



## **Pelletstown Local Area Plan Issues Paper**

### **Submission to:**

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### **Submission by:**

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Royal Canal Park Community Association.

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Date: 10<sup>th</sup> August 2012

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## 1.0 Introduction

This submission is made on behalf of the community groups in the general 'Pelletstown' Area, namely; Royal Canal Park Community Association (RCPCA) & The Rathborne Community Association (RCA).

RCPCA was founded in 2006 by a small group of residents in Royal Canal Park, Dublin 15. The objectives of the Association are to protect and improve the quality of life for all those living in Royal Canal Park and to help build a community there while forging links with neighbouring communities. RCPCA has over 100 members and an active committee who meet regularly to progress issues on behalf of its membership and to organise events for the whole community. RCPCA is a voluntary, non party political association, representative of the views of residents of an estate of over 800 dwellings.

The Rathborne Community Association (RCA) has been formed to represent the interests of all owners, tenants and landlords of the Village at Rathborne, Rathborne No. 1 and 2 (Earlswood, Royal Canal Court, Waterways), Laburnum, and Pelletstown Manor (approximately 1100 housing units in total). The RCA is committed to resolving issues regarding amenities and undeveloped aspects of the area, to help deal with security concerns and promote social activities in the Rathborne district.

The Pelletstown area has begun to develop as a community in recent years. Both associations run community events at Christmas and during the summer months. In April of this year both community associations worked together to hold the 'Canal Spring Fair' which was a great success. Activities and entertainment included canal boat trips, choir, brass band, face-painting, magician etc.

The unplanned halt in construction activity on the site affords us the opportunity to reconsider the sustainability of the original planning permissions granted for the sites in Pelletstown. It must be considered in a post Celtic Tiger light, where properties will not change hands on a regular basis every couple of years due to reduced public financing. This is recognized in the RPGGDA which state that *'whilst the RPGs take a long term view regarding demand and need, there is a need to consider the implications of the major changes the housing market has*

*undergone in the past year and the implications such changes could have on supply. The scale of house building experienced in the Greater Dublin Area in the past number of years is unlikely to be repeated in the short or medium term’.*

The shift in the property market has meant that a number of residents who bought property in Pelletstown with the intention of moving on in future years are remaining. Residents are “putting down roots” in the area. Therefore the LAP should strive for a scenario where a core permanent family-based community will sustain the overall development alongside a more transient population of apartment dwellers. There must be a commitment to genuinely engage with and act upon the feedback of the existing residents in the area. This is in the context of our most recent experience of engaging in development plans (the Dublin City Development Plan) which allowed for public submissions but seemingly disregarded all concerns raised by the residents of Pelletstown in the pursuit of high density development on the site (extract of submission contained within Appendix A).

The LAP must achieve a balance between satisfying higher densities in accordance with the City Development Plan and Regional Planning Guidelines, and meeting the requirements of the growing population and community established within the area. Development should be phased and should consolidate and improve existing residential areas.

Sustainability is a key concern of the current residents in Pelletstown. The Community Associations are of the opinion that a sustainable community can only be established in Pelletstown if there are a sufficient number of family-sized homes and community facilities available which will enable existing residents to remain within the area, and for new families to plan for a future in Pelletstown . This will also encourage residents to invest in local community infrastructure. Families with children are at the heart of every community. There is an insufficient number of family homes and educational facilities in the area. Many young couples Pelletstown may be forced to move out of the area as they do not feel they can raise a family in the area due to the lack of community and educational facilities. If this happens the population of the area will become more transient. The Community Associations are working to generate a natural community spirit in the area. The LAP should support this by redressing the imbalance between unit type, population and community facilities available.

Families that can see a long term future in the area are more likely to invest in local infrastructure in order to maintain the area as a pleasant place to live. Due to the large amount of professional landlords that own apartments in the area, management companies are struggling to ensure that they have sufficient funds to keep properties in good order. Huge financial investment is required to maintain large apartment blocks. The lack of financing available to management companies can result in a reduced service for all residents. This detracts from the attractiveness of the area to live / work.

The Issues Paper states that *“Due to the current economic climate and financial limitations on the public and private sectors, progress on several key development sites has ceased. Also the River Road has not yet been widened or improved. The LAP will seek to address these issues”*

We respectfully request that the Pelletstown LAP also seeks to address the cessation of progress on the site. We also request that the LAP identifies the consequences of it for those who have already invested in the area and who wish to remain in the area for years to come.

## **2.0 Background Reading and Format of Submission**

This submission is made following consideration of the following Policies and Guidelines;

- Dublin City Development Plan 2011-2017;
- Development Plans, Guidelines for Planning Authorities, June 2007;
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages) May 2009;
- Urban Design Manual, A best practice guide, May 2009;
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities;
- Regional Planning Guidelines for the Greater Dublin Area (RPGGDA);
- Implementation of Regional Planning Guidelines Best Practice Guidance, December 2010;
- Dublin City Canals, Recreational Tourism and Commercial Product Identification Study and Development of an Investment and Maintenance Framework' January 2010; and
- <http://www.cdysb.ie/>

Sections 3.1-3.11 below address the topics as set out in the Issues Paper

### **3.0 Response to the Issues Paper**

#### **3.1 Progress with developments to Date**

The development of Pelletstown has proceeded under a series of planning permissions. In its current state the development is comprised of two areas; Royal Canal Park to the east and Rathborne to the West. These two areas are separated by undeveloped lands. These lands secured with fencing / hoarding in various states of repair.

Royal Canal Park (RCP) is composed of approx 850 units – 820 apartments & 30 town houses.

RCP is in two phases. Phase 2 adjoins the Ratoath Road to the east and the River Road to the north. Phase 2 consists of apartments which are mostly occupied, however there has been no occupation of the retail / commercial units at ground level within the development or in the feature building which fronts the Ratoath Road.

Phase One of Royal Canal Park is located to the west of Phase 2 and is comprised mostly of apartments with some townhouses. Occupation of retail / commercial units has been more successful in Phase One with the opening of 'Centra' convenience store and 'Be Beautiful' salon, however there are still a number of vacant ground floor units.

The western end of Pelletstown is comprised of Rathborne and The Village. The breakdown of completed units in these developments is as follows;

- Pelletstown Manor -200 units.
- Rathborne No.1 which has 261 units comprising of 209 duplex/apartments, 48 townhouses and 4 houses.
- Rathborne No 2 is composed of 390 units – 329 apartments, 33 duplexes & 28 houses
- The Village is composed of 252 units – all apartments.

Retail and commercial floorspace has been occupied in the western end of Pelletstown to a greater degree with the opening of a supermarket, chemist, dentist, bookmakers, restaurants, bar, barbers, salon and estate agents. There are still some vacant units.

There is also a convenience store, salon, community centre, laundrette and crèche at Rathborne Place.

The limited retail and services offer in RCP and the playground at the Crescent Park encourages movement along the canal and between the two developments.

### **3.2 Location Context**

While the Issues Paper describes the 'Pelletstown' area very few residents refer to the place as Pelletstown. There is not one road sign in Dublin to direct people to Pelletstown, Rathborne or Royal Canal Park. There are signs for the River Road which facilitates a rat run between Finglas and Blanchardstown/Castleknock/M50. Due to the presence of Ashtown railway station many people use Ashtown as their address – this may be disputed by the original residents of Ashtown.

Signage helps to build a sense of place by informing and directing people to that place. These very basic omissions do nothing in aiding residents in constructing a sense of place.

The importance of a sense of place can be understood by looking at a definition of its opposite – 'placelessness'. *"Placelessness should be recognised as a primary design concern because the current development pattern it represents has generated a human environment that is less hospitable and healthy for the individual, less sensitive to the environment, and less economically feasible in the long run"*.<sup>1</sup> The importance that DCC attributes to a community having a 'sense of place' is also demonstrated by the fact that this term is referred to no fewer than 5 times in the Pelletstown LAP, Issues Paper.

Although, a "sense of place" appears to be somewhat subjective, most Place theorists agree, while differing on the degree of significance of each, that sense of place is derived from three main components: the physical environment, activities and meaning.<sup>2</sup>

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<sup>1</sup> Sense of Place and New Urbanism: Towards a Holistic Understanding of Place & Form, Kyle Joseph Beider May 2007. P 5

<sup>2</sup> Ibid. p18

This submission argues that there is no strong sense of place in the area. In terms of the physical environment, the sense of 'placelessness' is fostered by some very basic facts:

The LAP draft paper for Pelletstown refers to the fact that *'social and cultural activities helps to build connections'*<sup>3</sup>. In addition, 'Guidelines for Planning Authorities on Sustainable Residential Developments in Urban Areas' May 2009 P. 26/4.2 state that *'Sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally. In this context, planning authorities should seek to ensure that facilities for social and cultural use, such as community centres, and personal and community development, such as resource centres, are available within the wider community'*. There are limited facilities in the Pelletstown area.

#### Sense of Place & Unfinished Infrastructure

Social interaction is not limited to that which takes place within formal meeting places such as a community centre, it is also supported by other 'residential third places' even down to the 'walkability' of the place, i.e. because of their unfinished state, parts of Pelletstown do not accommodate full 'walkability' within the development. We refer specifically to unfinished infrastructure in the Rathborne part of the development; on the northern end of Rathborne Avenue, the lack of a pedestrian crossing in Rathborne Village, fading road markings, lack of traffic lights and traffic calming measures, the presence of dangerous junctions such as the one where the River Road meets Rathborne Ave.

The completion of the infrastructure in the cited areas would provide not only a better pedestrian experience and a safer environment for residents, but would in general help to create a sense of place that is negatively impacted by unfinished works within a development. This is discussed further in section 3.5 below.

#### Sense of Place and Sustainability

'Sense of Place' is intrinsically linked with sustainability and is considered one of the indicators of sustainability – DCC's own Development Plan states that *'The creation of attractive*

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<sup>3</sup> LAP for Pelletstown p14

*environments with genuine sense of place is a prerequisite to achieving sustainability*<sup>4</sup>. There is no doubt that the Pelletstown environment is attractive but the attractiveness of an area does not make a community. It is therefore recommended that the above mentioned issues are addressed in the LAP.

Developing a sense of place in a community is not only good for the well being of the individual, it also encourages residents to care about the physical environment around them.

### Vision for Pelletstown – Space to Place

Our community wants to transform Pelletstown from a ‘space to a place’; for residents to have a sense of belonging and pride in their neighbourhood; commitment and positivity to their area; a desire and willingness to lay down their roots in the area and thus promote future sustainability.

### **3.3 Boundary of the LAP**

The boundary of the LAP is defined by the natural barrier of the Royal Canal to the south and the River Road to the north. The railway crossings at Ashtown and Reilly’s Bridge define the boundaries to the east and west.

The canal and railway crossings are also a physical boundary between the Pelletstown area and surrounding residential areas of Ashington and the Navan Road.

This presents a difficulty in terms of the physical interaction between these spaces and the potential for interaction with the wider community. There is a high proportion of young adults that commute to the city on a daily basis from Pelletstown who have not become involved in local sports or social groups that pre-existed in the area. Again, a higher proportion of families are required in order to knit the Navan Road and Cabra communities with a new Pelletstown community.

The residents would also be aware of the strong objections that the pre-existing communities on the Navan Road and Cabra would have had to the scale and type of development approved on the Pelletstown site. The extent to which the wider community interacts with the

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<sup>4</sup> DCC Development Plan Ch 15.

Pelletstown area would seem to be limited to the use of the local supermarket and café/restaurant facilities.

The inclusion of the Tolka Valley Linear Park along the River Road and the site of the disused Ormond print factory on Ratoath Road at the exit of Royal Canal Park are supported. However the inclusion of the Tolka Valley Linear park should not influence the perception of open space and amenity provision in the Pelletstown area as the River Road and existing linkages within the development makes pedestrian access (when the park is opened) extremely difficult and unsafe.

### **3.4 Dublin City Development Plan and Development Principles**

“Pelletstown was one of a series of designated ‘large’ development areas where development would proceed in accordance with sustainable principles. The Pelletstown Action Area Plan (AAP), 2000, set out the vision for the area as *“the creation of a vital, viable and sustainable community with a distinct urban character and strong sense of place”*. Almost twelve years have passed since this vision of Pelletstown was formulated.”

The area is now classified as a Strategic Development and Regeneration Area in the current City Development Plan.

Further high density development in Pelletstown can certainly sustain the development of expanded transport links. It can sustain supermarkets and bars. However, it cannot sustain a community. Without a community that will willingly and naturally manage the area into the future there is limited potential for a successful development.

There is little expectation that the vacant land banks in Pelletstown will be developed over the life of the plan to 2017. Developers have struggled to sell their remaining units at deep discounts and many are not in a financial position to plan for future development. Vacant land banks in the area are the major issue currently facing the community. They are an eyesore and severely detract from the residential amenity and the value of properties in the area. They serve only to physically divide existing communities and facilitate dumping of waste, and other criminal activity. It is essential that these sites are cleaned up and that their perimeters are maintained to a high standard.

A medium term plan for the preservation and maintenance of these sites must be agreed to by their owners as a condition of the extension of planning permission. The LAP should support and facilitate communication between community representatives, developers, receivers, Dublin City Council and other stakeholders with regard to the short and medium term plans for the land. Consideration should also be given to opening up a portion of the sites for community based activities such as community gardens or allotments.

Based on progress to date, the main positive attributes of Pelletstown are;

- Canal walkway
- Train station
- Village centre
- Bus route
- Park
- Residents
- Proximity to the city centre
- Natural landscapes

The failings on delivering progress in the Pelletstown

- Absence of community and educational facilities
- Access to the site (manual level crossings)
- Absence of a town centre at the eastern end of Pelletstown
- Absence of train station at the eastern end of Pelletstown
- Market conditions
- Unit type
- Derelict lands
- Parking arrangements

### **3.5 Economic Growth**

The LAP can encourage job creation and strengthen the local economy by making the area physically attractive to do business in. Businesses will not locate in developments that are not maintained. The current economic climate has resulted in a number of vacant retail and office

units in The Village at Rathborne and Royal Canal Park. The LAP should support the take-up of these units by ensuring the surrounding area is an attractive place in which to do business.

The residents support additional economic activity and employment within Pelletstown. Pelletstown is suitable for accommodating retail, professional and tertiary service type employment which complements the demand for such services in the area. However, future commercial development should be in keeping with preservation of the amenity of existing residential properties. The possibility of promoting the existing office space in Royal Canal Park Phase 2 should also be considered. The LAP should set out pro-active objectives that guide developers and investors towards facilitating temporary uses in this location.

The inclusion of the Ormond Factory site also provides the opportunity to locate economic activity in an appropriate location, particularly for more industrial type activities.

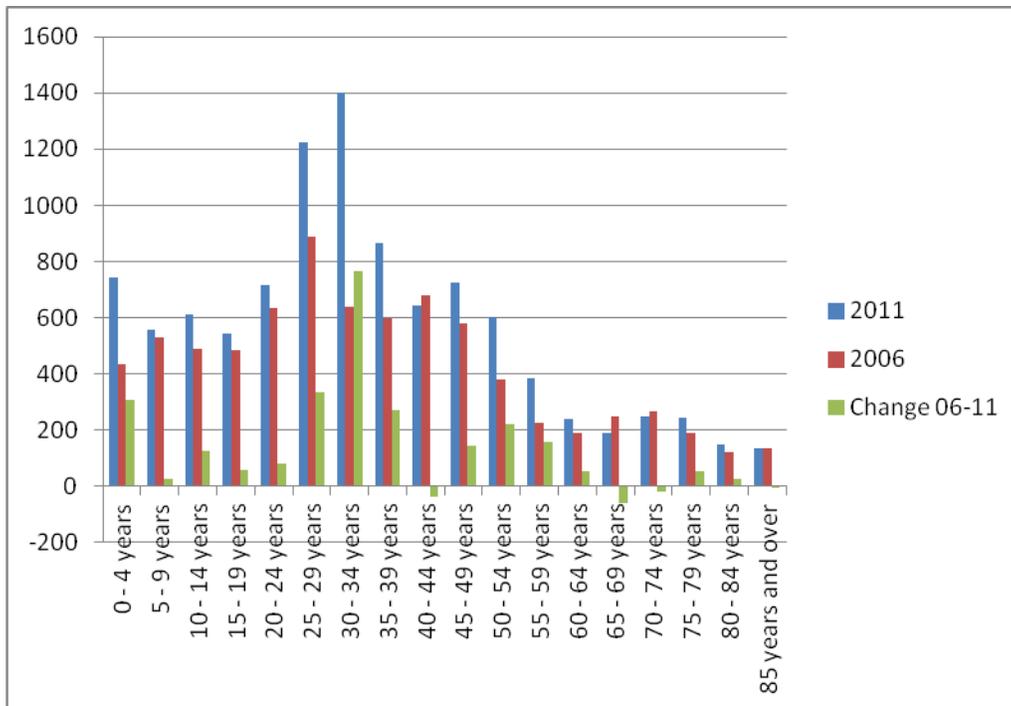
The opening of a new train station at Pelletstown will enhance the economic potential of the area by making it more accessible and a more attractive place to live.

The availability of broadband infrastructure in the area should be addressed. It should be an objective of the Plan to provide a fibre connection in the Pelletstown area.

### **3.6 Population and Employment**

The LAP can address the needs of the existing and future population of the local area by ensuring that the future provision of services and development of vacant lands are consistent with the needs of this rapidly growing community.

The figures below are based on the Small Area Population Statistics for 2011. They show that the population of 'Ashtown A' has increased by approximately 32% in comparison with SAPS for 2006. While the Ashtown A Electoral District extends beyond the boundary of Pelletstown it is considered that this large increase is accountable to the development of the Pelletstown area and any noticeable increase within a particular age cohort is attributable to Pelletstown.



**Figure 3.6.1**

It is clear that there has been a sharp increase in the number of children of school going age and the number of adults of household formation age within the area.

### **3.7 Urban Form and Spatial Structure**

#### **3.7.1 Layouts and Parking**

As outlined in Section 3.2 above it is difficult to comment on the positive examples of architecture/ urban design and housing layouts in the overall area as the vacant lands which are fenced off prevent linkages through the development. ‘Permanent’ layouts are not evident in most cases. As you move around the development you are diverted by hoardings and fences that were originally planned as linkages. These undeveloped lands make movement through the development more difficult and pedestrian trips are lengthened.

The layouts in RCP, Rathborne and The Village where blocks face each other creating attractive streetscapes on both sides are successful. The commercial units at RCP, Rathborne and The

Village provide landmarks and a sense of community as well as providing essential services. The units at Rathborne Court provide passive surveillance of the playground, park and canal without negatively impacting on the amenity of the open space.

There are two squares within the Rathborne development which encompass an enclosed common garden for all residents of the square (1 in Earlswood & 1 Rathborne no 2). This also provides for a private garden for most units is a very successful design. This provides a very safe environment for children, encourages neighbourly interaction.

In terms of day-to-day activity within the existing layouts there are some issues that should be addressed in any future development proposals, the LAP can ensure this.

The Dublin City Development Plan 2011-2017, in Map J and Table 17.1, sets out car parking standards for land uses across three parking zones. The LAP area is covered under two parking control zones. For residential land use, parking requirements are 1 space per unit in Area 2 locations and 1.5 spaces per unit in Area 3 locations. There is a shortage of visitor parking within the Pelletstown area as the parking provision per unit does not reflect the reality of residents parking requirements. In reality there are two cars per unit, particularly when one apartment is rented to several individuals. The visitor spaces then become occupied permanently by residents' cars. This creates problems for visiting friends and families as there is nowhere for them to park.

We would request that the LAP makes provisions that new residential schemes seeking planning permission must address the issue of parking provision. There should be no relaxation of these parking requirements in any instance.

There are no loading bays for commercial premises. This results in delivery trucks being parked up outside premises for periods of time to allow for unloading. This creates a traffic hazard for pedestrians and drivers as they are forced to navigate around the vehicles. The noise associated with unloading vehicles negatively impacts on the residents above these units. The LAP should ensure that all future planning applications for development ensure that there are suitable parking facilities for the delivery of good which will limit the impact on residential amenity.

Parking for childcare units should be convenient for parents dropping off and collecting children. Parking spaces should be located proximate to the entrance of the premises in order to discourage drivers from just pulling up outside the premises and parking illegally.

A pedestrian crossing is required in The Village. Paving designs actually confuse drivers and pedestrians as they appear to define crossing points but there are no lights or belisha beacons in place.

Traffic calming measures are also required on completed road networks. Undeveloped lands have resulted in longer stretches of road without any junctions (Royal Canal Avenue). The absence of junctions means that drivers tend to drive at faster speeds along the stretch of road.

### **3.7.2 Housing Density, Type and Building Height**

The housing types that have been developed in the Pelletstown area to date are not suitable for the different needs of different household types (as illustrated in section 3.6 above). The current housing offer of predominantly apartments does not offer the growing population suitable choice. It is considered that there is suitable availability of apartments to rent in the area. However the future sustainable development of the area would benefit from the addition of terraced and semi-detached houses which are more attractive to the growing family market. It can also be argued that houses will attract more owner occupiers which would contribute to establishing a greater sense of community

In the current economic climate, it is not envisaged that Pelletstown will be one of the main growth areas of the city over the next five years. Many sites have remained undeveloped since 2008 and no new development is imminent. Developers have realised that there is no market demand for the nature of residential units originally planned for the area. The property crash of recent years has made potential investors wary of apartment ownership, particularly in an area that already has ample supply. Further apartment development will only serve to further depress property prices in an area dominated by apartment units. Dublin City Council needs to appreciate this new reality and respond to evolving requirements of the area.

It is unclear how mid-rise buildings serve to enhance the main urban centres. The existing sites already have a number of mid-rise buildings and further development of this nature would represent an overdevelopment of the site and would not be appropriate for families.

The LAP should address the balance required between the higher densities associated with transport links and the housing types required by the emerging demographic in the area. The LAP should prioritise the delivery of life-long family homes as part of a successful mix of residential typologies while achieving a density that will support the provision of public transport, schools and other services.

The LAP should ensure that all new developments contribute positively to the enhancement of the existing community in the area.

### **3.8 Movement and Transport**

The Pelletstown area is easily accessed to/from the north side of the city centre by the train and 120 bus. However the area would benefit from greater public transport links to the south side of the city and to the Blanchardstown and Castleknock area. The proximity to the M50 means that there are still a large number of residents who live in the Pelletstown that travel to / from work etc. by car. This is evident in the 2011 SAPS for the area which show car drivers and passengers in the highest numbers for means of travel to work, school or college.

Movement within the development is along the canal which acts as an amenity as well as an important pedestrian / cycling route. Improvement of this corridor is recommended in section 3.10 below.

Traffic congestion is an issue in terms of the manual level crossings at Reillys Bridge and Ashtown Station. This has been highlighted during the process of the application for planning permission for the overbridge at Reillys Bridge. On account of these chronic traffic delays on Ratoath Road, the installation of an overpass at Reilly's Bridge should precede any further development of the Pelletstown site. Plans for the removal of level crossings at Ashtown station should also be prioritised.

Alternative plans should be put in place by DCC in the event that private developers are unable to maintain the current internal road network.

The canal side pedestrian route is not tree-lined (as per the AAP) and is in darkness during winter months due to the lack of public lighting. It is therefore unsafe to be considered a pedestrian route. This is addressed further in section 3.10 below.

Pedestrian access over the canal and railway line should be considered at the midway point of the canal boulevard to connect communities and provide access to playing pitches from the north. It is considered that the proposed railway station at Pelletstown will also allow for easier access between the area and the Navan Road.

Upgrades to the River Road should take account of the resultant increase in traffic on the route and the impact it will have on the two blocks of apartments (Park View and River Vale) which are situated very close to the road. Noise pollution from traffic is already an issue for residents in these blocks.

Development of vacant lands should allow for permeability through the development to allow for ease of access.

All planning applications for new developments should be conditioned to provide good quality cycle parking and storage facilities.

### **3.9 Social, Community and Cultural Development**

The current levels of community / cultural facilities in the immediate area are not adequate.

#### **Schools**

The presence of a school/s plays a very important role in sustainable development. In the foreword to 'Guidelines for Planning Authorities on Sustainable Residential Developments in Urban Areas' the then Minister John Gormley states that *'That's what sustainability is all about; the integration of schools, community facilities, employment, transport and amenities with the housing development process in a timely, cost-effective way.'*

Pelletstown does not have a school. Although, provision was made for a school in the Development Plan on the as yet undeveloped land between Pelletstown Manor and Royal Canal Park, there is no doubt both vacant land and high demand for such an enterprise. The presence of schools in an area attracts families to see such a community as a viable place to rear a family. Many residents of Pelletstown have stated their desire for a primary school in the area. Most children in Pelletstown have to be transported to school thus increasing car usage – this does nothing to encourage a healthy lifestyle for children.

The Pelletstown area is currently not listed as being in the catchment area for ANY local primary schools, as the area is listed as Dublin 15 and is therefore not in the parish of the local Dublin 7 schools. Unfortunately, and despite being in the Dublin 15 parish, we are also not listed as being in the catchment area for any Dublin 15 schools either. The nearest Dublin 15 school is St. Brigid's in Castleknock for which there is massive demand in the immediate Castleknock area and in which children living in Pelletstown have little or no chance of gaining in place. Educate Together schools in Dublin 7 and 15 are options, but with growing demand and limited places, these are not an option for families who have not had their children's names on the waiting list for several years. The Dublin 15 population has grown exponentially over the past 10 years and there is huge demand and pressure for school places from families living close to the schools, children commuting across the M50 such as those living in Pelletstown are not seen to be living in the catchment area as the schools are unaware that it is in fact in Dublin 15. The lack of a local school also impacts the sense of community at a local level, as it means that children living within the area do not get to know one another at school. Parents frequently have to drive their children to different areas so that they can play with school friends as opposed to having a large group of friends that live and go to school locally. The relationships between children, parents and families which grow organically from the presence of a local school would go a long way to developing the Pelletstown area as a sustainable community. Informal approaches to Educate Together as to the possibility of developing a primary school in the Pelletstown area, were greeted with positivity.

There are 30 primary schools in the Dublin 15 area, the vast majority are on the other side of the M50 and are located in areas where there is huge local demand, and are very difficult to secure places in. A list of these schools is contained in Appendix B.

*New residential communities can generate a demand for a significant number of new school places, particularly where families are attracted to the area. In such cases, it is vital to the process of supporting sustainable communities that the planning system facilitates the timely provision of new school buildings. Detailed guidance on planning for school provision through the development plan, local area plan and development management processes and the roles, responsibilities and specific actions to be taken in relation to forecasting future demand for school places is available in the Joint Code of Practice on Provision of Schools and the Planning System (August 2008).<sup>5</sup>*

### **Childcare**

There are two childcare facilities in the Pelletstown area. 'Giraffe' in Rathborne and 'Early Learning Creche' at RCP. We have heard from residents that both are fully subscribed. Additional childcare facilities are required in the area.

### **Community, Sports and Recreational Facilities**

To develop a sense of place and reinforce community identity a community needs to come together in a social and cultural context within that place. While community centres were included in the plans for previous development, and conditioned in grants of permission they have not materialised. A community centre is required to serve the entire Pelletstown community. In particular to meet the needs of the younger generation. The nearest youth club / project is in Cabra / Blanchardstown / Finglas all which would require a car journey. If we are to encourage people to take an interest in their immediate community, then we need a local centre where people can interact with each other. Most districts in Dublin have at least a parish hall where groups can meet or events can be held, but the wider area of Pelletstown does not have that. The one community space available in the area (the River Centre community room) is privately owned and is in danger of closing. This community centre is used weekly for a parent and toddler group, exercise classes and dance classes. The centre is also use for community association and local area policing meetings.

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<sup>5</sup> Extract from Guidelines for Planning Authorities on Sustainable Residential Developments in Urban Areas May 2009 P. 26/4.2

Limited public parking spaces cause difficulty when trying to host wider community events at this location. As the community centre is at Rathborne extra parking provision is required to cater for those coming from RCP. We request that some provision is made in the LAP for extra parking to be made available even on temporary basis by applying to developers/receivers for space for same from vacant lands.

Community, sports and recreational facilities will:

- Allow the community to celebrate the diverse culture of its residents
- Help identify and create a community character
- Provide a venue for the dissemination of community information, a place to address common concerns and engage residents on local issues
- Provide a venue for sports, social, recreational, cultural & arts activities to help residents forge a sense of place and belonging to their neighbourhood.
- Provide a venue for adjacent communities to engage and integrate with the 'blow-ins'
- A means of introducing new residents into the community
- A place for residents to participate in shared interests & activities which have been shown to transcend social class, ethnicity, religion and politics
- provide a venue for youth club / project / community groups - gardening groups etc to meet

A Community centre is not limited to a physical building. The residents would also be supportive of community gardens which require less financial investment. These projects have been successful in other countries, for example in New Zealand where vegetable patches were planted within a playground so that parents could do a bit of community gardening while children played. At harvest time people would have a community meal or share out the produce. The semi-circular park at Royal Canal Avenue may offer a suitable location for such a project. The feasibility of such a project should also be considered during the deciding of future planning applications.

## **Healthcare**

A community health centre is required to cater for the growing population of young children and to cater for the population of Pelletstown as it ages. While there is a dentist, there is no doctor within the Pelletstown area.

### **3.10 Landscape, Open Space, Biodiversity and Recreation**

The completed open space in Pelletstown is well utilised. However the landscape is negatively impacted upon by vacant lots which are in a state of poor repair.

There are limited sports and recreation facilities in the locality. Indeed, the City Council has specifically declined to become involved in the one community hall serving over 2,000 dwellings. This will become more of an issue as the younger age cohorts reach the teenage years. The provision of playing pitches is essential to establishing a community / club.

The canal towpath is probably the most used amenity within the Pelletstown area. Its improvement should be prioritised as it serves as a valuable pedestrian link within the overall area.

The area along the canal from Reilly's Bridge (Lock 8) to Ashtown Train Station Lock (Lock 10) is an integral route within the Pelletstown Area. It provides a valuable link between the Royal Canal Park development and the Rathborne Development. This pathway is used as a direct walking route to the train station and Rathborne Village with its shops, restaurants and other services. It is also a valuable recreation amenity with walkers, runners, and cyclists enjoying the benefit of the high quality footpath and picturesque setting.

While the recreational use of the canals is usually the main attraction it is considered that the stretch of canal between locks 8-10 has the added and valuable use of serving as a commuter route for people walking from Royal Canal Park to Ashtown Train Station.

However, as demonstrated in the figures below the absence of adequate lighting along this stretch of the canal acts as a deterrent for some as the walk to/from the station outside of daylight hours is perceived as dangerous. The absence of lighting is also considered as a contributing factor towards anti-social behaviour and littering/dumping in the area.

For this reason we would request that the possibility of erecting adequate lighting is investigated as part of this LAP subject to all environmental considerations.

We would also request rubbish bins are placed along the canal in order to discourage littering.

The feasibility of placing seating along the canal should also be investigated. There are grass sections along the canal at the eastern end of Pelletstown which may be a suitable location for picnic tables. Benches at intervals along the canal provide rest areas for those who may have difficulty walking long distances.

We refer to Dublin City Council's publication *'Dublin City Canals, Recreational Tourism and Commercial Product Identification Study and Development of an Investment and Maintenance Framework'* January 2010. This publication refers to a Stakeholder Survey and Waterway Users Survey undertaken in 2009. Around a dozen different problems were raised by respondents, but nearly half specified antisocial behaviour (26%) and litter/dumping (22%) and often these issues were linked together. Nearly 20% mentioned the problem of poor maintenance and nearly 10% mentioned poor access to or along the canal. Other significant problems were poor navigation along the canal, e.g. depth of water, poor facilities e.g. lighting, poor water quality, nearby traffic and weed growth

Of the 40% of respondents who were not users of the canal, the four key factors behind their non-use were;

Access problems (30%),

Safety concerns (30%),

Security concerns (28%) and

Lack of awareness (10%).

The issues of access, safety and security are the greatest deterrents to people using the canals as demonstrated in the statistics above. It is submitted that in order to maximise the potential use of this stretch of the canal the above should be considered.

The upgrade of the canal corridor will act as a safe space for recreation. Furthermore it allows pedestrians to move freely without cars in a high quality natural environment.

The upgrade of the canal corridor will contribute towards achieving the following objectives contained within the Dublin City Council Development Plan;

**SIO13** to develop new cycle links along the Grand and Royal Canal Premium Routes

**GCO2** To achieve the following critical linkages within the lifetime of the development plan;

(ii) To provide a pedestrian and cycle way green link interconnecting the Royal Canal to the Grand Canal via the Phoenix Park in consultation with the Office of Public Works;

(iv) To improve access to existing natural assets such as parks and waterways through identified green routes and

(v) To seek to provide pedestrian and cycling green links connecting the Royal Canal and the Tolka Valley via a route through Botanic Gardens/Prospect Cemetery and a route in the vicinity of Holy Cross College (or routes as close as practically possible) in consultation with the Office of Public Works

Development of Tolka Valley Linear Park greatly welcomed. It is essential that any initial signs of anti-social behavior are tackled immediately so as to set a high standard of public space for both the wider community and immediate local residents.

All proposals for development within the LAP that incorporate public open space to be taken in charge shall comply with Dublin City Council's "Guidelines for Open Space Development and Taking in Charge".

### **3.11 Green Infrastructure & Sustainability**

The preservation and improvement of the canal towpath should be included in the LAP to maintain this green corridor and will benefit nature/wildlife, connectivity and movement. New development should promote access to the canal towpath to encourage use of this green corridor.

The elimination of level crossings in the area will facilitate greater rail capacity and reduce car use.

Strong consideration should be given to the "greening" of existing brownfield sites that will not be developed in the medium term to 2017.

## **Appendix A -Text from joint submission on Draft Dublin City Development Plan<sup>6</sup>:**

### Building Heights

- *Buildings of the 25-50m heights envisaged are not conducive to the creation of neighbourhoods and communities. On account of their design and layout (underground car parks with lift access to upper floors, few areas for common neighbourly interaction, empty stairwells, corridors, halls, etc.) such buildings facilitate social isolation, detachment and militate against opportunities for regular engagement with neighbours. They facilitate anti-social behaviour in often cavernous unsupervised common areas.*
- *Such buildings are often described as “soulless” and tend overwhelm the surrounding areas and residents.*

### Density

- *The transport, amenity and adjacent environment indicate that the Pelletstown area is suited to a suburban, rather than an urban level of development.*
- *By virtue of its proximity to surrounding natural amenities (Phoenix Park, Royal Canal, Tolka Valley) the submitters propose that Pelletstown is suburban rather than urban in character. It is therefore urged that the Private/Communal Open Space requirements for Residential Development section of 12 – 15m<sup>2</sup> per bed space for apartments in the suburbs be applied to the Pelletstown area.*
- *With reference to the requirement for site areas on lands zoned Strategic Development and Regeneration Areas (Z14) to have public open space of 10%, the submitters urge that in keeping and in sympathy with the local natural environment the public open space requirement should be at least 20%.*
- *In keeping with the reasons mentioned above, the density standard for Pelletstown should be set at the limits for the outer city, rather than the Key District Centre/Key Developing Area, i.e. minimum density of 50 units per hectare, with a maximum in keeping with the policies/principles of the proposed LAP.*

### **Creating Neighbourhoods/Communities**

- *The policies and standards for apartment developments seeking to create liveable sustainable new apartment homes must be reviewed.*
- *The reference to Pelletstown in Chapter 11.1 with regard to the creation of new neighbourhoods is a fallacy where infrastructure promoting the growth of communities (community centre, common meeting places, etc.) has not been provided through the private development route. This issue should be addressed as a matter of urgency through the LAP process.*
- *Similarly, the reference to Pelletstown in Chapter 12.1 with regard to “Making Good Neighbourhoods & Successful Communities” deserves analysis for the fallacy it is, with no community or social infrastructure in place to allow interaction of neighbourhoods on a meaningful level.*

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<sup>6</sup> Joint Submission of RCPA, Rathborne Residents’ Committee, Rathborne Village Residents’ Committee on Draft Dublin City Development Plan 2011-2017, dated 10 March 2010.

- *The submitters urge that the plan be amended to contain policies and principals for Dublin City Council's interaction with the National Asset Management Agency ("NAMA") in the context of lands that are in the coming years taken into the possession of NAMA.*
- *The plan should strengthen the awareness and use of the Derelict Sites Act, 1990 where idle development sites are not maintained to the requisite aesthetic, health and safety and environmental standards.*

## Appendix B – List of Schools

1. Sn Oilibheir, Baile An Bhlaicigh Cluain Saileach, D15
2. Castleknock Educate Together National School, Castleknock Dublin 15
3. Scoil Mhuire Sin, Blakestown Mulhuddart Dublin 15
4. Scoil Nais Mhuire Sois, Blakestown Mulhuddart Dublin 15
5. Scoil Bride B, Blanchardstown Dublin 15
6. Scoil Bride C, Blanchardstown Dublin 15
7. St Brigids Mxd National School, Castleknock Dublin 15
8. Castleknock National School, Castleknock Dublin 15
9. Scoil Naisiunta Naomh Mochta, Clonsilla Dublin 15
10. St Francis Xavier Senior National School, Coolmine, Castleknock Dublin 15
11. St Patricks Junior National School, Corduff, Blanchardstown Dublin 15
12. St Patricks Senior School, Corduff, Blanchardstown Dublin 15
13. St Patricks National School, Diswellstown Road, Castleknock Dublin 15
14. St Ciarans National School, Hartstown Dublin 15
15. Tyrrelstown Educate Together National School, Hollywood Road, Tyrrelstown,
16. Sacred Heart Of Jesus National School, Huntstown, Mulhuddart Dublin 15
17. Ladyswell National School, Ladyswell Mulhuddart Dublin 15
18. Scoil Thomais Laurel Lodge, Castleknock Dublin 15
19. St Benedict's N.S, Littlepace Ongar Dublin 15 (Temporary Accommodation)
20. Mary Mother Of Hope Senior National School, Littlepace Castaheany Dublin 15
21. Mary Mother Of Hope Junior National School, Littlepace, Castaheany, Dublin 15
22. Blanchardstown West Educate Together National School, Castaheany, D 15
23. St Philip The Apostle Junior National School, Blanchardstown Dublin 15
24. St Philips Senior National School, Mountview Clonsilla Dublin 15
25. Scoil Grainne Community National School, Phibblestown, Dublin 15
26. Scoil Choilm Community National School, Clonsilla, Dublin 15
27. Mulhuddart National School, Powerstown Rd, Tyrrelstown, Dublin 15
28. Powerstown Educate Together National School, Tyrrelstown, D 15
29. Castaheany Educate Together National School, Dublin 15
30. St Francis Xavier J National School, Roselawn Road Castleknock Dublin 15