

Response ID BHLF-MMW1-9H17-B

111.

Submitted to Proposed Draft Variation No 6 of the Dublin City Development Plan 2016 - 2022: Marrowbone Lane (including DCC Depot lands), Dublin 8
Submitted on 2018-12-13 17:14:32

Introduction

1 What is your name?

Name:
Patsy Kearns

2 What is your email address?

Email:
[REDACTED]

3 What is your organisation?

Organisation:
Kevins Hurling and Camogie Club

4 Make a submission here

Make a submission:

From: Secretary Kevins Dublin [REDACTED]
Sent: 13 December 2018 15:47
To: Variations <variations@dublincity.ie>
Subject: Submission to the Proposed Draft Variation (No.6) of the Dublin City Development Plan 2016-2022: Site at Marrowbone Lane, D8

Avril,

Please find attached submission of Kevin's Hurling & Camogie Club as follows:

- a. Letter of Submission
- b. Dossier on need for sports facilities in The Liberties
- c. Analysis of Prof. G Mills

Best Regards.....

Patsy Kearns.
Secretary, Kevins Hurling & Camogie Club.

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Kevin's Hurling & Camogie Club
Cumann Báire Caoimhín

Avril Feeney,

Planning Dept,

Dublin City Council

Re: Submission to the Proposed Draft Variation (No. 6) of the Dublin City Development Plan 2016-2022: Site at Marrowbone Lane (incl DCC Depot Lands), Dublin 8.

13TH Dec 2018

Dear Avril,

We all recognise the importance of sport and recreation as part of a healthy community but in particular for child and adolescent development and the physical and psychological benefits to be derived. To deprive any child of these benefits is wrong but depriving children from disadvantaged areas is even more of an outrage.

As such, there is an urgent need for the provision of appropriate and substantial sporting facilities in South West Inner City Dublin.

This is required urgently in order to enhance the healthy development of children and young people in the area but also to aid the rejuvenation of the community as a whole. There are numerous indigenous sporting clubs (GAA, Football, Rugby and Boxing) in the South West Inner City Dublin that urgently need a dedicated sporting facility to allow for the proper running of their clubs and their development into the future. Such a facility would also increase community spirit ultimately aiding the rejuvenation in South West Inner City Dublin.

There are also many schools in South West Inner City Dublin that serve the needs of numerous primary and post-primary school children that find it extremely difficult because of the lack of sporting facilities to fulfil the requirements of the PE curriculum. This deficiency of green space/leisure/sporting areas has been identified in the audit conducted as part of the "Liberties Greening Strategy".

We reject the proposed draft variation and are calling for DCC to provide a park including a full sized multipurpose sports campus at the Marrowbone Lane site. This is the only reason why the site was rezoned unanimously by the full city council at a council meeting in Nov 2015 and is zoned Z9 in the current City Development Plan. Please support us and bring about the enactment of the following immediately:

1. That the DCC depot lands adjacent to St Catherine's Sport Centre on Marrowbone Lane, Dublin 8 remain zoned Z9 "Recreational" as per the Development Plan 2016 – 2022 in line with the Dublin City Council policy to improve on existing sports/recreational facilities in the city.
2. That the land adjacent to St Catherine's Sport Centre on Marrowbone Lane, Dublin 8 be publically earmarked for the development of a multi-purpose sporting facility in line with

the Dublin City Council policy to improve on existing sports/recreational facilities in the city.

3. That Dublin City Council engage in meaningful discussion with Kevin's Hurling & Camogie Club in regard to the development of the said multi-purpose sporting facility on the land adjacent to St Catherine's Sport Centre on Marrowbone Lane, Dublin 8.

Please see attached Data Analysis of Prof. Gerald Mills UCD

Please see attached dossier on need for sports pitches in The Liberties.

From a children's right's perspective, the right to play and recreation under Article 31 of the UN Convention on the Rights of the Child (UNCRC) has long been acknowledged at the International level as fundamentally important for children's well-being, health and development. Moreover, the Government's National Policy Framework for Children and Young People commits to developing child and youth friendly communities, while underscoring the role of the built environment and planning in relation to accessing nature and safe green space.

We strongly oppose the proposed Draft Variation and oppose the plans for a super depot in our community at Marrowbone Lane.

We suggest that the description of the proposed all weather "pitches" in the draft variation is disingenuous given that the largest "pitch" is 60m * 35m which is 30% of the size of a soccer pitch and that no organised competitive field sport (soccer, rugby, GAA, Hurling, Camogie, hockey) can take place on such small pitches. In addition, no sports club has called for nor can accommodate their games on such small areas.

We ask that the proposed development be subject to a child rights impact assessment in order to evaluate the future generational impact on children and in order to assess compliance with minimum children's rights standards, including the need for green spaces and appropriate facilities for play, recreation and sport.

DCC has a golden opportunity to develop a best practice model development of sports facilities and housing at this large Marrowbone Lane site for the benefit of future generations from this community & their indigenous sports clubs. The diminishing services of DCC from this site can be accommodated on numerous other DCC sites in more suitable localities such as industrial estates and adjacent to the Dublin port.

I look forward to hearing from you.

Yours sincerely,

Patsy Kearns

Patsy Kearns

Club Secretary

Kevin's Hurling & Camogie Club (1902-2018) tel: 087-2708992

Email: secretary.kevins.dublin@gaa.ie

114 Harold's Cross Road, Dublin 6W



Kevin's Hurling & Camogie Club
Cumann Baire Caoimhin

December 2018

DOSSIER ON THE PROPOSED DRAFT VARIATION (No.6) DEVELOPMENT
PLAN 2016 – 2022 THAT IS ABOUT TO DEPRIVE THE CHILDREN OF
DUBLIN'S SOUTH INNER CITY OF ANY SPORTING CHANCE IN LIFE

A MEMBER OF

**SPORTING
LIBERTIES**

Background

There are over 50,000 people and 10 primary schools with 2,500 children in the eight parishes of Dublin's South Inner City (Appendix II) that have NO green space whatsoever to play organised competitive sport. This is an area of Dublin where parts of the community have been decimated by drugs and crime over many years and the lack of green space for sporting facilities for the children in the area has been a key factor in creating this untenable situation.

What is the issue?

DESPITE the chronic lack of playing facilities inside the canal in the South Inner City being raised with numerous departments and officials in Dublin City Council on a regular basis for over three years; DESPITE a formal planning submission for playing fields to be included in the Teresa's Gardens Regeneration Plan; DESPITE a letter of support from the Teresa's Gardens Regeneration Board supporting the need for sports fields; DESPITE a submission by Sporting Liberties (a local group consisting of GAA/Soccer/Rugby & Boxing clubs) for the Marrowbone Lane site (now designated as a green area) requesting a multipurpose sports field; DESPITE there being 10 schools with 2,500 children within walking distance of the Teresa's Gardens and Marrowbone Lane sites not having a single blade of grass for sports; DESPITE formal letters of support from the schools requesting green space for sporting facilities in the area; DESPITE over 300 residents and local representatives attending a public meeting in Griffith College in February 2016 to support the urgent need for playing fields; DESPITE the developer of the Player Wills & Bailey Gibson sites (in NAMA) adjacent to Teresa's Gardens indicating his willingness to include a full size sporting field on the site; DESPITE there being more derelict land in Dublin 8 than there is green space; DESPITE a former sports field in the heart of the site owned by Dublin City Council lying idle for over 15 years; DESPITE in 2015 alone 7 local young people losing their lives to drug related incidents having never been given a sporting chance; DESPITE Dublin City Council's own paper on Greening The Liberties highlighting the fact that the area is 86% below the internationally recommended level of green space for such a population; AND DESPITE ALL local area councillors supporting and actively working to have playing fields included in the area, AND DESPITE DCC rezoning Marrowbone Lane as Z9 for Sport & Recreation: NO SPORTS FIELDS HAVE BEEN DELIVERED FOR THE BENEFIT OF THE CHILDREN AND YOUNG PEOPLE OF THIS COMMUNITY AND THERE IS NO GREEN SPACE WHERE ORGANISED COMPETITIVE SPORTS CAN BE HELD. Dublin City Council has cited the shortage of housing in the city and the NEED FOR A SUPER DEPOT as the reason why a multipurpose sports field cannot be accommodated in Marrowbone Lane. DCC have enough vacant land to build 40,000 homes (Dr. Lorcan Sirr DIT Urban Economics & Housing) and accommodate their depot needs in more suitable industrial estates and other DCC sites. DCC have a golden opportunity to deliver on housing and sporting amenity at the very large Marrowbone lane site.

Why is this plan by Dublin City Council UNJUST, WRONG and UNACCEPTABLE?

- Because Dublin City Council are going against the wishes of ALL the local area councillors, who are elected to represent the people of the area
- Because this area of the city is already one of the most densely populated residential areas of Ireland and has already absorbed a 40% population growth over the last 20 years.
- Because this part of the city does not need more housing, it needs proper infrastructure and green sporting facilities where adolescents and children have a healthy outlet and can embrace the benefits of organised competitive sport.
- Because one of the most vulnerable parts of the city should not be forced to accept a "Super Depot" to facilitate the needs of more affluent and better resourced parts of the city.

- Because the Dublin City Development plan in its current format is a direct contradiction to Dublin City Councils own objective of tackling obesity.
- Because without the opportunity of organised competitive sports, the children of the area are being denied an opportunity for Personal Development, Cognitive Development & Community Development.
- Because THIS IS THE LAST OPPORTUNITY to rectify this untenable situation. If this site is built on or used for a Super Depot, there are no other viable alternatives for proper sporting facilities that can be considered in the future. Once built on, the housing and Super Depot will never be knocked or reversed to make way for the chronic needs to the children of the area.

What size land-bank would be required to meet basic sporting needs of the area?

In order to accommodate a GAA playing field where organised competitive games can be played, the required area would need to be approximately 3 acres. Such a playing field could easily be sectioned into three cross pitches which would ensure that at the same time up to three schools or clubs could use the pitches. Having a playing field at Marrowbone lane would alleviate the massive pressures to provide green space for the schools. Cross pitches can be utilised for soccer training/matches and also lengthways for Rugby, GAA and Soccer matches.

The space required to meet such needs can be achieved with housing by good planning & design.

What needs to happen to ensure that the Draft Variation (No. 6) to the Dublin City Development Plan is not imposed on the people of the area?

- i) The profile of this plight to reject the Proposed Draft Variation (No.6) of the Dublin City Development plan 2016-2022 in its current format needs to be brought to the attention of all Dublin City Councillors, TD's, relevant Ministers and local & national media to highlight the multiple reasons outlined in this dossier why the plan should not proceed and why it is unjust, wrong and unacceptable to proceed with a plan that destroys any sporting chance that the children of this area might have.
- ii) The Draft Variation does not take on board the wishes of the local schools, residents, sports clubs or councillors who have pleaded that provisions be made for sports fields. We need our local area councillors to reject the Draft Variation & put forward amendments to the plan so that;

Quotes which highlight the gravity of the situation ...

Dr Latham Local GP - *"Such developments are not optional, they are essential for the future health and wellbeing of young people in the area,"*

John Costello, Chief Executive of Dublin GAA - *The work that Kevins HC and their volunteers do in this area is immeasurable. There is now a once in a lifetime opportunity in this area to address the facilities imbalance. The Player Wills Site & the St. Teresa's Gardens sites are the last available land-banks in the south inner city. The Dublin County Board fully support Kevins Hurling Club application for a full size GAA pitch in this community. It would be an honourable thing to do for the needs of the younger people"*

Nicky Brennan,, former president of the GAA and chairperson of Kevin's Strategic Group - *the GAA are aware of and fully supports this initiative by Kevins and we won't be found wanting in support. No other community in the country would tolerate such a situation.*

Sunday Times, 14th February 2016 on a dedicated article on the subject - *Over the next couple of months Dublin City Council will update its Dublin City Development Plan. That is their opportunity to right this grievous wrong. This scandal must end.*

Evening Herald 19th February 2016 on a dedicated article on the subject – *when referring to the level of green space for sports in the area it's an alarming statistic but also an indictment of public policy in our capital city.*

John Lonergan, former governor of Mountjoy commenting on the Kevins' submission and lack of sporting facilities in the area, February *We respond when people are in trouble, we forget our responsibility to prevent trouble in the first place.* (Full interview with John Lonergan <https://www.youtube.com/watch?v=1Bq31m8F8j4>)

Tommy Daly – club mentor with Kevins Hurling & Camogie Club - *for a child to engage in sport in Dublin 8: they must travel to and from a) Phoenix Park (pitches are in chapelizod almost), b) Brickfields Park (Drimnagh), c) Dolphin Park (Crumlin), d) Pearse Park or Sundrive Park (Crumlin) or Walkinstown cross. This is unrealistic for most parents or clubs to sustain on a regular basis and almost impossible for an 8-13yr child without parental support. Many kids from the area don't have any realistic opportunity to participate in sport.*

Mary Crampton – Local Parent - *The Swallows, Salmon, Badgers and Water Beetles of the nation are treasured more than the children and young people of Dublin 8.*

Irish Times 22 Feb – Published Letter to Editor - *Few living outside areas of deprivation in our towns and cities understand and challenge the misery that these communities put up with.*

TE Radio Today Show-John Lonergan, interview 7th March 2016 *I have no hesitation whatsoever in saying that Dublin City Council & City Planners have failed miserably the people of this area.*

Chairman of Sport Ireland – Kieran Mulvey “ *A key priority of the Board of Sport Ireland is increasing participation across every age group and from all social backgrounds throughout Ireland, and the Irish Sports Monitor will be instrumental in shaping the development of plans and policies at a local and national level.*”

A recap of some appalling facts and statistics for the area |

Access to Quality Green Space:

- The Liberties area is extremely deficient in quality green space – any available areas are small with no play areas or sports facilities. (*The Liberties Greening Strategy, 2014*)
- Within the Liberties area, accessible quality public green space is provided at a rate of 0.7 sqm per person. This is in stark contrast to an average of 49 sqm per person for Dublin City Council as a whole i.e. the Dublin City Council resident has 70 times more green space available to them compared to a resident of the Liberties. (*The Liberties Greening Strategy, 2014*)
- In the greater Liberties area of Dublin 8, there is three times more derelict or vacant land than green space, and about 30 hectares of derelict or vacant land. (*Redrawing Dublin, 2015*)
- Best practice international standards recommend a benchmark of 0.8 hectares for play in equipped and informal play spaces per 1,000 population. This equates to 11.6 hectares for the Liberties. At best there is currently only 1.85 hectares (16%) of the recommended benchmark space available within the Liberties. (*The Liberties Greening Strategy, 2014*)

Crime:

- Across all six Garda divisions in Dublin, total reported crime numbers have decreased from 2012 to 2014 by 3.9%. Over the same period, in the South Central Garda Division (which incorporates the south inner city) total reported crime numbers declined by just 1.9%. (CSO data)
- However total reported drug related offences, which decreased by 1.4% across the six Garda Dublin divisions from 2012 to 2014, actually increased by 50% over the same period in the South Central Garda Division. (CSO data)
- In 2015 alone there were 7 drug related deaths (Donore Community Drugs and Alcohol Service)

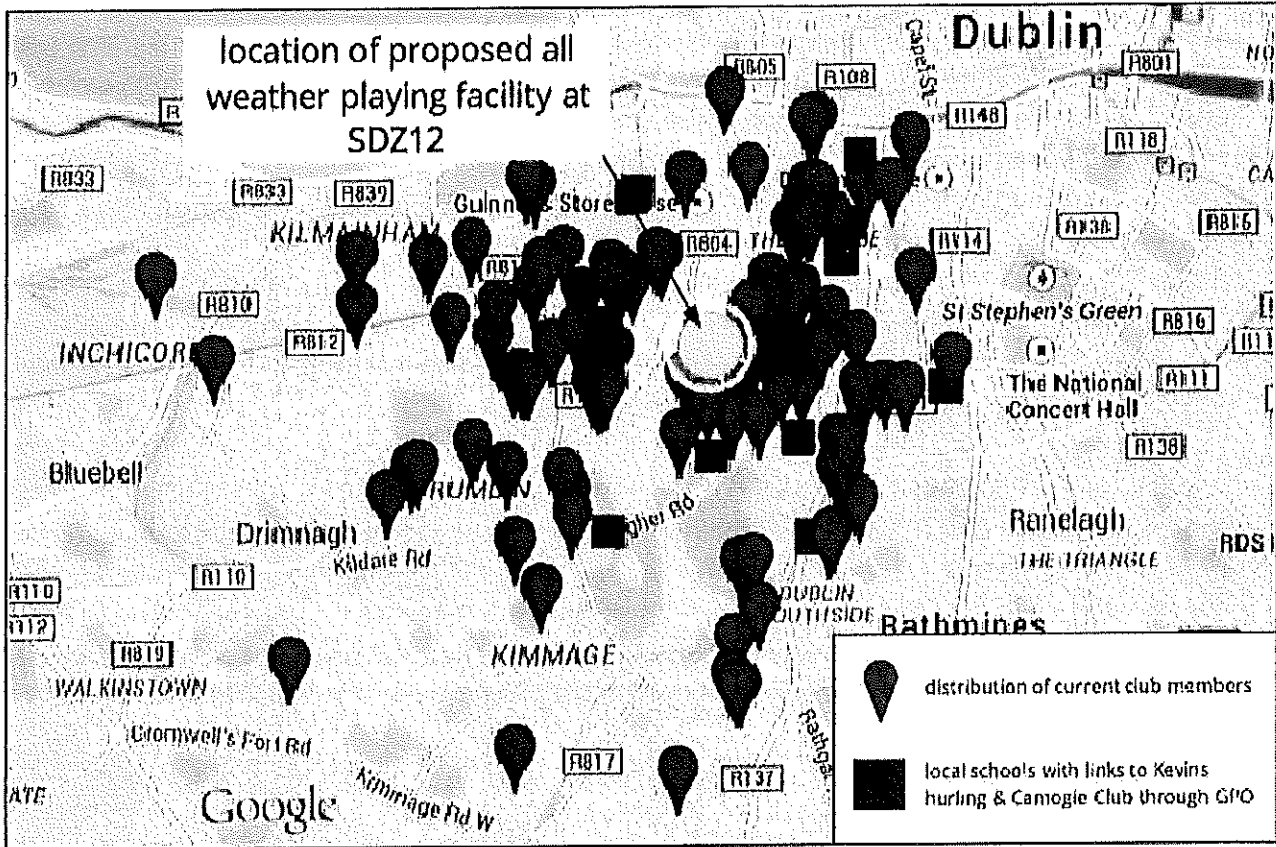
Population Density:

- This average population density across greater Dublin is 1,736 residents per square kilometre. This compares to the Liberties which has a densely populated area with approximately 15,000 residents per square kilometre i.e. more than 8½ times the Dublin average. (*The Liberties Greening Strategy, 2014*)
- In the greater Liberties area, 70% of the population live in apartments and for those that live in houses very few have usable private gardens. This increases the need for quality green space. (*2011 Census*)

School and Sport:

- 10 local schools (2,500 students approx.) within walking distance of St Teresa's Gardens / Marrowbone Lane have no access to any green space.
- A study by the Economic and Social Research Institute (ESRI) into the benefits of playing sports has shown that in addition to the health and fitness benefits, the results showed students who played sports in their final school years were more likely to continue a formal education after leaving school.
- Ireland is on course to become the most obese country in Europe, according to the latest figures from World Health Organisation (WHO) experts – yet Dublin City Council cannot provide a blade of grass to facilitate sports & recreation activity for thousands of children in the heart of our capital city?

The proclamation of Easter 1916 stated that we should “CHERISH ALL THE CHILDREN OF THE NATION EQUALLY” the children in Dublin 8 are clearly not cherished as much as other children in our nation.



Appendix II

Population by Dublin Parishes: Census 2011		Population by Towns and Cities: Census 2011					
		Table A		Table B		Table C	
Dolphins Barn	3987	Coolock	2632	Loughlinstown	3665	Carrick On Shannon	3980
Donore Ave	5493	Roscrea	5403	Kilcock	5533	Sallins	5283
Francis Street	5845	Walkinstown	5563	Monkstown	5555	Artane	5328
Harrington Street	9682	Ballyboden	9611	Portmarnock	9330	Gorey	9114
James's Street	8114	Castleknock	8301	Youghal	7794	Nenagh	8439
Meath Street and Merchants Quay	9844	Finglas West	9694	Kilmacud	9516	Ratoath	9043
Rialto	3652	Virginia	2282	Slane	1099	Camrighwill	4551
Whitefriar Street	3546	Newcastle, Dublin	3586	Dunshaughlin	3903	Athenry	3950
2011 Population of Core Area	50163		47072		46395		49688
Aprox Number of Playing Pitches = 0			18		18		22

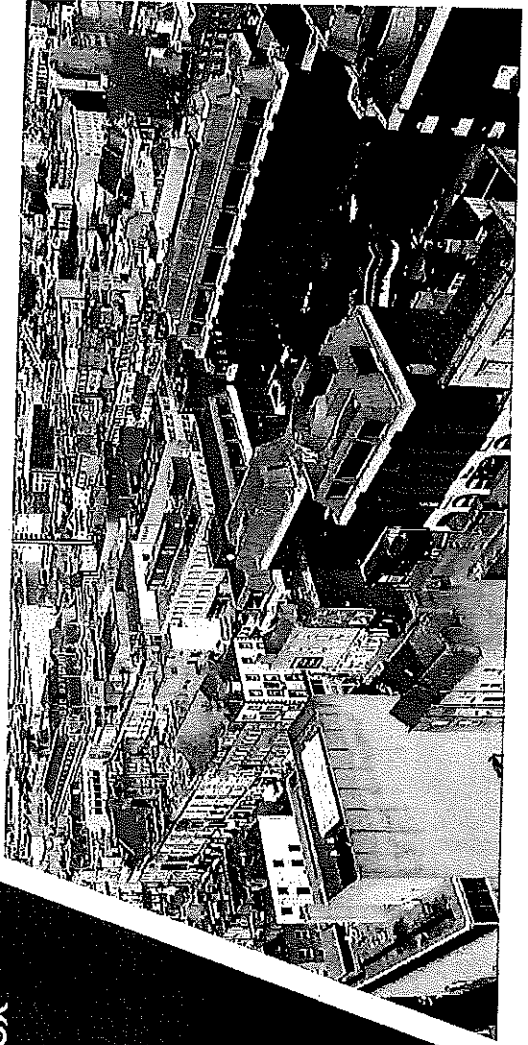
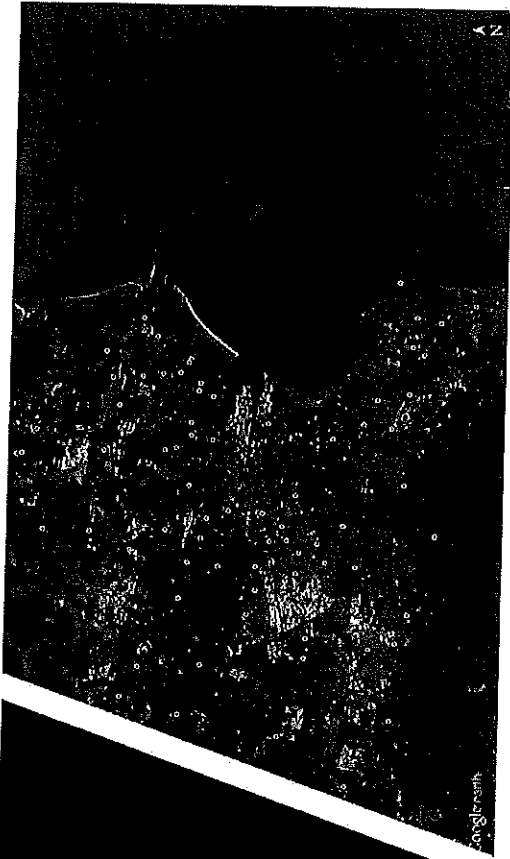
Kevin's and access to Greenspace in Dublin

In this presentation, I will describe the neighbourhood around Kevin's in relation to population and access to greenspace and compare it with other areas across Dublin based on GAA facilities.

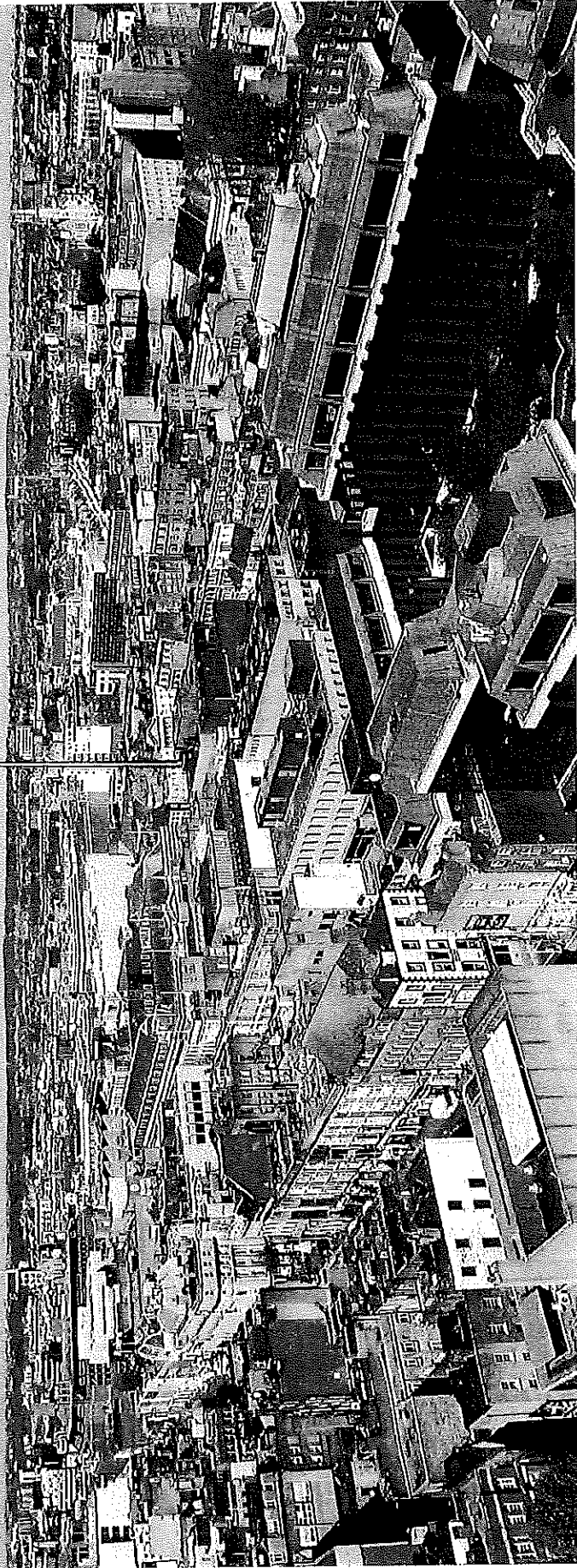
Data Sources

- 2016 Census of Ireland
- The Pobal HP Deprivation Index
- The European Urban Atlas
- Location of GAA facilities

Gerald Mills
School of Geography, UCD



Dublin City Council's Sport and Active Recreation Strategy 2009-2016 outlines how Dublin City Council can work with interested parties in Dublin City to deliver high quality, integrated and sustainable sport and active recreation facilities and services. **The key aim of this document is to get more people partaking in physical activity**, more of the time while also supporting competitive play, elite player development and representation on an international stage.

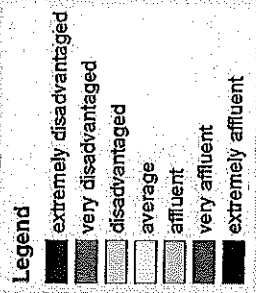
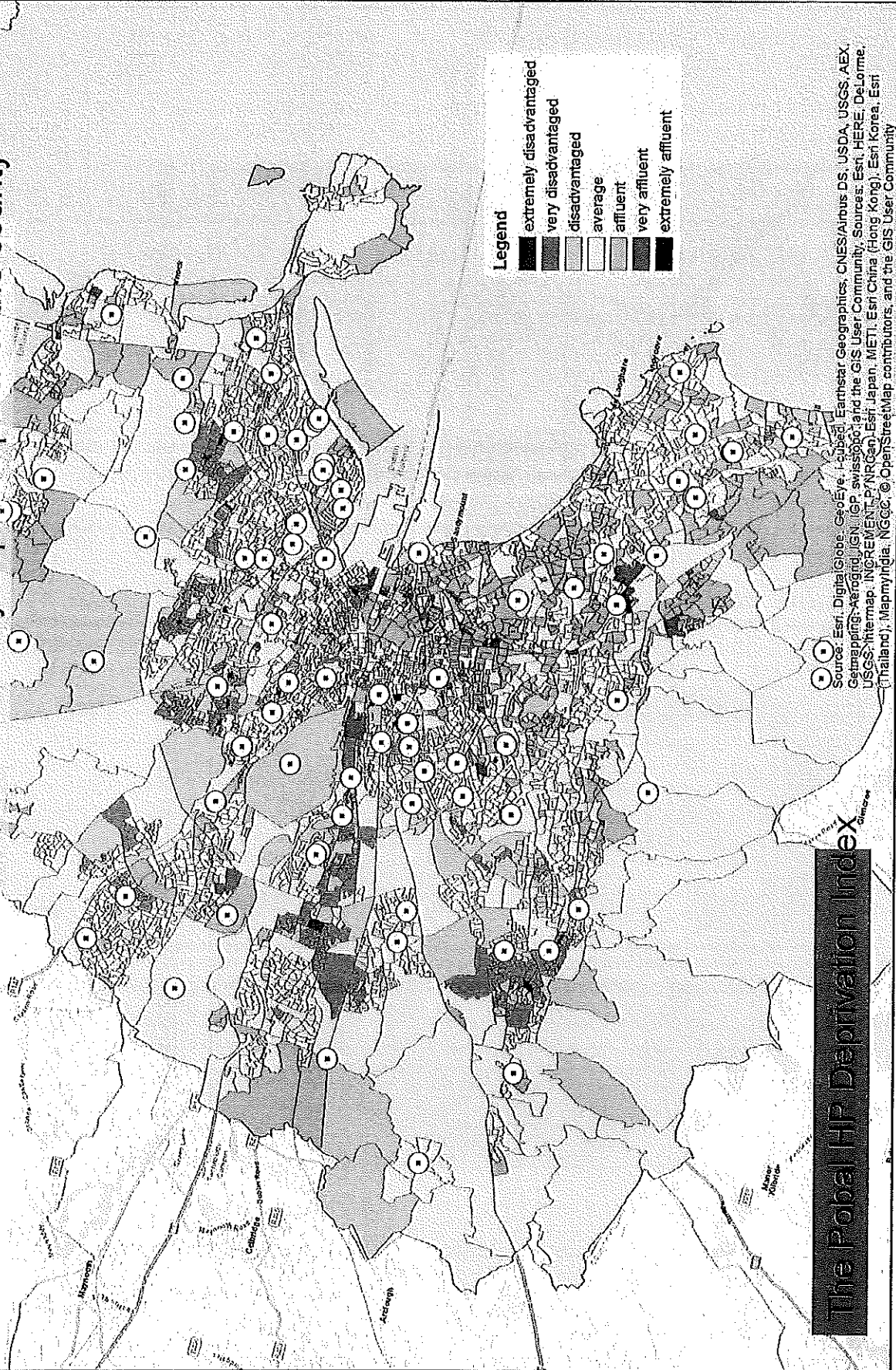


Dublin City Development Plan 2016-2022

It is the Policy of Dublin City Council to improve on existing sports/ recreational facilities in the city through the implementation of the Dublin City Sport and Active Recreation Strategy 2009-2016 and to ensure the availability of a range of recreational facilities to the general population of all ages and groups at locations throughout the city, including ice-skating. **In areas where a deficiency exists, Dublin City Council will work with the providers of such facilities, including schools, institutions and private operators, to ensure**

the local population

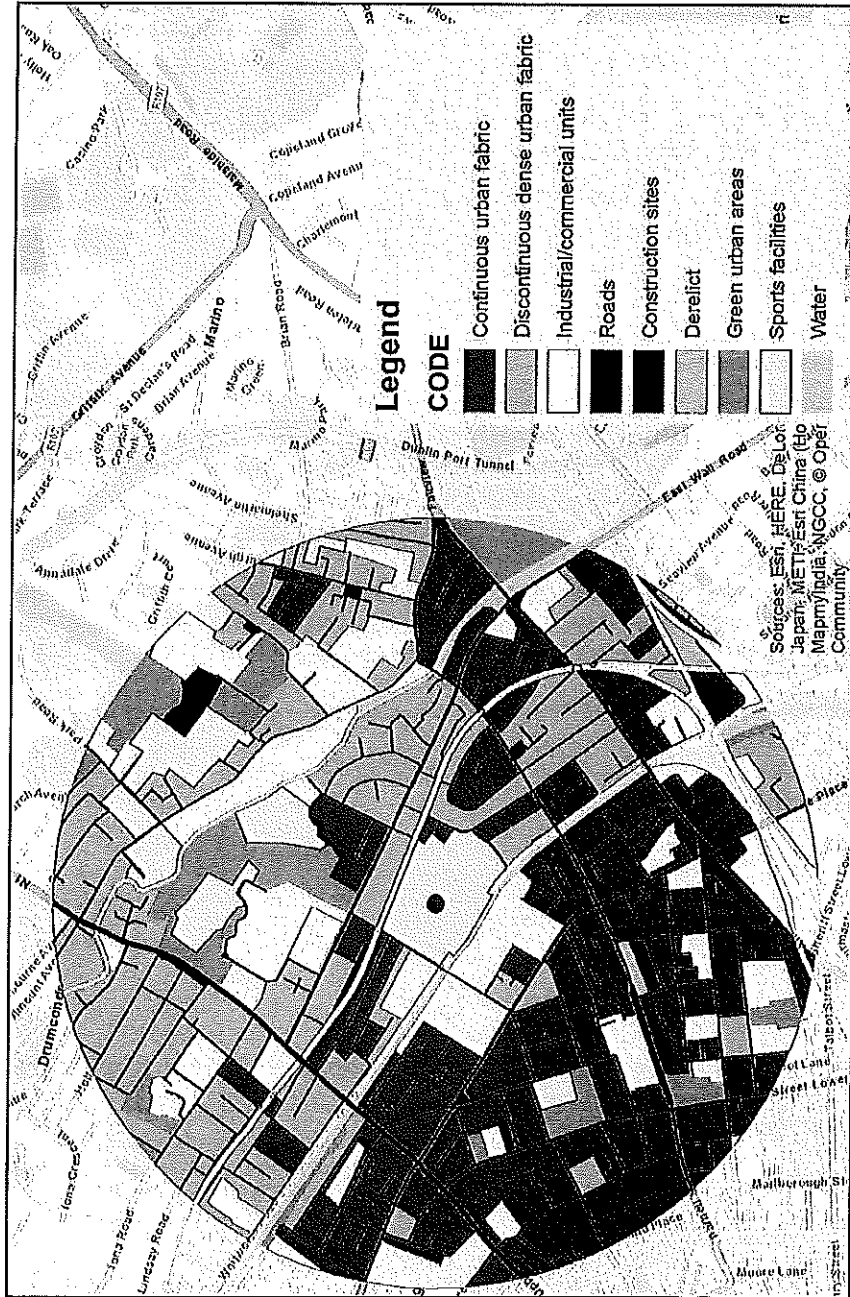
Many GAA facilities are located in economically deprived parts of the county



The Pobal HP Deprivation Index

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community, Sources: Esri, HERE, DeLorme, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), MapmyIndia, NGCC, © OpenStreetMap contributors, and the GIS User Community

Neighbourhood statistics



Green area 14.6% of landcover within 1 km radius of Croke Park

Population

41620 (11 sq. m per person)

Population <13

4247 (108 sq. m per child)

Neighbourhood statistics for Kevin's GAA

Variable	Number	Rank
Population ³	50446	5
Neighbourhood is densely populated		
Population under 13 ³	6114	10
Much of the population is under 13		
Population 13 to 19 ³	2427	26
A significant proportion live in economically deprived households		
Deprived Population (HP score) ¹	15821	58
(31%)		
A significant proportion of children live in economically deprived households		
Deprived Children (HP score) ¹	1253	58
(7%)		
Urban (percent) ²	91.5	1
It is the most urbanised (paved)		
Green (percent) ²	6.4	93
It has the lowest green fraction (parks/sports facilities)		
Green area (sq. m) per person	4.0	93
It has the lowest green area per person		
1. The Pobal HP Deprivation Index (Haase and Pratschke, 2016)		
2. The Pobal HP Deprivation Index (Haase and Pratschke, 2016)		
3. 2016 Census of Ireland		
Based on 2016 GAA facilities: lowest score 93 and highest score 1.		

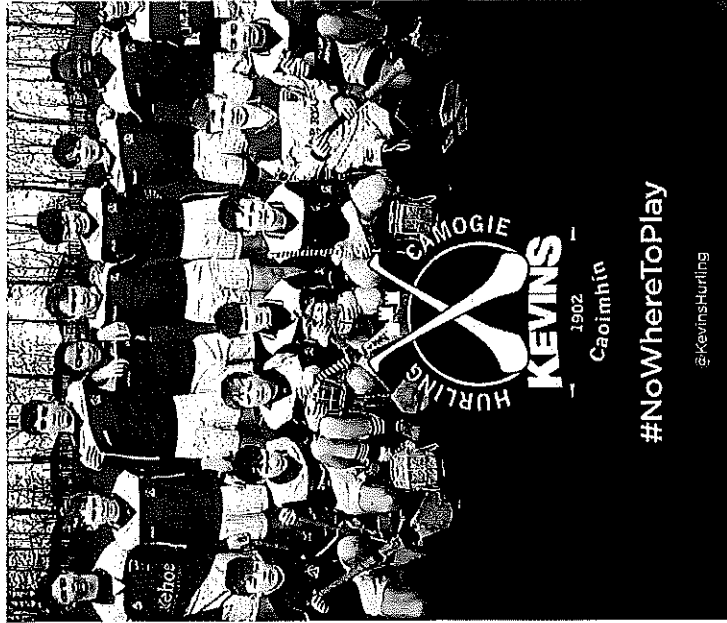
The 10 GAA clubs in Dublin with the lowest greenspace per person/child

GAA club	Sq m per person	Sq m per child
Robert Emmets GAA	12.0	92.7
Clontarf GAA Clubhouse	11.4	65.7
Templeogue Syngé St. GAA Dolphin Park	11.1	81.9
St. James Gaels GAA Clubhouse	10.5	74.5
Whitehall Colmcille GAA Clubhouse	9.7	79.9
Crumlin GAA Clubhouse	9.6	59.9
Whitehall Colmcille GAA Juvenile Pitch	9.4	79.9
Naomh Fionnbarra GAA	8.5	64.6
St. Brendans GAA	7.8	71.8
Crumlin GAA	7.5	52.7
Portobello GAA	6.9	75.6
Kevin's	4.0	33.0

Conclusions

The neighbourhood served by Kevin's:

- Has 6.4% public green cover. It is the most paved of all areas served by the GAA.
- Has a large population (>50,000) and a large number of children (6114)
- Has the lowest ratio of greenspace to population (4m²) and to children (33 m²)



World Health Organization

As a rule of thumb, urban residents should be able to access public green spaces of at least 0.5–1 hectare within 300 metres' linear distance (around 5 minutes' walk) of their homes.

Urban green spaces: a brief for action. WHO 2017.
Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns & Villages). Government of Ireland 2009

In general the following standards are recommended: In green-field sites or those sites for which a local area plan is appropriate, public open space should be provided at a minimum rate of **15% of the total site area**. This allocation should be in the form of useful open spaces within residential developments and, where appropriate, larger neighbourhood parks to serve the wider community.

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