

**CLONSILLA HALL, CLONSILLA ROAD, CLONSILLA, DUBLIN 15**

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*Representing: Blanchardstown-Castleknock-Clonsilla-Mulhuddart*

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On line submission  
Senior Administrative Officer  
The Planning Department  
Fingal County Council

A Chara

On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following observation as part of the public consultation on the Kellystown LAP

The Dublin 15 Community Council was formed 25 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.

As the original rezoning from Greenbelt to a mix of Residential and High Amenity zoned land was highly controversial, we recommend that the views of the community are listened to in developing the LAP.

Following a workshop with representatives from local residents' associations we have identified the following concerns and considerations which we submit for your consideration in developing the Kellystown LAP.

**Key Issues and Questions:**

**What are your hopes for the future of the Kellystown area?**

Our hopes are that this development will result in a well planned residential area that will link the Dublin 15 area with the high amenity land bordering the sensitive Liffey valley and linking the Diswellstown area with the active and passive recreational space at Beechpark Clonsilla. It is worth noting that Beechpark lands were developed as the public open spaces associated with the residential development in Diswellstown.

We hope that it will also link with the Royal Canal with appropriate passive supervision to prevent anti social activities.

Permeability will be a feature for pedestrians and cyclists while rat-runs are avoided for vehicular traffic

### Can you suggest a Vision for Kellystown? What should it include?

A clear boundary between the residential zoned lands and the High Amenity to create a defining southern boundary for the residential zone and preserves the Liffey Valley and its hinterland.

The use of land zoning objective to 'Preserve and provide for open space and recreational amenities' addresses the recreational needs of the local and wider Dublin 15 area. The High Amenity OS land use zoning (extending to 25.8Ha) should not deviate significantly from the line in the development plan.

The residential zoned lands should provide a high quality residential development that set an exemplar for sustainable development in sensitive landscapes.

### What should the LAP target specifically to help achieve this vision?

Effective use of the zoned high amenity lands to address infrastructure deficit associated with the residential development that has occurred in Dublin 15 over the last 20 years.

Create a defining boundary that restricts future encroachment on the Liffey Valley.

### What are the main features of Kellystown that will contribute towards its character and will make it an attractive place to live, work and visit?

Development in sympathy with the Royal Canal to the North and the Luttrellstown Castle demise to the south.

Existing network of hedge rows supporting green infrastructure (including flora, fauna and wildlife migrating patterns).

Notable historic features – i.e. Old Schoolhouse building, stone walls & boundaries, Luttrellstown Castle, Clonsilla green including the Church of Ireland buildings, canal, rail crossing, rail signal box and the modern but unusual golf pavilion & restaurant.

### What are the key issues relating to the built environment in proximity to the lands which might impact the LAP?

It is anticipated that elements within the Kellystown LAP area will be higher than the 2 story development that is historically associated with Dublin 15 in general and specifically in relation to Diswellstown & Clonsilla.

In the context of the Urban Development and Building Heights Guidelines for Planning Authorities, published in December 2018; Kellystown is a **suburban/edge location** the guidelines recommend:

- 3.4 Newer housing developments outside city and town centres and inner suburbs, i.e. the suburban edges of towns and cities, typically now include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments. Such developments deliver medium densities, in the range of 35-50 dwellings per hectare net. Such developments also address the need for more 1 and 2 bedroom units in line with wider demographic and household formation trends, while at the same time providing for the larger 3, 4 or more bedroom homes across a variety of building typology and tenure options, enabling households to meet changing accommodation requirements over longer periods of time without necessitating relocation.



- 3.5 The forms of development set out above can, where well designed and integrated, also facilitate the development of an attractive street-based traditional town environment with a good sense of enclosure, legible streets, squares and parks and a strong sense of urban neighbourhood, passive surveillance and community
- 3.6 Development should include an effective mix of 2, 3 and 4-storey development which integrates well into existing and historical neighbourhoods and 4 storeys or more can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets.

The LAP should ensure that boundaries to existing 2 story development, the high amenity areas and the Travelers halting site are treated sensitively. By this we mean that adjoining new developments should start as 1 or 2 story and gradually step up to higher buildings.

The LAP should also ensure that buildings facing onto the high amenity lands step up from 2 stories.

Ensure developments adjacent to the Travelers halting site are preceded with consultation with Pavee Point and local Traveller representatives, to address concerns (in the interest of long term community relations) and avoid to the greatest extent possible alienation and/or antisocial activities.

A road network that facilitates access to public transport without becoming a conduit for large volumes of through traffic.

#### What form of development would you like to see occur within Kellystown?

Mixed development that address the needs of new residents.

Well planned development in line with the zoning, with access to schools, local neighbourhood centres (shops etc.).

High quality developments.

A “retirement” zone that offers an attractive option for older people in Dublin 15 to downsize from 3 or 4 bedroom homes, freeing up traditional family homes for new families.

#### What are your concerns for future development?

Inappropriate materials of construction that require high levels of maintenance (use of natural materials like brick, and avoidance of difficult to access rendered surfaces that require painting).

Destruction of green infrastructure as a result of construction, ensure participation in “Considerate Constructors Scheme”

Cherry picking by developers that result in lack of essential services like creches, shops, schools etc.

Inaccessible Open Space lands.

Open Space community gain lags development.



## How can we improve 'quality of life' for people through place-making and design as part of this LAP?

Provision of small parks & informal play spaces within individual developments. For example areas where young children (pre-school and primary school age) can play.

Provision of trees within residential areas

## What services and amenities (e.g. education, health, leisure, shopping etc.) will be required to meet people's needs

The reserved school site should be retained. Consideration should be given to moving it to the residential zone to maximise the land for High Amenity. Where a school is located within the High Amenity it should be conditioned to provide access and services to the local community (along the lines of St Patricks & Diswellstown Community Centre).

Provision of crèches in appropriate sites (access for drop off & pick up) – a noticeable trend in new areas is the rent / price for crèches are too high for sustainable childcare businesses' with developers preferring to develop buildings with alternative uses and higher margins. 2019 realities mean that both parents need to be in employment to sustain a mortgage, childcare providers in new areas are essential. It should be a condition that crèches are provided for the first 15 years of a development with conversion to other uses open to consideration as the area matures. The CSO census Small Area Data evidence should be the key criterion for any change of use consideration.

## How should the LAP address the needs of the existing and future population of the Kellystown area?

Kellystown should address long standing needs in the Kellystown – Diswellstown – Carpenterstown – Clonsilla area such as the Graveyard,

Consideration of a retirement village or zone to encourage "empty nest" families to downsize while remaining in the local area.

Existing halting site requires sensitive treatment, Fingal should consult with key stakeholder groups such as Pvaee Point.

## What type of housing is appropriate in Kellystown (detached, semi-detached, terraced, apartment, etc.) and at what scale?

Ideally developments similar to Annfield or Fernleigh

Where higher buildings are permitted they should gradually increase in height from neighbouring buildings.

## What can be done to integrate new housing and people into the area?

Encourage formation of resident's associations once dwellings occupied.

Ensure retail, non retail is sequenced with residential developments.

Fingal managed community centre in Luttrellstown Community College should take the lead in reaching out to new communities.



# Dublin 15

## Community Council

### What steps should be taken to manage the impact of population growth?

Rapid growth of the area will overwhelm schools with Kellystown in their catchment area (examples St Mochtas N.S. Scoil Choilm C.N.S. Luttrellstown Community College). A development over a prolonged period may be easily absorbed.

### What gaps are there in the existing housing market in the Kellystown area (age friendly, family, single person, first time buyer, etc.)

Dublin 15 has traditionally attracted “starter homes” and families trading up to larger homes (where people having put down roots wish to stay in the area. This high demand trend is likely to continue.

The population of the adjacent Carpenterstown area, the largest age cohort is 50 – 60, given the trend that Consideration of a retirement village or zone to encourage “empty nest” families to downsize while remaining in the local area.

### How can the LAP aid and facilitate the delivery of more homes in the right locations?

The existing schools are to the east of the Kellystown area - “starter homes” and “trading up homes” should be prioritised next to existing schools.

### What type of retail facilities are needed to meet the demand of future residents and what is the optimum location for them as part of the LAP.

Neighbourhood centres consisting of convenience stores, café, local services such as hairdressers etc., should be located as part of the LAP. Consideration to locating near the active recreation sports facilities / grave yard etc and near Clonsilla Rail Station / future school reserved site.

### What type of non- retail facilities are needed within the area?

Local services, crèches, after school childcare, health care centre / doctor’s surgery, dentist’s surgery, remote office centres.

### How can the Kellystown Local Area Plan support new businesses and different types of employment?

Remote work is a working style that allows professionals to work outside of a traditional office environment. It is based on the concept that work does not need to be done in a specific place to be executed successfully. Remote office centres are usually located in close proximity to where people live; they are generally distributed throughout suburban and near-suburban locations. The idea behind a remote office centre is that you lease an office near where you live, in a building shared with other remote office users and you telecommute from a professional, secure, and reliable office-work environment.

The upper floors of neighbourhood centres are typically underutilised if they exist at all. Locating remote office centres in the upper floors of a neighbourhood centre could support new businesses and different types of employment however they would need to be designed so as NOT to displace the car parking to access the shops etc.



## What types of new job opportunities are required for Kellystown?

Advantages of remote office centres over traditional telecommuting

Professional work space with professional internet/network access.

Freedom from distractions inherent in home work environments (TV, family, chores, etc.)

Most people will not have the excess space to create a home office within their dwelling.

Separation of home and work. This is a key to mental health. For many people, it is hard to separate work from home, if you never leave home. Most people need a work place to go to and more importantly come home from. A remote office provides the office, and the social contact that comes from working in an office with other workers (even if they work for a different company).

## How best can we support new and evolving work patterns to reduce the demand for travel?

Provide an alternative to commuting to Dublin City Centre, i.e remote office centres are office space leasing centres which lease individual offices to employees from multiple companies in a single office location or centre. The purpose of remote office centres is to provide professional office space in locations that are near where people live, so they can cut down on the commute, but still work out of a real office with professional grade internet, phone service and security.

## What are the key transportation issues for the area?

The area is close to the Maynooth – city centre & Dunboyne – Docklands railway line. Train stations are at Clonsilla and Coolmine. Irish Rail & Dept of Transport have plans to electrify this line, that plan include closing the existing level crossing at Clonsilla train station, Porterstown Road and Coolmine train station.

The # 37 passes to the east of Kellystown (Diswellstown Road & Dr Troy Bridge), the # 39 passes along the Clonsilla Road.

The Bus connect plan retains the #37 but proposes elimination of the #39 route.

As part of the next stage of the LAP we request that Fingal work with the NTA to expand the 39 and 37 routes (separately to BusConnects) to facilitate easy access to the south side of the LAP area.

A new station may be developed at Dr Troy Bridge however there are no funded plans to do so. LAP should not assume higher densities in this area until there is a funded plan with timelines published to deliver a new station.

Both the Maynooth – city centre & Dunboyne – Docklands railway lines have no additional capacity and are full, while residents will get on trains at Clonsilla, given capacity limitations they will displace commuters at Castleknock and Ashtown.

Pedestrian and cyclist access to Clonsilla Rail station and the #37 bus stop at Diswellstown Road need to be prioritised.

The road network needs to take into account the closures of **all 3** level crossing.

Objective 130 in the Development plan map #13 is to *Prepare a feasibility study on the location of a road bridge, crossing the Royal Canal and the Dublin – Maynooth railway, connecting north to the Ongar Road. This location shall be determined in advance of, or part of, the adoption of the Local Area Plan for lands at Kellystown.*



## What transport objectives should be included in the Plan? Which objectives should take priority?

1. Pedestrian and cyclist access to #37 bus stop at Diswellstown Road
2. Pedestrian and cyclist access to Clonsilla Rail station
3. A road network that takes into account the closures of the level crossing.
4. Swept Path Analysis to ensure emergency vehicles can access all areas & appropriate traffic management implemented to ensure parked cars to not prevent emergency vehicle access

## What improvements could be made to public transport links?

Long term plan is to increase frequency on Maynooth – city centre & Dunboyne – Docklands railway line through the addition of extra carriages (4 years lead time) and electrification (5-10 year lead time).

## What measures are needed to create safe, good quality and attractive streets for people to move around, socialise and to do business?

A high degree of passive supervision where open spaces and footpaths are overlooked by dwellings.

Adequate level of public lighting.

High-level of permeability particularly for pedestrians.

## How can the use of public transport, cycling and walking be promoted and the use of the private motor car be reduced?

A extensive linked network of public paths with a high degree of permeability providing a short distance to transport nodes, neighbourhood centres, schools etc.

Safe places to lock bicycles at transport nodes.

A key safety issue for parents is safe cycle routes to schools, and the confidence that their children are unlikely to be involved in a traffic accident while on a bicycle.

A low permeability for private motor car ensuring “rat runs” are discouraged.

## How can facilities for the elderly and mobility impaired be improved and/or provided?

Ensuring disabled parking spaces are provided and monitored to ensure only disabled persons use the designated parking.

## Where should access points to the LAP lands from surrounding residential areas be reserved and where can existing linkages be improved?

Provide east-west access to Beechpark (Clonsilla) for residents at Annfield or Fernleigh (the public open space provided as a result of these developments)

Provide north-south access from Kellystown to the Royal Canal footpath and on to Clonsilla

Provide north-south access from Kellystown to open space to south.



## Is there an adequate quantity and quality of play, open space and recreational facilities in the general Kellystown area?

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. The value of land in the Dublin 15 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. The displacement of St Mochta AFC for residential development brings no additional playing pitches, The LAP offers the opportunity to increase access to sporting facilities for the 100,000 residents of Dublin 15 and address the objective in the Fingal Sports Strategy 2.3 Facilities Strategy Objective 5; "Support the development of new multi-sport facility in the County".

The Community Council supports sustainable access to sporting facilities accessible to residential areas. It has expressed its concerns on several occasions with locating Class 1 public open space remote from residential areas, and believes where possible the class 1 public open space should be accessible.

The Community council has identified the need for a rose garden type facility for the elderly can this be facilitated in the LAP? Would it make sense to have it accessible from the graveyard (similar to Glasnevin cemetery being accessible from the National Botanic Garden, but on a smaller scale).

## Where should new parks/open spaces and recreational areas be located?

Primary to the south of Kellystown.

Small parks within the new residential developments within Kellystown

## How can the Plan provide for both passive and active recreation?

Provision for active sports by providing new multi-sport facilities.

Provision of passive recreational with well designed open spaces that can attract a variety of ages where passive supervision will act as a deterrent to anti social activities.

## How do you think the Plan can provide opportunities for good connectivity for recreational walking and cycling purposes? Is there any specific location where you feel this Plan can address this issue?

The LAP should facilitate access from Portertown Park to Beechpark with walking and cycling connectivity. Access should also link to the Royal Canal greenway.

Extend the Greater Dublin Area (GDA) Cycle Network from Porterstown Road to Clonsilla Rail Station with a Indicative Cycle/Pedestrian Route.

## How can we integrate a Green Infrastructure approach to the lands and have it incorporated into any new developments?

Provide a Green Infrastructure network that leverages existing hedgerows, the Royal Canal greenway open spaces and the Luttrellstown Castle demise.



How best can we integrate new development with our natural heritage/landscape in a way that promotes biodiversity and in a way that does not lead to the loss of, or damage to, our natural heritage?

Integrate existing hedgerows, new swales (similar to the Fingal design showcased in Bloom 2018), to support biodiversity.

Encourage the planting of native species in the LAP.

How do we best protect and manage the environmental resources available to deliver environmental, social and economic benefits and services to the local area?

Unique suburban area adjacent Liffey Valley green belt, Luttrellstown Castle demise and Royal Canal.

Incorporate existing trees and hedgerows into new development

Ensure principals of green infrastructure are featured in LAP and deliverable objectives ensure green infrastructure is actually delivered.

How can the development process highlight the natural assets of the local area to a better extent?

Establish green infrastructure objectives for the LAP.

Establish phasing objectives for the LAP, including linking the provision of open space, recreational and green infrastructure objectives with the completion of various phases of the residential development.

Establish phasing objectives for the LAP, including linking the provision of retail, non-retail facilities, new businesses and different types of employment objectives with the completion of various phases of the residential development.

What types of new routes and connections would best facilitate access to the new park in a sustainable and sensitive manner?

Roads with traffic calming devices installed such as roundabouts, ramped “cushions” at junctions, avoidance of long straight sections where vehicles build up speed.

Extensive use of Toucan (Two can cross) crossings which allow cyclists and pedestrians to cross at regular positions along the main distributor road.

Use of intelligent traffic signals, using automated algorithms and real time data to make traffic signals work intelligently at high capacity junctions. Use of roundabouts at low capacity junctions – i.e. where developments access the distribution road. Prioritise cyclists at roundabouts.



## What policies should be included to protect and enhance our natural and built heritage?

Retain existing stone walls where possible.

- Luttrellstown Road

Retain historical local features in new development – examples:

- Level crossing gate keepers cottage, Porterstown Road, (Protected structure No 0699, Mid 19th century Rail Keeper's Cottage at rail crossing).
- Clonsilla signal box, (Protected structure No 0707, Late 18th century single-arched stone road bridge over Royal Canal at Clonsilla Train Station).
- The Gables, Luttrellstown Road, (Protected structure No 0945, Detached three-bay single-storey house mid-19th century house with distinctive advanced gabled-fronted bays added in late 19th century).
- The Scouts Den, Porterstown Road
- Home Villa, Porterstown Road, (Protected structure No 0727, Four-bay two-storey 19th century former presbytery).
- Dollard House, Luttrellstown Road
- Greenmount House, Clonsilla Road

## Are there areas or features of local historical and cultural value that we need to consider?

- Level crossing gate keepers cottage, Porterstown Road (Protected structure No 0699)
- Clonsilla signal box, (Protected structure No 0707).
- The Gables, Luttrellstown Road, (Protected structure No 0945)
- The Scouts Den, Porterstown Road
- Home Villa, Porterstown Road, (Protected structure No 0727).
- Dollard House, Luttrellstown Road
- Greenmount House, Clonsilla Road
- Existing stone walls, Luttrellstown Road

## What are the main infrastructure issues that should be considered in the Local Area Plan?

Sustainable transport, road network (taking into consideration level crossings will be closed), cycle network, pedestrian network, SUDS drainage, water supply, traffic management,

## What measures should be included in the Plan to ensure that waste is reduced and disposal of waste is better managed?

All dwellings to incorporate storage for segregated waste (i.e. storage for black, green, brown bins, glass WEE and other waste disposed of in civic facilities).

## What are the energy networks and telecommunication needs within the LAP area?

High Speed Broadband & sustainable power

## Are there water supply or water quality issues experienced in Kellystown?

Unknown



**How can Sustainable Drainage Systems be further encouraged and utilised within Kellystown?**

Integrate existing hedgerows, new swales (similar to the Fingal design showcased in Bloom 2018), to support biodiversity.

Storage & reuse of rain water during dry summers for planted public areas using underground chambers and solar powered pumps.

**How can the Kellystown LAP encourage energy conservation and energy efficiency and the provision and development of alternative sources of renewable energy?**

Aim for and encourage passive house standards in development.

**How best can land use planning promote UN sustainable goals as part of this LAP e.g. sustainable cities and communities, climate action and good health and wellbeing.**

Access to sustainable transport.

**How can renewable energy sources be better promoted in Kellystown?**

Encourage Photo Voltaic panels on each residential unit.

Encourage high energy efficiency design for each unit not type certification (local example where houses in Hamilton Park are energy efficiency in the sample house only – i.e. small north facing windows that become small south facing windows elsewhere in the estate)

**Are there energy initiatives that could be introduced into Kellystown and facilitated through the Plan?**

New areas to provide car charging points standard for each dwelling, ensure power can be provided to every car park space without causing trip hazards.

**What areas in Kellystown, if any, have experienced flooding? What have been the causes of such flooding?** Unknown

**What measures should be included in the Plan to deal with flood risk and assessment?**

Ensure sports grounds, rose gardens, and the graveyard are not used as sustainable drainage retention areas.

**What are the relevant environmental issues that need to be addressed and what environmental objectives should be included in this LAP?**

Air quality during construction (dust suppression, fume)

Air quality during occupation – no chimneys or open fires, no wood burning or bio-mass stoves to be permitted

**What measures should be implemented in order to safeguard our environment and heritage in Kellystown?**

Retention of hedgerows.

Archaeological surveys to identify any features

Encourage the establishment of resident associations in new areas.



Dublin 15  
Community Council

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

Yours sincerely,

*Celia Durnin*

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Celia Durnin

Secretary