

DUBLIN 15 COMMUNITY COUNCIL
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A CHUIMSION: BAILE BLAINSEIR-CAISLEAN CNUCHA - CLUAN SAILEACH-MULLACH EADRAD
Representing: Blanchardstown-Castleknock-Clonsilla-Mulhuddart

Chairman: **B.Brennan** Vice Chairperson: **S. Jay** Secretary: **M.Keogh** Treasurer: **K. O'Neill** PRO: **C. Kurtz**.

Senior Executive Officer,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1

17 July 2003

A Chara

On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following Objections, with respect to the adoption of the HANSFIELD, SDZ planning scheme, STRATEGIC DEVELOPMENT ZONE, Hansfield, Blanchardstown, Dublin 15.

Attached, please find the following:

Appeal fee of 200 Euro

Fingal County Council notice of adoption of the HANSFIELD, SDZ planning scheme.

Fingal County council e-mail acknowledgement of submission / observation on draft SDZ planning scheme.

Our specific objections and concerns are as follows:

General

- SDZ is premature, it is based on a future rail line to Navan, which has no government approval, no funding allocated and no published timeline for construction or operation.
- Proposal for QBC bus network is also premature. No timelines exist for the route indicated, or the frequency.
- No proposal to provide a direct pedestrian access to Clonsilla rail station.
- Public open space is not within the SDZ, no sustainable access.
- 110kV line & pylons should be re-routed away from the development prior to commencement; the proposed pylon corridor is not suitable in a residential setting.
- Proposal that community centre reservation revert to residential if no community facility materializes needs to be changed.
- Provision for sheltered housing to cater for the elderly and vulnerable is flawed.
- Provision of children's play areas.
- Capacity exists only for surface water, proposed foul drainage appears inadequate & likely to impact existing developments.
- The visual amenity.

1.0 This proposed SDZ is premature

There is considerable concern in the community council with this proposed Strategic Development Zone, of primary concern is that the development of the land at the densities and in the location proposed is premature. At the core of the proposal, it is based on a future rail line to Navan, which has no government approval, no funding allocated and no published timeline for construction or operation.

The recently published Strategic rail review states that the proposed Dunboyne line is not justified on the basis of low density, this line is conditional on developments in Meath which are outside the Fingal area and discouraged by the strategic planning guidelines for the greater Dublin area. This development of it's self will not materially change the parameters that will justify the proposed line to Dunboyne or Navan.

The proposal as it stands will just add to the already overloaded road network. Ultimately it will feed into either the Ongar road / N3 or the road to the Clonee / N3 interchange. Both these junctions are unlikely to cope with the additional private motorist traffic.

2.0 Proposal for QBC bus network is also premature.

The proposal for a QBC bus network is also premature. No timelines exist for the route indicated, or the frequency. To date the response of the bus service providers to the adjacent new areas has been totally inadequate. This has established private transport commuting as the only viable option for the residents in the adjacent Castaheaney area. To proceed without a commitment (funding allocated / published timeline for construction & operation) from the bus service providers is to recklessly overload the existing infrastructure.

The provision of parking spaces appears inadequate and based on the presumption that public transport will be in place from day 1. In the light of previous experience with the immediately adjacent estates this appears to be unduly optimistic. A firm commitment for the provision of public transport FROM DAY 1 should form part of this Draft proposal.

3.0 No proposal to provide a direct pedestrian access to Clonsilla rail station

There is no proposal to provide a direct pedestrian access to Clonsilla rail station. The SDZ proposal contains an aspirational local bus route, but no road or footpath in plan. The only pedestrian access provided is a long route via Hansfield road which will take the average commuter between 30 & 45 minutes to walk to Clonsilla rail station, hardly an attractive or realistic proposal. The Local Authority has a basic duty of care in this matter. This is not currently being adhered to and no provision is being made in this plan.

It should be noted that there is no current capacity on the Maynooth line to take additional passengers. The capacity constraints on the rail line exist in Dublin city centre and in the provision of rolling stock. This is unlikely to change until a new terminus is constructed in Spencer Dock with a link across the Liffey. This is demonstrated by Irish Rail returning developers € 4m for Phoenix Racecourse site rail h&t because it does not have the capacity to serve any additional developments on this line. It is expected that Irish Rail will not be able to provide services to the new developments in Pelletstown.

4.0 Public open space is not within the SDZ, no sustainable access.

The majority of the public open space is proposed to be located outside the SDZ. This proposal locates only 2 Ha within the SDZ, and the balance of 12 Ha will disappear into an “agreed contribution” to Fingal County Council. Wherever this land finally ends up is vague, but it appears that there is no sustainable access to this (12 Ha) public open space for the future residents of this SDZ in this proposal. The community council considers this aspect of the draft SDZ proposal to be outrageous and unjust deprivation of the facilities to which these residents are entitled. **The Local Authority are** proposing that 6650 to 7430 residents should be without access to adequate public open space. The planner’s attention is drawn to the The Fingal Sports Strategy 2003-2007 published by the Fingal Sports Partnership (Fingal County Council, the County Dublin VEC and the Campus Stadium Ireland). The report states (page 10):

“The largest single issue highlighted by sports clubs across Fingal was the access to, availability of, or the complete lack of facilities available to them to provide for their sport. The range of difficulties relating to facilities and grounds varied from security and safety of premises to lack of changing facilities or parking to unavailability of the desired facilities at appropriate times.

The situation relating to facilities is outlined in greater detail by the Collier & Broderick study. In some parts of the county there are proportionately less facilities per capita (this will be exacerbated by projected population growth) than in older longer established communities. This is the case in many parts of Dublin 15. While particular attention needs to be directed at these areas there are also needs in all of the areas across the county. The Collier & Broderick (p.21, 2002) study illustrates that 3 areas (Blanchardstown, Castleknock and Swords) with the greatest growth in population between 1996 and 2002 are now the most deprived in terms of facilities compared with other parts of the county.”

Chapter 3 page 17 *“In Dublin 15 (greater Blanchardstown and Castleknock) which has 75,000 people and is expected to grow to 100,000 by the end of the decade there very few sports clubs proportionally when compared to the rest of the county. Map 1 illustrates this as there is a higher proportion of sports clubs with their own facilities along the coastal areas and in Swords.*

In conjunction with Fingal County Council a new range of policies have been put in place to attempt to at least provide some facilities through gains for the community at planning permission stages”

It appears that **The Local Authority** is making this problem worse by failing to provide sustainable access to Class 1 public open space for the future residents of Dublin 15. The proposal in this SDZ to deprive the residents of local access to class 1 public open space will increase disadvantage in an area deprived of access to sporting facilities. The planners should specifically address this issue and redress the lack of facilities in the Dublin 15 area. Consideration should be given to the provision of high density sporting facilities within the SDZ, i.e. tennis courts, basketball courts. They should be clustered together and integrated with community or commercial facilities to ensure that they are maintained. Access to the balance of class 1 public open space should be sustainable (i.e. within reasonable walking distance)

5.0 110kV line & pylons.

110kV line & pylons should be re-routed away from the SDZ lands prior to commencement of the development. The proposed pylon corridor is not suitable in a residential setting, (particularly with the residential densities proposed) the norm in an urban setting is to locate the 110KV lines underground, and indeed most of the 110kv lines in the Dublin city council area are located underground. It may be expedient to leave 110KV lines above ground in a low density environment but it is inappropriate given the densities proposed. The concept of using the pylon corridor to cut diagonally through the centre of this development as a design feature may be considered imaginative in some quarters. It is considered by the Community Council to be a money saving ploy and not adequate for the future residents of this area. It is also considered to be extremely unattractive running the cables above ground level.

6.0 Community centre reservation

The proposal that community centre reservation revert to residential if no community facility materializes is unacceptable. The nature of new developments is that the new residents are preoccupied with creating their home and paying the considerable burden of a new mortgage. It usually takes 10 to 20 years for a community to raise sufficient funding to build a community centre. The developer should be obliged to provide community facilities as part of the development. The least the Local Authority should accept on behalf of the future community is that the land be taken in charge by Fingal County Council as part of the Public Open Space requirements until funding is raised to provide the community centre. The threat, which is how it is seen by the Community Council, that the community centre reservation revert to residential if no community facility materializes is absolutely disgraceful and should be deleted.

7.0 Provision for sheltered housing to cater for the elderly and vulnerable is flawed.

Provision for sheltered housing to cater for the elderly and vulnerable is flawed, developers have evaded their responsibility under Part M of the Building Regulations by providing “own door” apartments rather than communal access via lifts. This means that apartments are unsuitable for elderly or disabled. It should be a specific objective of the SDZ that 50% of the apartments are suitable in every way for sheltered housing for the elderly or the disabled and are provided with a lift access. These apartments should be clustered around local shops, but at some distance from public houses. Security inter-coms should also be provided in these dwellings to prevent unauthorized access past the entrance into the communal areas.

8.0 Provision of children’s play areas.

It is noted by many commentators that Ireland has more golf clubs than children’s play areas. It should be a specific objective to provide children’s play areas (complete with activity toys and soft surfaces) in well supervised class 2 public open space areas, particularly in the vicinity of family housing units.

9.0 Infrastructure deficit - foul drainage

Capacity exists only for surface water, proposed foul drainage appears inadequate & likely to impact existing developments. It appears improbable that there is sufficient excess capacity on the existing 375mm dia sewer to take 2 no 225mm dia and 1 no 300mm dia sewer serving 6650 to 7430 residents.

10.0 The visual amenity

The *Guidelines for Planning Authorities on Residential Density*

5.5 Building Height

One of the common perceptions in relation to higher densities is that they promote taller buildings. As case studies have shown, it is possible, however, to increase density significantly with modest increases in height. In general, low-rise buildings which respect the scale and character of Irish towns and cities are appropriate, save for particular cases

Given that individual buildings within the SDZ can not be challenged by the local community, it is considered essential that the **Draft Planning Scheme for the Hansfield SDZ** addresses and establishes a maximum building height. The draft details the building mix and appropriate locations for higher buildings, however the community council requests that building height be defined as follows:

- ◆ Maximum of 4 stories.
- ◆ Periphery buildings at 2 stories.
- ◆ Buildings adjacent school sites at 2 stories.
- ◆ Higher buildings at appropriate landmark sites (subject to a maximum of 4 stories).

Summary

Our core objection in principle to this SDZ is the remote location and the absence of any creditable transport plan. Our experience in Dublin 15 is that infrastructure lags development by some considerable time delay (in excess of 10 years in many cases). Proceeding with this SDZ without a firm commitment of finance & schedule to provide the necessary transport is reckless and will overburden the already inadequate transport. We would request that your inspector visits the site at the morning & evening peak times and experiences the existing rail and bus services to Dublin city centre and the industrial estates within Dublin 15. We would also request that the inspector walks from the existing rail station to the site to evaluate it's proximity to existing and proposed public transport. We would also request that the inspector meets the managers of Irish Rail suburban services and Dublin Bus as part of his evaluation. We request that the inspector also meets with the Garda Superintendent to understand the existing difficult transport situation.

We also request that the Board member evaluating the Inspectors report visits the site at the morning & evening peak times and experiences the existing rail and bus services to Dublin city centre and the industrial estates within Dublin 15, this is an unusual request, but one merited by the nature of a SDZ (it's scope is several times larger than the scope of the largest residential planning application), and the impact the development will have on the Dublin 15 area.

Yours sincerely,

Kieran O'Neill
Dublin 15 Community Council