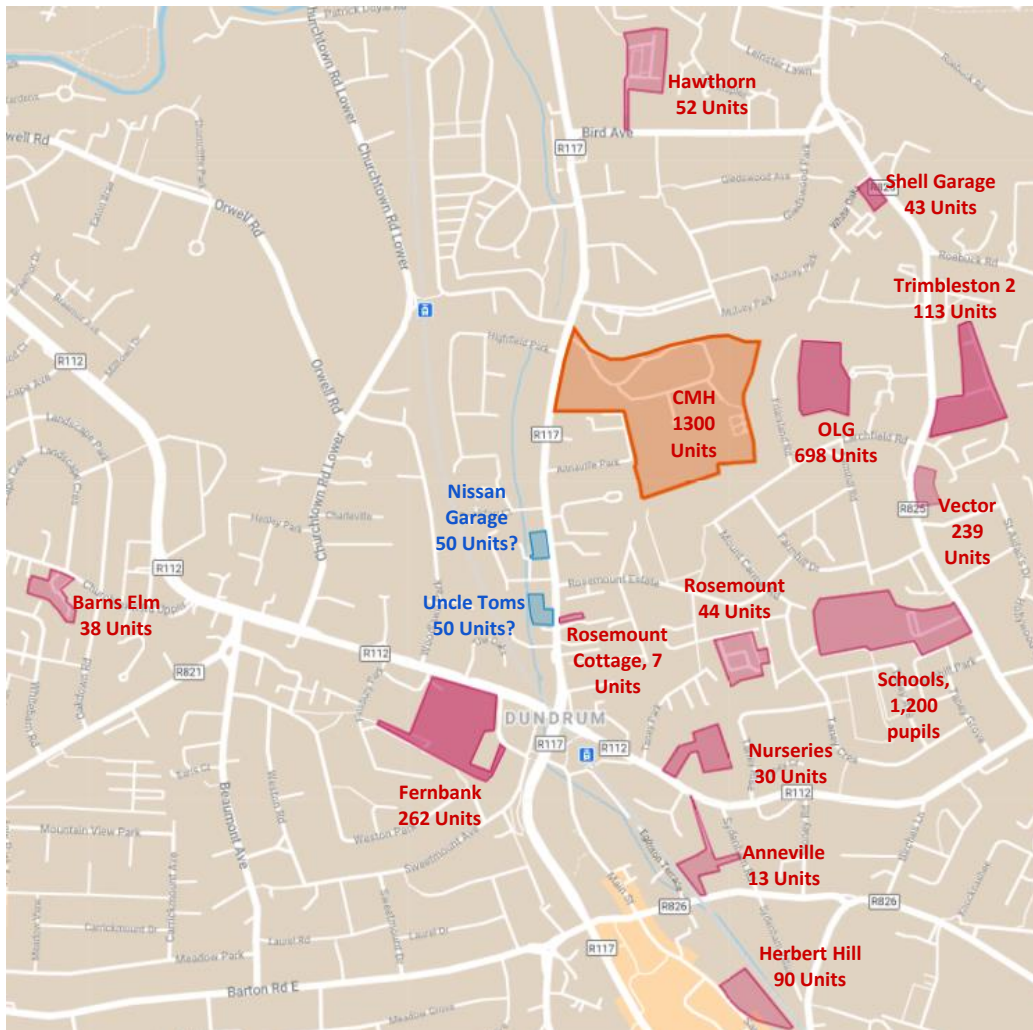
Map of Residents Association Areas and Central Mental Hospital Site



Appendix 2

Sites delivered since 2018 / with planning / in planning **IN RED**

Potential development sites **IN BLUE**



Appendix 3 – Visuals - Find below visuals created from information provided by LDA. These give a more representative view of the impact of the proposed development on the surrounding neighbourhoods than the graphics on the Dundrum Central website

Appendix 4 - Summary of Issues specific to each Residents Association



Very significant visual impact on surrounding suburban landscape



Images are interpretations based on current information made available by LDA



Appendix 4 - Summary of Issues specific to each Residents Association

Annaville / Dundrum Road Residents Association represents almost 100 households which surround the site of the Central Mental Hospital (CMH) on the south-west insert of the development site. The association was formed in March 2008, and in 2020 it extended the representation to include the 20+ houses on the Dundrum Road, opposite Annaville Park. The association plays an important role in looking after the interests of its members. It actively engages in the well-being of its members by promoting community social interaction to create a safe, secure neighbourhood. The association is a member of An Taisce and registered with DLR CoCo (PPN-00979) The committee's email address is: annavilledundrumdra@gmail.com

KEY MESSAGE

We are aware of the need for housing in the area and welcome the development of an historical site of much significance and value to the community. However, we want to ensure that the development is one which is sustainable and of benefit to the existing community, allowing all residents to integrate and co-exist positively and peacefully. We sincerely want the development to enhance the local area and local community, but we feel the current draft plan and emerging concept does not do so for our residents by reason of the following, which are our key and crucial concerns:

- **Height and density** - The proposed density and height are not appropriate for the site or the area. There is a real concern that our residents' homes will be overshadowed and overlooked. We believe that a more realistic density on this site, say 100 uph net, resulting in 850 dwellings, would obviate the need for the excessive height and scale and would allow for two storey development at the perimeter of the site, and a maximum of 8 stories in the central sections of the site, as desired by our residents. This would significantly address concerns about traffic, public transport and parking.
- **Proposed opening onto Annaville Park** - We are strongly opposed to this opening and do not agree that it will benefit the residents. 94% of the residents are opposed to this. Locating an access point through the wall at the end of Annaville Park will exacerbate the already limited parking and by default create a narrow and dangerous four-way junction between Annaville Park, Annaville Grove, Annaville Lodge and CMH development. With increased pedestrian and cycle movements through this area, there are **genuine health and safety concerns for pedestrians and cyclists**, including the probability of accidents. The increased traffic movements will also impact on emergency vehicle access to Annaville Grove, Annaville Terrace, and fire access to Annaville Residence apartments.
- **Location of the community centre** - Whilst we welcome the provision of a Community facility in the proposed development, we do have a number of concerns based on the outline information contained within the virtual room, mainly in relation to location, height and access. We further recommend that consideration is given to swapping the positions of this building and the green space adjacent. This would allow more height and reduce the possibility of overlooking.
- **Impact on the local Infrastructure** - We are hugely concerned about the wider impact of the development on all local infrastructure - public transportation, parking, road traffic, schools, particularly given the level of development and proposed development in the surrounding area. The area simply will not cope.

Roebuck Residents Association represent c380 households across the Larchfield / Farmhill / Mt Carmel / Friarsland area, bordering the entire eastern perimeter and the majority of the southern perimeter of the Central Mental Hospital site. We were established with the aims of a) protecting, maintaining and improving conditions and amenities in the area for the benefit of Ordinary Members and their families, b) encouraging community and social interaction for the benefit of Ordinary Members and their families, and c) improving communication between neighbours.



Key Message

We acknowledge that development will happen on the Central Mental Hospital site in the coming years, however we expect that this development will fit within, and enhance, our existing communities. The current proposal does neither. We are very concerned that it will be detrimental to our well-established close-knit community build over the last 70 years.

Our **Objectives** for this development are:

- **To protect our families:** We want quieter roads, not an exacerbation of the existing rat-runs.
- **Appropriate development:** 4/6 story blocks mid site, with 2/3 story houses at the edges is appropriate.
- **Diversity in housing:** Our area needs elderly/downsizer housing, family housing, a mix of owner occupiers and social housing.
- **Proper infrastructure:** Given the lack of public investment in past years, Luas, transport, roads, schools, healthcare, childcare and recreational space are all at capacity. There is no room for this development at the scale proposed.

Taney Area Residents Association was established in 2018. The aims of the Association are to promote the best interests of the residents and to protect and improve conditions and amenities in the area for the benefit of our members. We represent an estate of approximately 300 households. The homes on our estate were built in the 1960s and 70s. Our members live on Taney Rise, Taney Crescent, Taney Avenue, Taney Grove and Farmhill Park. Some residents have lived here since the houses were built. The estate is bounded by Taney Road to the south, Goatstown Road to the east, the former Irish Glass Bottle (IGB) sports ground and Roebuck to the north, and Rosemount to the west."...

KEY MESSAGE

The following statement is taken from the Land Development Agency website:

"Dundrum Central will be designed as an integrated compact urban neighbourhood, which respectfully embraces its setting within the Dundrum and Windy Arbour areas." <https://dundrumcentral.ie/>

We do not believe that the development as proposed achieves this fundamental objective. Taney Area Residents' Association is ready and willing to help make Dundrum Central an integrated, sustainable neighbourhood through meaningful community engagement with the LDA.

OUR OBJECTIVES

RESPECTFUL DEVELOPMENT: The residents of Taney have expressed serious concerns about the proposed size and density of the Dundrum Central development. We believe that the height and scale of the buildings need to be revised considerably.

TRANSPORT INFRASTRUCTURE: We believe the proposed development will create additional congestion in an already gridlocked area. Dundrum Road is not safe for cyclists. Rat-running of traffic through Taney, Roebuck and Rosemount is already a major concern for residents. We insist that Dundrum Central should not exacerbate this situation.

SPACE TO PLAY: The current design diminishes the value of the neighbouring green space at Rosemount, reducing the facilities so badly needed for training and exercise. We believe Dundrum Central provides an opportunity to create enhanced recreational facilities for all age groups.

HOUSING VARIETY: The over-dependence on high-rise buildings within Dundrum Central will not deliver housing for all. We expect a sustainable development to provide homes suitable for people of all ages, abilities, and circumstances.

COMMUNITY FACILITIES: To embrace its setting, Dundrum Central should include a wide range of community facilities, and recreational spaces for the wider community.

The **Mulvey Park Residents Association** represents 198 households located in Mulvey Park and Mulvey Crescent. Our estate is located to the north of the Central Mental Hospital/new development site separated with the boundary wall between the site and our residents back gardens (see map in Appendix 1).

The Residents Association is in existence for over 50 years with the current Association established in 2017. Mulvey Park RA is registered with DLR CoCo (PPN-00881). The RA website is <http://mulveypark.com/> and the committee's email address is mulveyresidentsassociation@gmail.com

The Association conducted a questionnaire of its households in February 2021 with a response rate of 70% and this submission is based on the findings from this questionnaire.

Mulvey Park Residents Association

Key Message:

We are aware that there will be a new development on the Central Mental Hospital site in the near future.
We would like to ensure that this is well thought through to acknowledge/blend in with the existing communities/estates that surround the Central Mental Hospital site.
This development will impact the whole neighbourhood.
Let's make sure it's a positive impact.

Our Concerns related to the proposed development:

- We believe that the proposed heights and density of this development are not appropriate.
- The scale of the development will have a detrimental impact on traffic and possible parking on surrounding roads/estates.
- Public transport is not adequate (Luas at peak times can't accommodate more users and a not fit for purpose Bus Service is to be reduced significantly after introduction of Bus Connect).
- Dundrum Road is very dangerous for cyclists. How can this be addressed?
- That impressive proposals for inclusive community facilities and amenities are realised.
- We would like to see the full integration (mix) of the social, affordable and other housing types.

Frankfort Park Residents Association has been in existence for over 50 years and our current Association was re-established in December 2015. We are located in a small cul-de-sac off the Main Dundrum Road and we represent 31 houses. Our aims as a committee are to protect, maintain and improve the safety of our Residents and to encourage social interaction between our neighbours.

Concerns in relation to the proposed Development at Dundrum Central,

- We believe that the proposed height and density are not appropriate for the area.
- The scale of the Development will have an enormous impact on traffic which is currently extremely busy and causing increased dangers while trying to exit from the Park onto the main Dundrum Road.
- Timing of the infrastructure while the Development is being completed (how many phases)
- Impact on existing transport systems Luas and Buses.
- Dundrum Road does not have adequate safe footpaths for pedestrians and space for cyclists.

Highfield & Westbrook Residents Association represents 150 houses and over 300 residents across Highfield Park, Westbrook Road and The Grove Highfield Park. The association has been in existence for over 50 years and is actively engaged in local community matters. The RA committee has been recently refreshed following the 2020 AGM and the RA is registered with DLR CoCo (PPN-00980). The RA website is <https://highfieldwestbrook.ie/> and the committee's email address is residentsassociation@highfieldwestbrook.ie

Highfield & Westbrook Residents Association have made a detailed submission directly to the LDA, with the organisation's key concerns summarised as follows;

- **Impact of traffic and access design at junction of Dundrum Road/Highfield Park/St Columbanus Road**
- **Impact of construction traffic for a lengthy period**
- **Requirement for a Public Park and importance of Permeability**
- **Unrealistic Car parking provision provided for in the design**
- **Need for Community Facilities.**
- **Impact on existing at-capacity Public transport systems**
- **Importance of balance of housing types**
- **inappropriate Scale of development in context of existing suburban setting**



Rosemount Residents Association

Response to the LDA proposed Central Mental Hospital Development

Introduction:

The Rosemount Residents Association represents approximately 250 housing units which are situated in the immediate vicinity of the site. We acknowledge the significance of the Central Mental Hospital Development Site (CMHDS) in terms of its potential to be a location which can serve both new residents and the residents of the surrounding communities.

In an active and ongoing consultation process with our residents' herein please find: Our key notes and key message.

Key Notes:

- We acknowledge that this significant site will be developed, indeed, we understand the wider societal need for housing particularly the need for social and affordable homes in such an attractive infill site in this location. We wish to put on record, the fact that Rosemount Residents Association wants to work collaboratively and constructively with the LDA in finalising plans for the CMHDS; we strongly believe that this will result in the best outcome for all parties.
- We are pleased to read about the inclusive Community Centre, sports facilities indoor and outdoor, a secure playground with clean, safe, accessible toilets, cafes and shops, a library, work hubs, a crèche and possibly a GP's surgery, places to relax on benches overlooking perhaps water features or beautifully landscaped open spaces.
- In DLR there is an acknowledged scarcity of good quality green spaces for communities to use and to act as lungs for air quality. The need in the proposal to create an entrance through our open green space is being contested. This space is widely used by all communities in the area for recreation and exercise. This is an ideal location for families to bring their children to space where they are safe from traffic.
- The LDA will need to constructively engage and listen to the existing communities and address their concerns seriously. They need to accept that we are equal partners and stakeholders in this proposal.

Our Key Messages

Roads:

Rosemount Residents Association will not support an intended plan to create a road within or in proximity to the existing recreational space at Rosemount Green and playing fields. We want our Green Space/Lung to remain intact.

We want safer and less congested roads, not an exacerbation of the existing rat-runs. We note that the LDA intends to stop rat running within the proposed development. But will export it to neighbouring communities in Goatstown/Dundrum instead.

Appropriate Heights:

We cannot support the proposed development heights and will only support what we feel is appropriate development: 4/6 storey blocks mid site, with 2/3 storey houses at the edges is appropriate. Let us not forget that this is an infill development in an existing developed and settled suburban community.

Diversity of Housing Stock:

We propose that there will be Diversity in housing type: Our area needs elderly/downsizer housing, family housing and a mix of owner occupiers, social and affordable, and social housing.

We are very concerned about the lack of evident proper infrastructure: Given the lack of public investment in past years, Luas, public transport, roads, schools, healthcare, childcare and recreational spaces are all at capacity. There is no room for this development at the scale proposed.

Proper Constructive Consultation:

The LDA needs to fully and constructively engage and listen to all the Resident Associations in relation to this proposal and treat them as equal partners.