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By e-mailed to devplan@fingalcoco.ie
Senior Executive Officer,
Planning Department,
Fingal County Council
County Hall
Swords
Co. Dublin

22 October 2006

Dear Senior Executive Officer

On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following observations on the call for submissions into the Local Area Plan for:- Lands at Hollywoodrath, Dublin 15

Infrastructure gaps have occurred in Dublin 15 over the last 20 years as a result of the rapid development of the Greater Blanchardstown Area, and particularly in the adjacent Tyrrellstown area where the provision of recreation, sporting and educational facilities has not kept pace with the development of new residential areas. These lands offer the opportunity to address existing needs.

We welcome the amended proposal to locate a primary school site on these lands. Our specific submissions, observations and concerns are as follows:

1.0 General planning issue

The experience of people in Dublin 15 is that there is difficulty in obtaining school places for their children, particularly in areas that have rapidly expanded. It seems that the school places in the Dublin 15 area make national media headlines each year.

The Dublin 15 area has grown at an unprecedented rate from a population of 40,000 in 1990 to in excess of 92,000 today. The area is transitioning from an outer suburban to higher densities. Prior to 2000, development was mostly 2 story semi, now the majority of development is apartment / townhouse.

With the increased densities there is sufficient residentially zoned land for 140,000. 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 projected 118,000 by 2011, dated 2001).

The population is also changing, and has become more diverse, with significant ethnic minorities (Chinese, Eastern European and African).

The area is predominantly development led, with infrastructure in continuous catch up mode. Examples are shortages in schools, overcrowded public transport, distributor roads constructed up to 10 years after the first phase of development.

Our research has shown that the provision of new schools both primary and secondary has failed to keep pace with the growth in population, we believe that the provision of primary and secondary education needs to be provided within the Dublin 15 area, as commuting out of the area Dublin 15 for school places is not sustainable.

In summary 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.

2.0 Provision of primary & post Primary school sites to cope with the population growth in Dublin 15.

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 were concerned at the likely gap in primary & secondary school places in the foreseeable future. As a result of this concern we commenced a survey of places available in the locality in May 2003.

From the enrolment data of pupils in primary schools we concluded that 3 post primary schools would be required to cope with this demand. In the intervening years the demand for primary school places has continued to rise.

The Department of Education & Science made a submission to An Bord Pleanála in November 2005 at the oral hearing of the Hansfield SDZ.

Our position on this issue remains unchanged. The level of residential development in the general Dublin 15 area and the consequential demand for educational provision effectively means that all existing educational infrastructure will be fully utilised serving children emanating from existing developments. Therefore, it is of vital importance that significant new developments such as the Hansfield SDZ should contain provision for the delivery of new educational infrastructure to serve the needs of that specific area as no

capacity exists in the surrounding area to absorb the demand for educational provision which will inevitably arise due to the level of planned residential units.

The importance of making adequate provision for new schools in the Hansfield Strategic Development Zone cannot be over emphasised.

Late in 2004 School Planning Section carried out a study on future school requirements in the Dublin 15 area. This study identified the need for four new 24 classroom schools or provision to provide 96 new classes in total at primary level. At post primary level a need was identified for an additional three new post primary schools or provision to provide circa 4000 new places at post primary level. This study was based on housing developments since 2002 and took account of additional units constructed as well as those under construction and those with outstanding planning permission. The study did not take into account of developments for which planning permission had not been granted and therefore did not include the Hansfield SDZ.

Although the Department of Education & Science submission related specifically to Hansfield there are 2 significant points that apply to the Hollywoodrath area:

- ❑ 4,000 additional post primary school places are required for the Dublin 15 area. Currently there are only 2 reserved sites for post primary schools (12 acres required per school) in Hansfield and Phibblestown. The size of a large modern post primary school is 1,000 pupils. It is clear to the community council that 1 additional site is required in the Castleknock / Diswellstown area and 1 additional site is required in the Tyrellstown / Hollywoodrath area.
- ❑ Department of Education & Science estimates only take into account developments since 2002, those under construction and those with outstanding planning permission up to November 2005. It is clear that there will be a shortage of primary school places in the Hollywoodrath / Hollystown area. Educate Together have made it clear that they will not permit their schools to increase beyond 16 classroom (2 classes per year). Given the experience in Castaheany this year it is clear that a new primary school will be required to serve the Hollywoodrath / Hollystown area

3.0 Planning for the educational needs of new areas.

In our submission to Fingal County Council on the 2005 County Development plan we requested

- ◆ To ensure that adequate & sufficient sites for primary and post primary schools are reserved *for Dublin 15* 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 place

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 its projected population rise cannot be accommodated in the existing facilities.

When our Local councillors attempted to raise this issue they were informed that the provision of school sites would be dealt with when developing local area plans. We believe that it is essential that a primary school sites is identified within the LAP and consideration be given to locating a post primary school site on the same campus within the LAP.

4.0 Issues around provision of new school sites.

The main obstacle of new schools is to secure agreement on a site (even when it is reserved). Clearly with residential-zoned (and serviced) land prices at a premium, this presents a major funding issue for the Department of Education & Science and their agents. It can be an insurmountable obstacle for the patrons of a new school to secure temporary premises.

In our submission to Fingal County Council on the 2005 County Development plan, we requested that they protect the reserved sites for educational facilities, to ensure that they are not replaced with residential housing when the funding to purchase the lands does not keep place with development.

Experience with reserved sites for schools held in private ownership is that developers are very reluctant to sell the sites for schools. This was demonstrated with Menolly Homes in Castaheany / Ongar and Park Developments (Castleknock Community College and later with the Primary school in Diswellstown).

We request that a condition be inserted in the LAP to encourage the provision of school sites by phasing the development and the school. We request that only 30% of the area is permitted to proceed to construction in the absence of a primary school site and only 60% of the area is permitted to proceed to construction in the absence of a post primary school site.

5.0 Transport infrastructure issues.

The Dublin 15 area is located in Fingal County Council; it was planned as one of the 3 western “new towns” to the west of Dublin city. The Dublin 15 area is one of the fastest growing areas in the state, and is to accommodate some 25% of Dublin’s planned housing expansion in the next 10 years. As a result of its rapid expansion severe congestion is evident on both major and local roads. This congestion is a daily feature of RTE’s traffic report on the “Morning Ireland” radio program.

Fingal County Council responded to this by commissioning the “Blanchardstown catchment area integrated development framework” study. The study revealed that there were 11,730 person trips leaving the area, 12,452 person trips entering the area and 4,822 internal person trips in the morning peak.

In addition to the residentially zoned land, there is a large industrial zone in north Blanchardstown of ~650 hectares with approximately 490 ha to be developed. This is likely to further increase the morning peak transport demand.

The area is constrained by geography; it is bisected by the M50, N3 and the Maynooth rail line, which restrict through movement and commuting patterns to Dublin city centre and the industrial areas north of the N3. As a result there is limited egress from the area with the main M50/N3 junction at capacity (Fingal commissioned report - Clifton Scanlon Emerson study February 2000).

General Transportation issues

- ◆ Key roads to distribute traffic within the area remain to be constructed (particularly the link road between N2 and N3 to the south of this area.
- ◆ Public transport infrastructure lags new developments, with route extensions taking place only after the area is taken in charge by local authority (long after the houses are occupied)
- ◆ Chronic overcrowding, lack of capacity & poor frequency on Maynooth – Dublin city centre Rail Service.
- ◆ QBC’s in Dublin 15 not effective, it takes ~30 minutes to exit area and more than 1 hr to travel to Dublin city centre. This is the only QBC route where travel by car is quicker & journey times have not reduced.
- ◆ Long queues at the access junction of the N3, and congestion on the N3 making the journey to existing schools difficult.

It is clear from the enrolment figures in schools within the Dublin 15 area that there is a overwhelming demand for children to be educated close to their own area. Transport is a key factor in that decision. The areas in the immediate vicinity of schools have to accommodate the morning and evening influx of cars dropping children to & from schools. One way of minimising this impact on local residents is to provide safe cycling routes to help children get to the schools.

Summary

In summary 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

Our research has shown that the provision of new schools both primary and secondary has failed to keep pace with the growth in population, we believe that the provision of primary and secondary education needs to be provided within the Dublin 15 area, as commuting out of the area Dublin 15 for school places is not sustainable. The geography is further complicated by the fact that internal road linkages within the Dublin 15 area are very poor, necessitating an even distribution of schools within the area

We are available to discuss further any of the issues raised in our submission.

Yours sincerely,

Dublin 15 Community Council