

DUBLIN 15 COMMUNITY COUNCIL

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Representing: Blanchardstown-Castleknock-Clonsilla-Mulhuddart

By e-mail to devplan@fingalcoco.ie

Senior Executive Officer,
Planning Department,
Fingal County Council,
County Hall,
Main Street,
Swords,
Co. Dublin,

26th March 2008

Dear Senior Executive Officer,

On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following observations on the call for submissions on land use and infrastructural assessment of the lands in the general area of Powerstown, Kilmartin and Tyrrelstown, Dublin 15, on the infrastructural requirements for future development and how potential development areas might be developed and integrated into the surrounding urban area.

The lands comprise significant quantum of unzoned lands in North West Dublin 15 which are identified as being within the long term 'Development Boundary' of the area in the Fingal County Development Plan 2005-11. These lands in the general area of Powerstown, Kilmartin and Tyrrelstown are positioned geographically to accommodate the possible future expansion of the Greater Blanchardstown urban area over the next 20 years.

Issues suggested for investigation in the study include:

- Provision of educational facilities, public open space and recreational amenities for the existing and future population
- Mix and extent of future residential and employment land uses
- Infrastructural requirements to serve potential future development
- Integration of the subject area with existing and programmed development areas adjacent
- Creation of a network of road, public transport, pedestrian and cyclist movement systems

1.0 Provision of educational facilities, public open space and recreational amenities for the existing and future population

1.1 Addressing the existing infrastructure deficit.

The adjacent area of Tyrellstown has seen considerable residential development over the last 5 years, growing from green fields to a community of 3,100 (last census).

The Tyrellstown residential development was accompanied by facilities like a hotel, neighbourhood center containing shops, supermarket and a public house. However this area has made national media headlines over the lack of school places to cater for its growing population.

The development was intended to address the pattern of social exclusion that was evident in the adjacent areas by changing the social – economic mix of population. To some extent the high proportion of private rental properties have frustrated this intent, as the area has a significant population reliant on rent supplement. The lack of infrastructure will increase this trend.

Some infrastructure deficits need to be addressed as a matter of urgency and as a first priority in any study of these lands. They are:

- School sites to cater for the immediate needs of Tyrellstown Educate Together.
- Additional primary school sites.
- A post primary school site.
- Playing fields and active recreation area
- Neighbourhood playgrounds.

One of the major lessons of the Tyrellstown developments was the folly of accepting a significant monetary sum in lieu of Class 1 Public Open Space. It subsequently proved impossible for Fingal County Council to purchase this Class 1 Public Open Space in the locality, (despite the presence of a significant land bank currently the subject of this study).

1.2 Providing for future population – education.

Changing the zoning of the lands in the general area of Powerstown, Kilmartin and Tyrellstown to new residential lands will generate demand for services. Experience elsewhere in Dublin 15 has shown that when developments are constructed sequentially their education facilities need to be provided as part of the lands rather than rely on adjacent facilities with subsequent overcrowding.

The reluctance of landowners to part with school sites is part of the local folklore.

The community's experience is that the delivery of new schools in Dublin 15 is painfully slow, with little or no co operation from developers. An example in the public domain is where Menolly Holmes & Manor Park appealed the requirement in the Hansfield SDZ to provide the site for the post primary school; the Dept. of Education robustly defended the school site at the An Bord Pleanala oral hearing stating clearly that there was no spare capacity in the existing primary and post primary schools in Dublin 15.

At the Oral Hearing to the Hansfield SDZ in November 2005 the Department of Education presented it's formula for calculating new school places as follows:

- ❑ Assumed occupancy rate of 3 per household
- ❑ National average figure for primary school attendance as a % of total population (11.3%)
- ❑ National average figure for post primary school attendance as a % of total population (8.5%)
- ❑ At a density of 20 housing units / acre, population would require 678 primary school places and 510 post primary school places.

From the formula used by the Dept. of Education the criterion is national average, it is to be expected that this would be surpassed in a rapidly growing area like Dublin 15. Clearly if the density was to increase this would drive a need for more school places. Hansfield SDZ oral hearing the Dept. of Education clearly stated that the schools in Hansfield were required for Hansfield.

For this area to be a successful development, the study must identify and hold secure sites for primary and post primary schools. The schools, ideally, should be located adjacent to the Class 1 public open space, so that playing fields are available in close proximity to the schools.

Irrevocable commitments in the form of sites need to be provided at nominal land value to the county council, as part and parcel of any rezoning emanating from this study.

1.3 Provision of open space and recreational amenities

As discussed earlier, one of the major lessons of the Tyrellstown developments was the folly of accepting a significant monetary sum in lieu of Class 1 Public Open Space. It subsequently proved impossible for Fingal County Council to purchase this Class 1 Public Open Space in the locality.

This issue needs to be addressed as a mater of urgency. The council is now in a strong negotiating position, having commenced this study. Part of any discussions with landowners in the study area should correct this deficit, by purchasing class 1 public open space at existing land use values.

1.4 Sporting infrastructure deficit in Dublin 15 area.

Lack of facilities in the Dublin 15 area

We would like to draw 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 addressing the disadvantage experienced by Dublin 15 and Swords area, we believe that the funding should be targeted at these areas. In the past clubs in similar areas would have fundraised to acquire playing fields, facilities etc.

The issue that make it very difficult for sporting organizations on their own to provide facilities is the cost of acquiring lands. The situation arises due to speculative pressure on land in proximity to residentially zoned land in the Dublin 15 area, which has made it virtually impossible for clubs to purchase their own lands.

1.5 Powerstown, Kilmartin and Tyrrelstown opportunity

In addressing the disadvantage detailed in “Fingal Sports Strategy 2003-2007” experienced by Dublin 15 and Swords area, we believe that the Class 1 public open space lands, should be made available locally to the public as a matter of urgency.

The study area will generate its own additional provision of public open space. Ideally this would be located within the study area to act as a visual break between the residential area and the adjacent industrial areas.

The study area is unique as it is generally owned by owner occupiers who in addition to their dwelling, own the surrounding lands. In contrast other development areas of Dublin 15 are in the hands of large property developers. This makes the identification of open space problematical; in the interest of fairness each landowner should contribute a portion of public open space. However for efficient use of active (Class 1) public open space, it needs to be in one area where the ground is sufficiently level for playing fields or other active recreation.

Resolution of this issue will involve consultation with the local landowners.

1.6 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.

Fingal county council has experienced considerable opposition to children’s play areas because of fear of anti social activities. These fears need to be addressed by:

- ❑ Designing in a high degree of passive supervision to deter antisocial activities (during daytime and when playground is closed). Passive supervision is both location and lighting levels.
- ❑ Lighting levels. There is an argument that providing lighting after normal hours encourages anti social activities (i.e. cider parties, drug abuse etc.). However having a playground in darkness will not prevent the anti social activities but will hide the activities. One of the features the success of the Riverwood playground is it’s proximity to adjacent street lighting, and the relatively clear view of the playground from the adjacent houses & apartments.
- ❑ Fencing. A perimeter fence or railing is required to provide a secure play area. Gates into the playground need to be spring loaded to minimize the risk of young children leaving the playground on their own.
- ❑ Soft surfaces. Soft surfaces prevent injury to children; they also make it difficult to break glass bottles.. We recommend that the synthetic rubber material is used.

- ❑ Parking. The playgrounds are designed for young children. The walking range of children is considerably less than adults. Children who live more than 250m away are likely to be brought in buggies, cycle on small bikes or be brought by public or private transport. The Riverwood Park attracts 3-5 cars during opening hours, the playgrounds will need to accommodate on street parking without causing a nuisance to residents.
- ❑ Provision of bins. It is important that the provision of bins in the vicinity of the playground (but not within the railings) are provided and regularly cleaned. If parents of young children come to a playground that has excessive litter or the debris of anti social activities, they will consider it an unacceptably high risk for their children, and cease to use the facility
- ❑ Park Ranger service. Fingal provide an effective Park Ranger service in their larger playgrounds (for example in Donabate). Small local playgrounds are unlikely to justify a permanent presence, however it is important that a regular presence is maintained to ensure the playground is actively managed to discourage antisocial activities.
- ❑ Requirement that the location of the children's playground is prominently displayed on all sales and marketing information used to promote the development, so that residents clearly understand the location of the children's playground prior to purchasing residential accommodation.

2.0 Mix and extent of future residential and employment land uses.

The study lands are bounded by the county border to the West, Greenbelt lands to the North, Science & Technology zoned lands to the South and to Residentially zoned lands to the East.

The study lands of Powerstown, Kilmartin and Tyrrelstown, Dublin 15 could logically be re-zoned either Greenbelt / Science & Technology / Residential or any combination.

It is worth reminding ourselves that Science and Technology (ST and ST1) is zoned for businesses requiring a high quality environment (in contrast to the General Industry (GI and GI1) for businesses with less demanding requirements).

The purpose of this Science and Technology land use designation is to provide areas for the location of high technology, research and development facilities, corporate/industrial offices, and support service facilities in a campus-like setting which ensures a high quality, aesthetic environment in accordance with an approved local area plan and subject to the provision of the necessary physical infrastructure. In certain locations there may be growing opportunities for many types of business operations to be carried on in tandem with residential and other complementary land uses in order to encourage balance and vitality.

In deciding what future direction these lands should take, the principles of the development plan should guide discussions.

- Strategy SIS3
To foster the development of socially and economically balanced sustainable communities, promoting social inclusion and the implementation of the National Anti-Poverty Strategy.
- StrategyCIS1
To promote and encourage the timely and appropriate provision and distribution of community infrastructure – including health, educational and social facilities – which are accessible to all the County’s residents.
- StrategyCIS2
To ensure that the additional demand created by new housing or employment-generating development does not outstrip existing or planned community services or facilities.
- StrategyOS1
To secure the provision of high quality, attractive and secure public and private open spaces, including playing pitches, together with appropriate intensive recreational/amenity/community/ facilities in association with all residential developments.
- StrategyOS2
To encourage a more sustainable use of residential zoned land through the provision of higher quality public and communal open spaces together with provision for recreational/amenity/community facilities (indoor or outdoor) of a more intensive nature, and the location where practicable of major public open space within greenbelt areas which are accessible to the local population
- StrategyES2
To reduce the need to travel, in particular by private transport, and to reduce journey times for the transit of goods, by matching the mobility needs of businesses with the accessibility of different locations, and by facilitating the provision of suitable employment opportunities within easy reach of housing.
- StrategyRS2
To develop an appropriate mix of good quality well-designed residential types and sizes and varying densities, and to counteract social segregation and facilitate the development of balanced communities by promoting mixed social/ affordable/ private housing development.
- StrategyRS3
To seek the provision of neighbourhood services and facilities that are compatible with housing development and that are required for sustainable neighbourhoods.
- StrategyRS4
To promote and improve residential amenity, and to provide public areas, public open space and indoor facilities that are attractive, safe and secure.

Discussion:

The Dublin 15 area currently provides adequate amount of residentially zoned land for the short to medium term.

According to a report recently presented to the local members of Fingal County Council recently,

- There are currently 33,012 houses and apartments in Dublin 15.
- At present approximately 2,650 of these are unoccupied.
- A further 1,704 houses and apartments are under construction in the area. When they are finished this will bring the total number of housing units in Dublin 15 to 34,716.
- Current planning permission for another 4,107 houses and apartments on various sites in Dublin 15. When these are built it will bring the total number of houses and apartments in the area to 38,823.
- The approximate capacity of residentially zoned lands on which there is no planning permission is 9,000 units. This figure does not include the potential for redevelopment in existing urban areas or smaller infill.”

What this means is that there is sufficient land in Dublin 15 which is zoned for housing and on which a further 9,000 plus houses and apartments can be built in the future. This will bring the number of housing units in the area to over 48,000.

There are currently over 90,000 people living in Dublin 15. When these houses for which planning permission has been granted, or for which lands have been zoned, are completed that population will grow to over 142,000.

There is a widespread concern of people living in Dublin 15 that the roads, schools, open space and every other conceivable piece of infrastructure are totally unable to sustain the existing population.

Any increase in residentially zoned lands must be specifically linked to fostering the development of socially and economically balanced sustainable communities, promoting social inclusion and addressing the issues identified in section 1.1.

Given the lack of public transport in this general area and the unlikely event of a significant improvement in this, any residential development will be low density (due to the absence of public transport and the location on a remote periphery of an outer suburban area).

The lands by proximity to an existing cluster of high technology industry and the presence of planned road infrastructure are ideally suited for the location of high technology, research and development facilities, corporate/industrial offices, and support service facilities in a campus-like setting. The landscape of gently rolling hillside will contribute to a high quality, aesthetic environment if developed in a sensitive manner.

Development should be predominantly an extension of the Science and Technology lands for the location of high technology, research and development facilities. The aim should be to attract high quality employment and encourage local linkages through sustainable transport links and address the pattern of social exclusion evident in the adjacent areas by providing good quality local employment.

Development of warehousing and retail warehousing in these lands should be discouraged.

3.0 Infrastructural requirements to serve potential future development.

The input of the IDA is critical in determining what additional infrastructure is required to service additional Science and Technology utilization. The obvious services are:

- ❑ Transport links to the N2 link road at Cherryhound.
- ❑ Pedestrian, cycle way and local access to the adjacent area of Tyrellstown.
- ❑ Adequate power supply.
- ❑ Foul and surface water drainage.
- ❑ Potable water supply.
- ❑ Local distributor road within the Science and Technology zoned lands that ensure traffic is diverted away from the residential areas of Mulhuddart and Tyrellstown.

4.0 Integration of the subject area with existing and programmed development areas adjacent.

There is a widespread concern of people living in Dublin 15 that the roads, schools, open space and every other conceivable piece of infrastructure is totally unable to sustain the existing population.

This is particularly so in the Tyrellstown area where schools (primary and post primary), sporting facilities, community centers and playgrounds are urgently required (see earlier discussion in section 1).

It is important that there is a visual break between residential and Science and Technology zoned lands, it is recommended that class 1 active open space be used for this purpose where possible.

5.0 Creation of a network of road, public transport, pedestrian and cyclist movement systems

The existing road network throughout these lands is in the process of being upgraded from a 19th century rural network to a modern network. The link road from the N2 via Cherryhound and N3Clonee interchange connect the area to the national road network.

Local linkages between the Science and Technology zoned lands and the residential communities of Mulhuddart and Tyrellstown do not really exist. There is a dilemma as local linkage encourages industrial traffic into residential areas.

Network improvements should provide access from the residential areas via pedestrian and cyclist paths in the shortest route. Passive supervision is important to ensure safe access.

Discussions should be entered with Dublin Bus to evaluate the extension of bus routes to service both the residential communities of Mulhuddart and Tyrellstown and the Science and Technology zoned lands.

General vehicle access to the Science and Technology zoned lands should avoid residentially zoned lands.

Summary

This study offers the opportunity to correct mistakes and infrastructure deficits in the Tyrellstown area that require urgent attention.

It also presents the opportunity to think strategically of land use in the Blanchardstown area. The last 10 years have witnessed an unprecedented residential housing boom, which has finally come to a halt. The housing boom has distracted attention from the fundamentals of providing the economic growth to sustain demand for consumption.

The study brief is to Plan strategically to accommodate the future expansion of the Greater Blanchardstown urban area over the next 20 years. The likely challenge will be rising oil prices, the need to reduce carbon “footprint” and to be internationally competitive by providing employment in manufacturing or internationally traded services.

In deciding what future direction these lands should take, the principles of the development plan suggest that these lands should be primarily developed as Science and Technology zoned lands. In particular, the strategic objective to reduce the need to travel, by private transport, and to reduce journey times for the transit of goods, by matching the mobility needs of businesses with the accessibility of different locations, and by facilitating the provision of suitable employment opportunities within easy reach of housing, clearly point to increasing the amount of Science and Technology zoned lands.

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

Yours sincerely,

Dublin 15 Community Council