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Representing: Blanchardstown-Castleknock-Clonsilla-Mulhuddart

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A Chara

On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following representations on the SDZ planning scheme, Hansfield, Blanchardstown, Dublin 15. You may be aware that the Dublin 15 Community Council is one of the appellants of the SDZ, in our oral submission we requested that the SDZ be amended to address our concerns rather than rejected.

Our original concerns

- 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.
- Majority of public open space is remote to the SDZ, with 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 of children's play areas.
- Urban design – housing mix & parking standards.
- Provision for sheltered housing to cater for the elderly and vulnerable is flawed.

There is considerable concern in the Dublin 15 Community Council with this proposed Strategic Development Zone, of primary concern is that the development of this land 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 proposal as it stands, without integrating with the transport, will just add to the already overloaded road network. Ultimately it will feed into 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.

The Rail service along the Maynooth – Dublin city centre is inadequate to meet the existing demand. Currently the 8.30 train leaving Clonsilla Rail Station has a considerable number of standing passengers, making it difficult for passengers to board at Coolmine and extremely difficult for passengers to board at Castleknock rail station. It is unlikely that passengers will be able to board at the new Phoenix Park Racecourse rail station without a substantial increase in train capacity. Recent improvements by Irish Rail have lengthened all the platforms on the Maynooth – Dublin city centre line to permit boarding of 8 carriage trains and the rolling stock replaced with “Arrow” type high capacity train. In looking at the rail transport situation, consideration must be given to developments in Co Kildare and in the Dublin City Council area, in particular the Pellettstown development which is expected to add considerably to demand.

There are clear signs that no additional passengers can be accommodated from the Hansfield SDZ without additional peak time trains. It is not sustainable to feed additional passengers to Clonsilla rail station without additional peak time services.

Our recommendations:

For the SDZ to succeed there needs to be clear linkages between the delivery of services and the phased development (like the Adamstown SDZ). 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.

1.0 Transport.

We believe the following linkages are essential.

Phase	No of dwelling	Service	Delivery of service prior to occupation of dwellings	In current proposal
Phase 1 a	0-500	QBC Bus	Bus operational on Ongar Road	Yes, on completion only.
Phase 1 b	501 – 1,000	Train (Maynooth)	Commencement of Irish Rail’s phase 2 service of 6,600	No
Phase 2	1,001 – 2,000	Local bus	Local bus service, Commencement of Irish Rail’s phase 3 service of 10,200	No
Phase 3	2,001 – 3,000	Train (Dunboyne)	Commencement of Irish Rail’s service to Dunboyne.	Yes or density reduced if not delivered.

The phasing scheme (section 10.1.) needs to be amended as follows:

Insert new phase;- Phase 0

That no units be occupied prior to

- The completion of the Ongar Road
- The completion of the Ongar Road QBC

Phase 1a (0-500 dwellings)

- No units shall be constructed in Zones 2 or 6
- The provision of new bus route running from Hansfield along the Ongar Road QBC, Snugboro Road QBC passing the Blanchardstown Centre and onto the N3 bus route
- The commencement of improvements to Clonsilla Station (as per revised plan).

Phase 1b (500-1000 dwellings)

- No units shall be constructed in Zone 6.
- The completion of Phase II of Iarnrod Eireann's rail service upgrade allowing for an increase in inbound capacity along the existing train line from 4,200 to 6,600
- The completion of improvements to Clonsilla Station (as per revised plan).
- Provision of a park & ride in vicinity of Clonsilla Station (as per draft development plan objective).

Phase 2 (1000 – 2,000 dwellings)

- The completion of Phase III of Iarnrod Eireann's rail service upgrade allowing for an increase in inbound capacity along the existing train line to 10,200

2.0 Education

There is considerable demand in the surrounding areas for primary school places, with the provision of school places lagging demand and the bussing of young children to temporary facilities in Lucan. We believe the provision of the first primary school should be linked to Phase 1A, with the post primary site linked (as currently proposed to phase 1B).

The SDZ concentrates the primary and post primary schools in 1 area to the west of the SDZ. Access to schools should be designed so as to separate the pedestrian movements of primary and post primary children.

3.0 Community facilities (Community centre, public open space, village centre)

We note that none of the facilities are proposed for the lands to the south of St Joseph's Hospital. We consider that in the interest of sharing the burden between landowners, that provision of a park & ride car park is provided in these lands (as per draft development plan objective).

4.0 The visual amenity – the 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.

The Clonsilla M3 interchange railway line feasibility study published by Irish Rail identifies a Pylon on the rail reservation. This has to be relocated to facilitate the re-instatement of the Navan line (page 17 of 33). The 110kV line will be impacted in any event and excuses not putting the line underground on the basis of an impact to the power lines do not stand up.

We note that in granting permission for the Adamstown SDZ An Bord Pleanála attached the condition (no: 19) that the overhead power line traversing the site be diverted or placed underground.

5.0 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. There is no sustainable access to this 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). The deficiency of the draft planning scheme is that it does not set specific targets for intensive recreational / amenity / community facilities (other than the 30% of POS requirement)

The SDZ is close to Beachpark and other lands required to be ceded to Fingal County Council, under the grant of previous planning permissions. A pedestrian bridge across the Canal & railway line is required to provide sustainable access to the open space. If direct access was provided to Class 1 Public Open Space at Beachpark (which is conditional on other developments) and these lands were developed and open to the community prior to the occupation of Phase 1a, this would address the sustainable access issue.

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 replaced *“with that the community centre reservation revert to **open space when** a community facility is constructed as part of school facilities”*.

7.0 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 class 2 public open space areas that have a high degree of passive supervision, particularly in the vicinity of family housing units.

7.0 Urban design

The Hansfield SDZ is located in the periphery of an outer suburban area. The Dublin 15 area has traditionally attracted new families and young couples preparing to have a family.

Proposed housing mix

Housing mix	3,000 unit option	2,500 unit option
1 & 2 bed units	52 -64 %	43 – 55%
3 bed units	28 – 34%	37 – 43 %
4 bed units	7 – 13%	9 – 15%

The high % of 1 and 2 bedroom apartments proposed for the site is a concern. The justification for this high % is the public transport (that is necessary to make this SDZ development a success) will attract large numbers of single people who commute to Dublin city centre or to technology jobs in the Lexlip area. This is just one element that is required to attract large numbers of single people; other elements are proximity to a thriving entertainment area like Temple Bar and access to facilities that cater predominantly for adults.

It is considered unlikely that the SDZ (located on the periphery of an outer suburban area) will attract the housing mix proposed in the SDZ.

Standard of car parking proposed.

Dwelling type	Parking spaces in draft planning scheme	Proposed parking
1 bed units	1.25	1.25
2 bed units	1.5	1.75
3 bed units	1.75	2.0
4 bed units	2.0	2.0

It is proposed to reduce the parking standards in zones 6 & 7, this is a mistake for the following reasons:

- When commuting by public transport a car is still required for weekly supermarket shopping and access within the Dublin 15 area.
- Zones 6 & 7 will attract cars into the area looking for parking near public transport (e.g. Portersgate Estate)

8.0 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, to date 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.

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. **The linkages between the provision of transport and the development of the SDZ need to be strengthened for the scheme to be successful.**

We would request that the councilors evaluating the revised SDZ 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, to understand the scale of the problem.

The 110kV line & pylons is an enormous visual impact to the scheme and would not be tolerated in most urban areas. This will render a large section of the scheme unattractive to owner occupiers, and contribute to a transient population. The reluctance of the ESB to put this underground is understandable on cost grounds and will need to be carefully project managed to minimize the impact to customers. It is technically feasible to place the line underground without major impact to customers, who will be impacted in any event as one of the pylons is on the proposed rail line and needs to be moved.

We believe that the SDZ plan is the most effective way of ensuring that the necessary infrastructure is delivered with the development. We request that you consider our observations and incorporate the above concerns in the revised Hansfield SDZ Planning Scheme. We requested that the SDZ be amended to address our concerns rather than rejected.

Yours sincerely,

Kieran O'Neill,
Chairperson,
Dublin 15 Community Council