



Dublin 15

Community Council

CLONSILLA HALL, CLONSILLA ROAD, DUBLIN 15

E-mail: d15comcoun@eircom.net

Web site: www.dublin15cc.com

Representing: Blanchardstown-Castleknock-Clonsilla-Mulhuddart

Chair: D Carbery, Secretary: C Durnin, Treasurer: K. O'Neill.

On line submission

Senior Executive Officer,
Planning and Strategic Infrastructure Department,
Fingal County Council,
County Hall, Main Street,
Swords,
Co. Dublin, K67 X8Y2.,

10 May 2023

Dear Senior Executive Officer,

On behalf of DUBLIN 15 COMMUNITY COUNCIL I wish to make the following observation as part of the public consultation on the Draft Fingal County Development Plan 2023 – 2029.

Summary

The key concerns are:

- ✓ Proposed zoning change of the greenbelt land located between Castleknock – Finglas – Ashtown – Dunsink to residential (Long Term Strategic Reserve), resulting in **overloading of the social, educational and public transport infrastructure.**
- ✓ The conclusions of the consultants commissioned to undertake an Area Based Transport Assessment (ABTA) for lands at Dunsink are fundamentally flawed, the **Finglas Luas line will not provide a sustainable transport solution for the Dunsink area.**
- ✓ Impact on the social capital of Dublin 15 by eliminating the affordable Elmgreen Golf Centre.

1.0 Introduction

The Dublin 15 Community Council was formed 20 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.



Dublin 15

Community Council

2.0 Proposed zoning change of the greenbelt land located between Castleknock – Finglas – Ashtown – Dunsink to residential (Long Term Strategic Reserve).

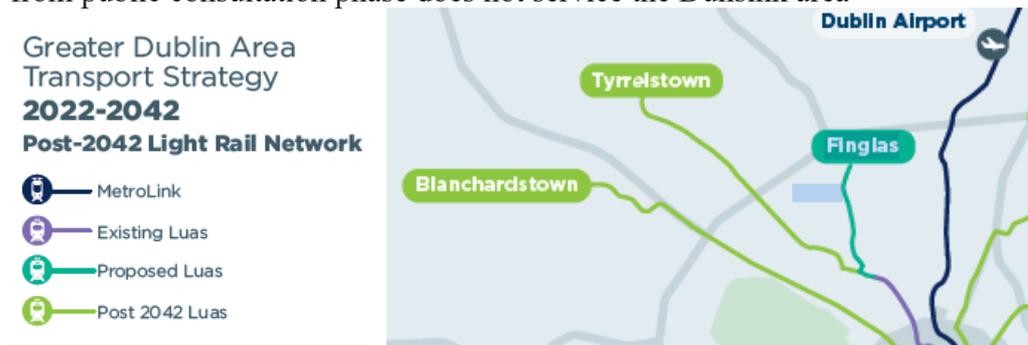
The Dublin 15 area has developed as one of the 3 satellite new towns envisaged in the 1970s to an area with a population of over 100,000 (mid-way between the size of Cork and Limerick cities). It has a distinct sense of place with its town centre, schools, university (TU Dublin) and surrounding residential, commercial and industrial districts. This sense of place is enhanced by the green belts – Phoenix park to the East, Liffey Valley to the South and the Tolka Valley to the North creating a distinct identity separate from but connected to the greater metropolitan area. Rezoning the greenbelts would compromise this identity and sense of place.

Dublin 15 has grown from 48,000 to over 110,000 population over the last 25 years, for much of this period social infrastructure (schools, public transport etc.) has lagged this development. Our experience of development is one where lagging infrastructure results in a crisis of school places and overcrowded infrastructure.

As a rapidly growing area, new schools have been built in response to this need however we are all too aware of the inertia and impacts lagging infrastructure have on the community.

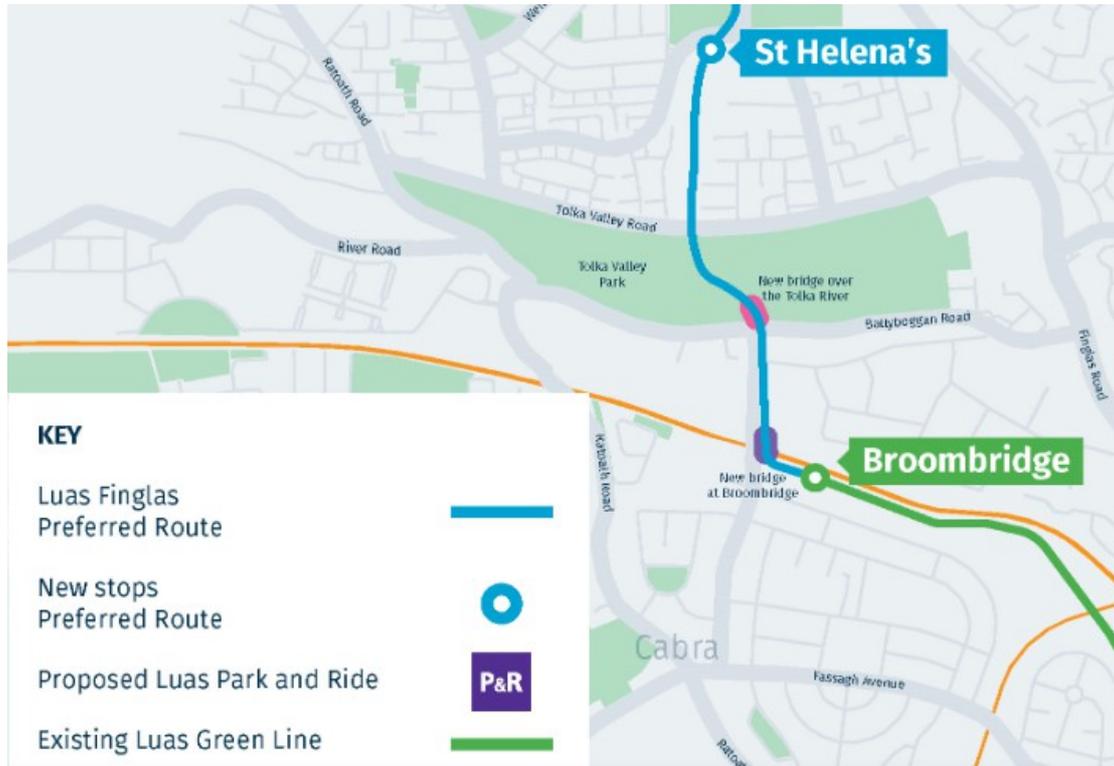
Bus Connects plan and the Dart+ Maynooth line are welcome and provide some hope that transport infrastructure will improve in the future. Again the lead time from identifying the need to deliver is a very extended timeline.

The draft development plan suggests that public transport to this area is enabled by Long term LUAS extension to Finglas, however the preferred route that emerged from public consultation phase does not service the Dunsink area





Dublin 15 Community Council



We note the National Transport Authority (NTA) draft Transport Strategy for the Greater Dublin Area which went on public display. The strategy outlines additional Luas Lines Post-2042 which includes Green Line Extension to Tyrellstown. While such long term plans are unlikely to become operational in our lifetime, we are concerned that such aspirational plans will be used as the justification for intensive development between Boombridge and M50 in advance of any public transport infrastructure. The reality is the conclusions of the consultants commissioned to undertake an Area Based Transport Assessment (ABTA) for lands at Dunsink are fundamentally flawed, the **Finglas Luas line will not provide a sustainable transport solution for the Dunsink area.**

We note the relevant national guidelines *Urban Development and Building Heights Guidelines for Planning Authorities* (December 2018) that will guide any development of these lands:

Specific Planning Policy Requirement (SPPR 1) *“In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.”*



Dublin 15

Community Council

Specific Planning Policy Requirement (SPPR 4) *It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.*

At best, this rezoning is likely to result in the construction of medium densities - 50 dwellings per hectare. In reality, a future and distant Luas reservation, and its location within the M50 ring will probably result in considerably higher densities.

The concern for residents is the perennial crisis of school places and the promised Dart+ improvements to the Maynooth lines are likely to be rendered inadequate by this proposed rezoning.

Our concern is that this re-zoning will perpetuate the crisis Dublin 15 has experienced over the last 20 years.

While I believe rezoning Greenbelt lands will very negatively impact Dublin 15's sense of place and Fingal identity, any rezoning of the Dunsink lands needs to be held back until a funded plan is in place to deliver transport and educational infrastructure in advance of any residential development. It is premature to rezone these lands which are reliant on an infrastructure identified as “post-2042. Once this is rezoned the Fingal County Council public representatives lose all leverage to deliver infrastructure.

3.0 Impact on sport and recreational amenities in Dublin 15

Many years ago, in a submission on the draft development plan we noted that there were more golf clubs than children's playgrounds. Fortunately, that situation has changed with the construction of new playgrounds by the local authority and as a condition of development.

At the same time, the number of golf facilities has reduced with the development of Hollystown golf club for residential use. The Dunsink lands contain the Elmgreen Golf Centre consisting of a Driving Range, Pitch & Put course and an 18-hole course consisting of 110 acres of lush green fairways and stunning views, first opened to the public in 1995, with spectacular tree-lined fairways, immaculate bunkers and captivating views of Dublin Mountains.

It is worth noting that the Elmgreen facility caters for people on modest means, where as the two other golf courses in Dublin 15 are significantly more expensive.



Dublin 15

Community Council

We request a specific objective “to retain a Pitch & Put, Driving Range, and 18 hole Golf facility” in public ownership, within the area bounded by the pink dashed line, indicating “Long Term Strategic Reserve”

We look forward to seeing these issued addressed in the next stage of the development plan.

Yours sincerely,

Damien Carbery

Kieran O'Neill

Celia Durnin

Damien Carbery
Chairperson

Kieran O'Neill
Treasurer

Celia Durnin
Secretary