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On line submission
Senior Administrative Officer
The Planning Department
Fingal County Council
County Hall,
Swords,
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A Chara

On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following observation as part of the public consultation in preparation for the Draft Urban Design Framework Plan for Blanchardstown Village.

1.0 Introduction

The Dublin 15 Community Council was formed 15 years ago (merging the Castleknock & Blanchardstown community councils which date from the early 1970's) to provide an umbrella organisation for the many residents and voluntary community groups in the Dublin 15 area.

Residents Associations and Community groups focus on their own specific areas but often feel powerless to influence the big issues like transport, educational, recreational & sporting infrastructure or crime prevention. The Community Council provides a forum to discuss these issues and potential solutions.

Our main objective is to develop the consensus views of the Dublin 15 community in matters relating to Planning & Development, Public Transport, Environment, Education, Health Care, Policing, Job Creation, Recreational Facilities, General Infrastructure and Tourist facilities. Having developed the consensus, make representation to State and other Statutory Bodies through a wide variety of communication channels, with the aim of improving the quality of life for the residents of Dublin 15.

2.0 Major problems

Blanchardstown was earmarked from the early seventies as one of County Dublin's' three new towns. It has been anticipated for the past twenty years that this area would eventually accommodate a population of circa 100,000 persons. The 2006 census showed the population of the Dublin 15 area at 93,000. It is likely that over time the population will greatly exceed this figure, given the extensive amount of land zoned for additional residential use within Dublin 15

With the growth of commercial, industrial and residential developments in Dublin 15, have come many of the associated problems that accompany such success.

Those relevant to development plan are:-

- ❑ Higher demand for schools, shops, leisure, entertainment, active and passive recreation.
- ❑ Increased inward investment in industrial / commercial activity, much of which is multinational in nature.
- ❑ Tremendous demand for Public Transport.
- ❑ Greatly increased levels of car ownership.

The effect of this is the capacity of existing infrastructure being exceeded by demand and this is evident across most areas.

Blanchardstown village is located at the centre of this rapidly expanding area. Over the last 30 years it has grown organically with commercial premises having displaced a number of residential uses along Main Street and Clonsilla Road. The overall sense is haphazard development, visually degraded by ad-hoc conversions of houses to business use and excessive and unsightly signage.

This study is a welcome opportunity to:

- Improve the area by developing a coherent plan that sets out a clear vision.
- Improve the pedestrian and cyclist environment.
- Address connectivity to the Town Centre.
- Develop separate residential and commercial areas.

2.1 Shops and retail outlets

One basic requirement for residential areas is access to shops, supermarkets and other retail outlets. Fingal have recognised this importance by developing a retail strategy for the county. A key element in this is the ratio of population to retail outlets.

We are fortunate in Dublin 15 to have a major retail centre of national importance located in the Blanchardstown Centre. The Community Council has been supportive of its development. The recreational, civic and administrative elements transform this retail centre into the cultural hub for the Dublin 15 area.

Our submission dated 25 June observation as part of the public consultation in preparation for a new Development Plan for the county identified the shortage of infrastructure particularly the provision of schools, shops and petrol stations in Dublin 15.

The Urban Design Framework Plan for Blanchardstown Village is a welcome opportunity to address those issues. We would like to comment specifically on the opportunity sites have been identified in the Village area

Site 1 consists of the main commercial complex at the Superquinn Supermarket. It contains a large surface car parking area as well as a number of shopping units and a pub/restaurant. It also includes an area of designated open space. It is suitable for a more consolidated development with five storeys of development fronting the Supermarket and the conversion of the forecourt area to a civic open space. The site comprises circa 1.86 hectares (4.6 acres) and is zoned SC

Critical to any development of this site is the retention of car parking spaces for shoppers and road access, as this is one of the small number of supermarkets serving a population of 92,000 people.

This site is located close to a mature residential area, there are obvious concerns at the problem of overlooking and shadowing with a 5 story development of part of this site. The Urban Design Framework Plan must address these issues with appropriate restrictions on use of the upper stories and design details (frosted windows etc.).

Site 12. *This contains the Garda Station, the newly constructed Women's Refuge and a Motor Sales premises. It is an extremely prominent site at the junction of major roads and provides the opportunity for a landmark building, as well as infill residential development. It could provide for an appropriate transition between the scale of the Village and that of the Town Centre. It measures circa 1.67 hectares (4.12 acres) in area and is zoned SC.*

In our submission dated 25 June we surveyed the cost of petrol in Dublin 15 compared to a similar population in North Kildare, we found that petrol station density was lower and prices were higher in Dublin 15. We are greatly concerned with any proposals that would reduce the number of petrol stations further.

The identification of alternative suitable locations of petrol stations is particularly problematic as they are understandably unwelcome and vigorously opposed by residents living nearby.

It is our opinion that the petrol station section of this site should be withdrawn from the report as an opportunity site and remain in it's current form and function.

Sites 13, 4, 3 (part of) and **11** (part of) are proposed to provide for small own-door office developments on the Main Street frontage and in sites 3 & 11 residential development to the rear.

We support a move away from house conversion to purpose built accommodation for business uses. It is important that the targeted rezoning recommended in the draft framework plan is incorporated in the Development Plan as a variation concurrently with the adoption of the Urban Design Framework Plan rather than at its next review.

The variation should also introduce a new local objective to ensure that any development within the terraces of single storey cottages respects the simplicity of character in height and form. This concept was challenged in recent planning applications and is an issue that needs to be urgently addressed rather than wait for the next Development Plan.

Site 7; The Bell Public House

This building is already a "landmark building" in popular terms (used by many people giving directions etc). It also performs a valuable service providing off street parking at the eastern end of Blanchardstown Village. It is worth noting that in granting permission for the current premises FCC required the demolition of a residential house to provide adequate car parking. We request that this site remains in its current form and function and is deleted from the Urban Design Framework Plan as an "opportunity site".

2.2 Recycling locations:

A few bottle banks have disappeared from Dublin 15. The Urban Design Framework Plan should identify sites for bottle banks and paper/plastic banks.

2.3 Urban Residential Areas

The proposal in this Draft Urban Design Framework Plan for Blanchardstown Village to create residential zones within the village is welcome. We fully support the proposal to change from SC (*To protect and enhance the special physical and social character of major suburban centres and to provide and/or improve urban facilities*) to RS (*to provide for residential development and to protect and improve residential amenity*), specifically in sites 2, 3 (part of), 5, 6, 10 and 11 (part of).

The proposal to similarly consolidate the commercial and retail to appropriate zones within the village is also welcome.

2.4 Parking

Ensure that parking allocation is fairly distributed within estates, whether assigned to individual units or a partially assigned with the remainder visitor parking. An obvious concern for residents will be the effect on their parking spaces of the proximity to both the Blanchardstown Town Centre and the commercial zones of Blanchardstown Village.

The Draft Urban Design Framework Plan needs to address this issue particularly if pay parking is introduced in the Blanchardstown Town Centre or the commercial zones of Blanchardstown Village.

2.5 Open Space:

All residential developments must provide open space areas within the development. These open spaces must be ready for use very early in the development process e.g. as soon as a tiny number of residents move in.

Combining open space requirements to create an area park well away from the developments causes problems for residents on a day-to-day basis. There are obvious issues of transport to and from the open space areas. A balance needs to be struck between accumulating sufficient open space to provide playing pitches and recreation and the need for informal “kick around” and other passive recreation within a development.

The only opportunity in this plan is in site 10 which contains significant river frontage the report notes *It is critical that access be achieved for the public through the site to the Tolka Valley*. Development levies for commercial and residential development in Blanchardstown Village should be ring fenced to ensure this objective is delivered.

2.6 Provision of recreational facilities as a condition of planning

Fingal have extensive experience of conditioning developers to provide playgrounds and other facilities as a condition of planning permission. This often comes as a surprise to the residents who purchase the residential units and are vigorously opposed due to concern about antisocial activities or excessive numbers of visitor car parking. Developers must be required to provide facilities / amenities prior to first dwelling occupation and clearly detail in all marketing plans before first house is sold.

Site 10 offers the opportunity for a local playground, this should be incorporated into the Urban Design Framework Plan

While a specific zoning objective is not needed to protect community facilities, the Planning Section must stipulate the location and delivery timing of community facilities when granting planning permission to developers.

2.7 Address lack of facilities for teenagers

There is a noticeable drop off in participation of children in sport as they go through the teenage years. This is one age group that is very poorly catered for.

Consideration needs to be given to the provision of internet cafés or other accessible and affordable facility for teenagers in the Urban Design Framework Plan. This may be delivered as a contribution in lieu of public open space for some of the developments proposed in this framework plan.

3.0 Heritage

3.1 Natural Heritage (bio diversity, geology & landscape)

The Urban Design Framework Plan offers the opportunity to focus on developing a green infrastructure in Blanchardstown Village.

A good definition of green infrastructure is:

- A strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features.
- Designed and managed as a multi-functional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and the need to underpin sustainability.

Our recommendations for the Urban Design Framework Plan

- The design and management of green infrastructure should respect and enhance the character and distinctiveness of an area with regard to habitat and landscape types.

- Environmental objectives should be based around the waterways (Tolka river and Royal Canal).
- Balance the needs of accessibility in an environmentally sensitive way. The ideal environment for maximizing biodiversity is an absence of humans however this is obviously not feasible in lands near a major urban area.
- Balance the needs of biodiversity with safety – areas with poor passive supervision can quickly become a “no go” area.
- Work with the RAPID & Safer Blanchardstown to improve the green infrastructure through community engagement in projects (example: the youth fishing club that successfully stocks and manages fishing along the Tolka river).

3.2 Built Heritage & Archaeology

St Brigid’s Church is the only building in the Village included in the Record of Protected Structures. The Spire of St Brigid’s Church dominates its surroundings, has attractive design feature and can be seen from many surrounding viewpoints. The church has a landmark and orientating function that signals the location of the Village.

There are other heritage features that are worthy of protection:

- Traditional cottages in terraces that define the Village character of Main Street and Church Avenue.
- Former St Bridgid’s Seminary (3 story stone faced building)
- The former Garda station that dates back to the original RIC station.
- Some traditional village shops that date back to the 1930’s.

There are a number of cottages in terraces that are important in determining the Village character of Main Street and Church Avenue. These are single storey and define the street space as well as having a simple vernacular charm. They are key to the identity of the village and should be afforded protection.

Our recommendation is to protect the Heritage of Blanchardstown by adding to Record of Protected Structures and establishing a Architectural Conservation Area

Where possible these buildings identified above should be added to Record of Protected Structures.

An Architectural Conservation Area should be established around the hub of Main Street and Church Avenue. Within this area retail premises should be required to reflect the form and function of a traditional Irish village. The character and form of the cottages in terraces should be maintained, ideally in residential use.

4.0 Transportation

4.1 Holistically resolving the Transport problems in Dublin 15

As discussed in earlier sections, the growth of Dublin 15 has impacted residents. On the key Dublin 15 – Dublin city centre route, the area is constrained by an existing road network which is very unlikely to increase in capacity.

If anything this network is likely to be reduced with Dublin City Council seeking to close or restrict access via Chapelizod and the OPW attempting to reduce traffic volumes and restrict commuter access to the Phoenix Park.

Clearly population growth in the Dublin 15 area is only sustainable if accomplice with a significant increase in public transport.

Some improvements have taken place over the last 10 years, notably:

- The M50 upgrade
- Improved services on the Connelly – Maynooth rail line, and a new service between Docklands and Clonsilla and a new station at the Phoenix Park racecourse.
- Improved frequencies on the 3 bus routes connecting Dublin 15 with Dublin city centre
- Plans for the extension of the Docklands – Clonsilla service to Hansfield and Dunboyne.
- Plans for the Metro West (with route selected and stops designed).

Despite these improvements some chronic problems remain with overcrowding on the commuter rail service and very long journey times particularly on the #39 QBC.

Solutions to the transport problems of Dublin 15 are known, the ***Blanchardstown Catchment Area Integrated Development Framework*** study completed by consultants SIAS and Grontmij in November 2002 analyzed the transport problems and made recommendations on how to address the problem.

- As outlined above some progress towards the objectives are evident.
- Proposed new bus routes – little or no progress.
- Cycling and walking – little progress

Consider a major review of the plan to determine what additional measures are required.

4.2 Road widths:

Minimum road widths within new developments should be adequately sized to allow space for on-street parking and cycling. Currently motorists illegally park partially on paths, often forcing pedestrians onto the road.

4.3 No more speed ramps:

Speed ramps are appearing all over the place. They are lazy, and often ineffective, methods of reducing speeding in an area. They generate additional road noise which can become a problem in residential areas at night.

Speed ramps mainly punish the innocent and cause people to use more fuel as they slow down and speed up between ramps. They also cause additional wear on vehicles. Furthermore, they are often badly designed and cause even worse damage to bicycles, who are not the speeders.

The alternative to speed ramps is better design;

- Avoiding excessive straight sections where motorists can either unintentionally build up speed or where straight sections become a track for the “boy racers”.
- Use roundabouts at the junctions of estates and distributor roads.
- Design internal road network within new estates to eliminate opportunity for excessive speed.
- Apply the design solutions the NRA use when the national road network runs through villages, by using street furniture & signs.
- Work with An Garda through the Fingal Joint Policing Forum to enforce speed limits and change the culture (where speeding is acceptable or assumed to be without consequence). Identify roads where they are a particular concern to residents for targeted action.

4.4 Improve pedestrian routes:

The organic development of Blanchardstown Village and the subsequent development of the Blanchardstown Town Centre has resulted in poor pedestrian facilities.

Existing paths are very narrow in places. There is poor connectivity between the Village and the Town Centre. We support the improvement of additional linkages and the improvements to footpath width to create a minimum of 2.7m.

Pedestrian routes should include 'short cuts' that are not available to motor vehicles.

Pedestrian crossing timings should be more favourable to pedestrians otherwise they will not wait.

4.5 Improve cycle routes:

In general the Draft Urban Design Framework Plan for Blanchardstown Village should make reference to the new National Cycle Policy Framework. This is an excellent new policy from the Department of Transport. Actions are tabulated and the ones that are the responsibility of local authorities are clearly noted. In general the Urban Design Framework should be reviewed against the policy. It is a new policy so it is perhaps understandable that it has not been addressed by the published document.

http://www.smartertravel.ie/download/1/0902%2002%20EnglishNS1274%20Dept.%20of%20Transport_National_Cycle_Policy_v4.pdf

<http://www.smartertravel.ie/>

The final document should address the points in the Transport National Cycle Policy below before adopting the Urban Design Framework Plan for Blanchardstown Village.

Particular actions relating to urban design include the following:

- Policy 1.1, and 1.2 states that cycling promotion should be included as a stated objective in Development Plans, Local Area Plans and Urban Design Frameworks.
- Policy 1.3 addresses designing areas to be accessible generally by appropriate lane-use
- Policy 1.6 addresses cycling and pedestrian permeability by addressing the retrofitting of existing neighbourhoods. This is particularly relevant to Blanchardstown.
- Policy 1.7 states that Development Plans and Local Area Plans must include objectives to produce local cycling policies.
- Policy 2.1 states that Local Transport Plans must address the Hierarchy of Solutions set out on page 18 of the Policy.
- Policy 2.2 discusses Local Transport Plans
- Policy 2.3: Removing through traffic
- Policy 2.4: HGV Management strategies
- Policy 2.5: Existing infrastructure in general should be audited with respect to cycling.
- Policy 2.6 follows on from the above and deals with remedial works.
- Policy 2.7 deals with future schemes.
- Policy 2.8 states that demand management measures should be included in Local Transport Plans



- Policy 2.9 discusses Urban Cycle Networks. NB: this does not imply the provision of cycle lanes or cycle tracks. Rather it refers to a network of safe high quality routes which address the Hierarchy of Solutions discussed on page 18.
- Policies 4.1 and 4.2 deal with safe routes to schools.
- Policies 5.4 to 5.6 deal with maintenance of infrastructure.
- Policy 6.1 deals with signposting of cycle routes
- Policy 6.2 deals with the provision of cycling maps.
- Policy 7.2 to 7.6 deal with parking provision.
- Policies 8.1 and 8.2 deal with access to public transport for cyclists and parking at stations and stops. These are particularly relevant.
- Policy 10.6 deals with the targeting of third level students by Local Authorities. Blanchardstown IT should be addressed.
- Policy 15.2 deals with reduced speed limits.

The Policy moves away from the idea of providing cycling infrastructure as the principal objective and sets out how integrated policies should support cycling. In particular, the provision of cycle lanes or cycle tracks should not be included in such as plan as an objective. Instead the objective should be to "Ensure that the urban road infrastructure (with the exception of motorways) is designed / retrofitted so as to be cyclist-friendly and that traffic management measures are also cyclist friendly" through the implementation of the Hierarchy of Solutions set out on Page 18 of the National Cycle Policy Framework. The general idea is not to provide a network of cycle routes but that almost all roads and streets should be safe and comfortable to cycle.

The above is obviously more complicated than simply saying that cycle tracks will be provided but is proven to produce increases in cycling numbers and safety. In contrast poorly designed cycle tracks are often less safe for cyclists than cycling in general traffic.

There is a debate between cycling enthusiasts who are critical of (and frustrated with having to use) poor quality cycle lanes, and parents who are conscious of risks to vulnerable road users and experience levels of children. Parents are often unwilling to let children cycle to school unless cycle paths are provided.

These shared use (Pedestrian / Cycle) pathways are not useful for the experienced cyclist who will instead use the road. They are however useful for young and inexperienced cyclists.

Some examples of poor cycle lanes and cycle tracks in Blanchardstown and Fingal are at the following links:

<http://www.dublincycling.ie/node/523>

<http://www.flickr.com/photos/7995245@N02/3724037675>

<http://www.flickr.com/photos/7995245@N02/3724852196>

Two examples of unacceptable provision for cyclists in current Quality Bus Corridor proposals are here:

<http://www.dublincycling.ie/node/480>

<http://www.dublincycling.ie/node/341>

The above leads to the following comments on the text of the Draft Urban Design Framework Plan for Blanchardstown Village document:

- 4.1.5 on page 22 states "There are no cycle tracks that would facilitate safe cycling". See the general comments above. This should be reworded. There is no evidence that the general provision of cycle tracks facilitates safe cycling. Instead it should say something along the lines of "Many routes inspected are not cyclist-friendly"
- References to the provision of bus/cycle lanes are strongly welcomed. Following on from the general points above, references to cycle lanes should be removed. Instead simply refer to "bus/cycle" lanes as the text already does in many places. With regard to widths we would support the typical provision of 4.5 m wide bus/cycle lanes with 1.5 m advisory cycle lanes marked in them. Speeds should be limited to 30 to 50 kmph or more width will be required. If there is not space for this at pinch-points 4.25 m cycle lanes should not be provided as they encourage dangerous overtaking of cyclists within the bus/cycle lane. Instead, for short lengths, 3.0 m bus/cycle lanes should be provided with no overtaking and a 30 kmph speed limit.
- 6.0 (10) on page 26: Remove "cycle lane" and refer instead to bus/cycle lane.
- Section 8.0 on page 59: Title and bottom of page: Remove "cycle lane" and refer instead to bus/cycle lane.
- Pedestrian and cycle routes should include 'short cuts' that are not available to motor vehicles. The individual site sketches should be evaluated for opportunities.

4.6 **Bicycle parking:**

Sheltered bicycle parking, with suitable parking stands (not the low ones most places currently has) should be provided multiple locations in Blanchardstown Village (bike theft is so high that cyclists will park their bicycles as close to their destination as possible).

5.0 Summary

- An Architectural Conservation Area should be established around the hub of Main Street and Church Avenue. Within this area retail premises should be required to reflect the form and function of a traditional Irish village. The character, form and function of the cottages in terraces should be maintained.
- Add to Record of Protected Structures.
 - Traditional cottages in terraces of Main Street and Church Avenue.
 - Former St Bridgid's Seminary (3 story stone faced building)
 - The former Garda station that dates back to the original RIC station.
 - Some traditional village shops that date back to the 1930's.
- We support the improvement of additional linkages between the Village and the Town Centre and increase to footpath width to create a minimum of 2.7m. Pedestrian routes should include 'short cuts' not available to motor vehicles.
- The plan should be reviewed to consider the Transport National Cycle Policy.
- Add objective to provide a local playground in Site 10.
- Add objective to provide internet cafés or other accessible and affordable facility for teenagers as a contribution in lieu of public open space.
- The Plan should identify sites for bottle banks and paper/plastic banks.
- Opportunity sites.
 - Site 1: This site is located close to a mature residential area, there are obvious concerns at the problem of overlooking and shadowing. Retention of car parking spaces must be a development objective.
 - Sites 2, 3 (part of), 5, 6, 10 and 11 (part of). We fully support the proposal to change from SC to RS specifically in.
 - Sites 4, 13, 3 (part of) and 11 (part of) We support a move away from house conversion to purpose built accommodation for business uses. It is important that the targeted rezoning recommended in the draft framework plan is incorporated in the Development Plan as a variation concurrently with the adoption of the Urban Design Framework Plan rather than at its next review.
 - Site 7; The Bell Public House. This building is already a “landmark building” in popular terms. We request that this site remains in its current form and function and is deleted from the Urban Design Framework Plan as an “opportunity site”.
 - Site 12: It is our opinion that the petrol station section of this site should be withdrawn from the report as an opportunity site and remain in its current form and function.