

16th May 2018

Submission re: proposed Variation No. 5 (Student Accommodation) to the Cork City Development Plan

Part I

A Chara,

We as a Resident's Group welcome Cork City Council's proposed variation No. 5 to the Cork City Development Plan. As a Resident's Group, we recognise that there is a shortage of student accommodation and that this shortage will continue into the future.

This highlights the need for Cork City Council to put in place and adopt a strategy and planning policy specific to student accommodation in consultation with all stakeholders.

As the area in Cork most affected by student accommodation, we make the following submission based on our experience of the related issues.

In particular, we note that while the proposed Variation primarily addresses PBSA (Purpose Built Student Accommodation), the vast majority of student accommodation in the city is ad-hoc conversions of family houses to student accommodation (Single Occupancy houses to Multiple-Occupancy houses). Based on figures provided in the proposed Variation, only 4000 student bed-spaces out of a total of 13000 are provided by PBSA. We believe that it is critical the Cork City Development Plan acknowledges and regulates for the 9000 ad-hoc conversions.

Magazine Road has reached saturation levels with respect to student accommodation. A recent survey of Magazine Road by the Residents determined that 70% of the housing stock is rented to students. The over-concentration of student accommodation in this area should be addressed and prevented by Cork City Planners. A reference to the photographs in Part II of the submission shows the deterioration of the area because of this imbalance and requires an urgent regeneration plan be put in place by Cork City Council.

This submission comprises this document (Part I) and the attached photographs (Part II) of our area.

1. Legislative Context

1.1. Permission for Change of Use

As stated in the proposed Variation, there is no distinction or requirement of planning permission to change the occupation of a dwelling from single to multiple-occupancy. Any new Policy on student accommodation should include a requirement of planning permission to change the use of a dwelling to multi-occupancy. This needs to be addressed within the

strategy in the interest of health and safety for occupants of the properties but primarily in the interest of proper planning and sustainable communities.

1.2. Maximum Occupancy Limit

Cork City Council need to put a limit on the maximum occupancy of an apartment. Recent planning applications, e.g. O Riordan's Joinery, showed 8 bedroom apartments in the planning application, which is clearly excessive in the interest of health and safety, acceptable living standards and conditions for occupants, and proper planning.

1.3. Register of Student Accommodation

We request that Cork City Council put in place a register of Student Accommodation Houses/Complexes which includes PBSA but also ad-hoc conversions, which currently make up the vast majority of student accommodation in the city. According to the proposed variation No. 5, there is a current demand for student rental bedspaces of 13000 in the city. Only less than 4000 of these spaces come from PBSA, therefore the remaining 9000 are from private houses.

This register should contain information such as the number of bed-spaces, PRTB compliance, contact details of landlord, emergency contact details, etc. This should cover all student accommodation and be a requirement of any planning permissions, sale, etc. of houses. The contact details must be available to residents, the guards and traffic departments so they have a point of contact in the case of anti-social behaviour, illegal parking, and medical and fire emergencies.

1.4. License to be a Landlord

A licensing system be introduced such that all landlords are required to acquire a license with Cork City Council (similar to a taxi license). Given the large number of student bedspaces alone, 13000 with the majority being from ad-hoc conversions, this is necessary for accountability and would ensure that all landlords are registered and approved. The register can be used for inspection purposes, health and safety.

2. Local Planning Policy

2.1. Impact Statement for Planning Application

Any planning applications for PBSAs should require a Residential Impact Statement. In the area of Magazine Road, in a 1 kilometer radius, we will have 2500 extra students within the coming months. This impact statement should include an assessment of the ratio of student to non-student housing in the area, with particular attention paid to houses already converted in an ad-hoc manner to student accommodation. A limit must be put in place to maintain a balance between student and residential accommodation in the interests of sustainable communities.

2.2. Preservation of Areas of Architectural Conservation

Planning applications and permissions granted in an area of Architectural Conservation, that is, Magazine Road, must take into account the protection of the streetscape, vis-a-vis the protection of railings (see photos 30 to 36) and the removal of front gardens (see photos 68

to 72) and amenity space of houses. The necessary laws are already in place but are ignored by Cork City Council.

2.3. Height and Scale Considerations

Furthermore, with respect to height and scale of PBSA complexes, for every additional floor of a PBSA complex, the ratio of public space and amenity space should be correspondingly increased.

3. Public Realm

Any PBSA strategy must address the public realm and amenity space and should be taken as an opportunity to improve visual amenities, such as improving and broadening footpaths, landscaping sites and adjacent public areas, providing a good quality of finish, and ensuring any new buildings complement the existing neighbouring properties.

4. Management Plan of PBSA

While planning permission for PBSAs addresses the issue of management of sites during construction, there needs to be an **ongoing long-term management plan** agreed as a condition of planning approval from Cork City Council.

This plan should address the following:

Waste management - ongoing cleaning of the student accommodation complex. Maintenance of Exteriors - ensuring that building and perimeter walls are maintained, ie, cleaned and painted on a regular basis (see all photographs of Part II).

Upkeep of Amenity Spaces - ensuring that landscaping is maintained and kept rubbish-free.

Security - security and management of the complex.

Noise Control – measures for dealing with anti-social behaviour from students.

5. Resident Parking Permits

Special considerations for Magazine Road should be in place because of the Architectural Conservation designation, which relates to the protection of front gardens and railings. The combination of front gardens and ornate railings are unique in Cork (see photos 30 to 36) and any remaining attractiveness of the area derives mostly from their enhancement of the streetscape.

Thus this designation is supported and welcomed by residents as it contributes to the heritage of the area and the public realm. However, it means that residents must park in the street, that is, they have no off-street parking available to them.

On-street parking is unfortunately almost entirely taken up by students. Four parking permits are allowed per house and widespread abuse by students is known to take place such that up to eight permits can be used by an individual student house.

The National Transport Policy states that students do not have cars and therefore have no need for parking. We therefore request that:

5.1. The Variation must clearly state that no resident parking permits be provided for any student accommodation (both PBSA and ASA ad-hoc conversions).

5.2. Occupants of rented accommodation (non-student accommodation) should only be considered for permits when proof is provided that the property is registered with the PRTB, which is a statutory requirement.

5.3. This exclusion be clearly stated in any planning applications granted by Cork City Council.

5.4. It be a requirement of planning applications, that the developers/owners must state in any subsequent letting advertisements that on-street parking is not available to students.

5.5. A system be put in place by the City Council to red-flag these developments to ensure that students do not get resident parking permits. The Roads and Traffic department responsible for issuing permits should be notified by the Planning Department that students from any such houses or developments are not permitted to obtain parking permits.

5.6. This system be retrospectively applied to all existing student accommodation in the area, in particular to ad-hoc conversions, which make up the vast majority of accommodation in the city. The Residents Association can assist with identifying the student accommodation units. All resident

parking permits issued to students or suspected of being issued to students should be immediately revoked.

These measures are essential to support residents and sustain the quality of life for existing residents. Workers need to be able to park their cars in the evening, families with children need to be able to park close to home with babies, buggies, school children, shopping etc. The chronic and severe parking problems one of the main issues forcing families out of the area.

These combined measures would improve the quality of life for existing residents, encourage families and professionals back into the area and force a redistribution of students into other city areas and lessen the burden on Magazine Road and surrounding areas.

6. Illegal Parking

There are also serious issues with people (mainly students) parking cars on double yellow lines and/or blocking exits to parks and houses when traffic wardens are off duty usually from 7pm onwards. The students wait until 7 to move their cars.

This a serious health and safety concern as it can prevent access to streets for emergency Services and prevents the refuse services from carrying out their refuse collection (see photographs 64 to 67) of persistent illegal parking at the entrance to Coolgarten Park. On three occasions in April/May alone, the refuse collection services could not access Coolgarten Park to collect refuse. That is 20 houses with no refuse collection, which is a serious health concern.

In addition, private entrances are consistently blocked by illegally parked cars, usually student cars. The on street parking spaces are painted in such a way as to extend right to the edge of private entrances and driveways, and usually provide space for one and half cars, when located between entrances. Students will find a remaining space for half a car and park their car blocking the driveway fully or partially, thus preventing the resident from moving/parking their car.

The traffic problems of the area need to be tackled with a combination of:

6.1. Traffic calming measures be put in place on, at least, Magazine Road, where cars speed in complete contempt of the speed limit.

6.2. Bollards put in place at critical junctions (Magazine Road/Coolgarten Park, Glasheen Road/Coolgarten Park, Magazine Road/Dorgan's Road) to prevent illegal parking and in the interest of pedestrian safety.

6.3. Repainting of parking bays to take into consideration the use by residents of their driveways, that is, not having public parking spaces right up to the edge of driveways.

6.4. The provision of extra out-of-hours traffic wardens to deal the persistent problem of illegal parking in the evenings.

7. Litter

There is a serious street litter problem in Magazine Road and surrounding areas. Between 22000 and 25000 pedestrians use the streets on their way to UCC on a daily basis. Furthermore, the student houses do not manage their waste appropriately and the refuse from overflowing bins and uncollected bins blows around the area constantly.

Given the number of different waste collection companies and the fact that they collect on different days, the area is constantly awash with litter coming from these bins (see all photographs of Part II).

Additionally, when students vacate a property, they do not arrange an orderly collection of refuse but fill the front garden or rear garden, or both, with overflowing refuse bags.

Some landlords, when cleaning out the houses after the academic year, throw out and leave huge amounts of refuse and soiled mattresses in front of the houses, which they leave there for several weeks sometimes.

We request that:

7.1. A street litter management plan should be put in place which cleans the streets on a daily basis. This needs to be both manual and motorised, as the density of car parking severely compromises street sweeper vehicles.

7.2. The area needs to be proactively monitored by Cork City Council Waste Management Department to ensure that bins are collected and brought off the street after collection.

7.3. The same department should proactively patrol the area and identify and remove rubbish dumped by students and landlords.

Conclusion

In conclusion, we believe that the Variation should address not just the PBSA complexes but also the existing stock of ad-hoc conversions. The PBSAs make up a small proportion of the student accommodation in the city. The ad-hoc conversions make up 9000 bedspaces in the city. This dwarfs the bedspaces which will be provided by the PBSAs and is entirely unregulated.

Furthermore, Cork City Council receives large amounts of development contributions from the developments in our area. We request that this money be ring-fenced and used for the improvement of the general area.

Magazine Road Residents Association would welcome a meeting with Cork City planners to have an input into the proposed variation No.5 and to aid in the development of a policy on student accommodation.

Should you require any further information, please contact the undersigned, Yours sincerely,

Chairperson