

Roebuck Residents' Association

Objection regarding Planning Reference PL06D.308353

Proposed Student Accommodation
at The Former Victor Motors Site, Goatstown Road, Dublin 14

7/11/2020

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1. Goatstown Local Area Plan

This development deviates from the Goatstown Local Area Plan for this specific site on the following items:

- **Density**

The proposal would over-develop the site given its context in the local area. It is significantly higher density than that of the adjacent Trimbleston development.

- **High Quality Design**

The design has no significant features that relate it to the adjacent buildings. At a minimum, the development should relate to the adjacent Trimbleston development in the provision of balconies.

- **Positive Contribution to Local Streetscape**

The development will not enhance the streetscape, and is more suited to an urban setting or a university campus. It is far too bulky and overbearing for such a small space. It is an overpowering structure that will dominate the neighbouring residential environment.

- **Height**

The height of the building is a storey and a half higher than the adjacent Trimbleston development, and dwarfs the parade of shops to the south. Not only does the proposal contravene the benchmark height of three stories, it also contravenes the maximum height stated.

It is not necessary to contravene the County Development Plan and the LAP in this way, as in the recent past there has been **significant provision of student accommodation in this area**, and it is perfectly reasonable to plan buildings of three and four storeys in such a suburban residential location. This provision includes projects in nearby Stillorgan, Kilmacud, Goatstown and Montrose, with major construction projects currently underway within UCD lands itself, and plans for further student accommodation projects adjacent to Belfield.

- **Building Line**

The Building line does not align with the Trimbleston development at the northerly end of the street front, and protrudes past the adjacent building line. As well as being visually jarring, it is unsafe for pedestrians passing by as well as for cyclists/pedestrians emerging.

The proposed vehicular access to the site is likely to result in serious traffic

congestion, given the busy narrow main thoroughfare that is the Goatstown Road. This is likely to be particularly severe at the start and end of term when students are arriving and departing.

- **Only Surface Parking Provided**

Only surface parking is provided. The Goatstown Local Area Plan states that underground parking should be provided for this site.

- **Landscaping**

- The development does not provide usable open space other than the roof terraces.
- There is no high quality private open space. Communal space only is provided.
- Minimal tree planting is provided along the site front, and all landscaping is mostly hard landscaping.

- **No Benefit to Existing Community**

This development does not provide any benefit to the existing community; it does not address the shortage of housing in the area, and it does not provide any public amenity.

2. Inadequate Car Parking

- **Accessible Spaces**

The development allows for 2no. accessible spaces, - this is an inadequate number considering there are 10no. accessible units.

- **Inadequate Parking and Set-down Spaces**

There are only 2no. parking spaces, and 2no. set down spaces within the drive through area, which is wholly inadequate given there are 239 units in the development. **There is no on-street parking on Goatstown Road, therefore this will lead to students and visitors parking on the adjacent residential streets, and/or blocking the cycle track and footpath.** The local development plan for Goatstown gives guidance for this site that underground parking should be provided.

- **No Public Car Parks in the Locality**

The Management Plan states that students who arrive by car with family and friends

are given information about local car parks before they arrive but the reality is that **there are no public car parks in the locality.**

- **Hotel Parking**

It is stated that the buildings will be used for tourism purposes in the summer. It is very likely that the demand for car parking will increase significantly when tourists are in residence.

- **Service and Delivery Vehicles Blocking Road, Footpath and Cycle Lane**

Also, with only no.4 non-disabled parking/set-down spaces for residents and visitors, where will service and delivery vehicles park? Inevitably they will end up parking on Goatstown Road in front of the development, blocking the road and the cycle lane, as well as causing a pedestrian obstruction.

- **No Facility to Charge Electric Cars**

3. Inadequate Bike Parking

- **Inadequate Bike Parking**

There are no.188 bike parking spots to cater for no.239 units. This will also include all bike parking spaces for visitors. Most of it is 'stacked' parking, in lockers at the rear. At the very least, one bike parking spot is required per room. Plus more for visitors. Another 70 is required, at a minimum.

- **There is No Cargo Bike (e.g. Urban Arrow) Parking**

How will residents with these types of bikes get their shopping home? One cargo bike space is warranted, per room, given that the residents will be expected to live without a car.

- **There are No Disabled Cyclists' Parking Spots**

- **There is No Facility to Charge Electric Bikes**

4. Shared Living Student Accommodation Not Appropriate For This Location

- **Density Too High**

The density of this proposed development is not in keeping with that of its surrounding developments. The adjoining Trimbleston site is high density but provides permanent housing, and is not over-development.

- **Potential Anti-social Behaviour**

There is also the issue of potential anti-social behaviour, as occurs at Trinity halls in Dartry, Dublin 6. Residents close to that location have made numerous complaints, despite being a further distance from that development, than a large number of residents will be at this location.

- **Inappropriate and Unsuitable Roof Terraces:**

- **Overlooking:** The provision of roof terraces would cause overlooking of neighbouring properties - including across the road.
- **Local Conflict:** Using the space on the roof to create a roof garden for socialising is totally inappropriate in this suburban context and it will undoubtedly lead to local conflict.
- **Wind Speed:** There is also the weather to take into consideration. The wind speeds at the top of this building will be impressive. The prevailing south westerlies will hit these roof terraces unimpeded at this height.

5. Inaccuracies In Documentation

We wish to highlight some inaccuracies contained in the documentation.

- **Incorrect Distances**

We would like to highlight that the distances stated by the developer throughout the documentation in various locations are incorrect.

It is a 1.5km walk (18 mins) to the Dundrum Luas – not 1.3km as stated

It is a 1.8km walk (23 mins) to Dundrum Town Centre – not 1.5km as stated

It is a 1.7km walk (20 mins) to UCD (the main campus buildings) – not 800m as stated

- **Levels Exaggerated**

The levels of the site shown in section CC in particular, are exaggerated. The fall across the site is not as great as that indicated on the drawings. The Planning Report

includes a photo (page 16) showing the level difference between the adjacent shops and the site to be a lot less than that shown in the proposed sections. Correct surveyed levels should be indicated. Also the dashed line that is shown for the rise in road is a lot steeper than in reality.

- **References to UK not Ireland**

The Management Plan appears to have been developed on a 'cut and paste' basis using a plan that has been prepared by the developer for student accommodation in the UK. References throughout the plan are to British standards as well as UK government and national requirements. There is very little reference to Irish culture, the local environment, Irish standards or the Irish university accommodation service or system into which this planned development should be integrated.

- **Bus Timetable**

The documentation refers to the number 11 bus travelling past the site at 15 minute intervals. In fact, it travels past at 15 and 20 minute intervals at morning and evening peak times respectively, and 30 minute intervals at off-peak times. Due to the pandemic, at the moment the frequency is a lot less.

6. Public Transport

The Management Plan refers to students using buses and trains, however despite what is stated in the application, public transport in the area is limited. Cars will inevitably be required at the very least when students are arriving and departing, but more likely on a regular basis.

- **Bus**

One bus route, the no11, runs along the Goatstown Road, between Glasnevin and Sandyford, via the city centre, with buses travelling at 15 and 20 minute intervals at morning and evening peak times respectively, and 30 minute intervals at off-peak times. The morning peak time is particularly busy. These buses are frequently full during the morning rush hour, passing people waiting at bus stops.

Despite Goatstown Road being ear-marked in the past to become a Quality Bus Corridor, this road has very recently been restructured to prioritise bicycles, with the addition of kerbed cycle lanes. It is highly unlikely to ever become a QBC at any stage in the future.

- **Luas**

The Dundrum Luas station is an 18 minute walk away (1.5km). By the time the trams reach Dundrum, they are very overcrowded and travellers frequently have to wait for a number of trams before they can get on board.

Despite these two transport options, there is significant car traffic congestion on Goatstown Road at morning and evening peak times.

7. Traffic Problems

An increase in effective public transport via bus is very unlikely due to the current, and future, volumes of traffic on Goatstown Road. Also, if the parking issue at the site is resolved through the provision of underground parking, it is important to take note of the increasing levels of vehicular traffic in the area. Levels which this development would be adding to.

- **Goatstown Road Unsited to Large Volumes of Buses and Cars**

Despite being designated a public transport corridor in the past, Goatstown Road has recently been restructured to prioritise bicycles. The new dedicated cycle lanes slow down vehicular traffic, making this road narrow and unsited to large volumes of buses and cars.

- **Significant School Traffic**

Our Lady's Grove primary and secondary schools, and an associated pre-school, are located approximately 300m to the north of the proposed development site, and result in very significant traffic congestion in the mornings and at pick-up time.

Two additional new schools – one primary and one secondary (Goatstown Educate Together) – are currently being planned for a site on Goatstown Road (IGB site) approximately 300m south of the proposed development site. The secondary school is due to move to this location in September of this year. The primary school is also due to move from its temporary location shortly. The total number of students planned for this campus is 1,200. Significant school related traffic/ and demand for public transport, will continue to grow as a result.

- **Trimbleston – Next Phase**

The next phase of the Trimbleston development, adjoining the Vector Motors site, is due to open this year, providing another 200 units with associated traffic and/or demand for public transport.

- **Insufficient Cycling Infrastructure to Support Bike-only Travel**

Although there is a new kerbed cycle lane on Goatstown Road, there is insufficient cycling infrastructure in the wider area if the residents wish to cycle to anywhere other than UCD.

8. Management Plan Concerns

- **Lack of 24-hour concierge service**

The lack of 24-hour concierge service is a concern. The Management Plan refers to the reception being open from Monday to Friday from 8am to 6pm but outside of those hours, security and other staff will be on call but not present on site. Given the focus on young first year students for the majority of the bed spaces, this lack of supervision is a concern to the local community.

- **Potential to Double Occupancy Rate**

Rooms will have double beds which has the potential to double the occupancy rate, particularly with the lack of oversight and supervision.

- **Minimal Cleaning**

There appears to be minimal cleaning of public spaces, which is likely to result in deterioration of the area.

- **“Cut and Paste” UK References – No Reference to Irish Culture and System**

The management plan appears to have been developed on a ‘cut and paste’ basis using a plan that has been prepared by the developer for student accommodation in the UK. References throughout the plan are to British standards as well as UK government and national requirements. There is very little reference to Irish culture, the local environment, Irish standards or the Irish university accommodation service or system into which this planned development should be integrated.

9. Poor Interior Design

- **It is Not a Sustainable Future-proof Design**

This development cannot be easily re-purposed for other renter category needs. In the likely event that the number of domestic and international students looking for this type of accommodation drops in the future, it is not a design that lends itself to being easily altered in order to accommodate self-contained units, for either single occupancy, or families.

- **The Pod/living Space Ratio is Too High, and the Spaces Too Small**

A ratio of 7 small bedroom pods per 1 small kitchen/living room that contains only 1 cooking area is not adequate. It is a "pack 'em in" business model that will lead to substandard accommodation.

- **No Ground Floor Storage**

What if a student is also a parent and needs a place to put a buggy? There is no ground floor storage.

10. Unregulated Hotel

A concerning aspect is the possibility this development will be rented as an unregulated Airbnb during the summer months. As well as being unfair on the regulated hotel sector, this has the potential to create many problems. How will this be managed during the summer months? What measures will be put in place to regulate the use of the rooms? There are no Management Plan details for such a scenario.

11. Inadequate Retail Facilities

Goatstown does not offer the range of retail facilities required for a 'no car' development such as this. There is one newsagents, that is not a multiple, located approximately 300m from the proposed development site. The next closest shop is a small Circle K convenience store approximately 700m from the development site. The nearest supermarket is Lidl, Dundrum Main Street, at a distance of 1.7km.

12. Shared living Not Appropriate In A Covid And Post-Covid Society

Considering the ease and speed with which Covid-19 has spread around the globe, it is imperative that any planning decisions made now are cognisant of the potential of another pandemic in the future. It is patently obvious that a shared living environment is completely inappropriate for the containment of a contagious virus.