



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

5th May 2022

Re. Planning Reference TA06D.313235  
Location: Former Victor Motors site, Goatstown Road, Dublin 14

To Whom It May Concern,

On behalf of The Roebuck Residents' Association we wish to make an observation relating to the above SHD planning application. We are an active residents' association of approximately 380 households in very close proximity to this site. We object to planning permission being granted for the reasons set out in this document.

Yours sincerely,

Una O'Shea  
*on behalf of*  
*Roebuck Residents' Association*  
[www.roebuckresidents.com](http://www.roebuckresidents.com)

## Inadequate Car Parking

The low number of car parking spaces (6no.) in the proposed development is completely insufficient, and is a material contravention of the DLRCoCo County Development Plan 2022-2028 (CDP).

The CDP, in Table 12.5 Car Parking Zones and Standards, states that there should be 1 parking space for every 10 bed spaces. That is 23 (rounding up from 22.1) parking spaces.

We note that the Statement of Material Contravention gives two main reasons why this development can contravene the Development Plan in relation to parking.

1. That is is of strategic importance
2. That is is within easy reach of public transport, specifically 700m of a bus stop on a Bus Connects Orbital Bus Route

In relation to point number 1 – just because this application has been submitted under the Strategic Housing Development process does not automatically qualify it as “strategic”. If that was the case, every development submitted under the SHD process should be viewed as strategic, which is clearly not the case, nor should it be. This was a point recently made in a High Court judgement (Clonres CLG v. An Bord Pleanála & Ors [2021] IEHC 303), Judge Humphreys states very clearly that just because something proceeds from strategy doesn’t make it “strategic”.

*104.*

*In the sense in which the word “strategic” is used in the SHD legislation, all it really means is large housing developments, rather than ones that are individually pivotally crucial to, or even individually significantly impactful on, the national interest. To say that democratically adopted development plans can be overridden for housing developments if the housing developments are large (and hence if the developments constitute “strategic housing development” as artificially defined), but not if they are small, could be viewed as another example of Jonathan Swift’s proposition that “laws are like cobwebs which may catch small flies but let wasps and hornets break through” (A Trritical Essay upon the Faculties of the Mind, 1707).*

This development is just one of many residential developments being planned for this area. In fact it is not even the only non-campus student accommodation development in the area. Less than 300m north of this site, permission was granted last year for a 698 bed student accommodation development (TA06D.309430). In addition, there are 1,254 beds currently under construction in the UCD campus to add to the stock already there, bringing the total of student beds on the university campus to over 5,000. So to claim this is “strategic” is disingenuous, to say the least.

In relation to the point about the development being within easy reach of public transport – it is important to note that the majority of developments in the Dublin area are close to public transport. That does not though, allow them to contravene the various Development Plans as regards parking

requirements.

**If the planning authorities were to follow the logic of the Developer in the Statement of Material Contravention in relation to parking, then every single development in the Dublin area would be exempt from a requirement to provide parking spaces. This is clearly nonsensical, and on this basis we believe that An Bord Pleanála has no option but to reject the application.**

### Lack of Parking and the Impact on Residential Amenity

Having regard to the intermediate urban location of the site, it is considered that the proposed development would, by reason of the inadequate number of car parking spaces provided, coupled with no on-street parking on Goatstown Road, result in significant car parking overspill on surrounding residential roads.

The proposed development would, therefore seriously injure the amenities of properties in the vicinity and as such, would be contrary to the CDP and to the proper planning and sustainable development of the area.

### Loading Bays

Section 12.4.5.7 of the CDP states the requirement for Loading Bays “*where there is a need for loading and unloading in a development*”. Considering there are so few parking spaces, most likely all deliveries that cannot be made by bike will arrive by car or van. The provision of Loading Bays is critical.

*“Where there is a need for loading and unloading in a development, additional parking bays suitable for loading should be provided in addition to the parking requirements set out in Table 12.5. Residential developments of more than 50 units should have at least one loading bay and there shall be a ratio of not less than 1 loading bay per 100 units in larger developments. “*

12.4.5.7 Parking and Loading Bays

### 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, however the reality is that there are **no** public

car parks in the locality.

## Poor 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.

The development will not enhance the streetscape, and offers no positive contribution in that regard. It is more suited to an urban setting or a university campus. It is far too bulky and overbearing for such a small space, and is an overpowering structure that will dominate the neighbouring residential environment.

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.

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.

## Inaccuracies and Missing Documentation

### Inaccuracies

The Statement of Material Contravention contains inaccuracies.

1.

*“2.28. The proposed development is located within 800m of UCD campus. It is also located along a **proposed Quality Bus Priority route as identified within the CDP** and within 1.3km of the Dundrum Luas stop and green route. The site is frequently served by the No. 11 bus route (circa every 15 minutes at peak times at the nearest stop, 30m from the site).”*

The Road along which the development would be located, Goatstown Road, is **not** identified as a Quality Bus Priority Route in the current CDP.

2.

*“2.46. The proposed student accommodation will be highly accessible to UCD by direct cycle lane and pedestrian path and is located adjacent to a bus route (no.11). **The DLRCDP also includes an objective for a proposed future quality bus route on Goatstown Road** “*

The CDP does **not** include an objective for a proposed future quality bus route on Goatstown Road. In fact the bus route on this road (currently the number 11, to be re-named number 86) is to have a reduced frequency under the new Bus Connects scheme.

### Missing Cycle Audit

We note that Section 12.4.6.1 Requirements for New Development, states a Cycle Audit must be prepared and included in the application. This plan is required to demonstrate how the Council's 'Standards for Cycle Parking and Associated Cycling Facilities for New Developments', are met within the development. We cannot find any such plan in the documentation.