

DUBLIN 15 COMMUNITY COUNCIL

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Representing: *Blanchardstown-Castleknock-Clonsilla-Mulhuddart*

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County Hall
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5 September 2003

A Chara

On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following **submissions on the forthcoming Fingal County Council Development Plan..**

Our specific submissions, observations and concerns are as follows:

General

- 1.0 Objectives in the current development plan were not achieved.
- 2.0 Objectives in the current development plan that are supported by the community council and should be protected from change / development
- 3.0 Recommended new zoning objectives
- 4.0 Provision of primary & post Primary school sites to cope with the population growth (40k to 80k in last 12 years, with projections to 120k by 2011)
- 5.0 Sporting infrastructure deficit in Dublin 15 area.
- 6.0 Transport infrastructure
- 7.0 Housing strategy objectives
- 8.0 The built environment.
- 8.0 The visual amenity.
- 9.0 Community development

Apendix

- ◆ Dublin 15 Community Council proposed Design guide for residential development
- ◆ Appeal of the Hansfield SDZ by the developers (Manor Park Holmes Ltd & Menolly Holmes Ltd) & their consultant (RPS McHugh) report.
- ◆ Proposed metro route through the Greater Blanchardstown area.

Attached please find our detailed observations & submission.

1.0 Objectives in the current development plan were not achieved.

1.1 Design guide for residential development.

This was promised in the last development plan, and the community council made a detailed submission on this issue. The delay in starting the public consultation process is disappointing, and this has resulted in the construction of future problems. The original *Guidelines for Planning Authorities on Residential Density*

5.0 CONTROLS AND SAFEGUARDS

Criteria for Higher Densities

The following criteria should be taken into account when assessing applications incorporating higher densities

◆ Quality of Proposed Layout and Elevational Design

The quality of the residential environment should be paramount in the acceptability of planning applications for higher density schemes

Given that so much of the development in Dublin 15 over the past few years has been “higher densities”, the delay in Fingal adopting a “Design Guide” is difficult to understand.

We attach our original submission in an appendix, and hope that you will incorporate many of our suggestions in the development plan.

1.2 Cycle ways

The last development plan established an extensive network of cyclepaths in the Dublin 15 area, many of these were targeted as 5 year objectives, with the balance “long term”. Progress in meeting the 5 year objectives cyclepaths is disappointing, with little obvious progress (other than as a condition of the grant of planning permission. We urge the council to retain the cyclepaths as a specific objective and to make this a priority for the Roads Dept. The current (shared) road space for cyclists is extremely dangerous and acts as a disincentive leading to more reliance on the private car for transporting children to school & commuters to work.

1.3 Footbridge at Kirkpatrick Bridge (Coolmine Rail Station)

The last development plan established a specific objective for a Footbridge at Kirkpatrick Bridge (Coolmine Rail Station). The current lack of a footbridge forces commuters to use the road to access the Coolmine Rail Station when approaching from the Blanchardstown direction. Progress in meeting this objective is disappointing, with little obvious progress despite the grant of permission to several developments in the vicinity. These new developments were at higher densities due to the proximity of Coolmine Rail Station, and the levies from these developments should be used to urgently address this unacceptable risk to pedestrians.

1.4 Lack of any real commitment to providing footpaths.

Too often there are unsafe gaps where Fingal are waiting for some future development to pay for a footpath along an existing road. Any real commitment to a hierarchy of transport infrastructure (walking to local shops / facilities, walking to public transport pick up points, cycling etc) is

really lacking and just forces people to rely on private transport because it is often too dangerous to walk or cycle.

2.0 Objectives in the current development plan that are supported by the community council and should be protected from change / development

2.1 Green belt around The Greater Blanchardstown area

The community council strongly supports the F, H & G zonings to establish a significant green belt between The Greater Blanchardstown area and the Lucan / Clondalkin area to the south, and the Finglas / Pelletstown area to the East & North. The community council would strongly oppose any dilution of this green belt.

3.0 Recommended new zoning objectives for the Greater Blanchardstown area and the county in general

3.1 There should be No re zoning south of N3 (to county borders).

The community council believes that there is sufficient land zoned for new residential developments for the next 10 years. The Greater Blanchardstown area has grown at an unprecedented rate from a population of 40,000 in 1990 to in excess of 80,000 today, and with the increased densities there is sufficient residentially zoned land for 120,000. Based on the rate of development we have seen since 1990 it is expected to reach a population of 120,000 by 2010 (Fingal development board projects 118,000 by 2011, dated 2001).

This population growth will be a major challenge to all involved in the provision of primary & secondary education in the Dublin 15 area. In 1995, the community council are concerned at the likely gap in primary & secondary school places in the foreseeable future (see detailed section on education).

In transport, there are no plans to increase road capacity between Dublin 15 & Dublin city center, there are long term plans to increase the M50 to 3 lanes, but no funding or realistic time scale. The only sustainable method of transport to cope with the population expansion in Dublin 15 is public transport, improvements over the last 10 years have been disappointing.

In this regard transport & education are interlinked, with the current situation of only 50% second level places for each primary place is leading to additional transport demand.

In short, the Dublin 15 area infrastructure is showing clear signs of being unable to cope with current demands; current new residential & industrial zoning will further exacerbate an already difficult situation. The Dublin 15 Community Council formally requests Fingal County Council to look elsewhere in the county for any additional new residential & industrial zoning.

3.2 No re-zoning north of the N3 until the new link road to the N2 is constructed and existing zoned area is developed to 70% of its capacity. The Industrial zoned land in Dublin 15 between the N3 and the N2 is currently the largest Industrial zoned area in the state. It is approximately seven (7) times the size of Sandyford industrial Estate. Recent transport studies commissioned by Fingal County Council (Clifton Scannell Emmerson – February 2000 and SIAS – unpublished) identify traffic flows into & out of the area. It came as a surprise to many that incoming traffic flows exceeded egress in the morning rush hr. The proposed link road to the N2 is critical to the development of the area, and is a pre requisite to the area growing to its potential. Given the existing constraints, the community council believes it would be reckless to increase the Industrially zoned lands beyond its current size. The evaluation of any expansion of this area north to the development boundary should wait until the new link road to the N2 is constructed and existing zoned area is developed to 70% of its capacity. Similarly any increase in residentially zoned land should wait for the above evaluation. The evaluation should include a detailed traffic study & model of the increase in demand.

Any proposal to re-zone the former agricultural laborites at Abbotstown should not occur without a evaluation of the industrial area to the north and a creditable transport plan. Given the deficit of sporting infrastructure in the area, it is the view of the community council that the lands be developed for sporting & recreational purposed for the local community. (see section 5, Sporting infrastructure deficit in Dublin 15 area).

3.3 New town in Fingal

We wish to propose that in order to provide sustainable future development in the Fingal area; planners must look at the whole of Fingal and the large underdeveloped areas that exist. We feel that the planners must concede that it is not possible for areas like Dublin 15 to be an area for future housing development.

- ◆ The amount of development in the past five years has been substantial and we feel that in the current situation where we are unable to provide vital road and transport links for the existing population and with proposed public transport plans still not implemented further development is unsustainable.
- ◆ No need for additional zoning in the Greater Blanchardstown area – see section 3.1 & 3.2
- ◆ To this end it would be much more viable to advocate developing a **new town** possibly in areas in north Fingal. The road and rail links

already exist and it would make for better planning for Fingal to look at developing a new development strategy with this in mind. The opening of the M1 removes a significant load from the existing N1 and offers opportunity for sustainable development elsewhere in the county.

- ◆ We believe Fingal County Council should compulsorily acquire a significant proportion of any new town (at existing use values) to compensate for the indirect infrastructure cost and to ensure that social & affordable housing are available.

4.0 Provision of primary & post Primary school sites to cope with the population growth (40k to 80k in last 12 years, with projections to 120k by 2011)

4.1 General

The Dublin 15 area has grown at an unprecedented rate from a population of 40,000 in 1990 to in excess of 80,000 today, and with the increased densities there is sufficient residentially zoned land for 120,000. Based on the rate of development we have seen since 1990 it is expected to reach a population of 120,000 by 2010 (Fingal development board projects 118,000 by 2011, dated 2001).

This population growth will be a major challenge to all involved in the provision of primary secondary & third level education in the Dublin 15 area. In 1995, the community council are concerned at the likely gap in primary & secondary school places in the foreseeable future.

Statistical data available (does not include recent years enrolments & reduction of school capacity due to maximum class size regulations)

Post primary schools in the Dublin 15 area

Roll No:	Post primary school name	Post primary school address	1998/99	1999/00	2000/01
91316Q	Blakestown Community School	Blakestown, Blanchardstown	803	771	695
60100Q	Castleknock College (private)	Castleknock	552	533	522
76062B	Castleknock Community College	Carpenterstown	648	901	1026
91315O	Coolmine Community School	Coolmin, Blanchardstown	1056	1030	1050
91339F	Hartstown Community School	Hartstown, Clonsilla	972	984	977
70081V	Riversdale Community College,	Blanchardstown Rd North	578	530	502
Total Post Primary Sch.			4609	4749	4772

Primary schools in the Dublin 15 area

Roll No:	Primary school name	Primary school address	1998/99	1999/00	2000/01
20098I	Castleknock Educate Together	Beachpark, Castleknock	0	34	84
18623M	Castleknock NS (C of I)	Main St, Castleknock	135	144	150
	Mary Mother of Hope	Littlepace			
16675V	Mulhuddart NS	Mulhuddart Village	108	109	108
19755L	Sacret Heart of Jesus NS	Huntstown	816	862	913
19769W	School Thomas NS	Laurel Lodge Castleknock	970	914	886
19850F	Scoil an Cheathrar Alainn NS	Ladyswell	499	459	421
18046A	Scoil Bride Boys NS	Blanchardstown	290	277	270
18047C	Scoil Bride Girls NS	Blanchardstown	297	312	292
19605P	Scoil Mhuire J NS	Blakestown	317	310	296
19694R	Scoil Mhuire S NS	Blakestown	442	386	355
	Scoil Oilibheir NS	Coolmine			
00697S	St Brigds NS	Beachpark, Castleknock	842	831	848
19644C	St Ciaran's NS	Hartstown	849	819	782
19435Q	St Francis Xaviers J NS	Roselawn, Castleknock	439	416	418
19470S	St Francis Xaviers Senior	Roselawn, Castleknock	554	544	493
18778S	St Mochta's NS	Porterstown	399	437	479
19545A	St Patricks J N.S.	Corduff	233	194	205
	St Patricks N.S.	Diswelstown, Castleknock	0	0	0
19636D	St Patricks S N.S.	Corduff	289	265	230
19601H	St Philip the Apostle JNS	Mountview Clonsilla	240	233	232
19643A	St Philip the Apostle SNS	Mountview Clonsilla	276	273	266
Total Primary School			7995	7819	7728

Some shocking statistical data:

Currently there are ~ 8,000 primary school places and 4772 post primary school places (including private school places) in the Dublin 15 area (2001 data).

There is significant resistance by developers to provide sites for secondary schools which **results in the commuting out of the area by ~ 50% of secondary school students** – hardly an example of sustainable development.

The number of school places has marginally increased in the last 8 years while the population of the Dublin 15 area has increased by ~ 100% in the last 10 years.

Proposed objectives of the County Development plan for *Dublin 15*

- ◆ To ensure that adequate & sufficient sites are reserved in the County Development plan and Area Action Plans of Fingal County Council.
- ◆ Specifically address the under provision of Post Primary places in Dublin 15.
- ◆ To look at the zonings for educational facilities, to ensure that they are not replaced with residential housing when the funding to purchase the lands does not keep pace with development. – it may be appropriate to create a new zoning for educational facilities or use the table of what is permitted / open for consideration in land zonings to secure the sites.

- ◆ To ensure that sites reserved for educational use are in appropriate locations, and are not relocated to less advantageous locations, ring fence the PS & PPS reservation with a new zoning.
- ◆ To ensure that the educational needs of the population growth that has recently taken place and the new developments under construction or in the planning phase are represented to statutory and other bodies.
- ◆ To raise awareness with other statutory bodies that as a consequence of the rapid development in the Dublin 15 and higher densities, the area should be accorded priority funding for new schools, as it's projected population rise cannot be accommodated in the existing facilities.

4.2 The Castleknock catchments area

The Castleknock catchments area needs to be addressed with an additional reserved site in the development plans:

The Castleknock community college (post primary school) catchments area includes the following primary "feeder" schools:

- St Thomas (Laurel Lodge),
- St Moctas (Porterstown)
- St Bridget (Beach park)
- Castleknock NS (C of I).

Currently this secondary school can not accommodate all children transferring from these schools (~80 children refused places for 2004/5).

The local demand is such that 2 new primary schools :St Patricks (Diswellstown) and Educate Together (Beachpark) have been established and 2 additional schools are planned (Phoenix park racecourse site & Educate Together – Diswellstown).

To accommodate this inevitable demand a second post primary school is required to meet the educational needs of the area. The option of sending the children to the adjacent schools in Dublin 7 is not feasible given the new developments in the Pelletstown area. Similarly any capacity in the other schools in Dublin 15 will be filled by new developments in the Clonsilla & Tyrelstown area.

In the appeal of the Hansfield SDZ by the developers (Manor Park Holmes Ltd & Menolly Holmes Ltd) their consultant (RPS McHugh) identified the need for a secondary school in the Diswellstown area (page 3, paragraph 3, copy of the report in appendix):

It is clear from the official statistics that the biggest demand for post-primary school places is located in the Diswellstown area of Blanchardstown where Castleknock Community College is located. There is substantial residential development yet to occur in this area(c. 2,300 units) and a significant amount already occurred or committed and only a limited number of post primary schools serving that area. It is likely that there could be demand for a further post primary school in that part of Blanchardstown.

We further note that the Menolly Homes has submitted a planning application to Fingal County Council for a 295-unit residential scheme on a 28-acre site opposite Farmleigh House off Whites Road on the edge of the Phoenix Park. The site carries a zoning of "two houses per hectare with septic tanks" – in the current development plan. The developer has challenged the density given it's location.

The community council would challenge any increase in density without a contribution to the sustainability of the area to support higher density. Specifically we are calling for the developer to provide a site for the much needed *post primary school*. We are calling for the development to be conditioned on the hand over of a site for a 1,000-student post primary school to Fingal County Council (in addition to class 1 & 2 POS) as a condition of developing the area. In any material contravention of the current zoning, the school site should be protected with a suitable zoning to enable the site be acquired at agricultural land prices & ring fenced to prevent the developer appealing the requirement to provide the site to An Bord Pleanala.

4.3 The Littlepace / Castaheaney catchments area

The Littlepace / Castaheaney catchments area that need to be addressed with an additional reserved site in the development plans:

The pace of growth in this area has enormous and considerable lands remain to be built on. The bulk of the remaining population as the area expands from 80,000 to 120,000 is expected to be in this area. The population profile is predominantly starter homes, which typically present children to primary schools within 5 to 10 years after initial occupation of residential units, this population enter post primary schools after 8 years. Given the explosive growth of the Littlepace / Castaheaney / Hansfield area the community council believe that the area is inadequately provided for. We also note that the Hansfield SDZ landowners have appealed the requirement to provide post primary schools to An Bord Pleanala.

5.0 Sporting infrastructure deficit in Dublin 15 area.

5.1 Lack of facilities in the Dublin 15 area

We would like to draw the Planning Dept's attention to 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 *Fingal County Council* is making this problem worse by failing to provide sustainable access to Class 1 public open space in most recent planning applications. The trend of locating the Class 1 public open space remote from the housing developments, deprive the residents of (sustainable) local access and 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 residentially zoned lands, 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)

5.2 Undue delay in developers handing over class 1 Public Open Space

There are numerous examples of undue delay in developers handing over the class 1 Public Open Space to the local authority for sporting & recreational activities. The Diswellstown class 1 Public Open Space was originally a condition of the Bramley Wood estate (started in 1989 & completed in 1991), it was subsequently extended as the developer completed other estates in the area, however none of it appears to be taken in charge, and the area remains a litter black spot.

5.3 Scribblestown action plan

The Dublin 15 community council made submissions to this study, and believes that the objectives of this study should be incorporated into the county development plan.

5.4 Abbotstown

The Government plans to transform this area into a sporting center have floundered because of the poor access to these lands (for a 80,000 seat

stadium). We believe these lands should be used to address the sporting deficit in the Dublin 15 area. Any change in zoning should be to amenity lands with a specific objective of encouraging local participation in sport.

6.0 Transport infrastructure

6.1 Proposed line of metro

Attached in appendix, is our proposed metro route through the Greater Blanchardstown area. We have submitted this route to the Rail Procurement Agency, and followed up with discussions. Our understanding is this route was accepted as a viable option. We would encourage you to discuss this route with the Rail Procurement Agency, and put it on the draft drawings.

6.2 Proposed outer orbital route

We strongly believe that this route should run west of the Greater Blanchardstown area. We strongly believe the initial proposal to run this down Blanchardstown Road North & South was fundamentally flawed and would have caused utter chaos.

6.3 General Transportation issues

- ◆ Traffic congestion caused by Blanchardstown Centre Public transport infrastructure within the County is very poor
- ◆ Need for Park and Ride at all train station and at stations in adjoining Local Authorities.
- ◆ An integrated transport system should be provided in order to encourage better use of public transport.
- ◆ Public transport infrastructure should be put in place before any housing development.
- ◆ There is no sense of Public transport plans being implemented.
- ◆ Maynooth Rail Service should be improved and the line electrified.
- ◆ QBC's and rail facilities should not be used as a reason for high housing unless they have adequate capacity.
- ◆ QBC's in Dublin 15 not effective.
- ◆ Master Plans should be developed for Park and Ride and QBC's in consultation with adjoining Counties
Need for more buses to run directly from Blanchardstown into the City Centre and not pick up along the way (very few Expresso services).
- ◆ Need for more buses for local services to be developed.
- ◆ Feeder Bus Services should be provided to Blanchardstown Town Centre and train stations.
- ◆ There should be adequate FREE parking at stations.
- ◆ Need for more park and ride facilities possibly as far out from hubs as possible.
- ◆ Routes of possible future rail and metro lines should be protected.
- ◆ The future Outer Ring Road should be located west of Blanchardstown and Lucan not through the greater Blanchardstown area itself.
- ◆ Long queues at the junction of Hansfield Rd and Clonsilla Rd, this is a real bottleneck and the council should adopt a specific objective to come up with a solution acceptable to the local community. The existing bridge layout & design can not cope with the demand, but the poor traffic flows

make the morning & evening situation unbearable. This is an important junction as it is immediately next to Clonsilla rail station.

- ◆ Potholes on Hansfield Road & lack of a safe footpath.
- ◆ Speed limits should be reviewed as new residential estates are built..
- ◆ Noise pollution from airport needs to be addressed; any flight paths over the residential areas of Dublin 15 should be discouraged. The use of helicopter maintenance facilities without valid planning permission should be closed down.
- ◆ Need for better traffic calming measures in many areas to discourage excessive speeding and for weight restrictions in residential areas.
- ◆ More road signs are needed especially on busy routes.
More maps are needed at new estates (good example is Laurel Lodge) as there is often a very large time lag between the initial occupation of a dwelling and it's appearance on the current standard ordnance survey street map of Dublin
- ◆ Avoid cycle/paths through small estates in order to alleviate anti-social behaviour.
- ◆ No houses should be occupied in new developments until public footpaths, roads and lighting is in place.

7.0 Housing strategy objectives

7.1 Participation in planning process

The participation of community groups in the planning process has been curtailed by recent legalisation (requirement to have observations into the local authority within 5 weeks to participate and potentially appeal the decision to An Bord Pleanala). This places many difficulties for voluntary groups, as they have to travel to the FCC offices in Swords to inspect the planning file during FCC's office hrs. It is recommended that Fingal County Council adopt the following to ensure openness, transparency & participation in the planning process.

- ◆ Require all developers (other than house extensions) to submit their written documentation in a word document. That document would be then posted on the Fingal County Council web site on day 1 of the 5 weeks available for public comment, observations & submissions.
- ◆ Require all developers (other than house extensions) to submit their drawings in a .wdf format drawing. (this is not the AutoCAD drawing, merely a "picture" of the drawing, that can be viewed in a similar manner to an adobe document). That .wdf format drawing would be then posted on the Fingal County Council web site on day 1 of the 5 weeks available for public comment, observations & submissions.
- ◆ Fingal County Council web site would adopt the current practise of An Bord Pleanala of publishing the planning report(s) and the executive decision. Currently An Bord Pleanala publishes the Inspectors report, the Bord decision and the Appeal notice (even if the Bord disagrees with the Inspectors decision).

- ◆ Fingal set up an account where a voluntary group can lodge (say 100 euro), and with a password in the covering e-mail, submit an observation within the 5 week time limit.

7.2 Affordable and Social Housing

The Community Council proposes that the Council should undertake an initiative to advance the cause of affordable and social housing within the County.

It is recommended that the Council

- ◆ Identify areas / land banks suitable for affordable and social housing.
- ◆ Establish a purchase fund to compulsorily acquire those lands identified at agricultural values.
- ◆ Hold an architectural competition for the design and outlay of the housing scheme- to incorporate the mix of households necessary to establish a broad base community.
- ◆ Hold a competition to allow developers build the new housing under licence.
- ◆ The Council is helping to control and retard development land price and hence the consequential price of housing built thereon.

It is also encouraging PPP type schemes, which central government seems so keen on.

7.3 Real communities

To establish real communities we must have commitment to community focused planning and development policies. We must move away from the 'build and be damned' housing policy, which we have blindly followed since the seventies. This policy demands that people must have houses to live in - full stop - that is where the policy ends. It merely sees the provision of the units themselves as the end.

We can no longer treat critical cultural economic and social supports as secondary considerations in planning new communities. That regrettably is largely the attitude we see applied towards housing/residential development in Dublin 15.

We have a shortage of primary and secondary school places in the areas that need them, poor / non existent access to public transport and a severe deficit with regard to cultural, recreational/ leisure facilities.

As both facilitators and providers of the aforementioned services, we would urge the council to reappraise its strategy in the areas mentioned.

Adopt a proactive and dynamic approach to ensuring that :-

Schools are provided as areas are built –dedicate school sites as a condition of planning – vest such sites in the Council.

Actively pursue the provision of transport links

Insist that community, social , recreational / leisure facilities are provided to new communities

– Levy developers under the Planning Acts to provide the above.

We marvel at the three major council parks that exist in the north of the county for a population a fraction of that of Dublin 15. Yet despite the expiration of another Development Plan, no moves have been set in motion to acquire a similar facility for the County's largest conurbation.

The Council should now give serious consideration to acquiring the lands of the Guinness family in the Liffey Valley with a view to establishing a County/regional Park for the area.

7.4 Community Forum Submission to Fingal County Development Plan 2005 – 2011

Attached in appendix is the Community Forum Submission to Fingal County Development Plan 2005 – 2011, which is endorsed by the Dublin 15 community council.

8.0 The built environment.

8.1 Population & Housing

- ◆ Housing estates should be designed in order to promote a better sense of ownership, community and identity, rat runs through estates should be discouraged in all situations & developers required to provide distributor road network.
- ◆ High density development is acceptable where the infrastructure exists (especially at public transport stops) and there is community support. Where developer seeks to claim a development is within 1 K radius of a rail station or 500m radius of a QBC but the actual access route for pedestrians is substantially in excess Higher Density applications should be refused. The inspector that checks site notices should verify the access route is within 1k/500mm.
- ◆ The Council should discourage exclusive own door apartments, as these are used to evade the requirement to provide disabled access as part of section M of the building regulations. Own door apartments with 1, 2 or 3 flights of external access are not accessible for permanently or temporally disabled people. Disablement can occur to people who are able when they purchase their dwelling, it can also occur at different stages of life (parents with young children / older people) Lifts should be provided in all buildings over 2 storeys in order to ensure access for all
- ◆ Houses in side gardens should not be permitted unless they are in keeping with existing design, ad hoc increases in density (where houses are replaced with apartment blocks should be discouraged)
- ◆ Needs of the existing population should take precedence over outside and future needs.
- ◆ Need for better enforcement of conditions on housing developments.
- ◆ Too much high density development taking place when there is not the transport infrastructure to justify.
- ◆ Planners should take cognizance of anti-social behaviour when planning paths, greens, rights of way etc.
- ◆ Bad housing design - need for design guidelines.

- ◆ No more development should be allowed until infrastructure is in place, infrastructure should lead development.
- ◆ Levies on development land should provide for the cost of water, drainage, roads etc for the whole infrastructure rather than just local distribution.
- ◆ Detailed flood plain analysis & published maps are required to avoid the danger of development on flood plains.
- ◆ More trees should be planted particularly between Blanchardstown Shopping Centre and West End Retail Park i.e. Snugborough Road.
- ◆ Allotments should be provided in agricultural lands on the periphery of residential areas.

8.2 Recreation, Leisure and Tourism

- ◆ Hotels and B&Bs needed in Greater Blanchardstown area to promote tourism.
- ◆ Tourist potential of Liffey Valley should be exploited in conjunction with adjoining Local Authorities.
- ◆ Need for better control of dumping particularly on narrow roads and small pockets of land.
- ◆ Need for more litter wardens.
- ◆ Problem of rats along the canal should be tackled.
- ◆ Public walkways should be safe and adequately lit.
- ◆ Developers should be responsible for cutting grass, hedges until areas are taken in charge by the Council.
- ◆ The replacement provision for public open space should be eliminated – no Class 1 open space more than 1km from the community it serves.
- ◆ A park should be created in Strawberry Beds. Tolka Valley should be opened up as a public amenity.
- ◆ Link the three waterways which run through D.15 by means of walkways and cycle paths.
- ◆ Huge shortage of sports/playing facilities in the area.
- ◆ The needs of Castlenock Hurling and Football Club should be given priority.
- ◆ The Royal Canal should be developed as a public amenity area.
- ◆ Keep Abbottstown as an amenity area.
- ◆ Need to maintain green spaces to counteract pollution.
- ◆ No further erosion of existing greenbelts in Greater Blanchardstown area.

9.0 The visual amenity.

9.1 Preserving the Arch heritage

The National Inventory of Architectural Heritage (NIAH) is a state initiative managed by Dúchas The Heritage Service under the Department of Arts, Heritage, Gaeltacht and the Islands. The NIAH aims to promote the appreciation of, and contribute to, the protection of the architectural heritage by systematically recording the built heritage on a nation-wide basis. The buildings & structures identified in the survey carried out by the

National Inventory of Architectural Heritage (NIAH) in Fingal this year should be protected by listing them for preservation on the lists incorporated in the development plan.

There has been a history of “protected structures” damaged by arson. Fingal need to insert a strong statement that any protected structure damaged by arson will have to be restored prior to the occupation of houses within a 1 k radius of the protected structure in the ownership (or any subsidiary) of the developer.

9.2 Heritage & Conservation

- ◆ A clearer definition of ‘Sensitive Landscape’ is needed & the guidelines permitting any developments in Sensitive Landscape’. The provision of 3 story duplex developments in the Sensitive Landscape adjacent to Castleknock college shocked the community.
- ◆ Views and vistas along the Liffey Valley should be preserved.
- ◆ Old cottages should be preserved and restored.
- ◆ Ongar House and Abbottstown House should be preserved.
- ◆ More active steps needed to ensure security of Protected Structures.
- ◆ High Amenity zonings along the Liffey Valley should be strengthened to protect the area from future development. The possibility of designating the area as a National Park should be explored.
- ◆ Liffey Valley SAAO should be extended as far as Kildare boundary.
- ◆ Conservation of the Liffey Valley between the Porterstown Road and the River should be key feature of the new plan.
- ◆ Importance of greenbelt areas and wildlife corridors.

9.2 Developing the Liffey valley & Schackelston’s Mills

- ◆ Many welcomed the purchase of Schackelston’s Mills in the Strawberry Beds. We recommend a public consultation to develop an action plan to make the site and the remainder of the Strawberry Beds an accessible and a sustainable leisure destination, without destroying the delicate eco system that makes this area the jewel in the crown of the Greater Dublin region.
- ◆ The lack of a footpath in the Strawberry Beds means that currently the area can only be safely enjoyed in a private car or a canoe.

9.3 .Recognizing Architectural elegance

There should be a competition every 2 years in Fingal to recognize new and restored buildings of Architectural elegance. Rather than become a RIAI event where Architects recognize each other, it should be the members of the public that nominate buildings they actually like.

Examples of Architectural elegance in the Dublin 15 area are:

- Molloy’s Off License on the Clonsilla Road
- The National Aquatic Centre

10.0 Community Development, Towns &

- ◆ A recycling facility should be provided at the Coolmine Depot.
- ◆ Community facilities not provided in tandem with housing - conditions requiring developer to provide shops, services and neighborhood facilities at the same time as housing estates. This is particularly important where new development takes place i.e. Tyrelstown
- ◆ Lack of child care facilities. Need enforcement of planning guidelines around provision of child care places in new developments. **Note Dublin 15 Community Council appeal was necessary to force Lido developments provide a crèche at the former Castleknock college lands**
- ◆ Levy on housing developments should be used to provide extra community facilities.
- ◆ All development should be built so as to encourage a sense of community.
- ◆ School buildings should be multi-functional and available for community use outside school hours.
- ◆ More effort should be made to create circumstances where young people in disadvantaged areas can thrive.
- ◆ Playgrounds and facilities for young people should be provided. The lack of places in Dublin 15 is appalling, there are more golf clubs than children's playgrounds. The progress on providing a children's playground in the millennium park has been disappointing.
- ◆ Urgent need for Health Centres in Mulhuddart and Little Pace.
- ◆ Need to build sustainable communities.
- ◆ Not enough schools currently (both primary and secondary) - should more housing be conditional on the provision of more primary & secondary places?
- ◆ School sites should be identified in new developments and should be vested in FCC until the Dept. of Education can build the school.
- ◆ Need for better facilities for older people - amenities not nursing homes.
- ◆ Elderly should be cared for in their community with day care facilities.

Towns,

- ◆ Need to protect and enhance the character of Castleknock Village.
- ◆ Need to protect and enhance the character of Clonsilla Village
- ◆ Need to protect and enhance the character of Mulhuddart Village
- ◆ Need to protect and enhance the character of Blanchardstown Village

Thank you for the opportunity to comment at your public consultation in Coolmine community school earlier this summer. We look forward to the next phase of the development plan process. We would be happy to discuss the content of our submission at a mutually convenient time.

Yours sincerely

Kieran O'Neill

Treasurer Dublin 15 Community Council
Convener Planning Sub Committee.