

Ashtown/Pelletstown Local Area Plan

Manager's Report on Submissions from the Pre Draft Public Consultation Issues Paper

Oct 2012

Contents:

- 1.0 Introduction
 - 1.1 Public Consultation on the Issues Paper
 - 1.2 Content of the Manager's Report
- 2.0 Themes Arising from Consultation Meetings
 - 2.1 Councillor's Workshop
 - 2.2 Public Consultation Meetings
- 3.0 Summary of the Submissions Received
 - 3.1 List of Submissions Received & Emerging Theme Headings
 - 3.2 Summary of the submissions from Statutory Agencies.
 - 3.3 Summary of Key Issues Raised by written submissions during public consultation
- 4.0 Conclusion and Managers Recommendations

Appendix 1:

Map A: Proposed LAP Boundary and Zones of Influence

1.0 Introduction

Dublin City Council intends to make a new Local Area Plan for Ashtown-Pelletstown (the area identified as Pelletstown in the issue paper, and in the Action Plan of 2000). The area is located between the existing established residential areas of Ashington (Navan Road), Cabra and Finglas South, with the more undeveloped areas of Scribblestown and Dunsink to the north west. The area is approximately 42 ha (just over 100 acres) and includes the recent residential and commercial developments of Rathborne Village, at the westernmost part of the LAP with Pelletstown Manor, Laburnum and Rathborne including the areas of Earlswood, Waterways and Royal Canal Court to the east of the village; with on the eastern side of the site the housing areas of Royal Canal Bank, including some office development (which is currently unoccupied).

The boundaries of the proposed LAP are defined by the Royal Canal and Sligo rail line to the south, by the River Road and Tolka Valley Park on the north, the boundary with Fingal County Council and Scribblestown Avenue to the west (adjacent to Ashtown rail station), and bounded to the east by the existing Ratoath Road in part and also the proposed new alignment of the Ratoath Road- to the east of the existing unused "Ormonde" printworks premises.

The area was first designated for development in 1999, and the preparation of the Pelletstown Action Area Plan in 2000 set out the main objectives to provide a coherent urban structure, supported by two frequently served rail stations (one existing, one proposed) and a significant investment in the Tolka Valley park and along the Canal to serve the new community and benefit existing adjoining communities in the area.

Since the lands were designated for development, over c. 3,000 housing units have been granted planning permission in addition to supporting retail, office, community and leisure facilities, a new street network and new public parks. Although some positive progress has been made to date with facilities including the upgrading of the towpath along the Canal, the almost complete upgrading of Tolka Valley Park and the opening of the Crescent Park, completion of quality new homes, a new bus service and new local shops and services, the current economic climate and limitations on private and public funding have halted progress on delivering completed and integrated development in the area.

Consequently, the area was identified to be in need of a LAP in the recently approved Dublin City Development Plan 2011-2017.

The primary purpose of this new LAP is to provide an updated strategy on how this area should be developed and managed in a sustainable way to meet the needs of all residents in the area. The LAP will focus in particular on the mechanisms that aid the delivery the necessary physical, social and environmental investment for the proper planning and sustainable completion of development of this area.

The LAP is also considered the appropriate mechanism to assist the delivery of designations for the area under the Dublin City Development Plan 2011-2017 which include the following:

- (i) The Z14 zoning objective of the LAP area to seek social, economic and physical development and/or rejuvenation of an area with mixed use of which residential and “Z6” would be predominant uses.
- (ii) Key Developing Area: These are the main growth areas of the city over the period 2011-2017. The development of these areas will create clusters of economic, commercial and residential neighbourhoods close to public transport corridors.
- (iii) Strategic Development and Regeneration Area for which a number of guiding principles are set out under the Development Plan.
- (iv) Sections of the Strategic Green Network designated along the river Tolka and the Royal Canal corridor. These routes are important for connecting different areas of high environmental quality, promoting sustainable modes of travel and for protecting natural habitats and amenities.

An important step in making a LAP is to identify the issues for the local area from the point of view of local residents, business people, land owners, state bodies operating services in the area and other interested stakeholders.

To assist this process, Dublin City Council called for submissions on issues which the plan should address and prepared an Issues Paper document to assist and encourage such submissions. This process ensures that important and informed local issues identified from a wide variety of sources are identified at an early stage to help the preparation of the draft plan.

1.1 Public Consultation on the Issues Paper

Preparation of the Ashtown/Pelletstown LAP was initiated following the adoption of the 2011-2017 Dublin City Development Plan and agreement by Council of an order of prioritisation.

A workshop was held with Councillors representing the Central Area on the 18th of September 2012 to discuss the stages involved in making a LAP, and the priority issues they wish the LAP to address.

The Pre Draft Local Area Plan public consultation was launched on Friday the 28th of June 2012 with the publication of a public notice and the Issues Paper document. A display and copies of the issues paper were provided at the Civic Offices in Wood Quay, at the Central Area Offices at Cabra and the Area office in Finglas, as well as at Finglas and Cabra libraries. The Issues Paper document and details on how to make a submission were posted on the Dublin City Council web site.

A period of over six weeks (from the 29th of June to the 10th of August) was given for submissions.

Three public consultation sessions were arranged in the local area to coincide with the observation period. These were:

- Tuesday the 3rd of July 4.00 pm to 8.00 pm in Pelletstown Community Centre
- Saturday 7th of July 10.00 am to 1.00 pm in Pelletstown Community Centre and
- Tuesday the 10th July 4.00 pm to 7.00 pm in Cabra Parkside Community Centre.

1.2 Content of the Manager's Report

This report contains:

- a) Summary of issues raised at consultation meetings
- b) The list of persons who made submissions or observations.
- c) Summary of the issues outlined in state organisation submissions (the National Transport Authority and the Environmental Protection Agency).
- d) Summary of the key issues from submissions received.

2.0 Themes Arising from Consultation Meetings

2.1 Councillor's Workshop

A workshop was held for the Area Committee Members for the Central Area on the 18th of September 2012. The main themes that arose from the workshop with the Councillors were as follows:

1. The renaming of the plan area to Pelletstown-Ashtown in order to create an identity for the area
2. The possible need for a primary school within the plan lands having regard to the numbers of young children in the plan area and the fact that the plan area does not fall into any particular catchment for school enrolment – discussions to take place with the Department of Education and Science
3. The building of more family-type residential units on those undeveloped sites
4. The extension of the plan boundary to include part of Tolka Valley Park and Tolka River and to the east to include the former printing factory (Ormonde)
5. The creation of pedestrian and cycle links between the plan area, Tolka Valley Park and Dunsink Observatory
6. Improving River Road – discussions to take place with the Roads and Traffic department
7. The possibility of a flyover at Ashtown rail station – discussions to take place with Irish Rail
8. Short-term and long-term uses of the undeveloped sites – discussions to take place with developers
9. The importance of community consultation – DCC to meet with community groups regularly
10. Possibility of a policy-research EU-funded project in this area focusing on the issue of community-engagement

2.2 Public Consultation Sessions

Below are listed the issues brought up by those who attended the three public information sessions. At all of the sessions there was a good attendance and a good debate on the challenges facing the LAP and the issues it should address. Residents were keen to state that while they had serious issues that need to be tackled within the area, they also wanted to emphasise that they liked living in the area and thought it was a good place to build a sustainable community.

The issues raised are grouped by topic.

Transport

- Road safety- road markings are absent, leading to confusion and lack clarity as to where pedestrian route, a problem as there are hairpins in the area
- None of the roads have been taken in charge
- Need lights at pedestrian crossings, poles have already been erected
- Ashtown rail station needs better access, currently level crossing system of barriers, no good during rush hour,
- Need for vehicular crossing – underpass, overpass options.
- Need more pedestrian bridges over canal (no clear agreement as to where best location would be).
- River Road is dangerous as it is too narrow and traffic speeds.
- Need to bridge Rathborne to the west with Royal Canal development to the east.
- What is the planning status of the new station at the Royal Canal end of the development
- Car parking issues (bottlenecks and indiscriminate parking) at the station and concern over similar problems occurring when the new station is completed
- When will the roads be taken in charge
- Kerb parking throughout the estate unsightly and dangerous
- Bus terminal – buses can idle at times causing noise annoyance
- Role of BXD- could it be extended to Pelletstown
- What are the plans for the railway station & rail crossing- waiting times for the railway gates is one of the biggest issues for the area

Density, Housing Mix

- Need to have a greater mix of units ie. duplexes and townhouses
- Need a better mix of housing typologies, namely more traditional housing with 3 and 4 bedrooms and gardens
- High buildings not appropriate- best suited to docklands and city centre as cap of 8 storeys set. No need for higher buildings.

Amenities

- Royal Canal could be a very positive feature in the future, have DCC any other successful canal-side schemes?
- Access to Tolka Park should be easy and safe but not encourage rat runs
- Community centre required
- Need to keep community square at Ratoath Road end
- School provision needed, there are many young families who will have to remain in the area for the foreseeable future. Where will the school be sited and who would be patron (Census statistics could provide further information when they become available)
- What links are planned for Tolka Park
- Semi-circle park – is it to be taken in charge by Dublin City Council
- Utilise Royal Canal as an amenity and attraction
- Development of an amenity area at Dunsink, and access & connectivity
- What are the plans for Tolka Valley Park
- Planning permission should not be granted for any further apartments; need a mix of housing types; apartments are occupied by tenants who are transient, creation of a sense of community is lost
- Greater links between Ashtown northwards into Tolka Valley Park would be welcomed

Phasing

- First phase of any development should be at the canal to ensure surveillance of the area

Development Sites

- Will DCC meet NAMA/receivers/developers with regard to these derelict sites
- Unsightly hoarding becoming dangerous as it deteriorates, is it not possible to erect secure fencing and landscape the area in the interim before any new development commences
- Could derelict land be used for allotment areas
- Unsightly attenuation area needs to be addressed
- Need to strengthen links between the two areas as there is a danger of separation
- Is there a recent permission for an 8 storey building in the area

Other Issues

- Prevalence of anti-social drinking in the vicinity of the canal
- Get a definitive name for the area - Pelletstown/Rathborne/Ashtown/Tolka
- Extend area of LAP to include Tolka Park and east to land bordering Ratoath Road
- Agree/Finalise a name for the area, area has identity crises
- Lack of time for communities to engage in the process a concern
- Timeline for LAP, and is it likely to be implemented given the economic downturn
- Has the print works building beside O'Reillys Bridge been purchased by Dublin City Council
- People like living in the area
- The decision to go ahead with an LAP is welcomed.

3.0 Summary of the Submissions Received

3.1 List of Submissions

A total of twenty submissions were received by Dublin City Council over the consultation period. The majority (eleven) of submissions were from local residents and resident associations. Submissions by and on behalf of residents in the adjoining area of the Navan Road were also received.

Three submissions were received from developers or those representing developers and one representing one of the main Management Companies in the area.

There were also two submissions from state organisations – the National Transport Authority and the Environmental Protection Agency. A list of all submissions received is set out in table 1 below.

Table 1: List of Submissions

no.	Submission	Submission Source
1	Joseph Maguire	resident
2	Davina Greene	resident
3	David Kielty	resident
4	John Henry	
5	Linda Fahy	resident
6	Anna Murphy	resident
7	Mary Dunne	resident
8	Tom Bruton	resident
9	David Galvin	Environmental Protection Agency
10	Frank Healy	Rathborne (No.1) Residents Committee
11	Kieran Rush Ltd.	Ballymore Group (landowner)
12	Paul Carroll	resident
13	David Rouse	Kingfisher Management Company Ltd.
14	Owen Shinkwin	National Transport Authority
15	Patricia Dunleavy	Resident- adjoining area
16	Manus Bree	Resident
17	Pat Alison	Navan Road Community Council
18	James Leonard	Castlethorn (landowner)
19	Jordana Corrigan	Royal Canal Park & Rathborne Community Associations
20	Stephen Little	Capel Developments (in Receivership, landowner)

The content, quality and depth of information in all of the submissions received will be a real benefit to the process of preparing the Local Area Plan. All submissions raised a range of issues, and made a strong case for these issues to be addressed in the LAP. All submissions were reviewed as a series of recurring issues emerged. These, along with the headings of the Issue Paper published, were used to structure this report, and are listed

below within table 2. The most significant issues highlighted were in relation to density and urban form, population mix-family housing, transport, and social and recreational amenities. The table below seeks to give a visual representation of the spread of issues raised by theme.

Table 2: Issues raised by Submissions.

Boundary & name																				
vision																				
Economic																				
Population																				
Urban form																				
Pedestrians & transport																				
Social & cultural infrastructure & recreation																				
Green Infrastructure & sustainability																				
Undeveloped Land																				
Consultation																				
Other																				

Each of points raised by all of the submission are collated in summary form in the next section of this report, structured using the headings above.

3.2 Submissions from State Agencies.

3.2.1 Summary of Submission from the National Transport Authority:

The National Transport Authority (NTA) made a submission stating that each local area plan within the GDA shall be consistent with the Greater Dublin Area Transport Strategy 2011-2030. The NTA expect that DCC will have due regard to the Draft Transport Strategy and reflect its policies, objectives and measures. They seek that a number of land use planning recommendations contained within the Strategy be considered when preparing the LAP; including (i) a sequential approach to development; (ii) increase in densities where public transport is good; (iii) internal permeability for walking and cycling; (iv) connectivity by walking and cycling between development areas and two villages; (v) parking designed not to dominate streetscape; (vi) severance is avoided and (vii) a mix of dwelling types are provided.

They highlight a number of specific infrastructural measures which impact on Pelletstown rail service, namely (i) removal of level crossings; (ii) electrification of the line to enable DART; and (iii) possibility of additional stations along the route.

They highlight the role of an LAP in deciding the most appropriate form of development to provide good links to the rail stations, and also the development of walking and cycling networks between existing and proposed developments to improve accessibility to the stations. They emphasise the issue of connectivity and the need for a good connection to Broom bridge station which will be served by BXD Luas, and the need to improve safety for walkers and cyclists at the level crossings and along the River road.

3.2.2 Summary of Submission from Environmental Protection Agency

The submission by the EPA sets out a series of issues that the Environmental Report, to be prepared as part of the Strategic Environmental Assessment process, should address. They list key issues and relevant EU directives that the LAP and SEA should consider including

- Water Framework Directive, which impacts on the Tolka River, surface and ground water resources
- Drinking Water/ Water Supply, in relation to modelling demand and best practice in provision,
- Waste water treatment, specifically Urban Waste Water Treatment Regulations and Waste Water Discharge (Authorisation) Regulations
- Groundwater Directive
- Water conservation measures and strategy
- Strategic Water Services Plans, under the Water Services Act 2007
- Flood Protection and Management, as part of the Flooding Directive
- Possibility of including hydrometric information
- Biodiversity, particularly sites covered by European Habitats and Birds Directives and protected species, and option of buffer zones and linkages and role of green infrastructure, habitat mapping and biodiversity action plans
- Data sources, including alien species and noxious weeds, EEA publications, NPWS, Management plans for designated areas, National biodiversity data centre;
- Air, Noise and Climatic factors- addressing climate change, air quality,
- Energy conservation and renewable energy
- Landscape character assessment
- Human health/quality of life
- Transportation,
- Tourism
- Infrastructure planning
- Urban waste water discharge licensing
- Waste management
- Environmental Impact Assessment
- Strategic Environmental Assessment
- Obligations regarding national plans and policies and EU environmental legislation
- EPA Report- Irelands' Environment 2008- Main Environmental Challenges.

They also seek that the LAP clearly sets out its context within the planning hierarchy, and that it is the role of the Planning Authority to determine if a Strategic Environmental Assessment is needed for the LAP.

3.2 Summary of Key Issues Raised by Written Submissions during Public Consultation

3.3.1 Boundary and Naming of the LAP.

Submission Numbers: 5, 8, 10, 12.

Summary of Issues Raised:

Name

All of the submission which raised this issue point out that the name Pelletstown is not used locally and is not well recognised. The submissions recommend using the name Ashtown in the title of the LAP or a combination of Ashtown with either Pelletstown or Rathborne.

Boundary

The issue of boundaries was raised in the context of the strong physical severance caused by the features that define the boundaries of the LAP area, and the impact this severance has on the residents, restricting integration with the adjoining residential communities and engagement with local clubs etc.

The delivery of the new bridge at the Ratoath Road is raised by a number of submissions as an issue the LAP should address. The inclusion the LAP of the former Ormond Factory within the boundary is seen as a benefit of addressing this issue.

3.3.2 Vision

Submission Numbers: 2, 11, 13, 16, 18, 19.

Summary of Issues Raised:

Two strong themes emerge in reviewing the submissions which directly commented on what the vision for the LAP should be. The first was the need to build a sustainable community- from a “space to a place”; promoting a sense of belonging and pride, commitment and positivity to the area, and a desire amongst the community to settle and put down roots there.

The second issue addresses the vision in the context of the original Action Area Plan. Support is expressed for the urban structuring principles of the AAP, but also the need to re-examine some of the elements, particularly (i) the commercial centre proposed for the eastern end, now that the rail spur to the Airport is no longer being proposed; and (ii) the densities that were originally outlined both in the AAP and in the subsequent Masterplan. It is sought that the new LAP should be primarily residential in character with a vision of building a sustainable community, with the commercial element to serve local needs only.

A key point is made by one submission that this LAP is an opportune time to evaluate the success and failures of the original approach to an integrated planned area, and to work with the local community to improve sustainability and viability of the community.

3.3.3 Economic Development

Submission No's: 2, 5, 7, 11, 13, 18, 19, 20.

Summary of Issues Raised:

The submissions in relation to economic development focussed mainly on two key elements- provision of retail and provision of office/commercial uses.

In relation to retail, the viability of requiring new retail units is questioned, and the opinion is expressed that the volume of retail units provided is adequate to meet the needs of the area, particularly at the western side of the LAP, where the Village and River Centre are already built and trading. It is put that the already built vacant units will provide additional services as needed. The difficulties experienced in letting retail premises in the area is raised. Some submissions express the hope that the existing vacant units will be taken up and point out the lack of a post office or banking facility in the area. A number of submissions state that the amount of retail provided is adequate, and no more should be added to allow these businesses survive. The negative impact of providing more retail on current businesses in the area and in surrounding areas is raised.

In relation to office/commercial space, the requirement of the 2000 Action Plan of ratios of commercial to residential in the two "centres" at the eastern and western end of the AAP (40:60 at the east and 20:80 at the west) is considered to be onerous and will undermine the viability of completing the developments. The problems with the existing commercial facilities built 6 years ago (approx 8,000 sq. m.) which has not been able to attract occupiers is cited. The submissions emphasise that it is not realistic to require the provision of more commercial space.

It is sought by some submissions that the LAP promote the area as an attractive location for business and that the inclusion of the "Ormond" site in the LAP area will provide a good location for commercial businesses. One submission raises the point that most residents have to travel outside of the area for work and that there are no opportunities for employment locally.

The point is made by a number of submissions that any new commercial or retail provided should only be permitted or encouraged where it will not have a detrimental impact on residential areas.

In relation to improving economic opportunities three points are made- (i) the importance of an attractive urban environment; (ii) improving access, particularly the Ratoath road overbridge and the new Pelletstown Railway Station and (iii) providing broadband access to the area.

3.3.4 Population & Employment

Submission No's: 1, 2, 3, 5, 7, 10, 11, 12, 13, 14, 15, 16, 18, 19.

Summary of Issues Raised:

A large number of submissions made points in relation to this issue, with a strong sense of coherence in the opinions given. All of the submissions stated that the mix of housing units currently provided is heavily imbalanced and the LAP needs to address this directly. Specifically emphasised is the very high percentage of apartments provided so far, with high numbers of smaller size units. This is considered by the submitters as not conducive to developing a sustainable community for the LAP area in the long term. It is put that the dominance of apartments mean that the mix of people in the area will be limited and as households grow families will be forced to move out of the area, creating continuous level of instability; which in combination with the higher percentage of rented units, undermine efforts to build a strong community. They seek local housing options for those currently living in apartments to move into and to have a long term home. It is pointed out that less than 4% of the housing units in Royal Canal Bank are houses and over 96% of units in the western half (Rathborne end) of the LAP area are apartments. The case is made that the amount of units already provided give a sufficient density of population to support local services, and that there is no need to continue such high density development.

The domination of particular age groups is also pointed to as a reason to encourage a better mix of housing units, to allow for more family housing, with in combination with the existing apartments will encourage a good mix of ages and types of households. Own door housing is seen in the submissions as an essential component to balance out the housing stock of the area.

Alongside this, also raised is the issue of the market, and the lack of demand for apartments in semi-suburban locations.

The high numbers of young children in the population is highlighted as a key issue in that there is a pressing need for the services to support these families, such as a primary school, play spaces and facilities.

3.3.5 Urban Form

Submission Numbers: 1, 2, 3, 5, 7, 10, 11, 12, 13, 15, 17, 18, 19, 20.

Summary of Issues Raised:

The submissions again all raise similar issues with a predominant view running through all. The key issues in this section are density, quality and height.

In relation to density all of the submissions seek that the levels of density applied for the remaining phases of the LAP are substantially lower than that already built, and outlined in the 2000 Action Area Plan. The argument is made that continuing the high density form will not allow the development of a balanced sustainable community within the area and that high density building form mitigates against social interaction between neighbours. The case is made in some submissions that the high density calculation standard of units per hectare used also undermines the provision of a mix of units, and encourages smaller size units. It is put that the use of bed spaces per hectare as an alternative calculation method would allow for a better mix of housing, whilst still maintaining the potential population densities necessary to sustain local services. It is pointed out that densities should have regard to national policies and be considered in the context of the LAP area as a whole.

In relation to height, a number of submissions state that buildings of 25-50m in height are not conducive to neighbourhoods and are imposing in form. It is sought that lower height buildings with own door access should only be built to complete the schemes and that buildings should be kept height to a minimum. It is asked by one submission that the finishing out of the Crescent should be in keeping with the existing buildings on the Crescent, to ensure a compatible and balanced finish. It is stated that the height built so far in the LAP area, if continued, would create an area of overbearing density, affecting the amenities of future residents. The point is made in one submission that it is unclear how mid rise buildings serve to enhance main urban centres and that there are already a number of mid rise buildings and adding any more would be overdevelopment of the area.

Also raised is the cost implication of higher density buildings, particularly in relation to apartments, which create an excessive burden of cost on residents and management companies. Concern is expressed that the impact of service disruptions (electricity, water) on residents is disproportionately borne by residents in higher buildings.

On design, the point is made that the new developments need to be of a design in keeping with the overall aesthetic of the existing estates and should contribute positively to the area. The importance of good quality new housing is raised by a number of submissions. Some submissions state that the overall urban structuring principles of the original Action Area Plan are sound, and should be continued in the interests of coherency and consistency but that more family type housing should be encouraged to

allow for a design form that incorporates flexibility and allow full lifecycle needs of residents to be met. It is argued that the housing types built in Pelletstown so far are not suitable for different needs of different household types.

One submission seeks that future apartment buildings should be provided with basement washing and drying areas, as the size of the units are too small and people use balconies for drying and that apartments should be bigger to allow for good storage space.

DRAFT

3.3.6 Pedestrian Movement and Transport

Submission Numbers: 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20.

Summary of Issues Raised:

This topic is the most raised issue amongst the submissions received. While recognition is given of good progress and delivery on some movement and transport issues, significant issues remain which frustrate the enjoyment and liveability of the area. Transport improvements that have been delivered include a new pedestrian bridge at Ashtown, the upgrading of the Ballybogan Road, towpath improvements and the commencement of a new bus service for the area- the 120. Alongside this, a number of internal roads have been completed, linking up the various areas of the LAP. The issues of concern raised by the submissions are summarised under individual subheadings below for ease of reading.

River Road

All of the submissions which raise the River Road express concern about the current levels of traffic and the condition of the road, which is not suitable for the volumes experienced and the speed of some traffic. A number of options are put forward by various submissions. One of these is the upgrading and widening of the road to make it safe and useable, recognising it's role a distributor road and key link road between Glasnevin / Finglas and Castleknock/Blanchardstown, whilst also including traffic calming and crossing points to make it safer for pedestrians and cyclists. Others seek the downgrading of the role of the River road so that the traffic is diverted, either by using one way systems, or by making the road a cul-de-sac, as had originally been proposed in the 2000 Action Plan. Some express objections to widening the road as it would remove the rural character of the road and encourage speeding and rat-running. The use of traffic calming ramps to manage a wider road is also suggested as unsuitable due to the impact of noise on residents. Concern is expressed that any upgrade of the road should take account of the resultant traffic on the route and the impact it will have on the two apartment blocks located very close to the road. It is pointed out that noise pollution is already an issue for the residents in these blocks.

Train Services & Stations

Support is expressed for the proposed station, and its commencement is sought. Some submissions point out that the development of this station will enhance the attractiveness of the area as a place to live. One submission seeks that its location is where it was originally proposed for, to ensure that it ties into the built form developed around that principle. One submission makes the point that the new station needs to be properly built and safe, and well lit- but not obtrusively so to impact on wildlife or adjoining residents. It is sought that plans for the station should be clear in the LAP that the station will also serve Ashington. It is asked in one submission that the location of the new station is included in the LAP as an objective.

The view is expressed that services are not frequent outside rush hour and congestion at rush hour on trains arriving discourages people from using it. It is put that no commuter parking should be provided at the new station, except for bicycle parking. One submission states that the train stations provided are adequate and makes the point that an additional station will not mean additional capacity on the train service.

Bus Service

The single bus services serving the area, the 120, is criticised in some submissions as most of the services only go as far as Parnell Square, with only 2 services in the morning going to Ballsbridge. This is considered to provide poor connectivity between this service, other bus services and also with the southside of Dublin, a major employment destination. It is sought by some submissions that the bus service route be restored to connect to the train station at Ashtown to give an integrated service, as the route no longer serves the station and that the current terminus arrangement should be resolved.

Parking

A number of submissions point out that the level of parking provision made in the built permissions was too low, resulting in significant overspill parking across the LAP; which blocks paths, cycleways and creates unsightly, untidy streets, particularly where this is happening adjacent to undeveloped sites, adding to the sense of a poor local environment. It is suggested as a solution that in providing parking for apartments, the option of leasing extra spaces should be made available- to encourage turnover of spaces as needed, and ensure car storage is adequately planned for. It is suggested that all future underground car parks should make provision for electric cars.

The lack of dedicated disabled parking spaces within the LAP area is also highlighted.

Ratoath Road and Ashtown Level Crossings

This topic was an important issue to many submissions with the chronic delays experienced to get out onto the Ratoath Road in rush hour due to the level crossing on the Ratoath Road- affecting private vehicles, pedestrians and the bus service – highlighted. A number of submissions make the point that it is essential that the overpass is delivered. Concern is expressed at the availability of funding for the upgrade. The view is expressed that this should have been provided before the LAP area was developed to the extent it is now; and that it should be delivered before any further development takes place. Support is expressed for the overpass as a solution, and a number of submissions call for a timeline to be made public. The importance of

adequately designing for the old Ratoath Road to avoid creating space for anti-social behaviour is highlighted.

In relation to Ashtown level crossing, concern is expressed at the lack of clarity from either Councils or Irish Rail regarding the future of this crossing. The submissions state that congestion around the crossing is severe, blocking movement and impacting on connectivity between this area and the Navan Road area. They call for clear plans for the removal of the level crossing, and that it should be prioritised. One view seeks the automation of both level crossings.

Canal Towpath

The submissions which raise this topic seek improvements to the Canal to make it more attractive to commuters, especially between Locks 8 and 10, to access the rail station. Currently the absence of any public lighting on a section of the Canal towpath within the LAP area is a deterrent to commuters using the towpath; and this lack of lighting facilitates anti-social behaviour. An extension to the upgrade of the tow path beyond the LAP area is also sought, with a cycle path to provide a high quality direct route for commuters into town, and to connect to the planned Broombridge Luas stop. It is sought that the LAP address the issue of the upkeep of the towpath. The option of movement triggered sensor lights along the canal is recommended for consideration, to discourage anti-social behaviour. Action is called for to deter the use of motorbikes using the towpath. The point is made that there are currently no bins along the towpath and this should be addressed, to encourage people not to litter.

Pedestrian & Cycle Movement

A number of issues are raised under this heading. One called for by a number of submissions is the development of a pedestrian crossing mid-way between the Ratoath Rd and Ashtown Rd Level crossings, to connect the communities either side of the railway; allow children in the LAP area directly access the local GAA club and football club and the playing fields. Improvements and completion of footpaths within the LAP area is called for by a number of submissions and also the possibility of opening up of vacant sites to provide new pedestrian routes, to increase permeability through the area. More space on new roads for cyclists is also sought.

The interface between the housing area and Tolka Valley Park is raised, with concerns expressed on the need to make the park safely accessible and well used by the community in the LAP area.

Connections beyond the LAP area on cycling and walking routes are also sought, with routes linking local amenities, including for example to Dunsink Observatory, and also improvements to the connections across the Navan Road for both commuters and those accessing the Phoenix Park.

It is sought that adequate cycle parking should be provided within new schemes.

Other Transport Issues Raised

It is recommended by some submissions that all new roads in the LAP should have traffic calming designed in, and avoid long straight stretches of road, which encourage speeding. The current lack of speed ramps is welcomed by one submission, who seeks that it remains so. The road arrangement at the junction at Rathborne is criticised and revisions to make it safer for both cars and pedestrians are sought. The comment is made that there is too much traffic around the apartments facing the canal. One submission states there is no need for traffic lights within the area, whilst others seek provision of pedestrian crossing points to make accessing the station and village safer. Improved road markings and signage are also called for. One submission objects to the proposal for an east west connecting road from Royal Canal way to the Village as the existing road is adequate, and it will only increase noise for the apartments along this route.

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3.3.7 Social and Cultural Infrastructure & Recreation

Submission Numbers: 1, 2, 3, 4, 6, 8, 10, 11, 12, 13, 15, 16, 17, 18, 19, 20.

Summary of the Issues Raised:

Submissions on this topic addressed a range of topics, with the school and facilities being the most commonly raised. The points made by the submissions are summarised under the relevant sub headings below.

School

A number of submissions raise the failure to deliver a primary school for the area as an important issue for the LAP to address. The need for a primary school is strongly argued- particularly as (i) the area of the LAP is not listed as within the catchment of any of the local primary schools; (ii) the growing young population within the LAP area, and (iii) the need for parents to drive their children to school due to the distance and busy roads between. Alongside this, also raised is the impact of not having a local school on the building of new sustainable community. The point is made that schools are important in attracting families into the area. The lack of a school impacts on the sense of community at a local level- the children are all in different schools on a street, missing the opportunity to build a sense of cohesiveness within the community.

It is pointed out that many schools surrounding the area are heavily subscribed, with the population growth of the Dublin 15 area meaning that most schools are full.

One submission points out that a 1.2 ha site has been reserved for a school. One submission expresses concern that the site reserved for a school may have been built on.

Crèche Facilities

A number of submissions point out that the number of existing operating crèches are low, and both facilities are fully subscribed; highlighting the need for more crèches to be developed. Two submissions argue that careful consideration should be made in requiring further crèches, taking into account already granted crèches, operating crèches adjacent to the area before the LAP makes a decision on the need for further crèches in the LAP area. They point to the impact of the economic downturn on crèche occupancy nationally. Concern is expressed by one submission that a developer sought to change the use of a built crèche building to another use.

Sport & Recreational Facilities

The submissions that raise this issue almost all point out the lack of local facilities available; particularly indoor sporting facilities or a community hall. They point out that a

community centre promised in the original plan has not materialised. The nearest youth clubs are in Cabra, Finglas and Blanchardstown- too far for a child to walk to. There is nowhere to host activities for children- unlike other communities who have use of parish halls. Such a facility is needed to forge a sense of place and belonging.

The River centre community room is described by the submissions as inadequate to meet the needs of a growing community, and that there is a risk that this facility will not remain open. Two submissions criticise Dublin City Council for failing to take an active role in running this facility and leaving it in the hands of the management company; placing an unfair cost on the residents who have to fund the insurance and services for the facility. They seek that the LAP clarify the role of the local authority in supporting the establishment of community facilities. The lack of sporting facilities is also criticised, with no playing pitches or sports fields in the area for young people to use.

A few submissions point out the wide range of facilities in the wider area available to residents- the Phoenix Park, the Canal, the Aquatic Centre, Ashtown Equestrian Centre, Coolmine Rugby Club, Elmgreen Golf Club, Charleville Tennis. One points out that the area is a great place to live; one seeks that connections between surrounding facilities are strengthened rather than seeking to deliver additional facilities within the LAP area.

Parks

A number of submissions raise points related to the provision of parks. The new Crescent park is welcomed, and it is remarked that the completed open spaces are well used. However is highlighted that the enjoyment of these spaces is negatively impacted by the poor visual setting with adjoining vacant sites in poor repair.

The parkland setting along the towpath is praised, and that the landscaping has been to a high standard, but the failure to have it completed along the extent of the LAP area is criticised and the need for this to be resolved as a priority is emphasised.

The development of Tolka Valley Park is welcomed. Concern is expressed that the original granite walls edging the Tolka Valley Park have been demolished and replaced. Improved pedestrian links are sought for accessing Tolka Valley Park and also the section of the Park adjoining the Ballybogan road. It is suggested that this should be delivered as part of the new overbridge at Ratoath Rd. The potential of the new park to create a walking/jogging loop with the canal and the park is pointed out, and it is suggested this should be developed. Hope is expressed that the proposed tennis courts are included in the new park, and that the option of having BBQ areas should be looked at.

The range of existing park areas near the LAP are listed by some submissions, emphasising the attractiveness of the area to live and also the benefits of supporting such facilities by improving connections rather than seeking to replicate them.

The point is made that all open space provided in future in the LAP area should be completed to Dublin City Council's standard for taking in charge. The green areas of

Pelletstown should be promoted and emphasised. It is sought by some of the submissions that the un-used areas of land within the LAP should be converted to parkland.

Play Facilities

It is pointed out in some submissions that there is only one small playground provided within the overall area. They state that there is a need for more play areas and a greater variety of play facilities for the growing number of children within the area.

Healthcare

One submission points out the lack of a community health centre within the LAP area, citing that there is currently only one dental practice within the area, and no doctor.

Community Gardens & Allotments

A number of submissions call for provision to be made, if supported by the residents, for community gardens and/or allotment space. Both public open space (close to playgrounds) and also vacant un-used sites are suggested as suitable locations for such a facility. The feasibility of providing for these is sought before granting any further planning permissions.

3.3.8 Green Infrastructure, Biodiversity & Sustainability.

Submission Numbers: 10, 11, 18, 19, 17, 20.

Summary of the Issues Raised:

The submissions that raised these issues fall into two topic groupings (i) biodiversity enhancement and (ii) building technologies.

In relation to biodiversity enhancement, it is suggested that strip of land between the canal and the rail line presents an opportunity for a biodiversity corridor, which by reason of its inaccessibility to the public, would provide a good refuge for wildlife. With selective planting, it has great potential as a wildlife corridor, and would also visually improve the area for those walking along the towpath. Also small actions are suggested, such as installing bat boxes and “biodiversity proofing” landscape management plans for open and communal spaces, would help improve the biodiversity of the area.

It is sought by one submission that the area to the north and west of the LAP should be kept as a green belt, and developed as parkland and a biodiversity corridor.

In relation to buildings, it is suggested by one submission that developers should be required to exceed Part L of the building regulations. This is not supported by a second submission. Criticism is made of the use of electricity as the source for heating the apartments when the gas network is available in the area. The point is made that the developments have a very poor energy profile and the large common areas in apartment buildings are wasteful of electricity. It is suggested that the opportunities for district heating should be examined for future developments.

3.3.9 Undeveloped Land

Submission Numbers: 1, 2, 5, 7, 10, 12, 13, 15.

Summary of Issues Raised:

The main concern raised by all of the submissions on this issue is the impact of the undeveloped sites on the amenity of the area. The view is expressed that the vacant plots, with poorly maintained and visually unattractive hoardings and builders rubble remaining on the sites make the area feel like a building site, are an eyesore, and block off areas from direct views- impacting on security and also removing the potential for an attractive visual aspect. The impact of severance of the sites is also raised. The view is expressed by many submissions that this issue needs to be resolved as a priority for the LAP. The view is expressed that these sites are unlikely to be built on for over 10 years, and therefore resources are needed now to fix these eyesores.

What is sought is upgrading of the lands either as parkland or at least grassed and attractively fenced. Until such times as the sites are developed it is sought that the LAP require that the sites are maintained in a condition consistent with the principles of the LAP. Formal structures are sought to be put in place to facilitate communication between the community representative, the developers, receivers, Dublin City Council and other stakeholders to discuss short and medium term plans for the land.

Consideration is sought of some portions of the sites being made available for community activities such as community gardens or allotments.

One submission asks that the LAP process should strengthen the awareness and use of the Derelict Sites Act.

3.3.10 Consultation

Submission Numbers: 10, 12, 17

Summary of Issues Raised:

Two submissions query the mention in Figure 2: Stages of Local Area Plan in the initial stage the reference to “initial meeting contact any stakeholders, community groups and clubs” prior to the publication of the issues paper.

The point is made that the LAP area is a relatively new community and that extra effort must be made to reach out to residents within the area. This is particularly an issue for apartment dwellers, where leaflets often are not received through letterboxes.

The use of Dublin 7 instead of Dublin 15 in the public notice reflects the need for the Council to properly consult with local residents.

One submission states that their residents association requested an additional public information session in the Navan Road Parish Centre or Cabra Library. They state that the notice given of the public meetings was too short for them to alert their members.

Comment on Issues Raised in relation to Consultation Process:

The image in figure 2 is a generic image of stages of an LAP. In preparing for this LAP, the decision was made to start the process with the public consultation so as to commence the process before the summer holiday season of 2012, rather than beginning with survey work and contacting groups. It is intended that consultation with relevant stakeholders will take place following the agreement of the Council of this Managers Report. It is accepted that this image did not accurately describe the stages put in place for this particular LAP.

In relation the public consultation sessions, the locations selected- two within the LAP area and one to the south in Parkside Centre, John Paul Park- targeted the existing residential population living within the Pelletstown area and those in the surrounding areas. The selection of Parkside as a second venue provided a location close to Pelletstown that is accessible to residents of Ratoath Road, Navan Road, Nephin Road, Cabra, Finglas South and Kinvara/Ashington road areas; whilst also providing an alternative time slot for residents within Pelletstown for those who cannot make the other times.

Cabra Library or Navan Road Parish centre were not chosen as they are either (i) further distance away from the Pelletstown area or (ii) from the communities immediately adjacent to Pelletstown to the east, such as Ratoath Road estate and Cabra.

3.3.11 Other Issues Raised

Submission Numbers: 7, 8, 10.

Summary of Issues:

A few submissions raised issues not identified above; these are listed below for consideration.

- The management company structure is currently struggling to ensure that they have sufficient funds to keep properties in good order.
- People who chose high density living should be rewarded with the reduced demands that their choice places on provision of infrastructure and services- such as water and transport. So far this has not been the case for this area; the LAP should seek to address this.
- The water supply to the LAP area is very hard in quality which is negatively impacting on household utility items such as washing machines and dishwashers.

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4.0 Conclusion and Managers Recommendations

All submissions received have been reviewed and all the comments received will be taken into consideration in the preparation of the Draft Local Area Plan.

The comments received and key themes identified will be important in the preparation of draft sections and in particular will be considered in the formulation of policy under the local area plan in several areas including land use proposals (long term and short term priorities), movement and connections, visual character, economic development, open space and recreational development, community and social development, residential character and neighbourhood creation, sustainable design and sustainable developments etc.

It is important to note that receipt and analysis of these submissions forms one important part of the overall pre draft preparation stages. The Local Area Plan team will continue to consult and meet with all relevant stakeholders up to the publication of a Draft Local Area Plan including state departments in areas of education and health services, government agencies and state bodies such as the National Transport Agency, the adjoining local authority of Fingal County Council, the providers of local services including the Gardaí and local schools, the landowners and local community based organisations to progress and evolve the content of the Draft Local Area Plan.

Many of these meetings will seek to address the issues as raised during the Issues Paper consultation.

The LAP team will liaise and work with the assistance of the Central Area Office and update and consult with the City Council, local Councillors of the Central Committee during the preparation stages of the Draft Local Area Plan.

A version of the Draft Local Area Plan will be presented to the City Council prior to its official display. This is estimated for April 2013.

Managers Recommendations:

It is recommended to the Council that the LAP proceed to draft stage, based on the proposed LAP boundary which proposes a c 1km area of consideration included as part of the LAP as a zone of influence (see Map A in Appendix 1)

- 1) The Draft LAP is prepared addressing inter alia the issues arising from submissions which are :
 - i. Providing for sustainable densities
 - ii. Ensuring a good mix of housing types, with more family size units provided
 - iii. Creating a quality neighbourhood.

- iv. Seeking provision of new primary school
 - v. Improving transport connections by road, rail, bus, cycling and walking both within and beyond the LAP area
 - vi. Treatment of vacant sites.
 - vii. Improving internal connections.
 - viii. Improvements to the built environment and public areas.
 - ix. Seeking ways to enhance the natural environment, heritage and recreation.
- 2) The Draft LAP is prepared in compliance with EU directives including Strategic Environmental Assessment, Appropriate Assessment and Flood Risk Assessment processes, legislation and the new Dublin City Development Plan 2011-2017.

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Appendix 1

Map A

Proposed LAP Boundary and Zones of Influence

