

DUBLIN 15 COMMUNITY COUNCIL

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Representing: Blanchardstown-Castleknock-Clonsilla-Mulhuddart

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

12 September 2006

Dear Senior Executive Officer

On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following observations on the call for submissions on Lands at Barnhill, Dublin 15, before the Draft Local Area Plan is prepared.

1.0 General planning issue

The lands comprise approximately **40.55 hectares (100 acres)** and are zoned RS1:

“To provide for new residential communities in accordance with approved Local Area Plans and subject to the provision of the necessary social and physical infrastructure

and include the Local Objective 385: No development shall occur on these lands until Iarnrod Eireann gives a written commitment to provide a train service to a new station at this site

- As the council is aware, this development takes place to the south of the Hansfield SDZ, and will be serviced from Hansfield for water, sewage, road access and public transport. Development on these lands should not undermine the phased delivery of the infrastructure promised with Hansfield. For this reason the LAP needs to clearly state that no development shall take place on these lands until the entire infrastructure required for Phase 3 of the Hansfield SDZ is in place and functioning.
- The approved SDZ plan for Hansfield will be the dominant influence on these lands and the LAP needs to integrate with the Hansfield SDZ.

2.0 Transportation for pedestrians, cyclists and vehicles

The existing road network throughout these lands consists of a single carriageway rural road where vehicles need to pull off the road to permit 2 vehicles to pass each other when travelling in the opposite direction. This road network is totally inadequate for outer suburban residential densities.

The primary access to these lands should be via the North – South distributor road linking the N3 at Littlepace / Damastown and the N4 at Lexlip. An element of this road will be constructed as part of the Hansfield SDZ, the LAP for Barnhill needs to ensure that this road is extended south via a new bridge across the proposed rail line linking Clonsilla with Dunboyne Co Meath. The LAP should require this road and bridge to be in place prior to the construction of the first residential dwellings.

The road network on the periphery of the LAP lands at Barnhill consist of the rural road (R149) linking Clonee with Lucan to the west, and a link road (R121) via Pakenham Bridge to the road linking Clonsilla village and Lucan to the east. We request that no access is permitted from the Barnhill LAP lands to either of these existing roads for the following reasons:

- ❑ The road to the east via Pakenham Bridge meets the R121 at a hairpin bend with very poor visibility. When a vehicle attempts to turn right from the R121 to Pakenham Bridge it causes a considerable delay to traffic from Consilla. If this road remains open it will require a substantial upgrade of the junction and will have a significant impact on the existing road network.
- ❑ The county development plan details the proposed route through these lands for a North – South distributor road linking the N3 at Littlepace / Damastown and the N4 at Lexlip, permitting access to the existing R149 will encourage non local traffic seeking a N3 - N4 link through Laracon and Lucan village. It would be preferable to see an early construction of this road rather than adding to congestion in Laracon and Lucan village.

Our recommendation is for the primarily access to the Barnhill LAP lands to be via the North – South distributor road constructed as part of the Hansfield SDZ. We recommend that access via Pakenham Bridge be downgraded to pedestrians and cyclists only.

We request that access to the existing R149 is restricted to construction traffic.

3.0 Environmental and infrastructural Services

This development takes place to the south of the Hansfield SDZ, and will be serviced from Hansfield for water, sewage, road access and public transport. Clearly the services installed for Hansfield need to be adequately sized for extension to the Barnhill AAP area so that it is not necessary to re-open roads etc.

4.0 Integration with existing development.

This development takes place to the south of the Hansfield SDZ, and will be serviced from Hansfield for water, sewage, road access and public transport. Development on these lands should not undermine the phased delivery of the infrastructure promised with Hansfield. For this reason the LAP needs to clearly state that no development shall take place on these lands until the entire infrastructure required for Phase 3 of the Hansfield SDZ is in place and functioning.

The key Hansfield SDZ phasing requirements were:

No more than 1,000 units occupied without:

- ❑ The permanent construction of the first primary school with a minimum of 8 number classrooms of permanent construction.

No more than 2,000 units occupied without:

- ❑ Construction of a second Primary School and Post Primary School each with a minimum of 8 number classrooms of permanent construction,
- ❑ The provision of a community centre.
- ❑ The provision of a 15-minute train service at Hansfield Station (4 per hr) and a 7.5 minute train service at Clonsilla Station (8 per hr) during the peak hours, each train with a capacity of 1,250 passengers.

The community council welcomed An Bord Pleanála decision to grant permission for the Hansfield SDZ as a landmark decision which will ensure that the growth of Dublin 15 will be constrained by the timely delivery of schools, community facilities and transport infrastructure.

Of particular concern is the possibility that development in the Barnhill AAP would “leap frog” phase 2 or phase 3 of the Hansfield SDZ. If this was to occur the results for the general Dublin 15 area would be catastrophic.

5.0 Format of future residential development

The Barnhill AAP 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.

Recent trends have confirmed this, although the building pattern has changed (from exclusively semi-detached estate houses 15 years ago to a mix of houses, duplex and apartments today), the area continues to attract new families and young couples preparing to have a family.

Given the proximity of the proposed rail line to Dunboyne it is expected that duplex and apartments will feature close to the proposed rail station. It should be an objective of this area to ensure that 95% of the accommodation units are

capable of supporting the established settlement pattern. **1 and 2 bedroom apartments should be discouraged and limited to 5%.**

The justification for 1 and 2 bedroom apartments generally offered is that proximity to public transport 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 Barnhill area (located on the periphery of an outer suburban area) will attract significant numbers of single people.

6.0 Provision of local community and educational facilities

This development 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 AAP rather than rely on adjacent facilities with subsequent overcrowding.

The community's experience is that the delivery of new schools is painfully slow and with little or no co operation from developers. An example 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. Local public representatives are aware of the annual crisis for parents in Dublin 15 in securing a place for their children's education.

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 – unless development is delayed for at

least 10 years after Hansfield is complete, Barnhill will have to provide sites for a primary and post primary school.

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

7.0 Provision of open space and recreational amenities

The area is fortunate in having the provision of Class 1 public open space at Barberstown, Clonsilla, adjacent to the LAP lands. This Class 1 public open space was conditioned as part of a previously permitted residential development on lands at (i) Phibblestown, Ravenswood, Stonebridge Estate, Allendale House, Dublin 15. (Allendale) (Reg. Ref. F01A/1270) and (ii) on lands at the townland of Clonsilla, north of Aldermere and Windermere, west of Stonebridge, south of Permitted Ongar/Snugboro (Allendale Square) (Reg. Ref. F02A/0912).

One of the deficiencies of the Hansfield SDZ was that the Class 1 public open space will be provided at St Catherine’s which is a considerable distance from these lands. Integrating the Barnhill LAP with the previously conditioned Class 1 public open space offers the opportunity to enhance the urban environment and provide local access to a desperately needed playing fields and active recreational amenity accessible to the people who will live in both Barnhill and Hansfield.

The Barnhill LAP will generate it’s own additional provision of public open space. Ideally this would be located within the LAP in proximity to the Class 1 public open space discussed above. Where this is not provided within the LAP it should be provided on the lands between Westmanstown Golf Course and Beachpark to preserve the green belt zoned sensitive landscape.

7.1 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. When we talk of disadvantaged areas, the Tyrellstown and Hollywoodrath areas are not areas that are associated with disadvantage. 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.

7.2 Barnhill Local Area Plan 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 at Barberstown, Clonsilla, should be made available to the public as a matter of urgency. If necessary enforcement action should be taken.

The Barnhill LAP will generate it’s own additional provision of public open space. Ideally this would be located within the LAP in proximity to the Class 1 public open space at Barberstown. Where this is not provided within the LAP it should be provided on the lands between Westmanstown Golf Course and Beachpark to preserve the green belt zoned sensitive landscape.

7.2 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.

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

Yours sincerely,

Kieran O'Neill

Kieran O'Neill
Chairperson, Dublin 15 Community Council