



roebuckresidents@gmail.com
www.roebuckresidents.com

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

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Roebuck Residents' Association
Objection regarding Planning Reference PL06D309553
Proposed Strategic Housing Development
at The Goat Bar and Grill, Goatstown, Dublin 14

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Introduction

We are a residents association of approximately 380 households in the Goatstown area in Dublin 14. Our area is approx. 0.5km to the north of the site. We are actively opposed to this SHD application, and consider the construction of four eight block towers to be completely inappropriate for this site.

1. Goatstown Local Area Plan

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

- **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 Drummartin, Birchfield or Taney developments.

- **High Quality Design**

The design has no significant features that relate or are sympathetic to the adjacent buildings or historical character of the area. According to the Goatstown LAP

Any redevelopment of the prominent and highly visible 'Goat' site shall be based on a design approach that is influenced by, and responds sympathetically to, the historic character of the area - most notably the mature trees, stone walls and various historic buildings; including Drummartin Terrace that flanks the southern boundary of the site. Any redevelopment proposals shall incorporate a diversity of uses and housing typology, varied plot widths and heights and shall include a rich mix and palette of materials and shall avoid excessive obtrusive signage.

- **Positive Contribution to Local Streetscape**

The development will not enhance the streetscape, and is more suited to an urban, as opposed to a suburban setting such as this. It is excessively dense, bulky and overbearing in comparison to its immediate surroundings. It is an overpowering structure that will dominate the neighbouring residential environment and the Goatstown Crossroads. The Drummartin cottages adjoining the site are deemed "protected structures" under the Goatstown LAP, which has implications for a proposal such as this. The LAP states that "*Any proposals for infill development within the curtilage of a Protected Structure should be of a high quality design that respects and complements the setting and character of the Protected Structure.*"

- **Height**

The Goatstown Local Area Plan sets a maximum height of four storeys on this site and Section 1.9 of the 'Urban Development & Building Height guidelines' indicates the need for 3 to 4 storey developments to increase density and compact growth within existing suburban locations. At eight storeys this development is TWICE the indicative levels and represents **over development of the site**. The development does not reflect the scale of the neighbourhood and surrounding roads.

The development will have a detrimental impact on its surroundings because of its mass and scale and will be overly intrusive; the sudden transition from cottages and two storey homes to five and eight storey apartment blocks is inappropriate. Furthermore, as this site is in an elevated position relative to the Goatstown crossroads, it will have a massively overbearing presence from the northern perspective.

- **Building Line**

The Building line does not align with the Drummartin Cottages or Birchfields development at the southern and western end of the street front, and protrudes past the adjacent building line. As well as being visually jarring, it is both dangerous and unsafe for pedestrians passing by as well as for cyclists/pedestrians emerging. The Council and APB will be open to litigation if/when accidents occur at this point.

- **Consider provision of live / work units**

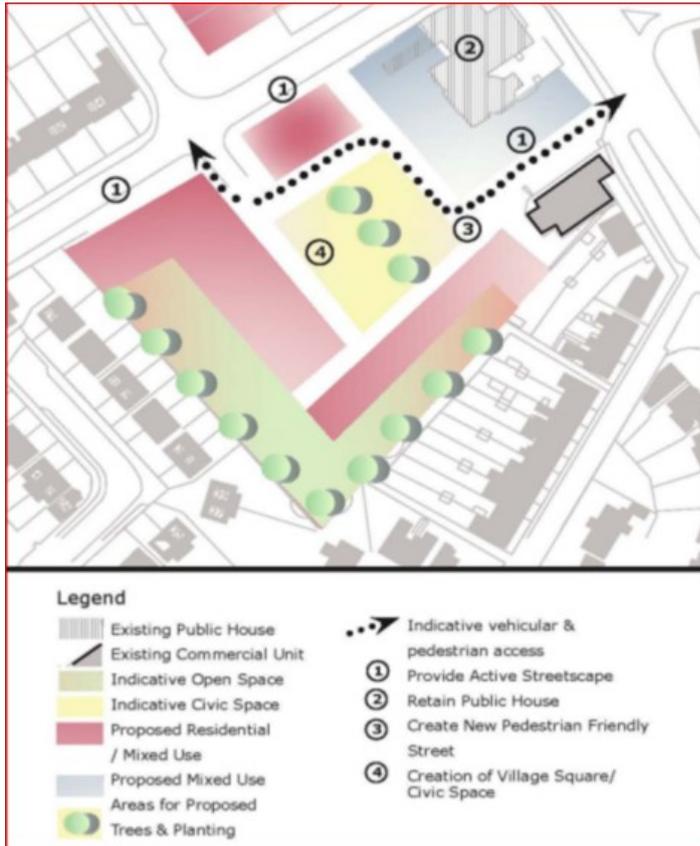
There has been no consideration given to the provision of live/ work units. Given the changes in work patterns over the last 12 months and likely to continue into the foreseeable future, the provision of work/ live units should have been considered.

- **Creation of a new pedestrian friendly street/open space**

The design of the street is not pedestrian friendly, and totally out of line with current public realm provision in DLR. There are a number of steps with no ramps. The vast majority of the open space available is behind gates with controlled access. Since the access is "controlled", it cannot be considered open. See drawing below

It is unacceptable that the only "public" space provided is the smoking area of the pub and where bike racks are to be located. To make matters worse, there is also a vehicle access in the middle of the public space. This, therefore, is not open space either, and consequently should not be used in the calculation of open space as it currently is in this application.

Image below of proposed layout of site as set forward in the Goatstown LAP



Proposed Private/ Public/ Creche space split



As is noted in the image above the vast majority of the open space is not public as required, as it is inaccessible to the current residents of Goatstown. A large portion of what is deemed as “public space” is seating for a licensed premises and, in line with licensing laws, this cannot be deemed to be public space. There is also a large vehicle entrance in what is deemed public space.

- **Own door access for residential uses where appropriate**

Due to the fact that only apartments are included in the development, there are no own door access for residential users. This is a serious omission in the application.

2. NC “Neighbourhood Centre” Zoning

Roebuck Residents’ Association is one of a number of new community groups that have formed (or re-formed) in the Goatstown area in recent years. We, and the other community groups, have been proactive in improving the area in which we live, work, and send our children to school. It is widely accepted that there has been a significant increase in community spirit in the area. Consequently, there is a growing sense of pride in Goatstown, as facilities such as the playground in Taney and improved maintenance of green spaces. In recognising these achievements we acknowledge a blossoming partnership with the County Council.

However, there is a problem around “identity” as it applies to Goatstown. People from outside the area are frequently not entirely sure where Goatstown is. The Goat pub is the only “landmark” that marks the area. Goatstown suffers from a lack of a coherent and readily identifiable village or “neighbourhood centre”, despite the fact that it is identified as exactly that in DLR’s recent draft County Development Plan (2022-28).

Our current Goatstown Local Area Plan already recognises this lack of a sense of place, and puts forward various objectives that would help improve the area. The creation of a village or neighbourhood centre is key in realising these objectives. The obvious location to site such a village or neighbourhood centre is the area around Goatstown Crossroads. The LAP recognises that the redevelopment of The Goat site as crucial in addressing this deficit.

“The potential to create any form of identity and enhancement of sense of place in the wider Plan area will be strongly influenced by any coherent redevelopment proposals for the lands at ‘The Goat’ and at the Topaz garage and its adjoining retail units. New development at these sites should include a variety and mix of uses to properly reflect the neighbourhood centre status of the site and incorporate a layout and design that creates a distinctive urban village centre.”

A distinctive urban village centre with “a mix of commercial and residential uses appropriate to a neighbourhood centre and in accordance with County Development Plan zoning objectives” the creation of a “new pedestrian friendly street”, the “creation of an attractive civic space”, an “active streetscape” etc. would be warmly welcomed by the residents of Goatstown.

What is not welcomed is this proposal, which is essentially inappropriate residential over-development being shoe-horned into a site that is not zoned for it. If it is approved by An Bord Pleanála it will effectively remove forever the chance for Goatstown to develop an appropriate village, or neighbourhood centre. Our community deserves better than this.

The site is currently listed as a “vacant site”. However, we do not agree with this designation. For decades goats, donkeys and horses have grazed there. Many children have grown up regularly visiting and feeding the animals that graze there. The symbolic goat, the animal after which the area was named, links the area back to its origins as a dairy farm providing goats milk to the invalided in Dundrum.

As per the Goat Bar Facebook page *“True to its name, The Goat played host to a real goat, Gertie, who acted as a mascot and delighted in keeping visitors entertained. She even had three children (Dinny, Miley and Biddy) and was part of the surroundings until 1983 when she was released into the wild in the Dublin Mountains. She is still fondly remembered by the owner, staff and visitors and her memory endures through the bronze statue of a goat that now stands outside the pub”*

This application, sadly, provides no link to that past, and will add nothing to the identity of the area, contrary to the intentions of the Local Area Plan. Another notable “central” facility for local residents on the current site, the local recycling unit, is not included in this application.

3. Piecemeal Development

This development is one of many that is being planned for the area, and should not be viewed in a stand-alone context. In the interests of sustainable development, due consideration should be given to looking at all proposed local development from a “big picture”, over-arching perspective. The SHD process has effectively removed the local authority from the process of local sustainable planning. Is An Bord Pleanála giving due weight to the issue of over-concentration of development in our area? On the Goatstown Road alone, permission has recently been granted for a 239 student bed development at the Vector Motors site, a 698 student bed development is awaiting a decision at Our Lady’s Grove, and a 1,200 pupil educational campus is planned for the old Irish Glass Bottle site. In the wider area there are multiple other developments coming on stream, not least of which is the nearby Central Mental Hospital with a projected 1,200 units.

It is crucial to the future sustainability of Goatstown, that An Bord Pleanála give critical consideration to the cumulative effect of these developments on local services, amenities, and infrastructure, including public transport and traffic levels.

4. Excessive Traffic

The site is situated at the junction of the main east-west route through the County, linking Dundrum with UCD and the N11, and a north-south route linking the areas beyond the M50 & Sandyford with the City Centre. Already there are significant **Traffic** flows through residential estate roads (rat-running) in the Goatstown area because of heavy congestion on the local link roads. This results in severe traffic problems for our area. An extra 475 car spaces will exacerbate the rat-running and result in health and safety issues in our communities.

An increase in effective public transport via bus is very unlikely due to the current, and future, volumes of traffic on Goatstown Road. 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 Unsuitable 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. We welcome this development as the new dedicated cycle lanes slow down vehicular traffic and promote cycling. However, they inevitably make this road narrower for vehicular traffic, and thereby more unsuitable 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 900m to the north of the proposed development site, and result in very significant traffic congestion in the mornings and at pick-up time. We welcome the addition of two new schools – one primary and one secondary (Goatstown Educate Together), which are currently being planned for a site on Goatstown Road (IGB site) approximately just 300m north 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.

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

Notwithstanding the welcome introduction of the new kerbed cycle lanes on Goatstown Road, the insufficient level of cycling infrastructure in the wider area is now more obvious. We are hopeful that the Council will address this deficit regardless of the outcome of this application.

5. Pressure on Public Transport Infrastructure

The LUAS Green Line is already experiencing dangerous overcrowding, especially at peak times. The ongoing measures to increase capacity do not take account of the additional development that is planned along the line. The Central Mental Hospital, Cherrywood, Clay Farm, Marmalade Lane, Greenacres and others will bring well over 10,000 additional households onto the Line. As some of these developments are upline from the Goatstown development, the LUAS will not be a viable commuting option for the dwellers of these new accommodation units. A full transport infrastructure assessment must be carried out and reference made to the forthcoming Dundrum Area Based Transport Assessment (ABTA). In addition, liaising with the Department of Transport and the NTA is highly recommended, particularly in relation to the decision to delay the Green Line Metro Upgrade for another decade.

One bus route, the no.11, 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 new Bus Connects plan will reduce the frequency of this route to 30 minute and 60 minute intervals (the new no.86). Despite Goatstown Road being ear-marked in the past to become a Quality Bus Corridor, this road has very recently been restructured to prioritise bikes, with the addition of kerbed cycle lanes. It is highly unlikely to ever become a QBC at any stage in the future.

6. Crèche Facilities

Although the addition of crèche facilities in the area is welcome, the details provided in the childcare capacity audit are incorrect. The study states that Knocklyon Lodge Crèche & Montessori is within 1km of the site, this is incorrect, it is 10km away!! Knocklyon Lodge Crèche & Montessori accounts for 100 of the 800 enrolment numbers. Also, the audit does not differentiate between ECCE only spaces (term time- three hour sessions) and full time crèche spaces.

7. Pedestrian/ Cycle Permeability

It is an objective of the Goatstown Local Area Plan to expand and upgrade pedestrian and cycle path facilities in the Plan area.

The current proposed development does not do this. The existing pedestrian and cycle layout of the Goatstown cross roads is very hostile to cyclists/pedestrians and dominated by car traffic. There are two 30 meter long pedestrian guard rails in place which funnel all pedestrian traffic from the existing site to the pedestrian crossing at the Taney Road junction. The proposed plan includes four entrances to retail and residential amenities with no alternate pedestrian access or crossing from Taney Road. The lack of an appropriate number of crossings increases the risk of jaywalking which, given the location of the site with three lanes of traffic and poor visibility of oncoming traffic, is not safe.

There is inadequate pedestrian provision all around this junction, but especially on the Kilmacud Road side of the proposed development with the current public path replaced in part by a ventilation grill from the basement car park.

The current site, at the junction at Kilmacud and Taney Road, is BELOW the existing road level. The proposed plans do not address the varying height levels between the road and existing footpath.

The cycle lane that runs by the current site is extremely busy due to its proximity to Sandyford Industrial Estate located to the south of the site and UCD to the North. The approach to the site northbound is downhill and cycle traffic moves fast at the point leading to the traffic lights. The proposed cycle lane at this point on the Kilmacud Road has ventilation grills included as part of the cycle infrastructure. This would not be appropriate or safe due to the speed of bikes on this stretch.

8. Excessive level of car parking proposed

All of the existing car parking of circa 125 spaces will be removed and replaced by the undercroft and basement car parking. The proposed development provides for 475 parking spaces accessed via two entrances off Taney Road and one off Drummartin Road. Assuming the current 125 spaces will be retained for the pub/ retail spaces, the remaining 355 will be for the residential development. This level of car parking is a significant over-provision and will result in a significant traffic hazard. There is no justification for the proposed 125 car parking spaces for the public house. The maximum provision for this use, based on the County Development Plan standards, is just 50 spaces. This over-provision is indicative of the applicant's approach in arguing on the one hand for maximum densities and heights of an urban site; and on the other hand for above maximum standard car parking provision of a suburban site.

9. Poorly considered vehicular access/ loading bay locations

There are already significant constraints at this very busy junction, namely:

- The right turning lane from Goatstown Road onto Taney Road has capacity for 2 cars only;
- The right turning laneway along Taney Road is heavily restricted in width, and often traffic is backed up to the proposed new entrance off Taney Road;
- There is a continuous white line at the first entrance to the site off the Lower Kilmacud Road and motorists are required to drive down to the next entrance to enter the car park. However even with current levels of traffic, illegal right-turning at this point creates a backlog of traffic on Lower Kilmacud Road.

A new loading bay and a "controlled" access point is proposed on Taney Road, just a short distance from the junction. This access point is not workable as proposed as it is situated right in the middle of the very limited space available for the public on foot. This access point is also located at the same point as the bus stop for the no.75 bus. It is clear from the plan that no provision has been made for the conflicting needs at this point.

The current cross roads is no longer the "gateway to South Dublin" it once was many years ago. It is already beyond capacity, and cannot cope with the significant daily traffic volumes going south to Sandyford Industrial Estate and north to UCD/ city centre. This proposal will make the junction more dangerous for pedestrians and cyclists, while creating backup chaos for motorists travelling in both directions.