

## Sandymount and Merrion Residents Association

c/o 15 Castle Park  
Sandymount  
Dublin 4

The Planning Officer  
Dublin City Council  
Civic Offices  
Wood Quay  
Dublin 8

11 December 2019

**Re: Application by the Minister for Education & Skills for planning permission for development on a 2.11 ha site approximately at Roslyn Park, Beach Road, Sandymount, Dublin 4**

Dear Sirs

### Introduction

These observations are made on behalf of the Sandymount and Merrion Residents' Association (SAMRA). The association was formed in 1957 and its aims include the protection and improvement of the environs of Sandymount Strand, Sandymount Village and Dublin Bay. Further information about SAMRA can be found on our website: [www.samra.ie](http://www.samra.ie)

At present we have over 100 fulltime paying members and a significant number of members and other residents have contacted us to express views regarding the proposed development at Roslyn Park. We have also consulted carefully with those residents who are particularly affected by the application (e.g. on Seafort Avenue, Newgrove Avenue and Seafort Villas), some of whom we understand have submitted separate observations. We do not seek to duplicate those submissions here.

### The proposed development

We understand that when it is completed and at full capacity, the proposed school development at Roslyn Park would accommodate some 1,000 post primary pupils, 432 primary pupils and 140 staff, which would make it one of the largest schools in Dublin. The current plans propose that there would be 477 bicycle and scooter parking spaces, and just 2 car parking spaces to cater for accessibility requirements.

### Summary of SAMRA's observations

SAMRA welcomes the proposal to provide high quality, modern facilities for local residents and the wider public to attend a multi-denominational State-funded school, in particular at secondary level. We also welcome the proposals to retain and enhance the protected Gandon House, which is a fantastic local heritage asset, and 12 Seafort Avenue, which is currently in a dangerous state of disrepair.

However, having reviewed the application, we consider that it is: of a scale that is neither necessary nor in keeping with the surrounding area; is based on unrealistic assumptions; and is not supported by adequate evidence.

Unless there are material changes to the application and/or significant ameliorating conditions placed on any approval, we believe that a development on such a substantial scale risks further

exacerbating the significant existing pressures on local infrastructure by adding substantial additional traffic and congestion, pollution and distress at the expense of local residents, prospective school pupils and the wider public.

We have set out below our observations in more detail.

#### Traffic and Travel Plan

The flaws in the present application are particularly apparent in relation to the assessment of traffic flows and transport to the proposed development. In summary, the existing local infrastructure is simply not able to cope with the extra volume of traffic that would reasonably be expected with a development on the scale proposed.

Many parts of the material provided in support of the application do not stand up to scrutiny and do not adequately take into account the views of the local community who will be substantially affected (both positively or negatively) by the proposed development.

See **Annex A** for further detail.

#### Mass and Scale

We understand that when it is completed and at full capacity, the proposed school development at Roslyn Park would accommodate some 1,000 post primary pupils, 432 primary pupils and 140 staff, which would make it one of the largest schools in Dublin on a site of just 5 acres. In contrast, the largest school in Ireland, Gorey Community School, houses 1,600 pupils and enjoys a site of almost 20 acres.

We submit that the scale and density of the proposed development on the site of a protected building (i.e. Roslyn Park) and the unprotected but important historic building known as Sandymount Park, which is also of cultural importance given its previous use, would have adverse effects on local residents and existing local infrastructure.

In particular, the proposed development is likely to result in overlooking, overshadowing and loss of residential amenity for many of the residents in the surrounding roads of what is an Architectural Conservation Areas. In addition, trees to be retained or added are not properly indicated on the available materials accompanying the application.

#### Noise and Loss of Privacy

The development would adversely affect the peaceful enjoyment of the properties on the surrounding roads to Roslyn Park (i.e. Seafort Avenue, Seafort Villas, Newgrove Avenue and Sandymount Green).

The vulnerable residents of Mount Tabor, which is a specialist residential care home and general nursing home, would also be adversely affected.

#### Construction and Waste Management

Section 6.8 of the Construction and Waste Management Plan states “Earthworks for the basement/foundation structures foundation [sic] forms a major part of the quantity of waste that will be generated by the construction phase of this project [...] The quantity of excavated material to be removed from or imported in the site can be greatly reduced by establishing levels of the proposed buildings which optimise the volume of cut and fill”.

However, the analysis accompanying the application fails to recognise that raising the OD ground levels of the lower parts of the site would be likely to seriously affect the surrounding roads and properties. There are already several instances in Sandymount where this has occurred and where substantial remediation work was required.

Section 6.8 also states that surplus soil excavated from the site “will be reviewed for possible reuse on adjoining or other construction sites within the region”. SAMRA would welcome further information on this point.

Finally we note at section 7.2 that it is intended that large trucks requiring access to the site will queue at a “pre-determined staging point” which has not been identified. We are particularly mindful that much of the large volumes of HGV traffic that currently travels along Strand / Beach Road contains construction waste and already poses a substantial danger to local residents and vulnerable road users. We would be very concerned about adding further volumes of such traffic to the area. Strand / Beach Road is also already in a state of disrepair and will be further damaged by increased volumes of HGV traffic.

#### Flooding, Raising of Ground Levels and Drainage

The application acknowledges that the proposed development “is within flood zone A. High probability of flooding and is classed as a highly vulnerable development”.

We note that the original buildings and site levels were deliberately designed to eliminate flooding of the then existing properties, with raised foundations above the surrounding OD soil levels. We submit that further consideration is needed in relation to impact of the development on matters such as tide-locking of outfalls, high water table and tidal continuity, and existing pumped drainage in the area.

In addition, we understand from the Engineering Report that surface water will discharge into the Irish Sea. The relevant pipes should instead connect to the existing sewer network to avoid increasing pollution on Sandymount Strand, which is a UNESCO protected vulnerable area that already suffers from regular pollution incidents.

Finally, we are also concerned about the capacity of the sewage network given the existing situation which sees the Irish Water sewage treatment plant in Poolbeg regularly discharge raw sewage into the sea following moderate rain fall. The Engineering Report only appears to consider the capacity of local sewage pipes rather than that of the Irish Water treatment facility which would be the ultimate destination for waste water coming from the site.

#### School amenities

As a condition of any approval, local residents should be afforded the opportunity to use school facilities outside of school hours at reduced or no cost.

#### Public Consultation

Finally, we would note for the record that the materials supporting the application were only made available online on 6 December 2019, while the application itself was registered on 11 November 2019. We would be grateful if every effort could be made to ensure that materials in support of important applications such as the present one are uploaded online as soon as possible after registration so as to enable informed and meaningful input from affected stakeholders.

Yours faithfully

**pp Sandymount and Merrion Residents Association**

## Annex A – Traffic and Travel Plan

### **Travel Plan assumptions**

- The Traffic & Transport Assessment refers to target modal split of 25% car, 25% walking, 30% cycling, 12% scooter and just 8% by rail or bus. These findings are said to be based on a Modal Split Survey carried out by Ranelagh MDS and Shellybanks ETNS. We submit that a more appropriate comparator would be the existing neighbouring local schools, e.g. Scoil Mhuire and Star of the Sea. Based on SAMRA's experience, it is not reasonable to assume that 55% of journeys would be made by walking or cycling, especially given the current lack of safe bike and pedestrian infrastructure in the area. We would recommend that further surveys are carried out to validate these assumptions. We would also submit that the Department of Education should look to be more ambitious in encouraging greater use of public transport, potentially coupled with dedicated school buses. The report refers to a potential private bus service but this solution should be investigated in greater detail and provided for as part of the conditions of any approval.
- Based on the contents of the School Travel Plan, the target model split is entirely unrealistic. Achieving the target in relation to a development of this substantial scale would require a material increase in the quality of the surrounding infrastructure in order to enable far greater active transport than is the case for equivalent local schools at present.
- The evidence to support the conclusion in the engineers report that there "is sufficient nearby parking for visitors etc. while students and staff can utilise sustainable modes or public car parking areas" is insufficient. Based on SAMRA's experience, there is already substantial congestion in the local area at peak times and adding the traffic flows associated with transporting nearly 2,000 extra individuals to the area will result in substantial additional traffic, especially on Beach / Strand Road and the narrow roads surrounding Roslyn Park and Sandymount Green, many of which form part of an Architectural Conservation Area.
- It is very important to ensure that the traffic and transport analysis is correct and any remediation in place before the development is finalised, rather than relying on 1, 3 and 5 year reviews as is currently proposed in the report. To do otherwise risks creating immediate and substantial congestion and stress for residents and pupils.

### **Public transport**

- The Travel Plan refers to "numerous" Dublin Bus routes which will facilitate access to the school. However it should be noted that these routes are infrequent, often unreliable given traffic volumes and already at capacity at peak times. In theory, similar considerations should apply to other local schools such as Scoil Mhuire and Star of the Sea and yet there is no appreciable use of public transport by parents and pupils, with the vast majority of parents preferring instead to drop off their children by car.
- No reference is made to the significant changes proposed by the NTA's Bus Connects proposals which are due to come into force before the development has been completed.
- More detailed consideration should be given to the use of dedicated school buses to transport students from key locations, e.g. Sandymount DART station, Merrion Centre etc.,.

### **Active travel**

- The School Travel Plan notes the intention to "encourage walking and cycling for journeys to and from school". In SAMRA's experience, it is mainly concerns by parents as to the safety

of travelling to school on foot or by bike that is the principal impediment to enabling greater numbers of journeys by sustainable means. What is needed therefore is proper, safe infrastructure to enable such journeys rather than abstract encouragement.

- There is insufficient evidence to support the finding in the Travel Plan that “pathways towards the schools... provide a safe route for pedestrians and cyclists”. On the contrary, Strand / Beach Road is extremely busy at all times, including with large volumes of fully loaded 5+ axle HGVs and other vehicles travelling well in excess of speed limits. We have written separately to the local Superintendent asking for greater enforcement of traffic in the local area. At present, cyclists of all ages are regularly forced to use pathways to avoid having to share the narrow roads in the area with large HGVs, which can be an understandable source of tension to pedestrians.
- The report refers to the NTA’s plan to provide continuous pedestrian and cycle route from Irishtown to Blackrock. As Dublin City Council will be aware, this proposal has been in existence in a number of forms for some 20 years without any concrete steps taken to make it a reality. We submit that completing this route (or at the very least ensuring a fully funded plan has been agreed) should be a pre-condition of approving this application.
- The Travel Plan notes that a Mobility Manager would be appointed at the school. While this would be a very welcome step and one that we believe should be replicated in other local schools, it is clear based on SAMRA’s experience that the principal bar to more children cycling and walking to school is parents’ concerns over safety. Enabling active transport by installing dedicated and safe infrastructure should therefore be a condition of any planning authorisation.
- The Travel Plan refers to the potential use of so-called Park & Stride facilities which rely on using shop car parks and other facilities. In our view there are very limited facilities in the local area that could be used for such a service. While the report refers to car parks along Strand Road, these are often busy at peak times already and are unlikely to be considered sufficiently convenient or safe for many parents given the inadequate provision of quality pedestrian and cycling infrastructure linking car parks to Roslyn Park. In our view it is far more likely that parents dropping off the 1,500 children attending the school by car will end up parking legally and otherwise in neighbouring residential streets, resulting in significant additional congestion, increased air pollution and distress to local residents.
- The Plan refers to the “high quality surrounding footpath and pedestrian crossing network” that will “promote walking and cycling”. We do not see how the existing network would be able to cope with an expected volume (based on the report’s own modal split assumptions) of 55% of a total school population of over 1,500.

#### **Impact on residents and the surrounding area**

- The application proposes to prohibit pupil drop-off on site, which is likely to increase even further the pressure on the surrounding area as parents will otherwise park (legally or otherwise) in the vicinity of the school, creating significant congestion and inconvenience to local residents. The knock-on effects are likely to be large, especially for students and staff travelling across the DART line given that there are already substantial queues at either side of the level-crossing gates near Sydney Parade, Sandymount and Landsdowne Road stations.
- Paragraph 2.2 of the Traffic & Transport Assessment states that “no change in traffic volume are expected for the area”. This finding would appear not to take account of the fact that substantial development is already occurring in the local and neighbouring areas, e.g. provision of 3,500 new homes for some 16,000 people as part of the Poolbeg SDZ.

- Taken in combination, these factors are likely to further increase the already substantial traffic flows on Strand Road and the surrounding area creating a real risk of road traffic incidents and injury.