

**DUBLIN 15 COMMUNITY COUNCIL**  
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**Representing: Blanchardstown-Castleknock-Clonsilla-Mulhuddart**

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On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following observation on the Draft Blanchardstown Town Centre Development Framework / Masterplan prepared in accordance with Objective U01 of the County Development Plan at Blanchardstown, Dublin 15.

General

This Draft Development Framework / Masterplan appears to focus on property development of the Blanchardstown Town Centre site at the expense of continued long term growth and success as a premier retail centre.

**Development context**

The Blanchardstown town center is the major town center within the Fingal administrative area and is one of the major town centres within the Dublin Metropolitan area. It serves an immediate area of Dublin 15 and is connected via the M50 and M3 to a much larger hinterland. The Dublin 15 Community Council is fully supportive of its continued growth and success as a premier retail centre.

The Blanchardstown town center in addition to its retail function is also the civic administrative and cultural centre for the Greater Blanchardstown (Dublin 15) area.

The Dublin 15 area is characterised by its rapid growth in the last 15 years from a population of 40,000 to 93,000 people. This growth has placed considerable strains on the infrastructure with transport and schools under considerable pressure to catch up with this rapid development. This is likely to continue (despite the immediate economic environment) as there is existing zoned land for a population of in excess of 150,000.

The Dublin 15 area is also characterised by the existence of the largest concentration of land zoned for science & technology, industrial, warehousing and associated commercial use. This zoning has attracted many office based employment such as e-bay / Paypal. The proposed Metro West route passes through a significant portion of this commercially zoned land much of which is currently undeveloped.

**Given the presence of significant quantities of residentially and commercially zoned land in Dublin 15 we see little compelling development reason to locate additional residential and office based new development in the Blanchardstown town center.**

In essence the Draft Blanchardstown Town Centre Development Framework / Masterplan seeks to apply the “celtic tiger” growth pattern of residential and office property development to this valuable site at the expense of its core function as a retail and town centre.

**We believe this plan should focus on how to position the Blanchardstown town center for continued long term growth and success as a premier retail centre, and offer the following recommendations:**

- The promotion of non retail employment uses should be critically evaluated to determine what value they add to the continued growth and success as a premier retail centre. A cost - benefit analysis should be required to evaluate impact on parking spaces and contribution to enhanced retail activity. Only where there is a compelling reason to permit this type of development in the town centre – as opposed to the surrounding commercially zoned land, should the development be permitted. Compelling reasons should be restricted to civic administrative, cultural or an office environment where a high degree of personal (face to face) interaction with customers is required to transact business. Change of tenancy should be subject to a “change of use” evaluation against this compelling reason criterion.
- Proposal to displace “retail warehousing” is a concern. There are synergies between this development and the standard retailing activities. For example people purchasing cookers in an electrical “retail warehouse” will require pots & pans. Similarly purchasers of furniture will also purchase soft furnishings (bed linens, curtains, etc). At present the Blanchardstown town center is a “one stop” shop for all retail needs.

- Proposal to displace supermarkets is a similar concern. There are few sites appropriate for this displacement – the saga of the Aldi application for a supermarket on the Clonsilla Road indicates how difficult it is to add this type of infrastructure to relatively mature areas.
- Encourage “retail warehousing” and supermarkets to provide a subsidised delivery service, to encourage follow on retail activity in other shops.
- The Blanchardstown Town Centre Development Framework/Masterplan should focus on ways to extend the opening hours of the centre by adding appropriate recreational activities. This is an existing feature with the presence of Draiocht arts centre, the multiplex cinemas and the leisureplex.
  - A solution used internationally is the presence of mid priced restaurants (sit down and be served) catering to the evening market. These are typically clustered in a section of the centre.
- Provide entertainment facilities where complementary to either the civic or retail objectives of the masterplan.
  - Provide an entertainment facility like a climbing wall / abseiling wall next to the outdoor shop “53 degrees North”.
  - Winter sport facility (similar to that proposed & rejected for Tyrellstown) above retail units.
- The Blanchardstown Town Centre Development Framework/Masterplan should focus on ways to enhance the shopping experience. Suggestions are
  - Provide a relax and re-charge facility for users of the centre. Examples of this are the “Pure escape” day spa in Applewood Village Swords where a full range of treatment options is provided within a small footprint.
  - Novelty supermarket – example a large continental or British supermarket that does not have a presence in the state – example Sainsbury’s
- Discourage residential development – site is too valuable as a major retail centre to dilute it with residential. Residential will increase competition for parking space.

### **Building height.**

We are concerned at the proposal to generally increase height to 4 – 6 stories with higher landmark buildings on adjacent to existing roundabouts.

- We believe the vertical design will introduce excessive bulk and mass to the town centre, and this should be limited to 5 stories.
- We believe the landmark buildings should not be replicated at the roundabouts on Road D due to the excessive overlooking of the adjacent residential areas. The existing landmark buildings are tolerable because of the proximity to the N3 however this does not apply to the other quadrants of the Blanchardstown Town Centre.

## **Transport and parking.**

We welcome the proposed pedestrian link to Blanchardstown village (section 6.2.3, Pedestrian Proposals). We feel that this should be developed independent of the other elements of the masterplan

We would encourage examining the addition of zebra crossings throughout the road network. As these do not require pedestrians to wait, they minimise incidences of jay walking and other dangerous crossing manoeuvres. Unlike signalised junctions they truly give back the right of way to pedestrians - and all customers of Blanchardstown Town Centre are eventually pedestrians."

The Blanchardstown Town Centre Development Framework/Masterplan suggests that development plan standards of parking are excessive and should be reduced to 46% of current standards. This is based on an **excessively optimistic view** of the impact public transport projects will have on the centre.

The current car parking at the Blanchardstown Town Centre is assumed to be available to Metro West as a Park & Ride facility. This assumption is clearly at variance with the interests of the two owners of the centre. Adding office based commercial activity and residential will make the competition for car parking even more intense.

The assumptions of Fingal County Council (master plan), the Rail Procurement Agency and the Centre owners are clearly not aligned.

The Development Framework/Masterplan proposal to significantly reduce development plan standards for car parking **lack credibility**.

Current thinking in the Department of Environment is that free parking in centres like Blanchardstown Town Centre gives an unfair advantage over Dublin city centre. **We dispute the perception that free parking gives an unfair advantage to suburban retail centres**, as the transport network of the Greater Dublin Metropolitan area is based on providing a network of transport for ~ 1 million people with the hub based in Dublin city centre radiating outwards to the metropolitan area. It can be argued that current transport policies give an unfair advantage to Dublin city centre. If pay for car parking is introduced in the centre it should be limited to discouraging all day parking or commuters abandoning cars in the Blanchardstown Town Centre to access public transport.

## **Summary**

The Dublin 15 Community Council is fully supportive of the Blanchardstown Town Centre's continued growth and success as a premier retail centre.

We believe that this plan is excessively focused on the wrong objectives and risks diluting the Town Centre as a premier retail centre by adding development that is more appropriate elsewhere in Dublin 15.

We are particularly concerned at the proposal to displace the supermarket and "retail warehousing".

We are concerned with the proposal to significantly reduce the car parking standards as it lack credibility and is based on an excessively optimistic view of the impact public transport projects will have on the centre.

We look forward to your consideration of our observation and urge you amend the defects in this Development Framework/Masterplan, by commissioning an international expert on major retail centers to ensure the masterplan has a focus for long term growth and success as a premier retail centre, while retaining its civic and cultural elements.

Yours faithfully

Dublin 15 Community Council