

# **Clongriffin Community Association**

## **Observations on SHD1 Clongriffin Application**

Please find below the observations compiled by the Clongriffin Community Association in relation to SHD1 Clongriffin application made by Gannon Homes regarding lands in Clongriffin, Dublin 13

Contact Details: Mr Stephen Murphy (Chairperson),  
17 Belletree Green,  
Clongriffin,  
Dublin 13

## Table of Contents

INTRODUCTION .....	3
EMPLOYMENT .....	5
RESIDENTIAL DEVELOPMENT .....	13
TRANSPORT .....	19
CAR PARKING .....	22
COMMUNITY INFRASTRUCTURE & SCHOOLS.....	23
DENSITY, HIGH RISE & POPULATION PROJECTIONS .....	28
CONCLUSION .....	31

Appendix A

Appendix B

## INTRODUCTION

Clongriffin Community Association have given consideration to the plans submitted to An Bord Pleanála (Clongriffin SHD 1 & SHD 2) in addition to the application recently submitted to Dublin City Council (Ref 3894/19). It is our view that these three applications must be viewed together as one, as they essentially comprise of a proposed substantial revision of the Clongriffin Local Area Plan.

The level of documentation contained within these applications is vast, which perhaps is not entirely surprising given the scale of the application, however, the result of this is that individuals and community groups such as ourselves will struggle to analyse the proposal in detail. In addition, given the scale of the proposal, professional assistance from town planners becomes prohibitively expensive. The very tight timeline to respond to something of this scale further exacerbates these problems. That being said we have reviewed the documents and have set out below the high-level issues as we see them, but we are very much dependent on An Bord Pleanála to rigorously examine the finer details of the application.

The lands in questions represent the most important areas of the Clongriffin SDZ. Development of this area must deliver on the objectives of the LAP, City Development Plan and must facilitate development of a successful urban area. Where the vision of developer is not sufficiently ambitious, it is the responsibility of ABP and DCC to ensure that necessary alterations are incorporated into the plans. This is particularly important, as with a limited land bank and structured urban design, the land is 100% allocated at time of planning. If something is omitted from this design, there is not possibility to fit it in retrospectively. It should be noted that plans for areas such as Baldoyle Stapolin LAP and development in areas such as Drumnigh etc. rely on Clongriffin to provide amenities, employment and essential services.

The original plan of Clongriffin was to be a vibrant, mixed-use development with high density residential, substantial levels of employment and high-end retail and community facilities. Some of the retail space, transport infrastructure was delivered, along with a number of residential units before the crash in 2007. Since then, all development in the area has been solely residential. The three applications under consideration represent the completion of most of the remaining land. The applications, however, have stripped out much of the essential aspects required to make Clongriffin a success. The total level of residential development in Clongriffin was only approved based on the provision of employment and services. These are still outstanding, are effectively owed to the Northern Fringe to justify the existing development in the area, and must be a requirement to allow any further large-scale development in Clongriffin. The observations contained in this document are all based on common sense and nothing outlandish is proposed. In the most part, we are not seeking for additionalities, but arguing that the original intent of the town be retained. The table below **lists** the services included in the original plan for the town and contrasts this with those delivered and proposed. In summary, it is a removal of services in place of additional residential units.

Our Observations fall under the categories of Employment, Community Facilities, Schools, Transport, quality and density of housing units delivered.

The level of documentation, planning history and number of units and uses is overwhelming, so three blocks are outlined below, their original intention versus the current proposal.

### **Block 17 - The tallest Building in North Dublin**

This iconic building was intended as a landmark building which could be home to a flagship office of a high-profile company. Being far taller than any building within sight, this was to announce Clongriffin as a serious place of business. Originally planned at 12 storeys with 9,500m<sup>2</sup> of office and 700m<sup>2</sup> of retail, this building alone would deliver approx. 900 jobs to Dublin 13. Plans were amended in 2007 to change height to 14 storeys comprising 7,600m<sup>2</sup> of office and 1,400m<sup>2</sup> of retail and café use. In 2017, however planning was granted for a wholesale change of use of this building to apartments and short-term lettings. The only justification for change was as follows (which is untrue and unconvincing) *“4.4 The current proposal seeks to have the tower residential. There is no demand for large scale commercial office buildings in out of centre locations.”*

Decision notice stated “9. While the LAP has no set mix or matrix for the type of uses within the town centre area and wider town area it is requested that the applicant provide an outline of the potential future development mix of the Clongriffin area - noting that to date only c.19,500m<sup>2</sup> of the c.100,000m<sup>2</sup> non-residential uses has been constructed.”

Therefore the change of use of block 17 cannot be taken as precedent for removing the commercial core of the town, as upon granting the change of use, An Bord Pleanála clearly intended the commercial function of Clongriffin to be retained.

### **Block 28**

Block 28 has a live grant planning permission (5470/08 and 5470/08/x1) for 75 apartments, a supermarket (1490sqm) retail (140sqm) and fitness centre, including swimming pool, (2960sqm). This permission also includes a pedestrian footbridge to Block 12 to make use of the ample car parking in Block 12. The Applicant seeks to change this use to residential (122 units) and retail (675sqm) and a gym (254sqm). They have provided no reason for the change in use. Furthermore, the planning history is inaccurate in that it omits reference to the leisure facility (11.6 times the size of that now proposed) and omits the original purpose of this site as a bus set-down area. When application 5470/08 was granted, the Planning and Development Department stated:

*“The proposed mix of uses of retail (supermarket, individual shop units), offices and Gym/ fitness centre in Block 28 is generally consistent with town centre type development and consistent with the zoning objective and North Fringe Action Area Plan.”*

It follows that the current proposal under the SHD be consistent with zoning objectives and wider city planning considerations. The Applicant has provided no justifications for these changes whatsoever and has demonstrated a lack of due consideration in this application.

### **Blocks 13 and 15**

Blocks 13 and 15 at first glance appear to hold true to their intended purpose by retaining a cinema and office space, but the key commercial, retail and leisure purposes have been dramatically reduced in this proposal. These are considered together as one case study here as the cinema is proposed to move from Block 13 to Block 15. A side-by side comparison of the sum of the two blocks is given below, showing how the focus has moved very much to residential rather than sustainable mixed use as originally planned:

	<b>Original (Sq.M)</b>	<b>Proposed (Sq.M)</b>
Residential	107	279
Retail	5,472	2,048
Office Space	10,373	4,736
Restaurants/Café	1,593	757
Community Centre	619	342 (Moved to block 4)
Childcare	280	nil
Cinema	7,667	5,253



## EMPLOYMENT

### OFFICE SPACE

The original Planning Application for the town (Ref 0132/02) provided for approx. 44,036 Sq.M of office space which, under these applications, could fall to approx. 12,350 Sq.M (3,882 Sq.M already granted as per Ref 4054/16 & 8,468 Sq.M now proposed). This is only 28% of the original amount proposed for the town, back when it was referred to as “Capital North”.

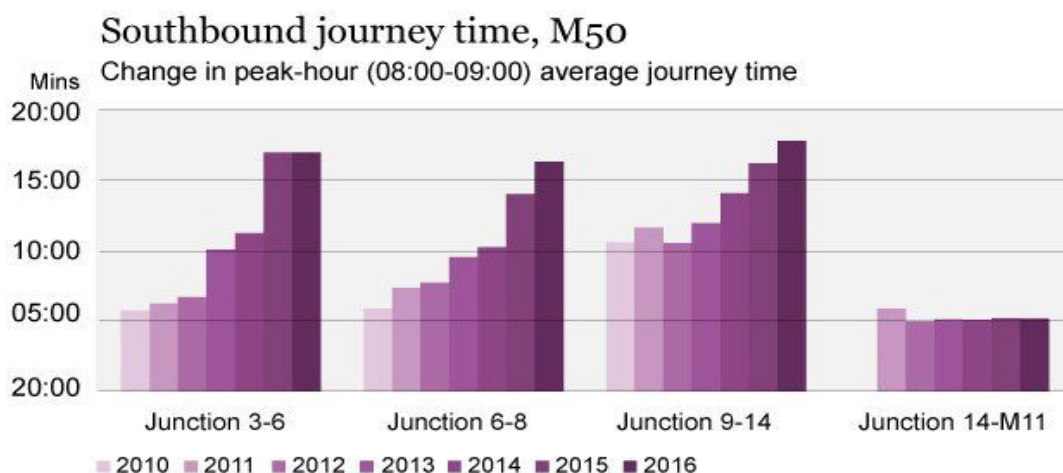
The Applicant has offered no justification behind the removal of more than 30,000 m<sup>2</sup> of office space. This represents a wholesale change of the strategic intent of the town of Clongriffin from a vibrant hub of North Dublin to a purely residential centre. It is unrealistic to expect ABP to believe that there is less demand for office space in Clongriffin than when the plans for Clongriffin were initially drawn up. This is why the applicant has failed to offer any explanation for the removal of this space: it is unjustifiable

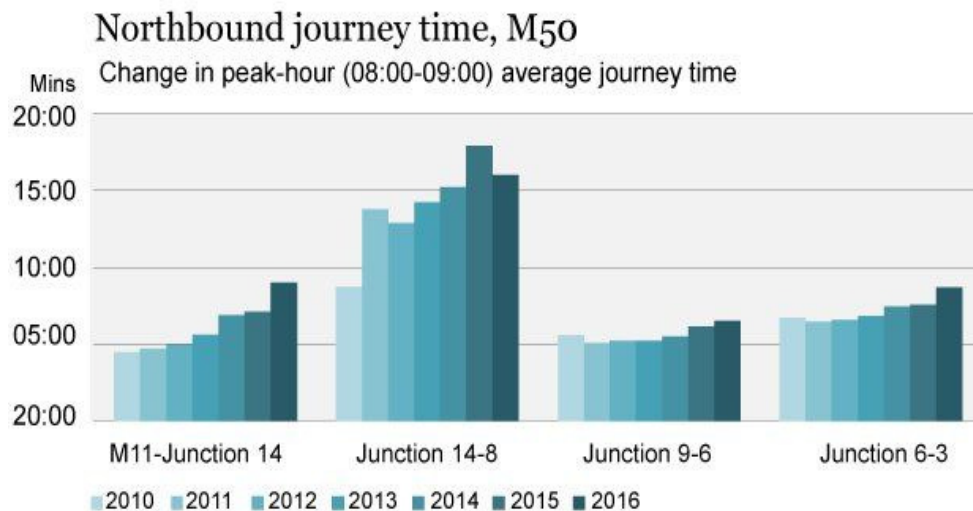
Instead, the developers are looking to replace this office space with more apartments, thus increasing the population further, decreasing the employment opportunities in a part of Dublin desperately lacking in office based employment options and exacerbating the local transport and infrastructure problems further. This is a wholesale change to the LAP 2012-18 (extended in 2017 for a further 5 years) which was to provide for an employment base in the town and to also serve the wider area. Much of the proposed employment is retail and leisure based roles which tend to employ less people per square foot and offer a much lower pay scale.

This is a designated Strategic Development & Regeneration Area and as such is to provide for Z6, enterprise and employment development (“Primarily office based industry & business technology parks”). The result of this removal, however, will ensure that Clongriffin can only but become another dormitory, residential, town with ancillary retail, similar (although larger) to virtually every town in North East Dublin.

### THE COMMUTE TO WORK:

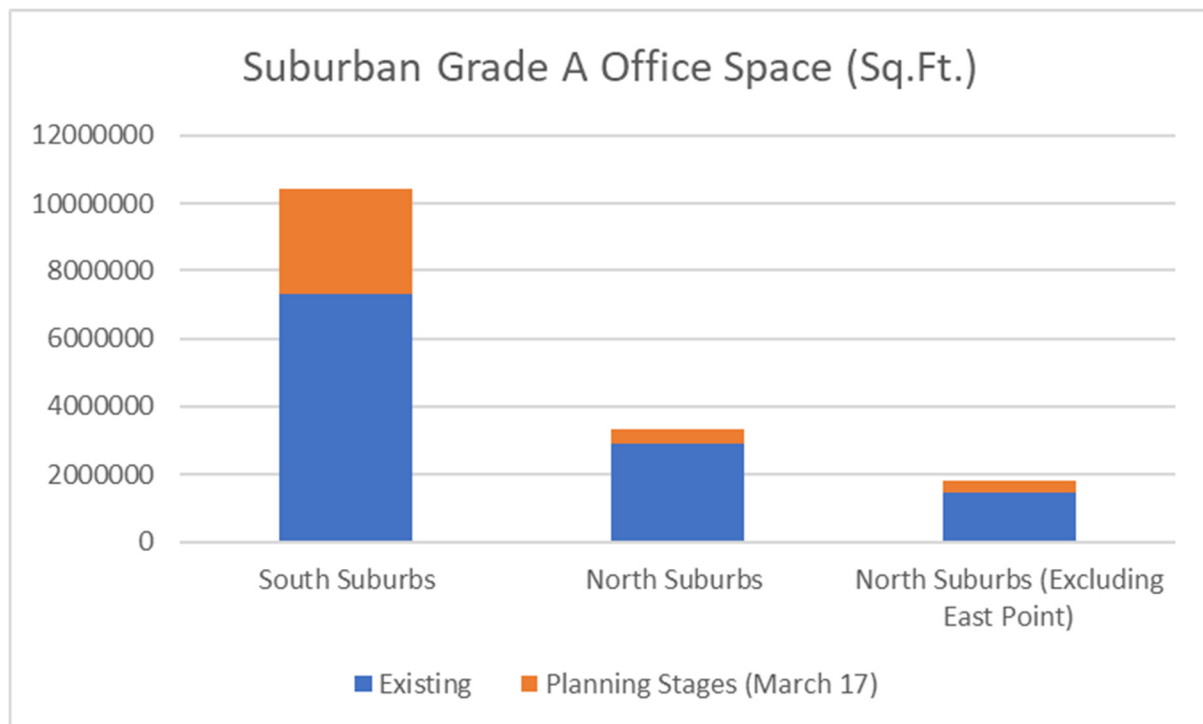
According to Transport Infrastructure Ireland, in 2016 journeys southbound on the M50 in the morning take 60 Minutes to run the full length of it, where as it takes 40 minutes to go the same distance northbound. In the evening it takes 75 minutes to travel northbound and only 50 minutes to travel southbound. That is a full 50% longer commute than those who reside on the south side of the city. Add that up over a typical workers say 47 weeks of work per year x 5 days and it amounts to 176.25 wasted hours or the equivalent of 11 waking (16 hour days). It also means that residents on the north side of the city are having a far more detrimental effect on the environment through fuel consumption, which, is clearly not sustainable. *See tables below*



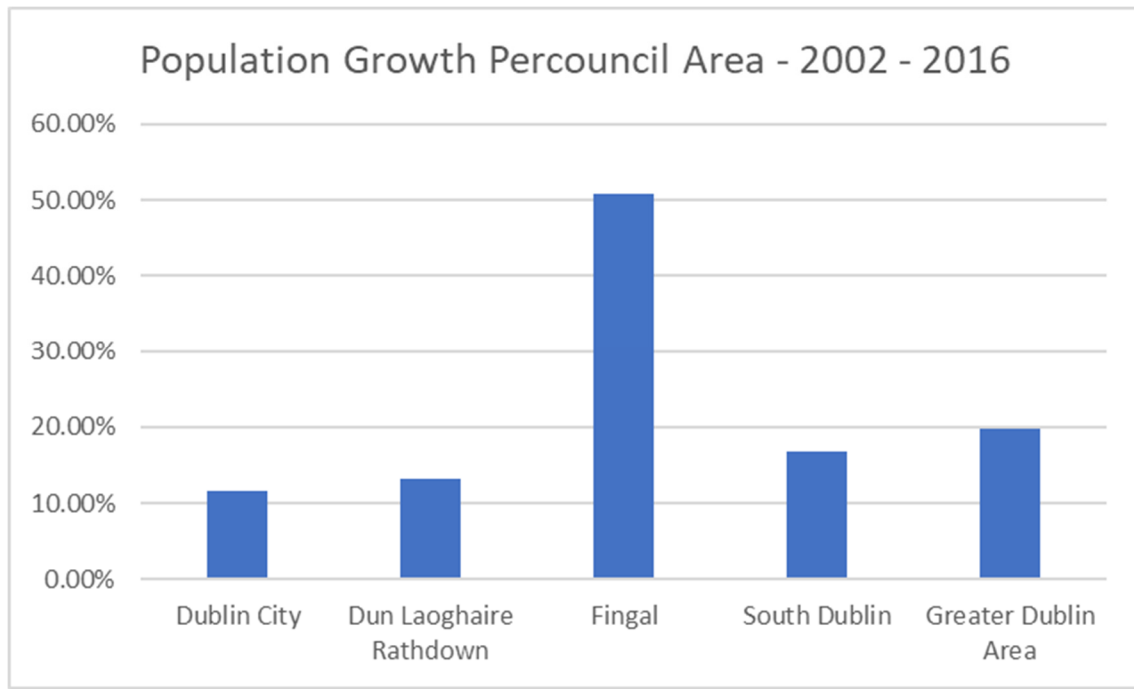


We question why this is so imbalanced.

According to “Ireland 2040 -National Planning Framework – Stage One Submission -Promoting Balanced Development in the Greater Dublin Area – March 2017” by Genvest, there is an enormous gap between the amount of Grade A office space provided in the southern suburbs of Dublin versus the northern suburbs. This report is attached in Appendix A. We have included two bars for the North Dublin suburbs. One including for East Point Business Park and one excluding it as it is effectively a city centre or edge of city office park as opposed to a true suburban office park.



Currently the population south of the Liffey is 8% larger than that in the north but this is likely to reverse in the coming years with the population in North Dublin (Fingal particularly, which abuts Clongriffin on two sides) expanding rapidly due to the larger level of zoned residential land.



Despite these disparities, South Dublin (as of March 2017) had 8 times the amount of office space in the planning stages than that of North Dublin. Therefore, this imbalance will be exacerbated with the resident population growing on one side of the city while employment opportunities grow on the other. This surely is the definition of unsustainable development and the existing infrastructure, already under pressure, is unlikely to be able to deal with this. There is no radial public transportation infrastructure in Dublin and travelling from North to South through public transport to these business parks would take a very long time. Therefore, the number of people looking to drive will increase and the M50 will become even more congested heading Southbound in the mornings.

#### So what is the solution?

The solution is the development of more modern office spaces in the northern suburbs of Dublin and at a pace, which can match the speed of the expanding population.

As can be seen from all of the large successful office parks in South Dublin there are some key ingredients that they all have.

- High capacity rail based public transportation
- Good access to the M50
- Mixed use areas with a high-density resident population and ancillary retail, leisure, food and beverage offerings
- Access to a high quality, diverse workforce

As things stand, there is only one place in North Dublin that can effectively tick all of these boxes. That place is Clongriffin.

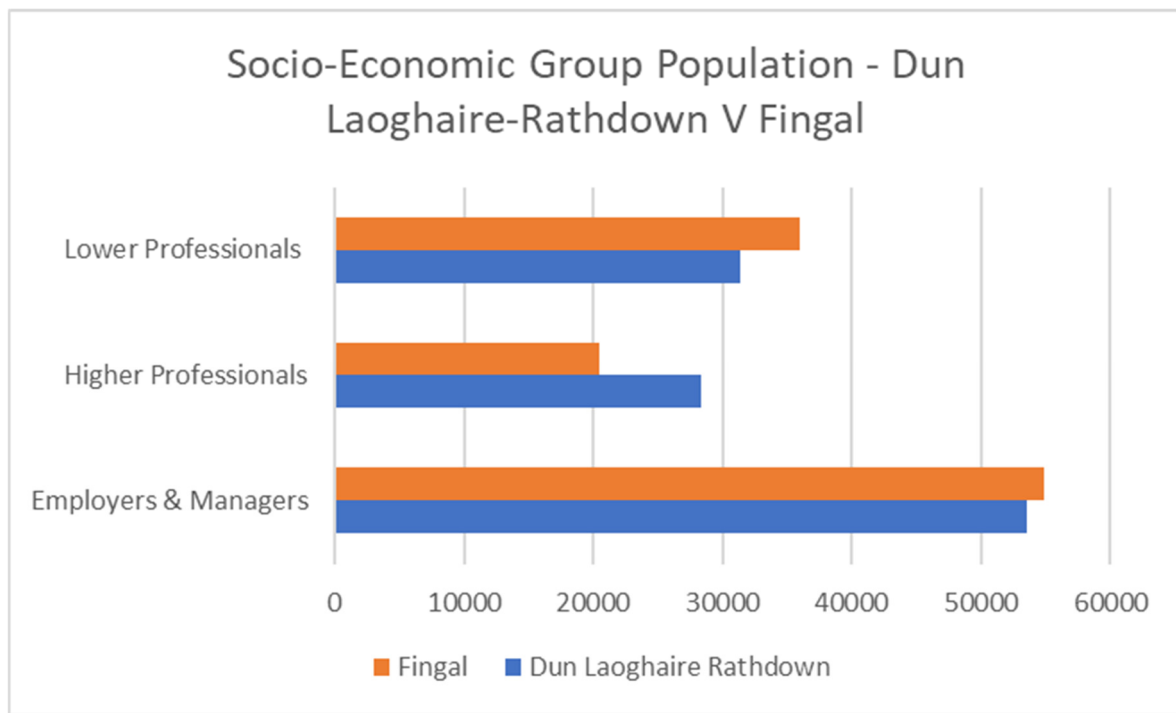
Rail - The only existing rail service in northeast Dublin is the Dart / Northern Commuter line. The Metro North may arrive in years to come but we cannot wait until that undetermined time. In addition, the bulk of the population is located along the coast / Dart / Northern Commuter line from Clontarf to Dundalk and they will not have access to any business parks on the Metro line via rail.

Bus-Connect – in addition to the rail links, the number 15 bus which travel every 10 minutes to the city centre at peak hours serves Clongriffin. While this service is very slow reaching the city centre at peak hours it is likely far less congested in the opposite direction. This adds connectivity all along the Malahide Road from Norther Cross to the city centre. The Bus Connect plan includes a link from Clongriffin to the city centre along the Malahide Road, in addition to new services from Beaumont/DCU, Howth and Swords. While Bus Connect may not proceed, it may be viable to instate the local services if the office development took place in Clongriffin at scale, regardless. Combined with the rail service this would then arguably be the best-connected town via public transport in North Dublin.

Roads - Clongriffin is located only an approx. 8 minute drive from the M1/M50 junction. If the much needed East/West relief road, presented at the original public consultation for this development earlier this year, is provided this could then shorten journey times to perhaps 5 minutes.

Mixed Use Development - Clongriffin and the surrounding areas will contain a high-density residential population, with a mixture of private and rental accommodation. There is already a large amount of retail space available for tenants.

Workforce – Fingal County has as many professional residents and Dun Laoghaire Rathdown (Genvest Report – Appendix A). See summary breakdown extracted below. Many of these people are located in the more affluent suburbs surrounding Clongriffin including Howth, Sutton, Portmarnock and Malahide. Indeed Clongriffin & Balgriffin also have a growing professional populace. These people have few opportunities to work within the area and the vast majority are therefore commuting to the City Centre or to the south suburbs.



Looking at the above factors it is clear that Clongriffin has scope to become a very successful office location:

- There are no other large undeveloped sites along the Northern Commuter line, which are also in close proximity to the M1/M50 that could possibly accommodate large-scale office park development.
- There are no existing competing office parks along the northern commuter rail line.
- The public transport infrastructure could become the best in North Dublin. While it is overcrowded at present, it is almost entirely empty travelling in the opposite direction.
- There is a large and rapidly growing workforce who would no doubt welcome the opportunity to reduce or eliminate their commute.

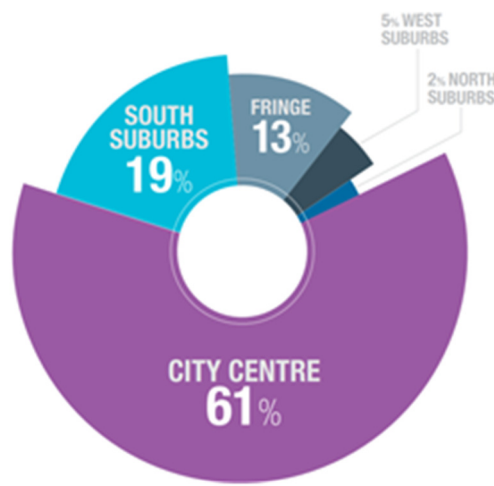
- Due to the lack of local competition, employers locating here can take their pick of the best of this high quality workforce.
- The retail space available and the public parks in the area could increase the appeal of this location over other office parks in North Dublin, which are not as well served by these facilities.

### **SUBURBAN OFFICE DEMAND**

The economy has improved significantly in the last number of years. The Society of Chartered Surveyors of Ireland (SCSI) Annual Commercial Property Report Outlook 2019 cited as one of the key factors impacting on the office market in 2018 a *“Shortage of suitably sized, suitably located and modern office space were the dominant factors impacting on the market in 2018, each ranked in the top three factors by between 50% and 60% or respondents.”* At present, office space in Dublin is in high demand.

According to Knight Franks Dublin Office Market Overview Q2 2019, suburban locations made up 29% of all take up recorded.

Take up in North Dublin however is very low and appears to vary at between only 2-5% per quarter with Q2 2019 representing only 2% as set out below.



This statistic is however hardly surprising given the lack of supply of space generally as set out above and particularly the lack of supply of virtually any office space along a major rail line.

While there is some existing office space located at Northern Cross, this is a 35 minute walk from the nearest rail station and is only served by a limited number of buses, mostly from areas which already also serve Clongriffin by the same or other means (excluding swords). It is therefore not well connected and as a result is unlikely to appeal to office occupiers to nearly the same degree.

Clongriffin will be only an extra approx. 3 minutes further by car from these roads but will benefit from the number 15 bus (to be merged with 27) in addition to potential new routes to Swords, Beaumont/DCU and Howth. It will also be on the dart line and northern commuter line in addition to the main line to Belfast. No other location, in the vicinity, could offer this particular level of high quality connectivity in North Dublin.

### **CLONGRIFFIN OFFICE DEVELOPMENT & PROMOTION**

The original planning granted for the site provided for 2-landmark office building of 8 and 12 storeys each. The planning for these blocks has now been amended to provide for residential use and removes the office space. If individuals had known at the time that significant changes were to be made, down the line, affecting heavily the overall plan for office development, it is likely that the resistance to the plans would have been far greater. These high profile office buildings would have sent out message to organisation that Clongriffin is a major place of business. In order to give the town a reputation as a place of business much of the future office development

should be located along the rail line and ideally, the original landmark office building should be reinstated as was originally planned.

At present, there is space within Clongriffin with planning consent for office use of 3,882 Sq.M which is located above the intended supermarket unit. This, we understand, is currently owned by the Applicant.

Unfortunately, for some reason this considerable office space does not appear to have been advertised as available. There are no signboards outside the building, there are no advertisements online and we are not aware of any specialist commercial agent appointed to promote this space.

In the absence of any discernible promotion or advertisement of available commercial space, there appears to be no reasonable prospect of utilising, to our advantage, this sizeable asset that is situated in the heart of the town. This indicates a significant missed opportunity on behalf of the Applicant in respect of the apparent failure to capitalise fully on the commercial space, which was built at an earlier stage of the planning process in order to bring growth, employment, and economic opportunity to Clongriffin. If it is not advertised, how are individuals to know it exists as an available opportunity?

The concern of the residents in this instance is the vulnerability of the town in terms of external factors, which could influence the area in a detrimental fashion. It is now more than a decade since the last recession and this commercial space continues to remain unoccupied. Should a further recession occur in the near future, or should the Applicant fail to adequately utilise and/or promote the further commercial space which is mooted for construction in said planning applications (which is wholly inadequate), the residents of Clongriffin will have visited upon them a large residential development with little or no economic identity or employment opportunities. This places the town at significant risk of becoming a most undesirable place to live.

In addition, the LAP cites the Hammerby Sjostad district in Stockholm as an example of 'best practice in sustainable design and planning', where objective SS04 explicitly states the importance:

*'To facilitate the provision of employment uses in close proximity to residential areas, to increase the opportunity for working close to the home (and thereby reducing the extent of work related commuter journeys)'*

DCC has already acknowledged the importance of implementing sustainable employment in this area, and it would be negligent of ABP and in turn DCC to ignore these facts.

In summary, the scale of the residential units proposed is too vast and is wholly disproportionate to the scale of commercial space that is proposed. What we are looking for is not an increase of local employment, but the delivery of the original vision for Clongriffin and not to be pushed aside purely because of the current popularity of BTR. Clongriffin should be developed as a major employment centre, with office development well in excess of that originally planned.

## **RETAIL & LEISURE**

There is a significant amount of retail space in the town already, however, there is also a high percentage of vacant floor space, 82% as per The Economic & Retail Study 2018. The same study indicated approximately 64% of units are vacant, which is significantly above the DCC average of 13.6% (*see table below*). The main reasons highlighted within the report are, lack of commercial visibility as units are out of sight, isolation and a lower socio-economic background of the population. Many of these units have been unoccupied for 10 years or more.

Unit and floorspace use at Clongriffin Main St				
	Units	%	Sqm	%
Convenience goods retailing	3	7%	306	2%
Comparison goods retailing	1	2%	163	1%
Retail Service	3	7%	164	1%
Leisure Service	3	7%	1,086	8%
Financial and professional office	1	2%	121	1%
Health	2	5%	397	3%
Community	2	5%	191	1%
Creche	-	-	-	-
Other	-	-	-	-
Vacant	27	64%	11,282	82%
<b>Total</b>	<b>42</b>	<b>100%</b>	<b>13,710</b>	<b>100%</b>

Table 3.4, Economic and Retail Study Belmayne, Clongriffin 2018

That being said, it is difficult to see how future successes can be expected in relation to retail units given the lack of balanced development and road infrastructure proposed in these applications.

Road Access - The town is located down a “cul-de-sac” at present. While a road is proposed over the rail line to the east, this is to be for public transport only. There is no through access to the south. A roadway to connect northwards from the end of Marsfield Ave near the rail line, through to the Moyne Rd and onwards via a new route to the M1/M50 junction was proposed in the initial consultation on this development a few months ago, this does not now appear to be mentioned in the application. This roadway would have opened the town centre up to the large growing populations in Portmarnock and Kinsealy but instead the town will remain at the end of cul-de-sac, in an area with increasing traffic congestion and will struggle to attract the required customers.

Limited Trading Window – Given the planned elimination of the majority of the offices in the town, the daytime footfall required to support retail ventures is unlikely to improve in any meaningful way. Consequently, the trading window for small retailers, restaurants and so on will be limited to evenings and weekends only. This is likely to result in continued vacant retail spaces, to which more does not need to be added. Indeed this is recognised in the Dublin City Development Plan 2016 – 2022 where under 14.8.4 District Centres, it states that *“To maintain their role as district centres, new development should enhance their attractiveness and safety for pedestrians and a diversity of uses should be promoted to maintain their vitality throughout the day and evening.”*

Disposable Incomes – As the majority of the town would comprise of renters, should this planning be granted, then disposable incomes are likely to be lower. This is due to the very high cost of rents in the area versus potential mortgage costs to an owner-occupier. The cost of renting is almost double that of a mortgage for an equivalent property. In addition, a mortgage holder would be building equity and would eventually own the property outright, giving them far more disposable income from that point forward and the potential to have a good quality of life in retirement. On the other hand and individual renting accommodation will not be building any equity. They will never get past having a housing cost and in all reality will struggle to save for a pension. In fact, we estimate that if the average interest and inflation rates over the past 20 years were to apply for the next 50, an individual renting would pay 6 to 7 times the property cost that an owner-occupier would pay for a similar property.

The Economic and Retail Study undertaken by AECOM indicated, “Of those people in work, examination of their occupational status reveals that the area is under-represented by the number of professional occupations (11% V 21% across the City). So too, as a corollary of the latter finding, there is an overrepresentation of people employed in the lower income occupations such as (i) Caring, Leisure and Other Service (ii) Sales and Customer

Service and (iii) Process, Plant and Machine Operatives. These occupations account for a quarter of the jobs in the area compared to 17% in Dublin City Council.”

Coupled with the limited employment opportunities to be provided in the town i.e. lower paying, primarily minimum wage retail/leisure roles, the level of disposable income for residents of Clongriffin is likely to be far lower than other areas. As such large-scale small business would likely struggle to survive. In addition to this, retail employment is in decline already due to robotics, computerisation and online shopping.

## HOTEL

There is little to attract people to visit Clongriffin at present. This may explain why the previously granted Aparthotel of 3694sqm, was unable to succeed, a portion of which has since been converted into residential units. It seems unlikely that this will change with purely residential and ancillary retail development. A large office park, given its proximity to the airport however, could work quite well. In the absence of potential for future success, it is difficult to see how this could work as a viable commercial operation.

## COMMERCIAL CONCLUSION

In conclusion, the applicants suggestion that there are large centres of employment nearby (aside from the City Centre) does not hold water. The centres mentioned are small in scale relative to the wider population or are primarily industrial parks which employ low numbers of people relative to their floor area and often provide, low paying jobs. They are also remote to this proposed high density area.

### The potential for a large scale office e park clearly exists here

Suburban office development of scale requires an ecosystem to succeed which does not currently exist anywhere on Dublin’s northside. High Quality public transportation, quality road access, an accessible working population in close proximity with a mixture of good quality rental and owner occupier housing, retail and related services to include food, beverage and leisure offerings, corporate stay hotel & meeting/function space, sufficient car parking and an attractive physical environment are required. This is available in many other positive examples in Dublin already including Sandyford, Citywest and places like Cherrywood, which is currently under development. Clongriffin has all of this bar the office development and there is no obvious reason why it should not be a roaring success having regard to the lack of existing or potential competition along the Northern Rail line or in North East Dublin generally.

An office Park also needs branding, promotion and scale. As a Key District Centre under the Dublin City Development Plan 2016 – 2022, the council are to promote it as a significant employment centre (Policy CEE 24) but we are not aware of any significant efforts expended in this regard in recent times. It may need support to get this going but looking at the Dún Laoghaire, Rathdown application to the Urban Regeneration fund in respect of Cherrywood to provide for access roads, public realm, parks, greenways and attenuation show what is possible. The town does not appear to have been adequately advertised and promoted by the Applicant as a commercial destination.

Other examples of mixed-use towns include Citywest and Cherrywood which are at the end of their public transportation lines so workers using it can only come from one direction but in Clongriffin it’s at the midpoint of a long line of dormitory towns along the north eastern coast. It is also close to the M1, M50 & Dublin Airport. It could also become a bus terminal with services connecting to Swords, Beaumont, Howth and the city centre. It will have a large high density population on site and immediately surrounding it. It will have shops–, restaurants, bars, cafes, crèches, a hotel and leisure facilities, in addition to two large scale parks. There are few locations outside of the city centres that can make that claim. The potential for a great ecosystem for the work, live and play lifestyle therefore already exists



In conclusion, we struggle to see how this town can ever becoming a successful thriving place without any mid-week, daytime spend in the local economy. The town's ecosystem will be out of balance and every other element of it will struggle without that. In addition, the residents will suffer ever-longer commutes with increased congestion.

## RESIDENTIAL DEVELOPMENT

This recent phenomenon of Private Rental funds would not have been envisaged in the LAP, which was in fact originally enacted in 2012 but extended (based on minimal public consultation) in Nov 2017. There was however some acknowledgement of the potential for large scale rental blocks being acquired and a small amount of limitation was included for in the Dublin City Development Plan 2016 – 2022. This was set out in provision (16.10.1.) which states that in relation to proposals for Build to Rent apartment schemes *“the applicant shall be requested to demonstrate that there is not an over-concentration of such schemes within an area, including a map showing similar facilities within 0.25 km of a proposal”*. In this instance, there would be 15 blocks, all within circa 10 meters from the next adjoining block, and many less than 250 meters from the existing blocks in the town. Even many of those will also only be a short distance from other such rental developments in Balgriffin and Baldoyle.

The applicant sets out, in their justification for BTR report, the locations of other build to rent developments in the area. They do not, however, include the many existing developments or those under construction or granted planning but not yet commenced and under consideration. Others development that we are aware of include the following:

### Existing Rental Blocks

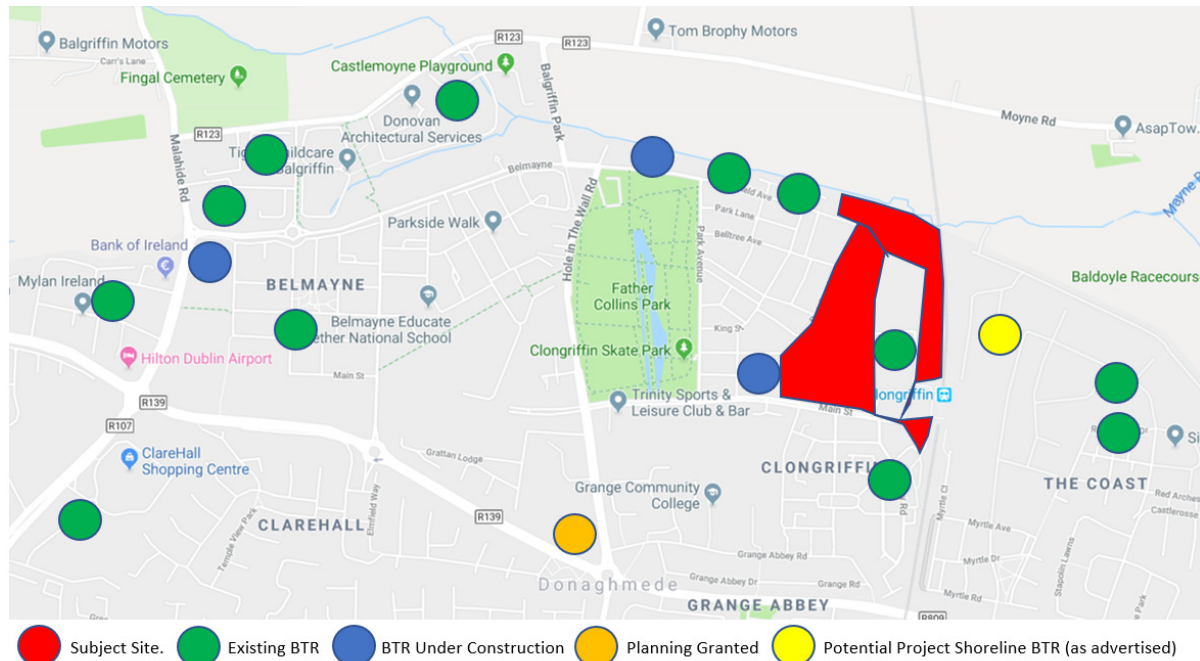
- The Square, Clongriffin – Converted from empty hotel – Believed to be owned by the applicant Gannon Homes (32 Units)
- Marsfield Avenue, Clongriffin - Existing – (50 Units+)
- Marsfield Avenue, Clongriffin – Iveagh Trust (55 Units)
- Railway Ave, Clongriffin – Iveagh Trust (75 Units)
- Castlemoyne, Balgriffin – approx. 50% retained by developer Shannon Homes (Unknown)
- St Doolaghs, Balgriffin – Shannon Homes (Approx. 76 Units)
- The Hermitage, Balgriffin – Shannon Homes (Approx. 192 Units)
- Main St, Belmayne – Cluid Housing (259 Units)
- Clare Village, Clarehall – Tuath Housing (119 Units)
- Red Arches Road, Baldoyle – Ires (53 Units)
- The Coast, Baldoyle – Tuath Housing (Unknown)
- Northern Cross – Ires (128 Units)

### Under Construction

- Marsfield Avenue, Clongriffin – New units under construction Tristan Capital / Twinlight (376 Units)
- Main St, Clongriffin – Iveagh Trust (84 Units)
- Malahide Rd, Belmayne – Dublin City Council (151 Units)

### Planning Stages

- Project Shoreline, The Coast, Baldoyle – Further BTR suggested under Project Shoreline site sale marketing (546 granted planning with scope for expansion to 1,592 units, pending additional planning)
- Columban Missionary, Donaghmede Roundabout – Planning Granted (Approx. 225 Units)



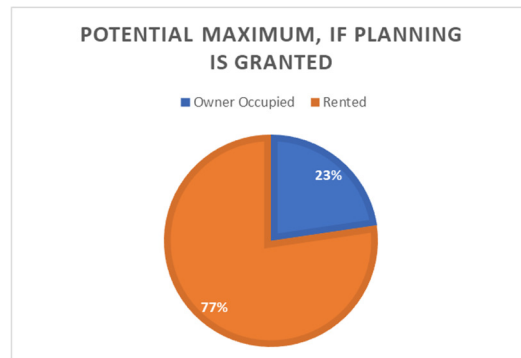
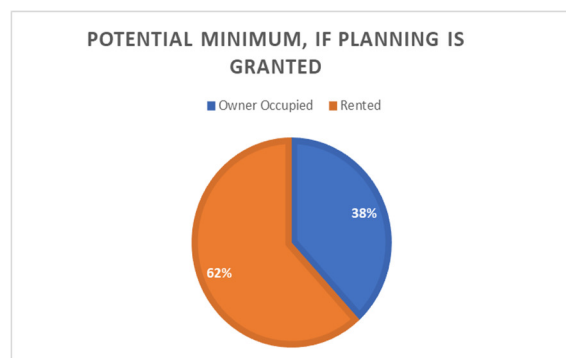
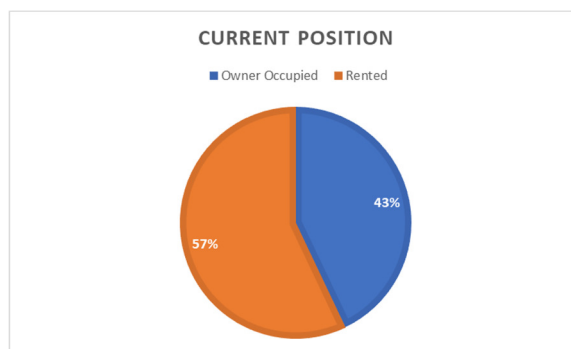
In addition to the above, there are large amounts of individual units that were sold to individual private landlords. When combined this area is likely to end up with one of, if not the highest, levels of rental accommodation outside of certain areas within the city centre.

We have reviewed the statistics from Census 2016 and have determined that, at that time, 49.9% of Clongriffin consisted of rented properties, while 43.3% were owner occupied, with the remainder presumably vacant.

Adding in the Marsfield BTR apartments under construction, the Iveagh Trust Building about to be occupied on Main St and the 1325 (private & 10% social) units proposed in these applications, the percentage of rental units in the town would climb to 65%. If 7% remained vacant then only perhaps approx. 32% would be owner-occupiers.

There is however, no guarantee that the Build-to-Sell, “Residential” units would not be sold to rental bodies. Indeed, at the time of the original public consultation, the developer had proposed that all 1950 would be constructed for rental purposes. Even if they are not ultimately sold to a rental body, en masse, unless they are sold with a clause in the lease stating that they are to be owner occupied only (which at a recent community meeting was indicated would not be the case) there is scope that a large portion are likely to be acquired by individual private landlords and placed on the rental market. Therefore, the number of rental units in the town could climb as high as 77%. Such a situation would not support a mixed tenure of accommodation within Clongriffin and will have a detrimental impact on the community as a whole.

CENSUS 2016 - Small Area ID	268072013/03	268072013/01	268072012	268072013/02	268072011	268072010	268072007	268072008	268072009	268072004	268072005	Total
Electoral Division	Grange B	Grange B	Grange B	Grange B	Grange B	Grange B	Grange B	Grange B	Grange B	Grange B	Grange B	
Households	105	112	97.00	128.00	106.00	139.00	85.00	138.00	105.00	134.00	106.00	1255
Rented	64.00	81.00	51.00	124.00	67.00	75.00	31.00	57.00	49.00	64.00	53.00	716
Percentage of units Rented												57%
<b>Development Projections</b>												
Belltree (Approx)												375
Iveagh Trust, Main St												84
Marsfield BTR												371
Current ABP & DCC Apps												1950
Future Devt Behind Shopping Centre. Say Approx.												400
<b>TOTAL NEW PROJECTED DEVELOPMENT</b>												<b>3180</b>
<b>Total Projected Households</b>												<b>4435</b>
Less Land Behind Shopping Centre												400
<b>Net units currently built, under construction or in planning</b>												<b>4035</b>
<b>Min Rental Units</b>												
Currently Rented												716
Marsfield BTR												371
Iveagh Trust, Main St												84
ABP & DCC Current Applications												1325
Total Min Rentals												2496
<b>Minimum Percent of Rental Units (Excluding land behind Shopping Centre)</b>												<b>62%</b>
<b>Max Rental Units</b>												
Currently Rented												716
Marsfield BTR												371
Iveagh Trust, Main St												84
Total ABP & DCC Current Applications												1950
Total Min Rentals												3121
<b>Maximum Percent of Rental Units (Excluding land behind Shopping Centre)</b>												<b>77%</b>



The Dublin City Development Plan states that in relation to District Centre, of which Clongriffin is to be one, developments must *“Establish significant residential population bases with diversity in unit types and tenures capable of establishing long term integrated communities”* (Ref 14.8.4). This proposal could not be considered a balanced level of tenure and is highly unlikely to create long term, integrated communities.

Also under 16.4 (Density Standards, the Dublin City Development Plan states that *“An urban design and quality led approach to creating urban densities will be promoted, where the focus will be on creating sustainable urban neighbourhoods. A variety of typology of residential units will be promoted with neighbourhoods in order to encourage a diverse choice of housing options in terms of tenure, unit size, building design and to ensure demographic balance in residential communities. All proposals for higher densities must demonstrate how the*

*proposal contributes to placemaking and the identity of an area, as well as the provision of community facilities and/or social infrastructure to facilitate the creation of sustainable neighbourhoods”*

Does the current proposals mixture of housing tenure and use mix what was envisaged when the lands were first zoned for development or when the LAP and the target housing densities were decided upon? Would the original LAP proposal have been successful if it did?

There must be more people who have skin in the game in the area in order to take a real active interest in fighting to ensure the positive development of an area. As a small practical example, despite repeated advertising, our community association is made up entirely of owner-occupiers, despite the majority of the town being renters.

Indeed, the local Gardaí have indicated that in their experience, areas that nobody cares about or takes pride in are the areas that “turn out bad.” With a prediction of over 10,000 likely transient residents in the area being introduced in these planning applications, it is unfortunately a concern for current residents that this creates an unacceptance risk that Clongriffin will fall into a state of disrepair and/or disrepute by virtue of the apathy or disinclination of such a large proportion of residents to invest in the area, either in the long term or at all.

Such apathy also places the area at increased risk of criminal activity at a time when the Gardaí are wholly under resourced, by their own admission, and there is no local Garda station in the area. At present, there have been a significant number of high profile incidents whereby the Dart Station has been vandalised, and residents in the area have fallen victim to, *inter alia*, burglary, assault and thefts.

At present, rental prices are almost double the cost of repayments for a typical mortgage for the same property. The creation of such a large scale of “rental only” properties further deprives aspiring homeowners from availing of opportunities to purchase a home and put down roots. There will also be few opportunities to buy within this area, which means those moving on from renting will likely be buying elsewhere, thus increasing transience in the area.

In terms of social issues and the human impact of such a large-scale construction of rental residential units, presumably it is envisaged that many of these units will house families who may be unable to afford to purchase a home. Whilst this presents a temporary, “sticking plaster” approach to the current housing crisis, consideration must be given to the longer-term impact of such an approach. Ireland is a country in which very few people rent for life. The creation of further rental properties, let at market prices, rather than homes for people to purchase, deprives families of any meaningful opportunity to save for a mortgage. This creates stress and instability for families, and in particular, one must be mindful of children who may reside in a rental apartment for a number of years and then subsequently be uprooted, changing schools, friends, clubs etc. when it is time to move. The construction of further homes for purchase on the market would also reduce pressure on the rental sector.

The scale of the planned units, and in particular the large tower blocks, some of which are in excess of 50m, are such that they cannot simply be torn down and replaced if they prove disastrous to the local area as anticipated. It is suggested that this development deprives individuals outside of the most expensive or affluent areas in the city an opportunity to get on the property ladder. The development of this Key District Centre should not be entirely shaped by the short-term whims of the free market.

The LAP does, however, require that a balanced tenure be provided for in the town under ‘Character of Development’ under the ‘Phasing and Implementation Strategy’. While it recognises that a higher density of 60 units per hectare would be appropriate in this Phase 4 of the development, the current proposals to ABP and DCC more than double this assumed density of 1,950 units on 11.8 hectare resulting in 165 units per hectare. This proposal could hardly be considered a balanced level of tenure.

There are not enough family-sized units – the majority are 2 bed properties. Families with two children are unlikely to want to reside here. The LAP aims to provide accommodation for family units, however, this will not be served by the vast majority of the proposed units.

Block 17 will at 63 m in height, along with the Millennium Tower, be the 5<sup>th</sup> tallest building in Ireland and the 3<sup>rd</sup> tallest in Dublin. It will be the tallest residential building in the country and will be the tallest building in Dublin outside of the city centre.

Block 26 is proposed to be 56.7m in height. This would be the 11<sup>th</sup> tallest building in Ireland and the third (number 1 being block 17) tallest residential building in the state. It would be the 7<sup>th</sup> tallest building in Dublin and the second tallest building in Dublin (after block 17) outside of the city centre.

These two buildings were originally envisioned (at lower heights) as landmark office blocks which would symbolise Clongriffin as the Capital of North Dublin. The only justification for such buildings cutting through the skyline would be to demonstrate the scale of investment and ambition of this new area. What is proposed is the tallest residential building in the country, well outside of the city centre. The justification for changing use from office to residential is that there is insufficient demand for offices outside of city centre locations, which is untrue. What is clear is that there is absolutely no appetite for residential units at these heights anywhere in Dublin. Consider the demand for living at such heights, this far from the city, with little-to-no high-end employment nearby. It does not add up. Office space is more proven at these heights.

### WEMBLEY PARK COMPARRISON

At a recent presentation by one of Gannon Homes consultants for this project, it was mentioned that they had looked and drawn inspiration from at other examples of large-scale Build to Rent projects. One prime example provided was that of the UK's largest planned Build to Rent area being the ongoing Wembley Park Development. This is to contain approx. 5,000 rental units (at a minimum) out of approx. 7,000 units on completion, with approx. 2,900 in existence. As set out above, Clongriffin alone could end up with a significant number of rental units and when Balgriffin, Belmayne, Northern Cross and The Coast in Baldoyle are added, there is the potential to exceed the levels provided in Wembley Park.

Wembley Park however is located in a city of 8.14M people versus Dublin with 1.35M. That is a city 6 times the size and therefore more likely to be able to absorb this level of rental demand in one location. That is also before looking at the other development at Wembley, which includes;

- A 90,000 seater capacity National Stadium
- 3 Hotels providing 1,400 bedrooms
- A large scale civic centre including conference centre, auditorium, amphitheatre, meeting rooms, winter gardens, wedding gardens for civic ceremonies, a major library, civic facilities and retail space
- A community centre
- 70 shops, restaurants and cafes in existence
- A 9 screen cinema
- The largest existing Boxpark street food and music venue
- A primary school
- Medical centre
- Wembley Park Tube Station
- Wembley Park Central Station (overground service)
- 660 bed student accommodation
- Offices of approx. 750,000 sq.ft. with much already in existence

This commercial development was phased over time in conjunction with residential delivery.

There are already thousands of permanent jobs in place on site and on completion is projected to contain approx. 8,640 jobs. The current and proposed future development of Clongriffin and the surrounding areas pales in comparison.

## **THE GERMAN EXAMPLE**

The argument was made by a member of the Applicants team, at the initial consultation, that many individuals now wish to rent long term. In Ireland however, logic does not back this argument up, unlike Germany. Especially as per our calculations, average interest and inflation rates over the past 20 years, if continued over the next 50 would result in renters paying 6 to 7 times that of owner occupiers for a similar property.

Germany is often used as an example of a successful renter society. This would however be a social experiment on a grand scale for Ireland. We have neither the societal culture, the investment culture, nor equivalent legislation to that of Germany.

In Hamburg as an example however, prices for units are similar to Dublin but rents are only 60% of that of Dublin. Blocks tend to be bought by German national funds which at least keeps the cash in the country but they are willing to accept far lower returns than the funds operation in Ireland at present. Given the similarity between rents and mortgage prices, combined with the lack of maintenance requirements, flexibility, rent controls and lack of market risk, renting in Germany is a more reasonable alternative to purchasing. (Primary source - <https://www.numbeo.com/cost-of-living/comparison.jsp>)

## **RESIDENTIAL CONCLUSION**

We are not against having any rental blocks or to having density in the area, we in fact welcome the sustainable development of land, which has remained empty for far too long. What we are appealing for is merely a balanced and considered approach to the development of the land. Rental blocks need to be interspersed with a greater proportion of private, owner occupied blocks. The overall accommodation density needs to be balanced with significant, tangible opportunities for employment in conjunction with social infrastructure for a wider demographic. A true town should also provide for the full cycle of accommodations and tenure over the course of a lifetime.

Any grant of BTR should be conditional upon at least half of the units or any subsequent units developed being for owner-occupiers only. In reality, there is already a significant level of rental accommodation available in the area and there is limited capacity for much more.

A positive example of this is the Poolbeg Peninsula site-planning grant, which takes account of the risk of rental fund takeover of a town. Of the planned 3,500 homes there, An Bord Pleanála ruled that to encourage sustainable communities, build-to-rent apartments would be limited to a maximum of 150 units in each of the four main blocks of the development or a maximum of 17% of the units.

It should also be a condition that owner-occupier units and office developments should be delivered concurrent with the BTR units. Without this form of conditionality, the delivery of KDC will never occur in an optimal or fair and balanced way.

Planning should be contingent on the local Bus Connect upgrade being confirmed, in addition to increased Irish Rail capacity and new roads being completed. The Proposed development places immeasurable pressure on an already overburdened public transport system. The Applicant has placed the onus of meeting the transport requirements for such a large number of residents on Irish Rail and Dublin Bus, and presumes that the resources will be provided to Clongriffin in due course once the proposed developments are populated.

## TRANSPORT

The plans submitted will provide for a far larger increase in residential population than previously envisaged. It also removes a key component of the town, being most of the daytime employment. Therefore, the pressure on public transport and road infrastructure will be far greater, with large numbers of people travelling out in the morning and back in the evening.

The proposed developments are almost entirely reliant on the population travelling to and from Clongriffin exclusively by way of public transport. The Applicant has indicated that the lack of car parking proposed is congruent with the Government objectives in reducing the number of people who travel to work by car. While this is a laudable aspiration, the Economic and Retail Study for 2018 highlighted, that car ownership in the areas studied is currently at 81%, which is higher than the DCC average of 66%. Also 48% of residents travel to work by car versus 34% in the rest of DCC. Perhaps this is an indication of the already overstretched public transport offering available in the area and the lack of local employment opportunities, which is certainly a cause of concern in light of the proposed applications.

However, it is submitted that such an approach is wholly unfeasible. Less than one car parking space has been provided per residential unit, inclusive of unassigned or on-street parking. It is futile to suggest that such a large influx of individuals to a suburban area would have no need or desire for a car. Whilst it may be the case that people will travel by car less frequently and some residents will choose not to drive to work, many individuals have cars for other, practical purposes such as travelling with (particularly, young) children, going to the supermarket or other shopping trips, travelling with pets, visiting friends and relatives, attending sports or leisure activities. In many instances it is simply not practical to undertake these tasks on public transport, particularly when carrying numerous or heavy items, or travelling to locations inaccessible by public transport. Often a number of stops, changes and different modes of public transport would be required in order to reach a destination when leaving from Clongriffin. This is wholly impractical for many people.

Whilst initiatives such as Go Car may ameliorate some of these difficulties, it does not provide a reasonable solution given the scale of the proposed development. Similarly, GoCar will also require the use of further parking spaces, thereby largely negating its purpose. Given the lack of car parking proposed, this will also have a heavy impact on already overcrowded roads in the area.

Overall, the application relies on a number of externalities which the developers are not in control of and which we cannot be sure will be delivered in line with the development, unless appropriate conditionality is attached to any grant of consent for development here.

## BUS

The justification for the development relies heavily on the Bus Connects proposal given the lack of car spaces and adequate road infrastructure. It is however just that – A Proposal. The project has already encountered delays and it is believed that a submission will not be made to An Bord Pleanála until H2 2020 at the earliest for statutory approval. 30,000 submissions were originally made in relation to the plans and even if there are no further delays the planned dates for construction are not expected to start until some time between 2021 - 2027. Start dates will be managed over this period on a phased basis and will take 2 years to complete for each phase. It is undoubtedly a controversial proposal and will take a substantial number of years to deliver, all going well.

To grant planning permission based on something that may or may not happen, without a condition attached that the development must only progress if the Bus Connects plan is delivered and its development is

substantially progressed. The consequences otherwise would be very damaging to the community and the wider area.

Currently travel times to the city centre from Clongriffin are up to 65mins according to Bus Connect and there are no services to anywhere apart from the city centre.

## RAIL

We are not aware as to whether Irish Rail have been adequately consulted in relation to this plan. They have acknowledged previously that they do not have enough rolling stock and that while more has been ordered, this stock, it is not due to arrive until 2024 and will be delivered over a ten year period. The previous plan to purchase second-hand carriages as a short term solution is no longer being progressed by the NTA as no appropriate responses were received to a tender.

Although the present applications have only recently been submitted, it seems unlikely that the potential population increase in Clongriffin and along the northern commuter line could be fully taken into account when additional carriages were ordered by Irish Rail. There is only a single track in either direction and Connolly Station is struggling to cope with the number of lines and services converging there as things stand.

Irish Rail recently launched a new website [peaktime.ie](http://peaktime.ie) with a view to persuading commuters to stagger their journeys during morning rush hour. A spokesperson acknowledged that the problem of overcrowded trains was more pronounced on services travelling into the city centre from the northside of Dublin. Services currently operate to/from Clongriffin approx. every 20 minutes, which cannot be considered a high quality service provision.

## TWO-WAY-SYSTEM

Instead, if developed in a more balanced way with large-scale local employment, the roads could be used in two directions, as could the rail and bus services.

Rail – If employment uses were provided the people heading south on the rail line could descend at Clongriffin rather than having to travel to the city centre, thus freeing up space for others heading south. More of the Northern Commuter services could then stop here also, alleviating much of the long journeys many of these people have coming from further into North Fingal, Meath & Louth.

Others could travel in the opposite direction going northbound. The trains are currently effectively empty in the mornings from Clontarf onwards.

Bus – The new Bus Connects services, if implemented this would be fantastic, however it seems quite wasteful and unsustainable to have a one way service with empty buses coming into Clongriffin, in the mornings and out in the evenings.

## ROADS

According to a survey undertaken as part of the North Fringe Retail & Economic study 2018, 48% of people in the North Fringe currently commute by car to work. As stated earlier, journeys on the M50 are 50% longer for commuters travelling southbound in the mornings and northbound in the evenings. With a larger amount of residential development happening in North Dublin and office development happening in South Dublin, despite the pre-existing imbalance, things look set to remain if not worsen in the years to come. The M50 travelling north in the morning and south in the evening is underutilised and the opposite direction is over utilised. It would therefore make far more sense to provide more office development here and more housing in the southern suburbs. From an environmental perspective this is also highly unsustainable in addition to being very



damaging to the lifestyle and health of commuters living in the areas who will directly feel the impact of long hours caused by traffic congestion.

At the public consultation for Applicants proposal, in December 2018, the developers highlighted the potential provision of a roadway, linking from the corner of Marsfield Ave and the Rail Line, down to and merging with the Moyne Rd, which would then divert behind the Balgriffin Cemetery and link down through the fields to close to the M1/M50 junction. Unfortunately, there is no mention of this road within the current application submitted.

The Applicant has relied upon a survey carried out over a period of 24 hours on Tuesday the 22<sup>nd</sup> day of May 2019 in conducting a traffic assessment. It is respectfully submitted that a single survey of commuters, carried out over the course of one day alone is wholly insufficient for the purpose of determining the fate of thousands of commuters' futures. There will naturally be some variance on a day-to-day basis, however, a survey performed in Autumn/Winter when colleges and secondary schools are not winding down for the summer, as they were in May, would appear to be more beneficial and offer a more realistic picture of road traffic in the area.

Whilst the Applicant's Traffic Assessment states that, *"The recorded two-way link flows on the roads at Clongriffin are presented in Table 5. No significant delays or queuing were identified during the survey."* It is respectfully submitted on behalf of the Clongriffin Community Association that residents are regularly subjected to very significant delays and queueing on a frequent basis in or about the vicinity of the locus the subject of the assessment. In particular, the traffic congestion at the Donaghmede Roundabout and Northern Cross junction are becoming major problem points.

In addition, there was also to be a C Road developed to divert the Malahide Road traffic away from the busy Northern Cross Junction. This was to split from Belcamp Lane, go behind Northern Cross and re-join the original Malahide Road around Kinsealy. Despite the huge amount of development ongoing and planned in the wider area, nothing appears to have progressed with this.

## **TRANSPORT CONCLUSION**

These new roads are vitally needed and any development here should be conditional on their early delivery. It should also be conditional on the confirmation of the Bus Connects Plan and upgrading of the Irish Rail service.

In addition to this, it must be acknowledged that this proposed development in Clongriffin is not taking place in isolation. This is but one site of many in the wider area. In addition to Clongriffin, Balgriffin, Belmayne, Belcamp College, Kinsealy, Malahide, Portmarnock and Baldoyle are all undergoing or are set to further undergo major residential development in the next few years and much of the traffic generated as a result will be forced through these junctions.

The provision of only .75 parking spaces for units in respect of 2,000 apartments (not accounting for other developments in the area) equates to a total of 1,500 spaces for a population of 6,000 people. The plans presupposes that 3 out of every 4 residents in the new development will be either unwilling or unable to purchase a motor vehicle. The balance of the Applicant's proposed residents, a total of 4,500 people, are expected to use public transport, placing an increasing strain on an existing resource which is already stretched beyond capacity.

If one accounts for an estimated 4,500 residents without cars comprising mostly of young people who are in employment, some of whom are not working peak hours, there will still likely be an additional 3,000 residents utilising public transport. If two thirds of these additional commuters use the dart then this equates to an extra 2,000 on the dart at peak hours. This is not an unreasonable estimate for a proposed development of almost 2,000 residential units, some of whom will have multiple commuters in the same household. How many extra carriages and services required for this development alone? This is before accounting for other developments in the area and developments in other areas along the line.

By the time the additional carriages (which have been ordered to meet the present transportation demands) arrive in approximately 2024, the population of Clongriffin will have expanded by a minimum of 6,000 additional commuters, approximately 3,000 of whom are wholly reliant on public transport. The DART, even at capacity, will end up similar to the Luas whereby nobody, a few stops on from Clongriffin, will be able to get on.

While building high density, sustainable accommodation with accessible public transportation routes makes theoretical sense, at what point will it be too much for the available (or even anticipated and planned future) infrastructure? The DART is already heavily overcrowded. Even with new carriages to come, the population growth on the northern lines will almost certainly greatly outstrip this extra capacity. There are also capacity constraints in relation to adding services as so many lines currently converge in Connolly. The Bus Connect Plan appears to be on somewhat uncertain ground and its delivery times are already heavily impacted. The M50 will be an unmitigated disaster. The only solution is to balance the employment opportunities across the city and ensure that the residential growth in a particular area is not so overambitious or concentrated that it will be wholly unsuitable and unsustainable.

## CAR PARKING

The development proposed includes for only 0.75 car spaces per unit, with the average units comprising of 2 bedrooms. One third of this however is made up of surface level spaces, most of which would be required to support the level of retail sought. If one estimates an average of approximately 3 people per apartment, then, as outlined above, only one in four (or one in six, if one considers provisions for car parking for visitors or employees etc. to the locus) may practically own a car. This is extreme and wholly disproportionate for an out of city centre location, particularly one with very few employment opportunities in the locality.

Such a proposal might make sense, if this location consisted of a smaller development in an already built up suburban area, which was equipped with a good level of existing car spaces. However, to develop half of a suburban town in a way that assumes this presumptuous, extreme and unreasonable. Such an approach would be more appropriate for a development located in the city centre where ample employment and amenities are within walking distance or a short distance by public transport.

The result of this will inevitably mean that people instead look to park elsewhere nearby, rather than in their blocks. At present, current residents have reported that others are encroaching upon the parking spaces assigned for their use. They are experiencing difficulties with finding a space near their homes, despite having been assigned on-street parking. These spaces are presently being utilised by both the public, workers, and residents of a number of apartment blocks who are unwilling or unable to pay the fee for an underground parking space in their building. It is plain that an absence of adequate parking spaces for this development will lead to new residents being forced to park their cars in other spaces located in the nearby housing areas populated by existing residents. If the developments require residents to pay a fee for parking, it is likely that many residents will consider it good financial practice to locate their cars elsewhere. This will create a nuisance for existing residents who are already struggling with insufficient parking spaces and whose homes or driveways may be blocked by any of the 4,500 new residents for whom no parking spaces have been assigned.

The public car parking available along Park Avenue by Father Collins Park and on Park Terrace beside the proposed Nursing Home will therefore be absorbed for this purpose and visitors will no longer be able to easily access the park.

With the drive towards electric vehicles and a move away from more traditional combustion engines the provision of a higher percentage of electric vehicle charging points, over and above the 5% indicated in the plans, is indicative of the belief that in fact private cars will not disappear from our roads, in the future, but that they will evolve into a cleaner, more sustainable, method of transport. They will support public transport methods

but they will still need somewhere to be parked. If the uptake of electric vehicles continues to increase, as anticipated, it is essential that an adequate number of parking spaces and charging points be provided, particularly in circumstances whereby apartment dwellers will not be in a position to install their own personal charging points.

Furthermore, the applicant maintains that there are sufficient schools places and that there are apparent large employment centres in the wider area. The reality is that most of these are located well beyond walking distance from Clongriffin and many are not connected to the area via public transportation. How, therefore, are people to access these places, if they cannot own a car due to a lack of car parking spaces? The number of car spaces should, therefore, be greatly increased to account for the above.

With an office park, there would be separate peaks of demand at different times of day. If the offices are replaced with more residential units, however, it will be overcrowded in the evenings and weekends but largely empty the rest of the time.

The proposed vision for the town is not one filled with restaurants, employment, schools, or any meaningful community facilities, meaning that travel to these services will be essential and the car is the dominant mode of transport in the city. We welcome less car transport on our roads (that is why we are looking for adequate levels of facilities to be located within walking distance), but practicalities must be considered. As a sense-check, what percentage of couples who pay circa €2,000 per month do not own a car? This is luxury-priced accommodation, a car is seen as a modern essential, never mind a luxury.

A low level of car parking is only potentially viable if the public transportation infrastructure is very strong (not yet established and may not be delivered), there is a strong level of local employment so people can walk to work and ample local retail and leisure offerings.

## COMMUNITY INFRASTRUCTURE & SCHOOLS

If looked at purely on a geographic basis alone, it looks like there are a lot of community & sports facilities in existence in Clongriffin. If looked at on a Per Capita Basis however, the picture is quite different for this high-density area. When the lack of facilities in the rest of the North Fringe are also added into the mix, and when the existing population of Donaghmede and Clarehall who have been using many of them for decades are also added in, then the picture starts to look very different.

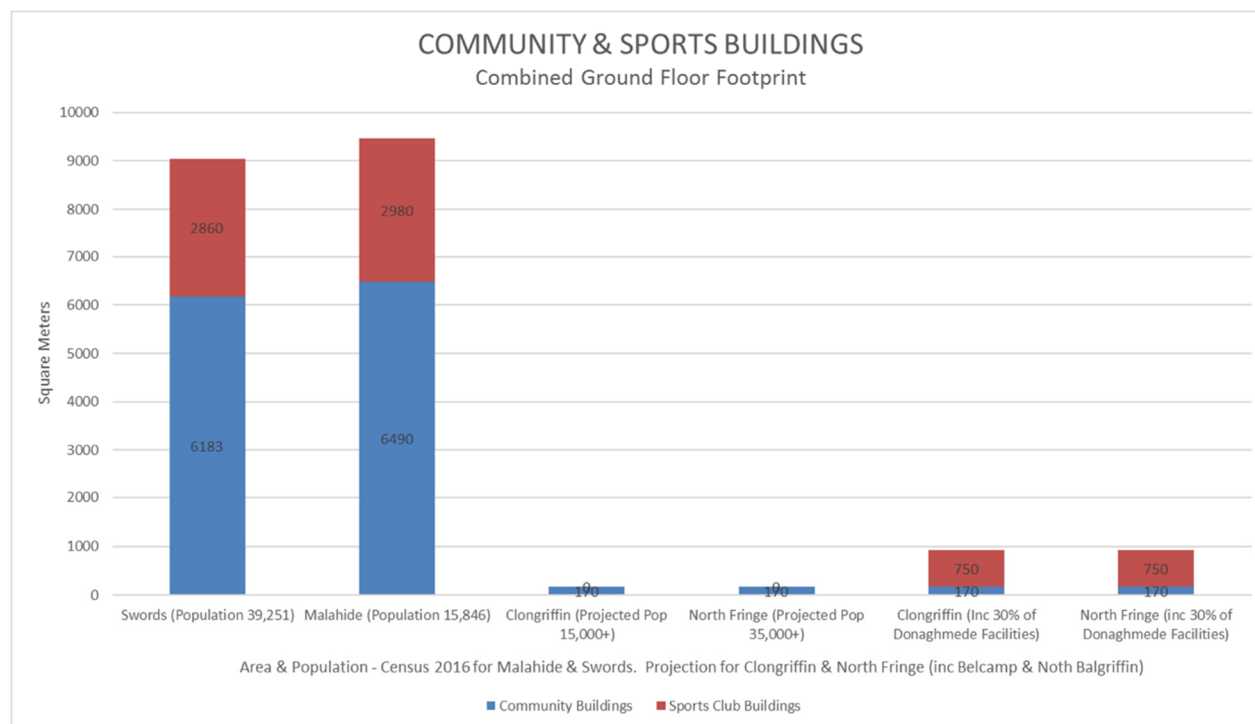
### COMPARATIVE ANALYSIS

In an attempt to put the scale of the problem in context, we have analysed the community and sports facilities available in our area by comparison to other nearby towns. In doing so, we wanted to compare the requirements of towns with similar population level to that envisaged for Clongriffin and separately for the North Fringe (including Clongriffin). We therefore chose two towns, Malahide with a population of 15,846 (Census 2016) and Swords with 39,251. These are isolated populations in that they are physically split from adjoining towns by green belts, which helps somewhat in assessing what a particular population level may require. Where boundaries are blurred, it may be more difficult to assess this.

In order to do so, based on the limited information available to us, we decided to identify all community and sports buildings that we could find in each area and scale the approximate ground floor footprint of each respective building online using the Myplan.ie measuring application. We then compared the footprint provided in each town, in addition to the number of sports clubs, classes and community organisations in each location. While this is not a perfect measure, it certainly shows some indisputably seismic variances which would be

unlikely to be closed substantially through any other form of analysis or based on any other reasonable assumptions.

The summary results are set out in the table below and a detailed breakdown of all of the sports club facilities, community facilities and the classes and other regular events held in each is attached in Appendix B.



One key aspect of this analysis relates to the treatment of the Trinity Sports & Leisure complex and the Trinity Donaghmede Football Club facility in the area. The Trinity Sports facility existed long before the development of Clongriffin and the North Fringe and it already serves an existing population from Donaghmede and Clare Hall. If this is to be included in full therefore, the populations of these areas would also need to be added to the analysis. Instead, we have assumed that there is a 30% capacity available within the facility to service the growing population here. We would be interested to hear what the actual level of capacity is.

Either way, the numbers appear bleak. Based on this analysis we currently stand at somewhere between 2% and 10% of the comparison towns, with little else currently as being confirmed in the pipeline, to make up the gap.

### EXISTING & PROPOSED FACILITIES

Trinity Sports is extremely dated and not fit for purpose. It serves a pre-existing population and we are not aware of the levels of capacity available to facilitate ours. While we are aware that it receives state funds, it is not a state or Clongriffin community owned facility and we are not aware of any locals being involved in its operation.

Trinity Sports & leisure themselves have confirmed in a letter to the council on September 9th 2013 as part of a planning application (Ref. 3216/13 which has not been enacted), that many of the facilities there are “*not fit for purpose*” and are not in line “*with what people expect of our club in the twenty first century*”.

A Multi-Games Area has been planned by DCC for Belmayne but one MUG is not enough to cater for a young population of this scale and it is too far from Clongriffin for older kids and teenagers to independently and safely access it. Currently there is nowhere for teenagers to go in the evenings, particularly on long cold winter nights.

This lack of positive outlets results in kids hanging about streets and increases the chances of anti-social behaviour occurring.

We have heard that there may be a library planned for Belmayne but, to date, have not seen any details in relation to its scale, proposed functions or timeline. In the meantime, the unit originally intended for use as a Library has now been sold and a planning application was submitted for change of use to more apartments. More population growth and less social infrastructure!

Clongriffin and the DCC North Fringe generally has no dedicated sports teams or facilities. There are a couple of facilities there serving the existing community in the adjoining town of Donaghmede and its clubs but they will not be of sufficient capacity to be able to absorb the large new population expected here. So where are our GAA, Soccer and Rugby clubhouses and respective pitches? Where are our Tennis clubs and Multi-Games areas?

Without these community and sports facilities, families will be forced to go elsewhere to find these outlets and the growing sense of community will decline. Community leaders will dedicate their time to the benefit of other towns and children will make connections in those places to which they commute, rather than locally. Meanwhile this area will be left without a sense of community or a real sense of place. The large number of children and teenagers soon to come will also lack positive outlets! Unfortunately, this situation has already occurred somewhat in the older parts of Clongriffin and Balgriffin but some locals are now fighting to change this. Again, this lack of community creates a further increased risk of crime in the area, as previously outlined.

The lack of a community centre has also resulted in all sorts of barriers and complications being in the way of community growth. Some practical examples of the complications that come with not having a proper staffed community centre as follows;

1. Difficulty in groups obtaining independent insurance to hold events in non-community spaces.
2. Not having a staffed facility where people can call in to see what is on, or whom locals can phone to make enquiries.
3. No way of getting back into the site for lost property.
4. Not having anyone to turn on the heating in advance of an event (the Junction & The Hub are both extremely cold during the winter months).
5. No storage space available.
6. Nowhere for children and adults to wait safely and warmly inside before or after an event.

The limited facilities have had practical implications on our own community building efforts to date. Members of the Clongriffin Community Association have, in recent times, been involved in the organisation of multiple street parties and they have also organised larger scale Christmas and Halloween events. These were housed in the larger of the two community rooms, plus a large empty retail unit on the town square, facilitated by Gannon Homes. These were fantastic community events but the turn out far exceeded the capacity of the facilities provided. The Association is keen to build on this momentum, however, with large-scale population growth ongoing, and the extra retail space provided eventually to be let out to shops, there is currently little hope of this happening.

## **REQUIRED FACILITIES**

The needs of the community will shift and change over time and there needs to be space to allow for this however, a normal successful town with well-integrated communities would normally contain many or all of the following as a few examples.

- Sports Clubs and associated facilities
- Sports Halls

- Multi-Games Areas
- Scout Dens
- Hobby Clubs
- Youth Clubs
- Libraries
- Meeting Spaces
- Adult education spaces
- Community Event Space

The detailed breakdown of the sports and community facilities and the lists of organised events or activities in Swords and Malahide provide a very good guide as to what is possible and reasonably desired in this location (See Appendix B).

At present it is a very young demographic and the initial uses should naturally reflect this.

## SCHOOLS

The applications provide for no education facilities within Clongriffin. Condition 29 of the original plans stipulated that portions of two blocks (8 and 26) to be reserved for primary school places. We contend that this should be the minimum provision and that the provision of a second level school would be prudent also.

“Condition 29: A portion of omitted blocks numbers 08 and 26 shall be reserved for future use as a primary school until such time as it may be determined in writing by the planning authority that there is no need for such a facility”

The applicant has provided a report to justify the removal of school facilities from the town. The report submitted by the applicant claims that 1062 school spaces required by this development do not lead to the requirement for a new school or schools. It suggests that there is sufficient capacity in local schools to meet the demand of the new homes. Even a cursory examination shows that this is not a reasonable conclusion. This report is far from convincing and contains several errors/omissions. The three applications under consideration represent approximately 40% of the housing units within Clongriffin. The school requirements must be considered to include the homes already provided in Clongriffin under the original the masterplan, for which no school places have been delivered. The report provided by the Applicant suggests that the proposed development demands the provision of 606 secondary school places and 456 primary school places. When the existing residential units as well as those under construction are included, the primary and secondary schools places required to serve Clongriffin are approx. 1440 and 1,080 respectively. This means provision of 3 primary schools and one large secondary schools need to be provided. This proposal provides none and will lead to one of the biggest deficits in schools capacity in the country.

## **Secondary Schools:**

While there are several schools in the area, one must take into account that the area is densely populated. Moreover, these schools are already heavily oversubscribed and serve an existing population. Many residents have reported that this is a very real problem. The Applicant places the burden of making provision for such considerable additional educational resources to accommodate the large population influx from the planned development on the Department of Education. There plans are such that the entirety of the lands of the Clongriffin site will be allocated and it will not be possible to retrospectively identify spaces for schools within

the lands once these plans are granted. We are not aware of any consultation with Department of Education on this matter.

The report identifies a potential secondary school site. This site, however, is not owned by the Applicant or DCC, and there presently appears to be no planning permission provided for such a purpose. To propose the provision of such a solution is misleading as it cannot be assumed that a school will be built on for the recreation lands of another school within the timescale of the proposed development or indeed at all.

### **Primary Schools:**

The applicant appears to suggest there are 960 new school spaces coming due to the building of two new schools in Belmayne. This is incorrect. These are replacements for the temporary schools that were already in place and will provide the same number of school spaces as before. Many of the other schools with capacity are those which are perceived to be low performing and most are of a significant distance from this development. It is not reasonable to expect parents to travel long distances to poorly performing schools in order to obtain a school place for their children. Their report also ignores all of the developments that have occurred since Census 2016, which forms the basis of their assessment. This includes Belltree, Parkside, New Priory, The Hermitage, St Doolaghs, The new Marsfield BTR scheme, Silverbanks and the Ayrfield development.

### **NEW SCHOOLS PLANS – TEMPORARY & PERMANENT SITES**

It should be noted that the LAP in 2012 (extended to 2022) recognised that the temporary accommodation, at the time, for both Primary schools was at capacity. It further indicated that permanent buildings for these schools would be delivered by 2014. The permanent buildings for these schools were completed in 2019, five years after the expected delivery. Since 2012, as noted previously in the document, the area has experienced a mass influx of new residents, contributing to these school places. In the Downey Planning 'Statement of Consistency with Planning Policy', Section 4.1.4 'Sustainable Neighbourhoods and Communities', considers policies SN01-06. However, no reference is made to DCC's policies SN10-SN14 of the Development Plan, referring to 'Schools and Educational Facilities'. This hardly upholds a statement of consistency with planning policies. These policies are the basis on which the LAP is informed, underlining the need for lands to be retained for future educational provisions.

The Department of Education and Science confirmed during the consultation of this LAP more than seven years ago, 'confirmed the requirement for land reservation for future schools provision' and 'have requested that these sites are retained as land reserves for potential future educational use to service future populations as new residential developments are completed in the medium to longer terms. The sites will remain reserved, managed and maintained by the landowners'.

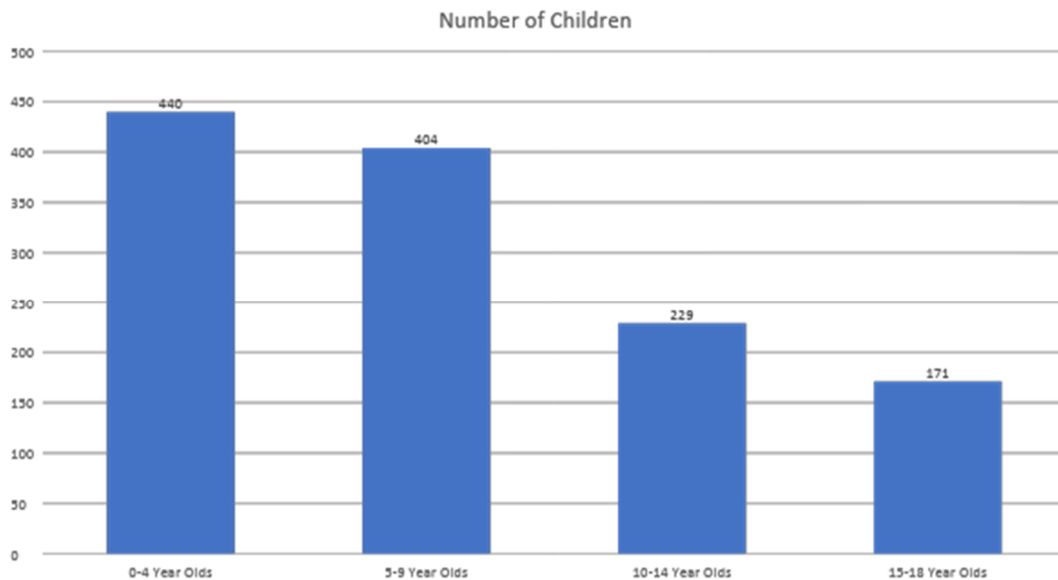
To ignore this unambiguous direction from Government is another example of the disregard for building a sustainable community. Omission for provision of educational facilities is completely unacceptable, and further underlines the neglect by the applicant to understand the needs for this area. We would implore ABP and DCC to uphold and defend the intent of the original LAP.

## DENSITY, HIGH RISE & POPULATION PROJECTIONS

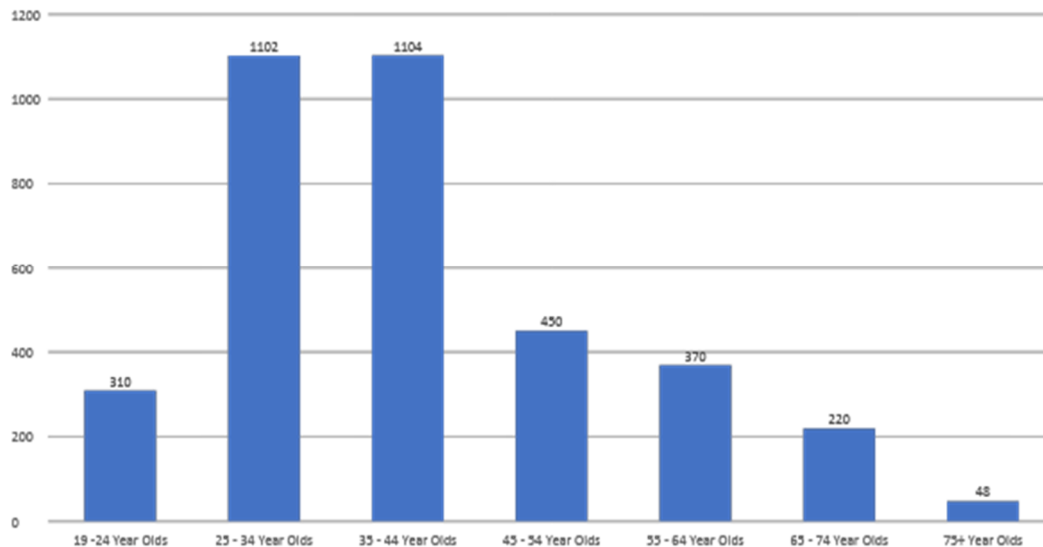
Whilst we are in the midst of a housing crisis, this does not mean that we must disregard all standards and ignore fundamental deficiencies in transportation, employment, community and social infrastructure by cramming more and more units into an area already earmarked for high-density development.

The number of units envisaged for the area under the LAP was approx. 3,600, which would already make it one of the highest density suburban areas in the country. Density more akin to the Dublin Docklands but without any employment opportunities. This plan added to the units currently in existence and under construction would bring the total to approx. 4,000. The application also seems to largely, if not entirely, ignore the existence of the approx. 4.5 acres of land located to the rear of the shopping centre which was originally earmarked for residential development. If this was developed at a similar density, we could end up with approx. 4,400 units. This would result in a density more akin to the Dublin Docklands area but without the corresponding employment opportunities.

In addition, the Applicants project a population of 11,774 for the town. In doing so, they not only omitted the 4.5 acres behind the shopping centre but also based their population projection on the current average number of occupants per unit in the town as of Census 2016. As can be seen from the table below the town has a very young age profile, with the bulk of the population in the age demographic whereby they would be starting families. Many of these people are only just starting or are soon to start families and so the number of people per household should increase greatly in the next few years. As a result, it is our view that the population of the town would be more likely to exceed 15,000 people.







The new Urban Development & Building Height Guidelines for Planning Authorities (December 2018) allow for increases in height and density in central or accessible areas. While no upper guideline density is specified in the guidelines, this is not to suggest, as part of some mindless mantra, that the sky is the limit and there are no restrictions on development densities or building heights. This area was already planned having regard to its accessibility and pushed to the limits of that capacity or in our view beyond that.

If this over development of the town is allowed to proceed, we may end up easing somewhat the housing demand problem, but we will end up creating far more problems, which will be very difficult to rectify retrospectively. It is important that we do not panic into a repeat of many of the town planning mistakes of the past.

It is further submitted that the tower blocks as proposed for the developments will negatively impact and cause visual disruption to the skyline. It is the Applicant's contention that the National Development Plan allows for a maximum height of 50m and is therefore in conflict with the Local Area Plan. However, the Local Area Plan is useful with regard to examining objectives which are individually tailored for the area in a manner which the National Development Plan does not have the opportunity to fully consider.

It is submitted that, whilst the NDP permits, in some limited circumstances, the construction of buildings of up to 50M for a particular area, this does not necessitate that the LAP be wholly disregarded. Planning guidelines provide that consistency between plans and strategies at different levels is essential. Therefore, consistency for this purpose would mean that a guideline in the NDP permitting a building height in principle of up to 50m is not wholly inconsistent with the LAP which restricts the height of development at this location to c.6 storeys, a height which is far more appropriate for the area.

The Dublin City Development Plan 2016-2022 sets out policies and objectives to guide how and where a development will take place in the city over the lifetime of the Plan. It provides an integrated, coherent spatial framework to ensure the city is developed in an inclusive way which improves the quality of life for its citizens, whilst also being a more attractive place to visit and work. This Plan was adopted by Dublin City Council at a Special Council meeting on 23rd September 2016. The Plan came into effect on 21st October 2016. Consideration was given to high rise buildings in the plan as follows;

*"....Clustering of taller buildings of the type needed to promote significant densities of commercial and residential space are likely to be achieved in a **limited number of areas only**. Taller buildings (over 50m) are acceptable at locations such as at **major public transport***

*hubs, and some strategic development and regeneration areas (SDRAs). For example, the North Lotts and Grand Canal Dock SDZ planning scheme provides for a limited number of tall buildings at Boland's Mills, the Point, Spencer Dock Square and Britain Quay."*

It is clear that any application for planning permission in respect of taller buildings must be wholly exceptional in nature. Whilst the area is presently designated as SDRA, and therefore has a potential maximum permissive building height of up to 50m, it is clear that such high rise buildings may not be appropriate and should only be placed in *some* strategic development and residential areas. Concerns were highlighted such as the potential for an incoherent streetscape, and it was noted that proposals for taller buildings must respect their context and address the assessment criteria set out in the development standards section.

It was further noted in the Plan that it is the policy of Dublin City Council to provide for taller buildings in those limited locations identified in order to promote investment, vitality and identity. It is respectfully submitted that the proposed development does not promote any of these things. It is a wholly disproportionate, predominantly residential development that fails to deliver even basic amenities such as adequate parking spaces for up to 75% of residents. There cannot be vitality in such a development in circumstances whereby there is no balance between, *inter alia*, residential and commercial opportunities.

The identity of the area will be detrimentally impacted and overpowered by the height of these looming residential tower blocks. The disproportionate reduction in available office space will result in reduced opportunities for investment and employment in the area. The identity of Clongriffin as an attractive North Dublin suburb will be impacted greatly by the construction of such disproportionately tall buildings in close proximity to the existing developments which comprise mainly 2-3 storey houses and approximately 6 story apartment buildings.

The Dublin City Developmental Plan further states that;

*"It is The Policy of Dublin City Council: SC17: To protect and enhance the skyline of the inner city, and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the city.....(and) to promote a co-ordinated approach to the provision of tall buildings through local area plans, strategic development zones and the strategic development and regeneration areas principles, in order to prevent visual clutter or cumulative negative visual disruption of the skyline."*

It is respectfully submitted that consideration should be given to the LAP in determining whether the application should be approved. It is clear that the construction of high rise buildings in the locus would negatively impact the skyline, resulting in visual clutter and creating an unattractive vista, making the area far less desirable. It is further clear that Dublin City Council envisaged that LAPs should be considered in co-ordination with any plans for taller buildings, regardless of the provision for maximum height buildings in the NDP, and that permission for such taller buildings should only be granted in exceptional cases.

Furthermore, under section 16.5 of the Dublin City Development Plan (Plot Ratios), it states that "*A higher plot ratio may be permitted in certain circumstances such as – adjoining a major public transport termini and corridors, where an appropriate mix of residential and commercial uses is proposed*". It is clear that this proposal neither provides for an appropriate mix of residential uses and it provides very few balanced commercial uses relative to the density proposed. The only box ticked is that it is on a rail line but even that resource is already over utilised and any improvements to it to come are to be shared with a booming population all along the northern commuter line, with very few employment opportunities generally.

## CONCLUSION

In conclusion, we firmly believe that this application and Clongriffin itself must not be looked at in isolation. It must be considered in a wider context given the level of residential development planned in the surrounding area and all along the northern commuter line.

The proposals represent a fundamental change to the master plan, LAP and the objectives for the lands behind the shopping centre should be outlined as part of this. The town should become, as originally envisaged, the economic hub of North East Dublin or Capital North as it was referred to.

The realities of employment opportunities, school place availability, community and social infrastructure, transportation and roads infrastructure, population projections and the amount of Build to Rent properties in the area, are in reality at major variance to what has been presented in these applications. The implications of a grant of consent on the back of this are potentially very negative for the local population and the wider north east of Dublin.

The area is also one of the first of many planned high-density new towns for the Dublin region. As such, this should act as a positive example of dense development rather than potentially becoming a reinforcement of negative perceptions that very commonly exist in Ireland as a result of previous planning failures.

There should be conditionality attached to any planning grant here that the development is phased in such a way that employment opportunities (particularly office based), infrastructure and residential accommodation are provided in tandem or in advance where appropriate.

The current draft plan appears more like a cynical attempt to maximise short term returns and at the expense of the future of the place itself and the lost opportunity for north Dublin generally. It would become nothing but another dormitory town. With the proposed housing development planned in neighbouring Fingal and other surrounding areas there are in fact no other alternative sites, on the rail line in North East Dublin, which could accommodate such office development. The impact on the environment of this lost opportunity would be enormous. What would benefit the area greatly would be more employment not just increased levels of housing.

In summary, no real attempt at quality “place making” appears to have been made with this application. The proposals represents bad decisions in relation to density, not good, and are wholly unsustainable. The site being considered has the potential to act as a fix to many of the issues in the North East of Dublin and should not be used to exacerbate them. The proposal provides nothing in the way of opportunities for Clongriffin to become a successful town. It would be genuinely difficult to envisage a worse development plan for this or any other town for that matter.

Thank you for considering our observations and we very much hope that they resonate with you.

Yours sincerely

**CLONGRIFFIN COMMUNITY ASSOCIATION**

## **APPENDIX A**

### **Ireland 2040 – National Planning Framework – Stage One Submission – Promoting Balanced Development in the Greater Dublin Area**

**Genvest - March 2017**



## **Ireland 2040**

### **National Planning Framework**

Stage One Submission

*Promoting Balanced Development in the  
Greater Dublin Area*

March 2017

## Contents

<b>Executive Summary.....</b>	<b>1</b>
<b>Promoting Balanced Development in the Greater Dublin Area .....</b>	<b>2</b>
1. Introduction.....	2
2. Population Growth in Dublin City & the Greater Dublin Area.....	2
3. Imbalance in Land Use Planning and Public Transport Infrastructure.....	2
4. Impact of Current Development Trends.....	6
5. Looking to Ireland 2040 .....	9
Figure 1 - Map of the Greater Dublin Area. Source – nationaltransport.ie.....	3
Figure 2 - Dublin Council Areas. Source – volunteersouthdublin.ie .....	3
Table 1 – CSO Census Data .....	2
Figure 3 - Distribution of Dublin Suburban Grade A Office Space prepared by QRE Real Estate Advisors.....	3
Table 2 - Grade A Office Space Distribution by Dublin Region – data produced by QRE Real Estate Advisors ....	4
Table 3 - Population and Grade A Office Space Dún-Laoghaire Rathdown and Fingal.....	4
Table 4 - Socio Economic Group Population Dún Laoghaire-Rathdown and Fingal .....	5
Figure 4- Taken from Irish House Price Report Q4 2016 produced for Daft.ie by Ronan Lyons .....	6



Figure 2 - Map of the Greater Dublin Area. Source – nationaltransport.ie



Figure 1 - Dublin Council Areas. Source – volunteersouthdublin.ie

Area	Population 2016 Census
Dublin City	553,165
Dún Laoghaire-Rathdown	217,274
Fingal	296,214
South Dublin	278,749
Greater Dublin Area	1,345,402

## Executive Summary

Ireland 2040 and the creation of a new National Planning Framework provides a unique opportunity to develop a dynamic yet sustainable vision for how and where our people will live, work and travel around the country. Dublin as the epicentre of the nation's economy is key to this successful vision for the future.

Since the adoption of the last National Spatial Strategy in 2002 the population of Dublin has grown by almost 20%. However, this population growth has not been evenly spread throughout the Greater Dublin Area. The greatest population increase since 2002 has been in Dublin Fingal with an increase of more than 51%. Population in the areas of Dublin City, South Dublin and Dún Laoghaire-Rathdown has increased by 11.5%, 13% and 17% respectively (data from the 2002, 2006 and 2011 censuses).

Office developments and transport infrastructure throughout this time however, have been concentrated in South Dublin and Dún Laoghaire-Rathdown. These areas have benefitted from the Red and Green Luas lines and have thus attracted large scale Grade A office developments. This concentrates development along the west and south of the M50 corridor. Dún Laoghaire-Rathdown which holds 16% of Dublin's population, has over 4 million sq. ft. of existing Grade A office space with a further 3 million sq. ft. proposed. Fingal, which holds a much larger proportion of Dublin's population (22%), is home to Dublin Airport and is a key region on the Dublin-Belfast corridor, only has 25% of similar type office space.

This imbalance in land use and office space distribution has many implications. House prices close to large scale office developments with good public transport links increase. People therefore look to live in more affordable areas in West and North Dublin. Motorway congestion, especially along the M50 corridor, increases as people are forced to use their cars to commute to work. Further development along the M50 corridor in North Dublin is restricted in order to protect the strategic function of the motorway and avoid further congestion. However, this only serves to perpetuate the problem.

The Government has now committed to developing Metro North in their Capital Plan. This will greatly benefit the large North Dublin population and will facilitate ease of access to the City Centre. However, it is not clear if it will serve any other large scale office developments, other than at Dublin Airport and will not provide a much needed transport link to the large business parks that already exist along the M50.

In order to break from this cycle of 'business as usual' development we must not only look at how we would like the Greater Dublin Area to be in 2040 but must address the issues that exist today. A number of key principles have been identified which can be included in the National Planning Framework which will serve to rebalance the employment opportunities and population distribution across the Capital:

- Promotion of development along the Dublin-Belfast Economic Corridor
- Promotion of public transport to serve future developments in North Dublin

The implementation of policies that promote these key principles within the new National Planning Framework will be vital to protect Dublin's strategic road network which is key to the Capital's competitiveness in the global economy.



## Promoting Balanced Development in the Greater Dublin Area

### 1. Introduction

Ireland's capital city is the driver of growth for the Irish economy and is key to the nation's competitiveness on an international scale. Dublin, as the "Gateway to Europe" is fast becoming one of the most attractive global cities for doing business. Large scale development outside the City Centre however, has been mainly focused in West and South Dublin, along the M50 corridor. In contrast, North Dublin despite its increasing population, the proximity of Dublin Airport and the Dublin-Belfast Economic Corridor, has few office developments of a standard that would attract international clients.

### 2. Population Growth in Dublin City & the Greater Dublin Area

The population of Dublin has increased by almost 20% since the adoption of the last National Spatial Strategy in 2002. This population increase has not however, been consistent across the Greater Dublin Area. As can be seen from the table below, the population of Dublin Fingal increased by 51% since 2002 in comparison to an average of approximately 13.8% across the other Dublin regions. In fact Fingal has had one of the largest population increases in the country over the past twenty years both in real and percentage terms.

Area	Population Change 2002-2016	Percentage Change
Dublin City	57,384	11.57%
Dún Laoghaire-Rathdown	25,482	13.29%
Fingal	99,801	50.81%
South Dublin	39,914	16.71%
Greater Dublin Area	222,581	19.81%

Table 1 – CSO Census Data

### 3. Imbalance in Land Use Planning and Public Transport Infrastructure

The population growth throughout the Capital however, has not been matched with appropriate employment opportunities and transport infrastructure to sustainably support people's needs. Office developments outside of Dublin City Centre, have been focused primarily in the Dún Laoghaire-Rathdown and South Dublin administrative areas leading to an imbalance in the employment opportunities that exist for the wider Dublin population. Similarly, the development of new public transport infrastructure over the last twenty years has also been concentrated in these areas.

As can be seen from the map in Figure 1 below, large scale Grade A office developments outside of the City Centre have been concentrated around the M50 corridor. The largest developments in the county are found to the west and south of this corridor in the South Dublin and Dún Laoghaire-Rathdown regions. Detailed statistics can be seen in Table 2 overleaf.



This trend is set to continue with almost 3,125,000 sq. ft. of office space proposed for development in South County and Dún Laoghaire-Rathdown. The DAA have recently been granted planning permission for approximately 400,000 sq. ft. of Grade A office space at Dublin Airport. This is a welcome advance but does not serve to address the imbalance in any significant way.

Grade A Office Park	Existing Grade A Office Space Sq. Ft.	Proposed Grade A Office Space Sq. Ft.	Dublin Region
Airside	350,000	-	Fingal
Dublin Airport	100,000	400,000	Fingal
Northwood	325,000	-	Fingal
Blanchardstown	650,000	-	Fingal
Eastpoint	1,500,000	-	Dublin City
Parkwest	900,000	-	Dublin City
Liffey Valley	130,000	-	South County
Citywest	1,750,000	110,000	South County
Dundrum	350,000	-	Dún Laoghaire-Rathdown
Sandyford	2,000,000	1,200,000	Dún Laoghaire-Rathdown
South County Leopardstown	775,000	285,000	Dún Laoghaire-Rathdown
The Park	700,000	230,000	Dún Laoghaire-Rathdown
Cherrywood	690,000	1,300,000	Dún Laoghaire-Rathdown

Table 2 - Grade A Office Space Distribution by Dublin Region – data produced by QRE Real Estate Advisors

The disparity in the concentration of office developments is most clearly seen between the Dún Laoghaire-Rathdown and Fingal administrative areas as highlighted in Table 3 below. Despite having 6% more of the overall Dublin population, being home to Dublin Airport and being at a key location on the Dublin-Belfast Economic Corridor, Fingal is currently severely underserved in terms of Grade A office developments to provide employment for its expanding population and highly skilled workforce.

Area	Population 2016	% of Total Dublin Population	Existing Grade A Office Space (sqft)	Proposed Grade A Office Space (sqft)	Total Office Space (sqft)
Dún Laoghaire-Rathdown	217,274	16%	4,515,000	3,015,000	7,530,000
Fingal	296,214	22%	1,425,000	400,000	1,825,000

Table 3 - Population and Grade A Office Space Dún-Laoghaire Rathdown and Fingal

This distribution of Grade A office space, which is associated with a highly skilled work-force is also not correlated to the socio-economic groups that live throughout Dublin county. As can be seen from Table 4 below, Fingal and Dún Laoghaire-Rathdown have a similar population of skilled workers as per the 2011 Census.

Socio Economic Group	Dún Laoghaire-Rathdown	Fingal
Employers and Managers	53,518	54,886
Higher Professionals	28,317	20,505
Lower Professionals	31,326	36,027
<b>Total</b>	<b>113,161</b>	<b>111,418</b>

Table 4 - Socio Economic Group Population Dún Laoghaire-Rathdown and Fingal

This concentration of highly skilled jobs to the west and south of Dublin means that the large workforce living in North Dublin is heavily reliant on accessing jobs either in these areas or in the City Centre.

### 3.2. Uneven Investment and Implementation of Transport Infrastructure

Over the past twenty years North Dublin has benefitted greatly from the expansion and upgrading of the DART line. The DART facilitates a large number of people who commute to the City Centre on a daily basis. However, apart from jobs located in Dublin City there are a limited number of developments which are directly accessible via the DART line. East Point Business Park which operates a shuttle bus from Clontarf Road DART station is the only Grade A office development of significance which is served by this line. People living in North Dublin in areas that are not served by the DART rely heavily on Dublin Bus and private bus operator services to commute to the City Centre. Commuting by private car is the only method of accessing the large developments along the M50 corridor.

The development of the Red and Green Luas lines have provided much need public transport infrastructure for the people of West and South Dublin. These lines provide ease of access to the City Centre but also serve the large office developments in the South Dublin and Dún Laoghaire-Rathdown areas.

The commitment to Metro North in the Government's Capital Plan is a welcome development for the population in North Dublin and will no doubt facilitate significantly shorter travel times for those living in Fingal and travelling to the city for work. There is currently an additional 3.1 million sq. ft.<sup>1</sup> of office space under construction in Dublin City and Docklands. The people of North Dublin will benefit from these increased employment opportunities as will the wider Dublin population. However, the introduction of Metro North, which is not set to be open to new passengers until 2026/2027, will not

<sup>1</sup> JLL 2016 Dublin Office Market Outlook



alleviate the existing issues of people accessing the motorway network to commute to work in the large business parks in South Dublin and Dún Laoghaire-Rathdown.

## 4. Impact of Current Development Trends

### 4.1. Rise in property prices forces people to move to areas where housing is more affordable

The concentration of highly-skilled employment opportunities and public transport infrastructure in South Dublin and Dún Laoghaire-Rathdown increases the demand for housing in these areas. This in turn leads to increased property prices and as a result people are forced to look for homes in areas that are more affordable. The latest daft.ie report on Irish Property Prices in Q4 2016 highlights the disparity in property prices across the Greater Dublin Area. As can be seen from the infographic below the average house in South Dublin costs more than 50% more than the average home in the west or north of the Capital.

## Dublin

Average asking prices and Y-on-Y change

### AVERAGE ASKING PRICES AND ANNUAL PERCENTAGE INCREASES

Q4 2015 - Q4 2016

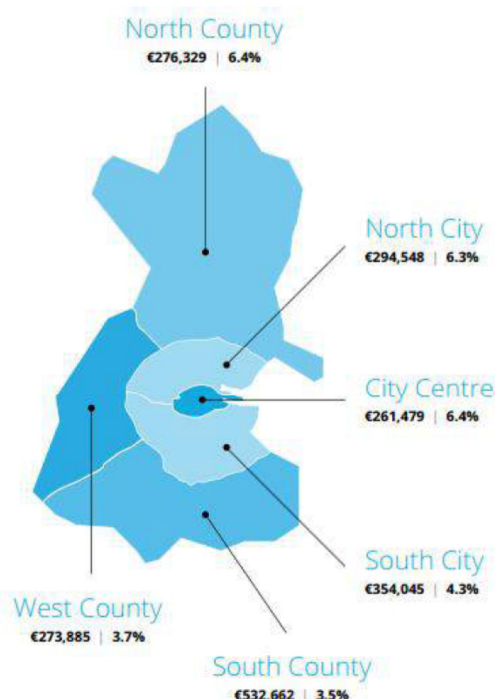


Figure 4- Taken from Irish House Price Report Q4 2016 produced for Daft.ie by Ronan Lyons

#### 4.2. Motorway congestion increases to unsustainable levels

With the disparity in house prices across the Capital, North Dublin becomes an area of choice for many people to live and therefore commuting to their jobs in the business parks in West and South Dublin on a daily basis. There are no public transport services to connect them to their places of work without multiple modal changes and therefore using their cars to travel along the M50 corridor is the only option.

This leads to additional congestion on Dublin's motorways which is now reaching unsustainable levels. The **M50 Demand Management Report produced by the NRA in April 2014** found that without the implementation of demand management measures such as additional tolling, 50% of the sections of the M50 will be operating above safe capacity by 2023. This report acknowledges that the high numbers of people commuting daily from North Dublin and travelling southbound on the M50 is having a particularly significant impact on motorway congestion:

*"[T]he data suggests that [the] significant congestion issues are occurring on the M50 in particular the southbound direction during the AM period." (Pages 9&10, M50 Demand Management Report, April 2014).*

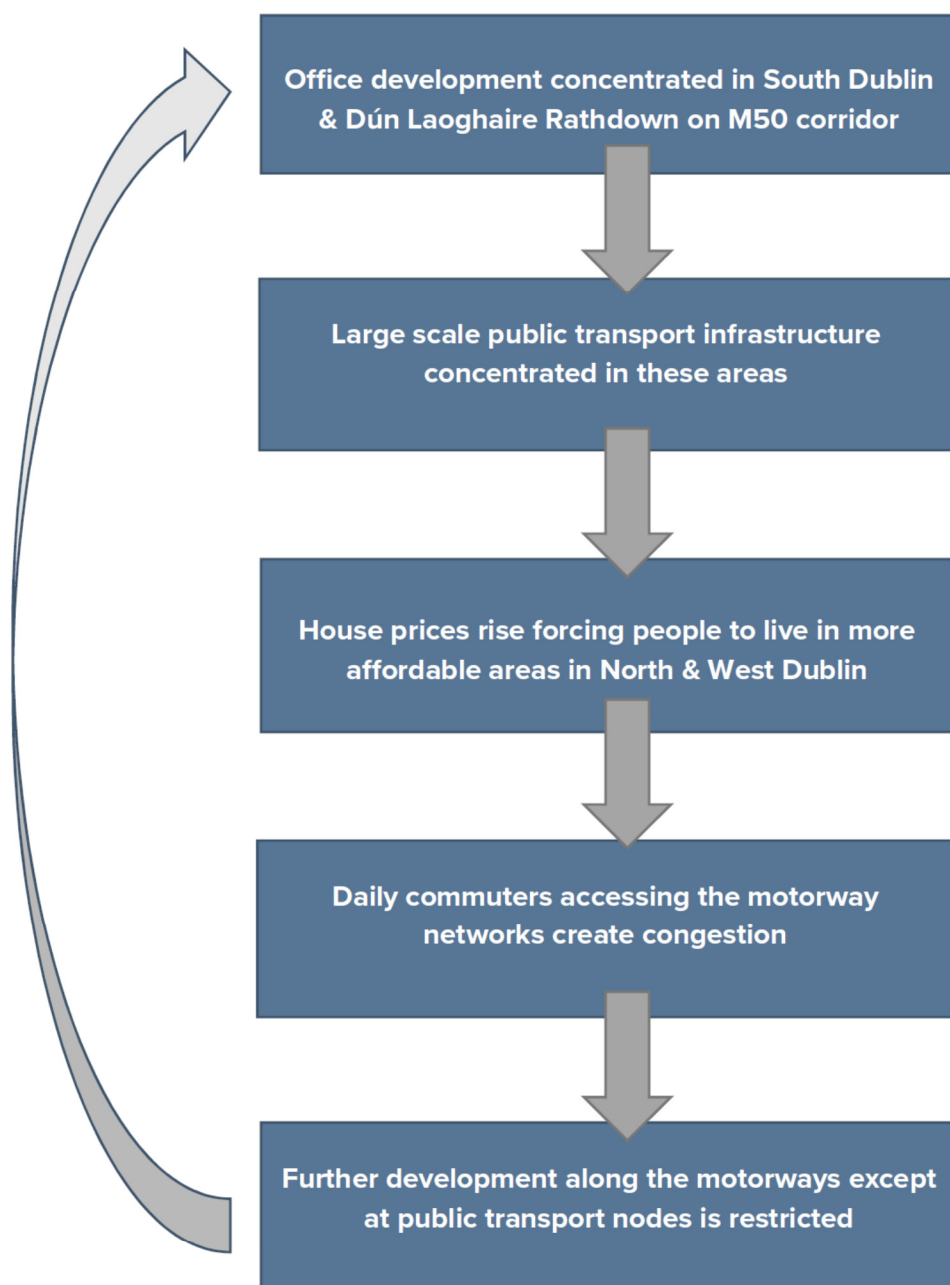
#### 4.3. Further office development along the motorways is restricted

In order to protect the strategic function of Dublin's motorway network and in particular the M50 orbital route, further office development along the motorways except at existing or committed public transport nodes is restricted (**Chapter 7 Greater Dublin Transport Strategy 2016-2035**). The implementation of this policy means that large scale suburban development in the Greater Dublin Region is primarily focused in South Dublin or in Dún Laoghaire-Rathdown near existing Luas lines. Development in North Dublin is limited to the few areas that are appropriately zoned and beside the proposed Metro North or DART lines or at other transport hubs such as Dublin Airport. Airside Business Park, is the only Grade A office development of significance along the M1 motorway which critically links Dublin and Belfast. The imbalance in the distribution of Grade A office space throughout the county is then perpetuated as this cycle continues and people commuting from North Dublin to the business parks in the west and south increase.

There are a number of key sites in Fingal along the M50 corridor, close to large suburban settlements and zoned for General Enterprise and Employment and High Technology Employment business. Coordinated and sustainable development of these areas would provide a large employment base for the growing North Dublin population. As these sites however, are close to the strategic road network and are not currently directly served by existing public transport, development is being restricted.

Proposals for any medium to large scale office developments at these sites have been met with strong objections from Transport Infrastructure Ireland and the National Transport Association due to the potential impact they may have on the motorway network. However, it is precisely development in these key areas of Fingal that is required to alleviate pressure on the road network. Such developments would help to foster stronger business links with Northern Ireland through expansion along the Dublin-Belfast Corridor. High quality developments close to Dublin Airport would be attractive to large multi-national and domestic companies that can also benefit from the large highly-skilled local workforce. Over time this will serve to reduce the number of people who live in North Dublin and have to travel long distances along the M50 to commute to work.

#### 4.4. The cycle of the imbalance in development throughout the Greater Dublin Area continues



## 5. Looking to Ireland 2040

Adopting policies that promote balanced development across the Greater Dublin Area will be key to harnessing the future potential of Dublin and in turn, the rest of Ireland. To do this greater employment opportunities need to be created for the people of Fingal and North Dublin. This needs to be supported by investment in public transport services to cater for the office developments that provide these opportunities. This in turn will reduce the need for the people living in these areas to travel long distances along the M50 to work and will serve to alleviate the current capacity issues that the motorways are experiencing. The National Planning Framework could serve to address these issues by adopting a number of key principles:

### ➤ **Promotion of development along the Dublin-Belfast Economic Corridor**

Large scale developments at key sites along the Dublin-Belfast Economic Corridor should be promoted. Developments at strategic sites in Fingal and North Dublin would be easily accessible and would serve the growing population in these areas. There should be a focus on providing employment opportunities within communities in Fingal and North Dublin to reduce the need for commuters to access the M50 to travel to work. Expansion along the Dublin-Belfast corridor from Dublin Airport to Belfast would serve to reinforce Dublin as a European Capital City and would also strengthen ties to Northern Ireland.

### ➤ **Promotion of public and private transport to serve future developments**

Public transport infrastructure throughout North Dublin and along the Dublin-Belfast corridor should not solely be focused on the commuter's journey to Dublin City Centre but should also serve key strategic sites that have been identified for future development. Additional services could link into the existing DART and COMMUTER train lines and the new Metro North and facilitate travel across the whole of North Dublin. The commuter journey should be seen as a multi-modal journey similar to other large European cities. Committed private transport infrastructure provided by developers should also be considered as a means of travel for commuters in the initial stages of development.

The creation of a new National Planning Framework provides us with the opportunity to envisage the type of county we want to develop for the people of Ireland in the year 2040. However, as important as it is to look towards the future it is also vital that we implement policies that address the current issues. In order to avail of the many opportunities that exist, development of Dublin should be appropriately balanced across the whole county. The development of North Dublin and Fingal with its proximity to Dublin Airport and on the Dublin Belfast Economic Corridor is a key opportunity that must be seized to further boost the Nation's economy and provide employment for the growing population in these areas.





4a Windsor Terrace,  
Church Road,  
Malahide,  
Co. Dublin

**t** +353 1 8450969  
**e** [info@genvest.ie](mailto:info@genvest.ie)

**[genvest.ie](http://genvest.ie)**

## APPENDIX B

### COMMUNITY & SPORTS INFRASTRUCTURE – COMPARATIVE ANALYSIS 2019

#### Swords Community & Sports Facilities

SWORDS - Community Facilities & Activities				
No.	Category	Activity	Location/Facility/Building	Approximate Footprint Sq.M.
	Community	Library	Swords Library	320
	Community	Scouts	Swords Scouts	280
	Community	Scouts	164th Brackenstown Scout Group	230
	Community	Community Centre	Applewood Community Centre	850
	Community	Community Centre	Holywell Community Centre	850
	Community	Community Centre	Rivervalley Community Centre	770
	Community	Youth Centre	Swords Youthreach	390
	Community	Community & Business Centre	The Riasc Centre	1153
	Community	Community Centre	Liam Rodgers Community Centre (Kinsealy?)	1000
	Community	Event Space	Swords Castle	340
<b>Total Non-Sports Community</b>				<b>6183</b>
1	Sports	Sailing	Swords Sailing Club	250
2	Sports	Golf	Balheary Par 3 Golf Course	70
3	Sports	Football Club	Swords Manor Football Club	0
4	Sports	Football Club	Swords Celtic Football Club	360
5	Sports	GAA	St Fintans GAA Club	250
6	Sports	GAA	St Colmcilles GAA Club	650
7	Sports	GAA	Fingallians GAA Club	1280
8	Sports	Judo Club	Swords Judo Club	
9	Sports	Tennis	Holywell Tennis Courts	0
10	Sports	Tennis	Swords Tennis Club	0
11	Sports	Karate	Swords Karate Club	
12	Sports	Boxing	Swords Boxing Club	Shared
<b>Total Sports Club Facilities</b>				<b>2860</b>
<b>OVERALL TOTAL SPORTS &amp; COMMUNITY FACILITY BUILDINGS</b>				<b>9043</b>
Total Sq.Ft				97339
Population Swords - Census 2016				39251
Square Feet Per Capita				2.48
People Per Sports Club				3271
NOTE - Footprint areas represent the gross external ground floor area as scaled from MyPlan.ie				

## Malahide Community & Sports Facilities

MALAHIDE - Community Facilities & Activities				
No.	Category	Activity	Location/Facility/Building	Approximate Footprint Sq.M.
1	Adult Education / Hobby	Golf	Malahide Community School	Shared
2	Adult Education / Hobby	Yoga	Malahide Community School	Shared
3	Adult Education / Hobby	Pilates	Malahide Community School	Shared
4	Adult Education / Hobby	Gardening	Malahide Community School	Shared
5	Adult Education / Hobby	Mindfulness	Malahide Community School	Shared
6	Adult Education / Hobby	Ballroom Dancing	Malahide Community School	Shared
7	Adult Education / Hobby	Meditation for a Calmer Life	Malahide Community School	Shared
8	Adult Education / Hobby	A Healthier You - From The Inside Out	Malahide Community School	Shared
9	Adult Education / Hobby	Art	Malahide Community School	Shared
10	Adult Education / Hobby	Art for beginners	Malahide Community School	Shared
11	Adult Education / Hobby	Basic Course in Legal Studies	Malahide Community School	Shared
12	Adult Education / Hobby	Bread Bak Off	Malahide Community School	Shared
13	Adult Education / Hobby	Irish Music	Malahide Community School	Shared
14	Adult Education / Hobby	Bridge for beginners	Malahide Community School	Shared
15	Adult Education / Hobby	Comhaltas Ceoltóirí Eireann	Malahide Community School	Shared
16	Adult Education / Hobby	Computer Coding	Malahide Community School	Shared
17	Adult Education / Hobby	Computer Classes (Intermediate)	Malahide Community School	Shared
18	Adult Education / Hobby	Creative Writing	Malahide Community School	Shared
19	Adult Education / Hobby	DSLR Camera	Malahide Community School	Shared
20	Adult Education / Hobby	Córus Singing Class	Malahide Community School	Shared
21	Adult Education / Hobby	Diploma in Event Management	Malahide Community School	Shared
22	Adult Education / Hobby	Excel for Business	Malahide Community School	Shared
23	Adult Education / Hobby	Enchiriadis Treis Choir	Malahide Community School	Shared
24	Adult Education / Hobby	Fashion Design	Malahide Community School	Shared
25	Adult Education / Hobby	Flower Arranging	Malahide Community School	Shared
26	Adult Education / Hobby	French Beginners	Malahide Community School	Shared
27	Adult Education / Hobby	Furniture Design & Upholstery	Malahide Community School	Shared
28	Adult Education / Hobby	Garden Design	Malahide Community School	Shared
29	Adult Education / Hobby	Guitar for beginners	Malahide Community School	Shared
30	Adult Education / Hobby	Internat courses	Malahide Community School	Shared
31	Adult Education / Hobby	Irish Conversation	Malahide Community School	Shared
32	Adult Education / Hobby	Irish Genealogy	Malahide Community School	Shared
33	Adult Education / Hobby	Italian for beginners	Malahide Community School	Shared
34	Adult Education / Hobby	Jewellery Making	Malahide Community School	Shared
35	Adult Education / Hobby	Keyboard for beginners	Malahide Community School	Shared
36	Adult Education / Hobby	Literacy Classes	Malahide Community School	Shared
37	Adult Education / Hobby	The Mindfulness Revelations	Malahide Community School	Shared
38	Adult Education / Hobby	Politics & Society	Malahide Community School	Shared
39	Adult Education / Hobby	Searsol Touch Typing	Malahide Community School	Shared
40	Adult Education / Hobby	Singing Course	Malahide Community School	Shared
41	Adult Education / Hobby	Spanish for beginners	Malahide Community School	Shared
Total Footprint			Malahide Community School	4680
42	Community	Library (inc study / lecture & Exhibition rooms)	Malahide Library	600
43	Adult Education	Spanish Language Exchange	Malahide Library	Shared
44	Community		Malahide Church Community Centre	570
45	Adult Education / Hobby	Yoga	Malahide Church Community Centre	Shared
46	Adult Education / Hobby	Dance Fitness for over 55s	Malahide Church Community Centre	Shared
47	Adult Education / Hobby	Alom Mental Arithmetic for 5-13 year olds	Malahide Church Community Centre	Shared
48	Adult Education / Hobby	Bridge Classes	Malahide Church Community Centre	Shared
49	Adult Education / Hobby	Pillates	Malahide Church Community Centre	Shared
50	Education	Maths Grinds	Malahide Church Community Centre	Shared
51	Adult Education / Hobby	Akido	Malahide Church Community Centre	Shared
52	Education	Kids Dance Classes	Malahide Church Community Centre	Shared
53	Education	Creative writing for children	Malahide Church Community Centre	Shared
54	Education / Hobby	Stage School	Malahide Church Community Centre	Shared
55	Education / Hobby	Finger Arts & Crafts for small kids	Malahide Church Community Centre	Shared
56	Adult Education / Hobby	Dance Fusion Ladies exercise classes	Malahide Church Community Centre	Shared
57	Adult Education / Hobby	Vinyasa Yoga	Malahide Church Community Centre	Shared
58	Adult Education / Hobby	Spanish Classes for kids	Malahide Church Community Centre	Shared
59	Adult Education / Hobby	Clinical Physio Pillates	Malahide Church Community Centre	Shared
60	Education / Hobby	Baby Sign Language Classes	Malahide Church Community Centre	Shared
61	Education / Hobby	Fashion for Children	Malahide Church Community Centre	Shared

62	Adult Education / Hobby	Fit-Mum Pregnancy Yoga	Malahide Church Community Centre	Shared
63	Adult Education / Hobby	Theatre Arts	Malahide Church Community Centre	Shared
64	Education / Hobby	Fingal Childrens Choir	Malahide Church Community Centre	Shared
65	Adult Education / Hobby	Ivengar Yoga	Malahide Church Community Centre	Shared
66	Adult Education / Hobby	Slimmingworld	Malahide Church Community Centre	Shared
67	Adult Education / Hobby	Over 55s Yoga	Malahide Church Community Centre	Shared
68	Adult Education / Hobby	Senior Citizens Bingo	Malahide Church Community Centre	Shared
69	Adult Education / Hobby	Mum & Baby Yoga	Malahide Church Community Centre	Shared
70	Adult Education / Hobby	Qi Yong	Malahide Church Community Centre	Shared
71	Education / Hobby	English Grinds for Leaving & Juior Cert	Malahide Church Community Centre	Shared
72	Education / Hobby	Kids Bricks - Fun & Learning with lego	Malahide Church Community Centre	Shared
73	Adult Education / Hobby	Zen Pod Mindfullness & Meditation Classes	Malahide Church Community Centre	Shared
74	Adult Education / Hobby	Mum & Toddler Group	Malahide Church Community Centre	Shared
75	Adult Education / Hobby	Baby Massage	Malahide Church Community Centre	Shared
76	Adult Education / Hobby	Art Classes	Malahide Church Community Centre	Shared
77	Education / Hobby	The Drama House for Kids	Malahide Church Community Centre	Shared
78	Education / Hobby	Malahide Coder Do Jo	Malahide Church Community Centre	Shared
79	Adult Education / Hobby	Indoor Bowls	Malahide Church Community Centre	Shared
80	Adult Education / Hobby	Irish Dancing	Malahide Church Community Centre	Shared
81	Community	Bridge	Malahide Bridge Club	360
82	Community	Cubs & Scouts	Malahide Sea Scouts Den	280
83	Community	Malahide Chamber of Commerce		Unknown
<b>Total Non-Sports Community</b>			<b>6</b>	<b>6490</b>
1	Sports		Malahide Yacht Club	330
2	Sports		Malahide Rudgy Club	750
3	Sports		Malahide United Football Club - Gannon Park	350
4	Sports		Malahide United Football Club - Shared with Bridge Club	Shared
5	Sports		St Sylvesters GAA Club - Town Centre Club House	400
6	Sports		Malahide Cricket Club	350
7	Sports		Malahide Castle - Par 3 Golf & Tennis	250
8	Sports		Malahide Tennis Club	470
9	Sports		Fingal Sailing Club	80
10	Sports		Malahide Golf Club	
11	Sports		Malahide Basketball Club	Shared
12	Sports		Malahide Hockey Club - Shared with Bridge Club	Shared
<b>Total Sports Club Facilities</b>			<b>12</b>	<b>2980</b>
<b>OVERALL TOTAL SPORTS &amp; COMMUNITY FACILITY BUILDINGS</b>			<b>18</b>	<b>9470</b>
Total Sq.Ft				101935
Population Malahide - Census 2016				15846
<b>Square Feet Per Capita</b>				<b>6.43</b>
<b>People Per Sports Club</b>				<b>1321</b>
NOTE - Footprint areas represent the gross external ground floor area as scaled from MyPlan.ie				

## North Fringe Community & Sports Facilities

NORTH FRINGE - Community Facilities & Activities				
No.	Category	Activity	Location/Facility/Building	Approximate Footprint Sq.M.
1	Adult Education / Hobby	Aqua Aerobics	Trinity Sports & Leisure	Shared
2	Adult Education / Hobby	Life Saving Lessons	Trinity Sports & Leisure	Shared
3	Adult Education / Hobby	Swimming Lessons - Adult	Trinity Sports & Leisure	Shared
4	Adult Education / Hobby	Swimming Lessons - Child	Trinity Sports & Leisure	Shared
5	Adult Education / Hobby	Kantanni Karate	Trinity Sports & Leisure	Shared
6	Adult Education / Hobby	Ballet / Stage School	Trinity Sports & Leisure	Shared
7	Adult Education / Hobby	Unislim	Trinity Sports & Leisure	Shared
8	Adult Education / Hobby	Pilates	Trinity Sports & Leisure	Shared
9	Adult Education / Hobby	Target Yoga	Trinity Sports & Leisure	Shared
10	Adult Education / Hobby	Trinity Youth Club	The Hub	Shared
11	Adult Education / Hobby	Newman Dance Academy	The Junction	Shared
12	Adult Education / Hobby	Rainbow Music for Kids	The Hub	Shared
13	Adult Education / Hobby	Yoga Sphere Ireland	The Junction	Shared
14	Adult Education / Hobby	Life is Beautiful Yoga	The Junction	Shared
15	Adult Education / Hobby	Barefoot Babies - Baby Massage & Reflexology	The Junction	Shared
16	Adult Education / Hobby	Wellness Workshop	The Hub	Shared
17	Adult Education / Hobby	Dance Together Dublin	The Junction	Shared
18	Adult Education / Hobby	Community Yoga Classes	The Hub	Shared
Total Footprint				
	Community	The Hub	Approximate	50
	Community	The Junction	Approximate	120
	Community			
Total Non-Sports Community				170
1	Sports	Trinity Swimming Pool - Donaghmede Owned	Trinity Sports & Leisure - Assume 30% Capacity	567
2	Sports	Donaghmede Football Club - Donaghmede		183
3	Sports	Trinity Boxing Club - Donaghmede		Shared
Total Sports Club Facilities		3		750
OVERALL TOTAL SPORTS & COMMUNITY FACILITY BUILDINGS		3		920
Total Sq.Ft				9903
Population North Fringe			Rough Estimate Only	15000
Square Feet Per Capita				0.66
Population Per Sports Club Facility				5000
Projected Population North Fringe				35000
Square Feet Per Capita				0.28
Population Per Sports Club Facility				11667
NOTE - Footprint areas represent the gross external ground floor area as scaled from MyPlan.ie				

## North Fringe Community & Sports Facilities (excluding Donaghmede facilities)

NORTH FRINGE - Community Facilities & Activities				
No.	Category	Activity	Location/Facility/Building	Approximate Footprint Sq.M.
1	Adult Education / Hobby	Aqua Aerobics	Trinity Sports & Leisure	Shared
2	Adult Education / Hobby	Life Saving Lessons	Trinity Sports & Leisure	Shared
3	Adult Education / Hobby	Swimming Lessons - Adult	Trinity Sports & Leisure	Shared
4	Adult Education / Hobby	Swimming Lessons - Child	Trinity Sports & Leisure	Shared
5	Adult Education / Hobby	Kantanni Karate	Trinity Sports & Leisure	Shared
6	Adult Education / Hobby	Ballet / Stage School	Trinity Sports & Leisure	Shared
7	Adult Education / Hobby	Unislim	Trinity Sports & Leisure	Shared
8	Adult Education / Hobby	Pilates	Trinity Sports & Leisure	Shared
9	Adult Education / Hobby	Target Yoga	Trinity Sports & Leisure	Shared
10	Adult Education / Hobby	Trinity Youth Club	The Hub	Shared
11	Adult Education / Hobby	Newman Dance Academy	The Junction	Shared
12	Adult Education / Hobby	Rainbow Music for Kids	The Hub	Shared
13	Adult Education / Hobby	Yoga Sphere Ireland	The Junction	Shared
14	Adult Education / Hobby	Life is Beautiful Yoga	The Junction	Shared
15	Adult Education / Hobby	Barefoot Babies - Baby Massage & Reflexology	The Junction	Shared
16	Adult Education / Hobby	Wellness Workshop	The Hub	Shared
17	Adult Education / Hobby	Dance Together Dublin	The Junction	Shared
18	Adult Education / Hobby	Community Yoga Classes	The Hub	Shared
	Adult Education / Hobby			
	Adult Education / Hobby			
	Adult Education / Hobby			
	Adult Education / Hobby			
	Adult Education / Hobby			
	Adult Education / Hobby			
	Adult Education / Hobby			
Total Footprint				
	Community	The Hub	Approximate	50
	Community	The Junction	Approximate	120
Total Non-Sports Community				170
1	Sports			
2	Sports			
3	Sports			
Total Sports Club Facilities			0	0
OVERALL TOTAL SPORTS & COMMUNITY FACILITY BUILDINGS			0	170
Total Sq.Ft				1830
Population North Fringe			Rough Estimate Only	15000
Square Feet Per Capita				0.12
Population Per Sports Club Facility				N/A
Projected Population North Fringe			Confirm against index	35000
Square Feet Per Capita				0.05
Population Per Sports Club Facility				N/A
NOTE - Footprint areas represent the gross external ground floor area as scaled from MyPlan.ie				



### Clongriffin Community & Sports Facilities (Excluding Donaghmede facilities)

CLONGRIFFIN - Community Facilities & Activities				
No.	Category	Activity	Location/Facility/Building	Approximate Footprint Sq.M.
1	Adult Education / Hobby	Aqua Arobics	Trinity Sports & Leisure	Shared
2	Adult Education / Hobby	Life Saving Lessons	Trinity Sports & Leisure	Shared
3	Adult Education / Hobby	Swimming Lessons - Adult	Trinity Sports & Leisure	Shared
4	Adult Education / Hobby	Swimming Lessons - Child	Trinity Sports & Leisure	Shared
5	Adult Education / Hobby	Kantanni Karate	Trinity Sports & Leisure	Shared
6	Adult Education / Hobby	Ballet / Stage School	Trinity Sports & Leisure	Shared
7	Adult Education / Hobby	Unislilm	Trinity Sports & Leisure	Shared
8	Adult Education / Hobby	Pillates	Trinity Sports & Leisure	Shared
9	Adult Education / Hobby	Target Yoga	Trinity Sports & Leisure	Shared
10	Adult Education / Hobby	Trinity Youth Club	The Hub	Shared
11	Adult Education / Hobby	Newman Dance Academy	The Junction	Shared
12	Adult Education / Hobby	Rainbow Music for Kids	The Hub	Shared
13	Adult Education / Hobby	Yoga Sphere Ireland	The Junction	Shared
14	Adult Education / Hobby	Life is Beautiful Yoga	The Junction	Shared
15	Adult Education / Hobby	Barefoot Babies - Baby Massage & Reflexology	The Junction	Shared
16	Adult Education / Hobby	Wellness Workshop	The Hub	Shared
17	Adult Education / Hobby	Dance Together Dublin	The Junction	Shared
18	Adult Education / Hobby	Community Yoga Classes	The Hub	Shared
	Adult Education / Hobby			
	Adult Education / Hobby			
	Adult Education / Hobby			
	Adult Education / Hobby			
	Adult Education / Hobby			
	Adult Education / Hobby			
	Adult Education / Hobby			
	Adult Education / Hobby			
Total Footprint				
	Community	The Hub	Approximate	50
	Community	The Junction	Approximate	120
Total Non-Sports Community				170
1	Sports			
2	Sports			
3	Sports			
Total Sports Club Facilities				0
OVERALL TOTAL SPORTS & COMMUNITY FACILITY BUILDINGS				170
	Total Sq.Ft			1830
	Population Clongriffin - Census 2016			4848
Square Feet Per Capita - 2016 Census				0.38
Population Per Sports Club Facility				N/A
	Population Projection Say			15000
Square Feet Per Capita				0.12
Population Per Sports Club Facility				N/A
NOTE - Footprint areas represent the gross external ground floor area as scaled from MyPlan.ie				

## Clongriffin Community & Sports Facilities

CLONGRIFFIN - Community Facilities & Activities				
No.	Category	Activity	Location/Facility/Building	Approximate Footprint Sq.M.
1	Adult Education / Hobby	Aqua Aerobics	Trinity Sports & Leisure	Shared
2	Adult Education / Hobby	Life Saving Lessons	Trinity Sports & Leisure	Shared
3	Adult Education / Hobby	Swimming Lessons - Adult	Trinity Sports & Leisure	Shared
4	Adult Education / Hobby	Swimming Lessons - Child	Trinity Sports & Leisure	Shared
5	Adult Education / Hobby	Kantanni Karate	Trinity Sports & Leisure	Shared
6	Adult Education / Hobby	Ballet / Stage School	Trinity Sports & Leisure	Shared
7	Adult Education / Hobby	Unislim	Trinity Sports & Leisure	Shared
8	Adult Education / Hobby	Pilates	Trinity Sports & Leisure	Shared
9	Adult Education / Hobby	Target Yoga	Trinity Sports & Leisure	Shared
10	Adult Education / Hobby	Trinity Youth Club	The Hub	Shared
11	Adult Education / Hobby	Newman Dance Academy	The Junction	Shared
12	Adult Education / Hobby	Rainbow Music for Kids	The Hub	Shared
13	Adult Education / Hobby	Yoga Sphere Ireland	The Junction	Shared
14	Adult Education / Hobby	Life is Beautiful Yoga	The Junction	Shared
15	Adult Education / Hobby	Barefoot Babies - Baby Massage & Reflexology	The Junction	Shared
16	Adult Education / Hobby	Wellness Workshop	The Hub	Shared
17	Adult Education / Hobby	Dance Together Dublin	The Junction	Shared
18	Adult Education / Hobby	Community Yoga Classes	The Hub	Shared
Total Footprint				
	Community	The Hub	Approximate	50
	Community	The Junction	Approximate	120
Total Non-Sports Community				170
1	Sports	Trinity Swimming Pool - Donaghmede Owned	Trinity Sports & Leisure - Assume 30% Capacity	567
2	Sports	Donaghmede Football Club - Donaghmede		183
3	Sports	Trinity Boxing Club - Donaghmede		Shared
Total Sports Club Facilities		3		750
OVERALL TOTAL SPORTS & COMMUNITY FACILITY BUILDINGS		3		920
Total Sq.Ft				9903
Population Clongriffin - Census 2016				4848
Square Feet Per Capita - 2016 Census				2.04
Population Per Sports Club Facility				1616
Population Projection Say				15000
Square Feet Per Capita				0.66
Population Per Sports Club Facility				5000
NOTE - Footprint areas represent the gross external ground floor area as scaled from MyPlan.ie				