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By e-mail to devplan@fingalcoco.ie

Mr. Peter Tuck,
Senior Executive Officer,
Planning Department,
Fingal County Council
County Hall
Swords
Co. Dublin

25 August 2005

Dear Mr. Peter Tuck,

On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following observations on the call for submissions into the study for lands in the vicinity of Dunsink and the Tolka Valley

We note the public notice Fingal County Council are looking for ideas and inspiration about the future of this large and unique area and would like to contribute to the debate.

These lands contain the Dunsink Observatory, part of the Tolka Valley and Royal Canal, the former Dunsink Landfill and a public golf course. It also contains a number of old houses, remains of estates and gardens. It bounds the junction of the M50 and the Navan Road [N3] and the Dublin-Maynooth railway runs along its southern edge. Abbottstown, West Finglas, Castleknock and Blanchardstown are all adjoining or within the immediate vicinity.

Infrastructure gaps have occurred in Dublin 15 over the last 20 years as a result of the rapid development of the Greater Blanchardstown Area, where the provision of recreation, sporting and educational facilities has not kept pace with the development of new residential areas. These lands contain an extraordinary range of natural, historical, cultural and recreational opportunities and offer the opportunity to address existing needs.

We believe that the key development themes for the study for lands in the vicinity of Dunsink and the Tolka Valley should be:

- Maintain sporting & open character of the land.
- Maintain the green belt separating Fingal (and the Dublin 15 area) from the Dublin City Council area.
- Address the lack of post primary school places in Castleknock by providing an additional reserved site for a school.
- Playing pitches (including some all weather playing surfaces) for Dublin 15 clubs.
- Playing pitches (including some all weather playing surfaces) for Dublin City Council area (Finglas, Meakstown and Pellettstown) clubs.
- Community resource center (similar to Portmarnock center) adjacent to playing fields c/w car park & changing facilities.
- Bridle path in the vicinity of the Ashtown equestrian center & the development of an equestrian leisure & tourism center.
- Additional 9 hole extension to Elmpark golf center.
- Encourage diversity by provide for sports not already catered for in the Dublin 15 area – (See list).
- Develop angling and water sport at appropriate locations along Tolka Valley and Royal Canal
- Interpretive centre based around the Dunsink Observatory, with a Science, Space & Planetary theme
- Link to the Phoenix Park racecourse development's proposed public open space, with a pedestrian bridge over the Royal Canal & railway line.
- Address the unauthorized use of agricultural lands in the vicinity of the Dunsink Observatory for scrap car business.

1.0 General planning issue

The Dunsink/Scribblestown Study area includes the Dunsink Landfill, parts of the Royal Canal, Tolka River Valley, N3 and Connolly-Maynooth Railway line, Elm Green house and public golf course, an astronomical observatory, a number of traveller halting sites, the National Food Centre, some industry (eg Manders), the Travellodge, a number of sports grounds (including Coolmine RFC and Ashtown Villa FC) and the remains of a number of fine houses and estates including Dunsinea, Priorstown, Ashton and Ashbrook.

This area provides extensive views southwards over the Castleknock area, parts of Dublin City and to the Dublin Mountains. Conversely, it is a highly visible area from these locations although a significant number of these views are long range in nature. The high amenity zoning of these areas is based on the prominence of the lands rather than an intrinsic quality to the landscape.

The closure of the Dunsink landfill at long last allows this land to realise its potential for a range of uses including amenity, tourism, ecology, education, science and residential. Under the current Development Plan the Study Area is primarily zoned for green belt, high amenity and open space and recreational amenities purposes with small areas zoned for residential and industrial uses. The newly adopted County Development Plan already provides enough land for more than sixteen thousand additional housing units in the Greater Blanchardstown Area including substantial lands on which no permission has yet been granted at Hollystown, Tyrellstown, Mulhuddart, Ongar, Diswellstown, Cappagh, Castleknock College, Hansfield and Clonsilla Village. There is enough land zoned in Fingal to meet our housing targets with headroom of 45%. Moreover, there are substantial lands within the development boundary in the Kilmartin/Powerstown area that are still zoned for agricultural development.

This is one of the last significant remaining green belt areas in Dublin 15. In all development planning in Dublin 15 over the last 15 years, the green belt zoning of these lands has been enhanced and upheld in recognition of the fact that the Dublin 15 area has undergone tremendous intense development for both housing, industry and commerce. The proper development of the area requires a significant amount of green land, providing space for parks, recreation, amenity, sports and tourism facilities. Retaining the Tolka Valley and Dunsink as green belt would ensure some essential environmental balance to the onward growth of Dublin 15 and indeed of Dublin city

It would be totally unnecessary and totally premature to zone open space and greenbelt lands in the Dunsink/Scribblestown area for housing. Not to mention the fact that it would undermine the greenbelt and require an alteration of the development boundary. **It should be noted, that any residential or increased industrial rezoning would be totally unacceptable.**

Within the current zoning there is considerable opportunity for recreation and amenity uses which are of themselves significant employment opportunities. Our submission seeks to identify these opportunities.

2.0 Education infrastructure deficit in Dublin 15 area.

The community council is concerned that the rapid growth of the Dublin 15 area is putting the local educational infrastructure under considerable strain, with clear signs that existing post primary schools will not be able to cope with the numbers of children currently in the primary cycle.

The Dublin 15 population has rapidly grown, based on currently zoned lands and building rates it is likely that the population will exceed 120,000 by 2011. The growth has occurred throughout Dublin 15 with large increases in the Littlepace – Ongar – Hansfield and the Diswellstown areas.

The problem in the Littlepace – Ongar – Hansfield would appear to be in hand with a new post primary school approved, and a site identified to construct the school.

On the other hand the Diswellstown - Castleknock area remains without a clear plan to accommodate the growth in demand. The population increase has naturally resulted in increasing demands for school places with new primary schools established recently:

- ◆ St Patrick's NS (3 class per year with 90 pupils entering post primary from 2009)
- ◆ Castleknock Educate Together (currently in start up, with 1 class per year and 2 class per year (60 pupils) entering post primary from 2007)

This year's demand has taken many by surprise with St Patrick's NS planning to take 4 classes of Junior Infants in 2005 and St Mochta's planning to take 3 classes of Junior Infants in 2005 (a total of 210 starting school that year).

Most of the pupils in Castleknock Educate Together and St Patrick's National School will qualify for access to Castleknock Community College as they reside within its current catchment area. Currently there are ~ 1,100 students in Castleknock Community College, as children graduate from the new primary schools this will result in demand exceeded supply.

This increase in demand for Post Primary education presents an obvious problem as there is no site identified in the current or draft development plan within the Castleknock electoral ward. Having discussed the issue local residents, parents and teachers are opposed to increasing school size beyond the current capacity. Indeed it is felt by some that the school is already too large at 1,100 and operating beyond its optimum pupil numbers.

To address this issue the community council would like to propose some possible locations for new post primary school for Castleknock / Carpenterstown / Diswellstown area:

- There is no opportunity to either the north or south of the area, as the lands to the north are existing residentially zoned lands, and the lands to the South are constrained by Phoenix Park, Liffey Valley Special Amenity Area, & lands in control of Castleknock College (a private post primary school).
- West – Kellystown
These lands are in close proximity to existing schools Castleknock Community College & Coolmine Community College. It is possible to locate a school in these lands however this would concentrate all the schools for the area in close proximity.
- The lands to the East offer the most opportunity with 2 options:
 - There is a 3 acre reserved site in the Phoenix Park Racecourse development (currently under construction by Flynn & O'Flaherty's). This development is a high rise development with the requirement to retain 30% of the site as open space. The reserved site is less than the 5 acre normally required for a post primary school, however given the nature of the development, may be adequate. A multi story school building with access to the extensive open space for playing facilities may address this issue. The site was originally reserved for a primary school, an alternative site will be required (possibly in the Scribblestown area).
 - Land in the Scribblestown area, zoned for Green Belt and High Amenity. Within these lands there are several sites that will be suitable for a post primary school site. The main restriction is access from the Castleknock area across the Maynooth railway line and Royal Canal.
Access is readily available at:
 - New railway station
 - Ashtown
 - Travellodge roundabout

The issue was discussed in depth at the community council, and the consensus is:

- The growth of the Dublin 15 area has caused a considerable strain on the educational infrastructure, with clear signs that there are not enough post primary school places.
- In addition to the planned post primary school at Littlepace – Ongar – Hansfield, an additional post primary school is required in the Diswellstown - Castleknock area to educate those children currently in primary schools.
- The lands to the East of Castleknock offer the most opportunity with 2 options, use of the 3 acre reserved site in the Phoenix Park Racecourse development or a new campus in the Scribblestown area

3.0 Sporting infrastructure deficit in Dublin 15 area.

3.1 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 Castleknock, Castaheany and Swords 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.

In addressing the disadvantage detailed in “Fingal Sports Strategy 2003-2007“ experienced by Dublin 15 and Swords area, we believe that the majority of the funding should be focused in these two areas rather than evenly distributed across the county.

3.2 Opportunities in the Dunsink – Tolka Valley study area

The Dublin 15 area is the largest conurbation in Fingal County. It is a satellite town within the Dublin Metropolitan Area, separated by strategic green belts from Finglas to the East (Scribblestown & Dunsink), Phoenix Park to the South East and from Lucan to the South (Liffey valley).

Access to sporting facilities within the Dublin 15 area is a major problem, with all clubs competing for any available Class 1 Open Space. The new Town of Blanchardstown, with a target population of 120,000 is one of the few areas without it's own Urban Park. Tallaght has Tymon Park, Clondalkin has Corkagh Park and Malahide has Malahide Castle and Demisne. When the issue of an urban Park for the New Town is raised, the Phoenix Park is mentioned. The Phoenix Park is a designated National park providing for passive recreation and institutional use. It is impossible for any new club to gain access to it's facilities. In addition, the Pheonix Park caters for the residents of Dublin 7, 8 10 & 20

Playing fields are either in private ownership (i.e. the Garda sports grounds in Westmanstown) or in public ownership in lands that are transferred to Fingal County Council as a result of Class 1 public open space contributions as a result of residential development.

The rapid increase in the value of land in the Dublin area, and the changes in land zoning in the Dublin 15 area in the last 20 years have made it impossible for clubs to purchase land. This means that new clubs are solely reliant on Class 1 Public open space for playing facilities. We are fortunate in the Dublin 15 area to have existing GAA, Soccer and Rugby clubs but we need to maximize participation by ensuring that sufficient playing pitches are available. Land that is suitable for playing pitches in this study area should be acquired for playing pitches and managed by Fingal to address the needs discussed above.

3.3 Lack of community facilities in the Dublin 15 area

The growing areas of Dublin 15 (i.e. Diswellstown, Castaheany, Ongar, etc.) are generally without community facilities. In addition to the difficulty in establishing these facilities, there is an ongoing difficulty and cost of keeping the facilities open.

The provision of community facilities is being imaginatively addressed by Fingal County Council in combining the design of new schools with community centres where the facility is planned to be available to the wider community in the evenings (Mary Mother of Hope – Littlepace and St Patrick's - Diswellstown). This is a welcome development.

However not all community activities take place in the evening, (Parent & Toddler, Active Retirement, Second chance education). Where possible the pavilions of new sporting facilities should be available to community groups at reasonable cost.

Dublin 15 Community Council requests that Fingal County Council identify lands in Dunsink and the Tolka Valley which are suitable for multiuse sports facilities.

Dublin 15 Community Council has lobbied consistently over the years for the protection of the Green Belts surrounding the Greater Blanchardstown area. The location of sporting facilities within the green belt lands is viewed as an acceptable and sustainable land use for this zoning.

If we are to address the disadvantage experienced by residents in Dublin 15 as detailed in the “Fingal Sports Strategy 2003-2007 “, additional sports facilities need to be provided in the green belt lands adjacent and accessible from residential areas. These lands in the vicinity of Dunsink and the Tolka Valley contain an extraordinary range of natural, historical, cultural and recreational opportunities and offer the opportunity to address the needs discussed above.

3.4 Urban Park Land

It is considered that the lands within Dunsink and the Tolka Valley should be identified for an Urban Park to provide active and passive recreational facilities for the residents of the New Town and its environs.

The Urban Park should contain promote an active participation in physical activities. A key strategy in maximizing participation is to encourage minority activities. Many of these activities do not require level land and some may be suitable for the former dump at Dunsink. Suggestions are:

- 3.4.1 Orienteering course.
- 3.4.2 Climbing wall
- 3.4.3 Animal welfare centre, i.e. urban farm where interested people could keep and tend to their animals. There is also a business opportunity to provide kennels where people could leave their pets in during holidays or trips away from home. Indeed there is the potential for animal “crèches” .
- 3.4.4 Incorporate facilities for children / young people for equestrian use similar to the Cherry Orchard Equine, Education and Training Centre (see appendix).

West Dublin used to be horse country, this has disappeared (the former phoenix park racecourse and stud farms of Clonsilla and Ongar have been rezoned for residential development. Castleknock and Luttrellstown, which were once full of stables, have been lost to apartment developments. Developers have closed the Luttrellstown Equestrian Centre soon after buying them. The only stables that remain are at Ashtown and River Road which are within the study area, the sustainability of their access to the phoenix park lands is subject to regular review with the possibility of access denied in the future.

There is a youth culture of purchasing horses at the Smithfield markets and grazing them on public or other opportunistic land.

This area offers the possibility to bring horses back to the area. The possibility of trekking linking the private stables with public stabling near Finglas or the M50 should be considered. The municipal stables in Cherry Orchard is proposed as a suitable model for enabling disadvantaged youth to participate.

- 3.4.5 Motocross runs.
Currently motor bike “scrambling” occurs on an ad hoc basis on unsupervised public open space. Joy riding remains a problem in some estates. This could be contained and directed in a positive direction by providing trails or a motocross racecourse on the Dunsink lands. This could be run on a commercial basis but access needs to be prioritized for youths at risk (i.e. in the Garda JLO).
- 3.4.6 Park to contain walks, wooded areas, child safe play areas and adventure playground, children’s cycle routes, picnic areas, gardens and open space. Given the difficulty of finding sites for neighbourhood playgrounds in the Castleknock area there are many suitable sites in the study area.
- 3.4.7 Ensure that there are multi use facilities available for all sporting codes. Cater for less popular sports e.g., basketball, tennis, volleyball, martial arts, hockey, cricket, bowls, archery etc.
- 3.4.8 Develop angling and water sport at appropriate locations along Tolka Valley and Royal Canal. Build on the recent project of involving local youth in the stocking of local rivers by establishing relationships with underprivileged youth. Consider a municipal canoe club.
- 3.4.9 Adventure playground. A model is the Clara/ Laragh playground in Co Wicklow, which is run on a commercial basis. A similar development in these lands would have the commercial advantage of proximity to major urban centres.
- 3.4.10 Paintball – many of the sites are suitable for this type of activity which has obvious commercial potential.
- 3.4.11 Facilities for teenagers, - rollerblade or skateboard areas. Places that provide a “cool” atmosphere that will appeal to teenagers as being a step up from a children’s playground and that will provide an alternative to the pub culture.

Our recommendation is that Fingal work with local post primary schools to get transition year students to design a playground specifically for teenagers, with the winning design selected by the students.

3.4.12 Facilities for the elderly, a safe supervised environment with a walk that is undemanding – i.e. level and easily accessible. A rose garden or other visual attraction would complement this. This may be linked with the objective in the County Development Plan which provides for a nursing home to be built on Scribblestown Road.

4.0 **Theme park based around the Dunsink Observatory.**

Interpretive centre based around the Dunsink Observatory with a Science, Space & Planetary theme.

Built between 1783 and 1785, Dunsink Observatory is the oldest scientific institution in Ireland. Today it is home to the astronomy section of the school of Cosmic Physics for the Dublin Institute of Advanced Studies. Dunsink's claim to fame includes involvement in the first Irish space experiment aboard the shuttle Challenger in 1988. It was also home to famous mathematician and physicist, Sir William Rowan Hamilton.

Dunsink is currently open on a limited basis (the first and third Wednesday of each winter month – October to the end of March). There is the opportunity to develop an interpretive centre for Irish science and technology based around this historic site and its most famous mathematician and physicist. This could be modelled on the Science Museum is known as Technquest. It's web address is www.tquest.org.uk

Technquest is a science discovery centre, designed to engage people of all ages in science through interactive exhibits and live demonstrations. As well as 160 hands-on exhibits, we host a unique programme of special events for families and leisure groups. This includes captivating shows in the [Science Theatre](#), fascinating tours of the universe in the [Planetarium](#) and a chance for visitors to experiment in the [Laboratory](#) and [Discovery Room](#). During term-time, Technquest run theme weeks for [school groups](#) on a range of topics aimed at every age from pre-school to post-16. There is also an active [outreach](#) programme, through which Technquest activities and equipment tour venues throughout the UK.

Technquest have had 2.5 million visitors since first opened in 1986. Every year about half a million people around the world get a “Technquest experience” of some kind.

In discussions with the technology based employers in Blanchardstown they have expressed concern at the lack of science and mathematics interest and achievement in post primary students. The recent Leaving Cert results show a reduction in applicants for Science courses in our third level institutions. Fingal Co. Co. could be at the fore in encouraging interest in Science among young people by promoting a “Technquest” adjacent to Dunsink

We believe that the technology based employers in Blanchardstown would be well disposed to part funding a interpretive centre for Irish science and technology.

6.0 Urban forest

The former landfill site at Dunsink may be suitable for an urban forest. This could be a source of revenue for Fingal as forestry represents an excellent long-term investment with attractive returns and taxation benefits. Investing in Forestry makes sound commercial sense and can be viewed as a hedge against inflation. Typical returns, net of inflation, are in the range of 5% to 7% depending on species, land quality and other circumstances. Coillte can offer professional advice on the investment opportunities that are available from forestry (Afforestation grants and Premium Schemes currently on offer).

A successful example of this type of project is the 85ha Carrickgollogan wood in south County Dublin. The rationale for selecting Carrickgollogan Wood for this project was based on: its popularity as a recreational forest; its location on an urban fringe; and the increasing levels of vandalism.

The pilot project offered a novel approach to Coillte and local communities to conserve the natural assets at Carrickgollogan and enhance the enjoyment of the forest and countryside for all concerned. Contacts are Michael O'Brien, Coillte Eastern Region Manager and Tim O'Regan, Coillte forest manager.

We believe that the urban forest combined with the following segregated activities is a suitable use for the lands:

- Motocross track,
- Mountain biking track,
- Bridal path.
- Orienteering course
- Archery.

7.0 The Royal Canal and Canal Banks

The Royal Canal has the potential to be one of Fingal's finest amenities. However, it has been neglected and is under-utilised. Progress in implementation of the RPS Cairns Study for the development of the canal as an amenity is painfully slow.

The canal banks should be opened up to the public with the walkway upgraded, explanatory plaques provided along the route and a cycle lane put in place. There are some very wide grassed areas along the canal bank that could be brought into better use as picnic areas, etc. There is also the possibility of providing a walking link from the N3 at the new railway station via the Canal to the Tolka River.

The protection of the existing mature tree belt and hedgerow is essential as is a Nature Conservation Management Plan for this part of the canal.

8.0 Access & security issues

The security issues on the subject lands have been extensively documented in local and national media. For these Dunsink and the Tolka Valley lands to meet their potential, the following issues need to be addressed:

8.1 Security.

- Policing & park ranger service along the lines of the OPW support for the Phoenix Park.
- Controlled access to the facilities whether on an individual development or an area based (like the access to the Snugbrough Industrial Estate).
- Secure boundaries so that the controlled access can be effective.
- CCTV at locations at risk from vandalism.
- Need active observation, Fingal can not rely on passive observation.

8.2 Vehicular Access

- Vehicular access to the recreational zones to be provided from Dunsink Lane rather than River Road. River Road is narrow & lacks footpaths while, in contrast, Dunsink Lane is a good road with connection to the N3 form a roundabout.
- Clear strategy on re-opening Dunsink Lane or alternative main access.

8.3 Car Parking

- Provide car parks at strategic locations along Dunsink Lane with short access roads to serve specific facilities such as clubhouses for new recreational facilities. These should generally be located as close as possible to the Dunsink lane which will function as a 'vehicular spine road' to reduce the impact of vehicular traffic into the area.

8.4 Pedestrian/Cycle routes

- A network of pedestrian/cycle routes to provide access into and through the recreational areas. Locations are suggested along River Road where such routes could commence, but detailed site investigation will be necessary to determine the exact location for such routes. However, because of the poor horizontal alignment of River Road, it is recommended that car parks should be provided at entrance points only where the routes meet River Road (Castleknock, Pelletstown / Ashtown, Finglas).
- Linkage to the public open space in the Phoenix Park racecourse site (north of the N3).

9.0 VIEWS AND PROSPECTS

Important views to be protected include the following

- The Dunsink landfill provides a local high point of 94 metres giving a panoramic viewing point with views of a large part of Fingal, incl. Dublin Airport and the future National Sports Stadium. It is recommended that this viewing point is developed as a recreational attraction within the area, linked in with the internal network of pedestrian routes.
- View from the Southwest in north eastern direction, providing a view of the Dunsink Observatory.
- View from Elmgreen Golf Club access road in south eastern direction, providing a scenic view to the Dublin Mountains
- View from entrance drive to Cappagh Hospital, in southern direction, providing a scenic view of the Dublin Mountains.
- View from eastern site boundary in south western direction, providing a scenic view of the Dublin Mountains.

Proposed Suburban Centre area deleted prior to adopting the current development plan

- This area is located between the N3 and Royal Canal and currently accommodates the Travel Lodge, Esso garage, and a traveller halting site. This site is totally inappropriate for a Suburban Centre. A mixed development such as this would clog up the junction and would blight both the canal and Tolka Valley. .
- The importance of preserving views across the Tolka Valley should be paramount.

10.0 Funding of proposed developments.

In our proposal there are mixtures of commercially attractive projects that will generate their own funding and projects that will require public funding.

We recommend that Fingal approach Dublin City Council to jointly fund those projects that require public funding. There is a clear benefit to adjacent areas within the Dublin City Council boundary. We understand that precedence exists for this type of arraignment (where developments in Wicklow in the vicinity of Britas Bay were funded by Dublin local authorities in the past).

11.0 Community participation

Because the Council issued the call for submissions at the height of the summer holiday period, it has been very difficult for community groups and organizations to give consideration and prepare a submission.

We propose that Fingal Co Council would consult specifically, and by way of local meetings, the residents of the community immediately adjoining the areas involved. In this way many of the communities and interested parties might have a genuine opportunity to participate in planning the future of this unique area.

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