

MARSTON

PLANNING CONSULTANCY

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

10th November 2021

Our Ref. 20080

Re: Planning & Development Act 2000 and the Statutory Regulations made thereunder (as amended). Third party observation by Ballyboden Tidy Towns Group, 17 Glendoher Close, Rathfarnham, Dublin 16; in relation to a Strategic Housing Development for the construction of 131 no. residential units (21 no. houses, 110 no. apartments), crèche, retail unit and associated site works at Stocking Lane, Ballyboden, Dublin 16.

An Bord Pleanála Ref. TA06S.311616

Date of application: 11th October 2021

Period for observations ends: on or before end of 15th November 2021

Dear Sir / Madam

We, Marston Planning Consultancy, 23 Grange Park, Foxrock, Dublin 18, are instructed by our clients the Ballyboden Tidy Towns Group, 17 Glendoher Close, Rathfarnham, Dublin 16 to make the following submission to An Bord Pleanála in respect of this Strategic Housing Development application for approval lodged by MacCabe Durney Barnes Limited (the applicant), for the above described development. We note that an earlier SHD application at the subject site was refused by An Bord Pleanála recently under ABP Ref. PL06S.308763 (as identified in the planning history section of this submission).

In accordance with the statutory regulations, we enclose a cheque made payable to An Bord Pleanála for the appropriate statutory observation fee of €20. Our submission and the full reasons and considerations upon which this is based are set out below. We have also included with this submission the traffic assessment of the original application by Martin Peters and Associates. Whilst the scheme differs in a number of ways from the original scheme, a number of the issues relating to Stocking Lane, and lack of public transport capacity remain. We would be grateful if the Board would consider this, in this context.

We confirm that the submission is made within the statutory five week period in accordance with the Planning and Development Regulations 2001 (as amended). We have inspected the subject site and examined the planning drawings and other particulars that form part of this Strategic Housing Development (SHD) planning application.

1. Overview

The SHD nature of this application and the difference in development form of the proposal to its surrounding context requires the Board to consider this application in a thorough and comprehensive manner relative to the relevant local, regional and national policies. This assessment must include whether the applicant has taken the correct approach to the overall design, layout and scale of development within its local context; and whether policies and objectives of the South Dublin County Development Plan 2016-2022 are being upheld by the proposal and that they are not in conflict with Regional and National planning policies.

It is not in question in this instance as to whether the principle of residential development is acceptable on the site given the zoning of the site, nor is it in question that all planning policy at a local, regional and national level is pushing for higher residential densities at appropriate locations. However, we respectfully submit that in this instance the subject site is not an appropriate location for the scale, density, height and layout proposed at the subject site. The proposed development will be injurious to existing residential amenity of adjoining

residential developments and lacks access to high frequency public transport modes and must therefore be refused by An Bord Pleanála.

Prior to outlining the detailed grounds for our client's observation it is useful that the context of this application is laid out before the Board.

2. Subject site and environs

The subject site is a greenfield site that is bounded by a strong tree line apart from at its furthest eastern edge, and is located to the east of Stocking Lane (R115), Dublin 16. The gross site area is c.2.47 ha. Two letters of consent are included with the planning application, one from a private individual (E. Barnes) and the other from South Dublin County Council (both letters date from April 2021). The Council owned lands relates to part of Stocking Lane which the applicant has included for the provision of connections at the south-west and north-west corner of the application site. The site rises by c. 5m from north to south across the site.



Aerial view of application site (source: Google Earth)

The site is bound to the north by 4 no. detached dwellings set within landscaped grounds that includes no. 4 Stocking Lane (Saint Winnows and outlined in blue) that is also owned by the applicant. The site is bound to the east by the Springvale residential estate that comprises of two storey semi-detached and terraced dwellings. A notable feature of this estate is that its access road that bounds the application site to the east sits c. 2m below the existing ground level of the subject site, with a high retaining wall with a wire boundary fence marking the boundary.

The site is bound by the cul-de-sac part of the Springvale estate as well as two storey houses of Prospect Avenue and Prospect Heath part of a residential estate to the south. It is notable that the boundary with this part of Springvale is formed by a low stone wall and by rear garden fencing along Prospect Avenue. These houses also appear to sit below the prevailing ground level along the southern boundary. The site is bound to the west by Stocking Lane. The boundary of the subject site along Stocking Lane is formed by existing mature trees and hedgerows. The Ballyboden Water Treatment Plant bounds the western side of Stocking Lane opposite the application site.

The applicant refers to a key constraint within the site, namely an Irish Water pipe that traverses the site in an east-west route. The planning report submitted as part of the SHD application sets out that the constraint of the 600 mm Irish Water pipe c.4 metres underground is critical to the Ballyboden reservoir operation as it acts as an emergency overflow pipe and leads to the Owendoher River that is known to be used by otters for feeding and commuting. The applicant has completely failed to adequately assess the impact of the proposed development on this habitat under the application and Screening for Appropriate Assessment that accompanies the application. There is a building free 10m wide zone over the pipe.

Public transport in the area is very limited and already at capacity during peak travel times due to completion of a significant new development on Stocking Lane (Scholarstown Wood), and will become further congested due to the recent permissions that have been granted by the Board to the south of the M50 and other ongoing

applications in the area. These include the following as well as a HSE Primary Care Centre on Edmondstown Road that was granted by ABP against the recommendation of its Inspector:

- White Pines East SHD (ABP Ref. TA06S.309836) – 241 units – granted with conditions
- White Pines Central SHD (ABP Ref. TA06S.310398) – 114 units – granted with conditions
- Ballycullen SHD (ABP Ref. TA06S.310578) – 329 units – granted with conditions
- HSE Primary Care Centre on Edmondstown Road

3. Recent Planning History

South Dublin County Council Reg. Ref. SD18A/0225– Refusal for Residential Development

On 13 August 2018 South Dublin County Council refused permission for 95 residential units, a crèche and a shop on the subject site. There are some significant similarities between the 2018 scheme and the current proposal.

In summary the 8 no. detailed reasons for refusal related to the following:

- Contrary to the Development Plan policy for residential development. The proposed development would seriously injure the amenity of the properties in its vicinity. Contrary to proper planning and sustainability of the area.
- Public Open Space/Children's Play Area – inadequate and substandard
- Proposals does not comply with DMURS
- Surface Water Layouts – Planning Authority was not satisfied that the proposal would provide adequate and appropriate surface water drainage
- Issues with the design of the proposed single aspect apartments
- Poor Urban Design demonstrated throughout the proposed development
- Failure to meet minimum housing and apartment requirements
- Unsatisfactory Landscape Plan.

It is notable that the refusal was so emphatic that the applicant chose not to appeal the decision to An Bord Pleanála. It is notable that no vehicular access to Springvale was proposed with only a pedestrian link connecting the subject site and the nearby residential estate.

Recent SHD Development Refusal at the subject site (An Bord Pleanála Ref. 308763-20) Refused 25th March 2021

The site was subject to a SHD application that was made in November 2020. On 25th March 2021 An Bord Pleanála issued a refusal for a Strategic Housing Development at the same site of the current application of c.2.47ha.. The applied for development under that SHD comprised:

- 131 residential units including:
 - 21 houses (11 no. 4-bed; 10 no. 5-bed) of up to two-storey plus roof storey.
 - 51 duplex apartment units (11 no. 1-bed; 23 no. 2-bed; 17 no. 3-bed) in seven blocks of up to three-storeys.
 - 59 apartment units (18 no. 1-bed; 38 no. 2-bed; 3 no. 3-bed) in three apartment blocks up to four-storeys.
- A creche of c. 128 sqm at the ground floor of Block L.
- A shop of c. 65 sqm at the ground floor of Block G, with associated storage.
- A total of 167 car parking spaces, of which:
- 88 are at surface level and 79 in the basement under apartment Blocks F and G, of which 5 are dedicated visitor parking spaces.
- A total of 288 cycle parking spaces and 5 no. motorcycle spaces.
- A new vehicular access onto Stocking Lane.
- A new vehicular and pedestrian/cycle access to the Springvale estate to the east.
- New roads, footpaths and cycle paths and connections within the site
- A new pedestrian crossing on Stocking Lane to the north west.
- The expansion and upgrade of the existing pedestrian crossing on Stocking Lane to the south west. The development also includes landscaped private and public open space, boundary treatment, lighting, play

area, an ESB substation, site drainage works and all ancillary site development works above and below ground.

An Bord Pleanála refused the proposed development for one detailed reason as follows:

'Having regard to the provision of the South Dublin County Development Plan 2016-2022, specifically Housing (h) Policy 9 – Objective 3 requiring proposals to comply with Section 11.2.7 of the South Dublin County Development Plan 2016-2022, which states that new residential development that would adjoin existing one and/or two-storey housing, shall be more than two storeys in height, unless a separation distance of 35m or greater is achieved, and to the form, height layout of the proposed development, it is considered that the proposed development materially Planning Report, Statement of Consistency & Material Contravention contravenes the Housing (H) Policy 9 – Objective 3 of the South Dublin County Development Plan 2016-2022.

Furthermore, the statutory requirements relating to public notices and the submission of a material contravention statement have not been complied with by the applicant. Accordingly, the Board is precluded from granting permission in circumstances where the application is in material contravention of the development plan and where the statutory requirements referred to above have not been complied with.'

Reg. Ref. SD21A/0194 / ABP Ref. ABP-311559-21

This application for three detached houses on lands immediately adjoining the site, to the north, is at appeal stage following its refusal of permission by South Dublin County Council. The first party, who are the same in this instance, appealed the decision, and the appellant (Matt & Lucia Barnes, who are substantially the same applicant as in this instance) has requested that ABP can examine the two applications at the same time and has denied that it is fragmentation / project splitting. However, under the application there is consistent reference to the SHD and that ABP can consider them both collectively, but each on its merits.

Commentary on Planning History

We respectfully submit that the applicant has failed to address the key planning and sustainable development concerns relating to the nature and extent of the proposed development at the subject site. We also note that the proposal once again provides a greater density of development at the subject site and does little to address or rectify South Dublin County Council's recent reasons for refusal for residential applications at the subject site in terms of the proposed layout of the development and the impact of the proposed development on the amenity of adjoining properties in its vicinity.

4. Proposed development

As set out in the statutory notices, the proposed development at the subject site of c.2.47ha on lands at Stocking Lane, Dublin 16, consists of:

- 131 residential units including:
 - 21 houses (1 no. 3-bed; 11 no. 4-bed; 9 no. 5-bed) of up to two-storey plus roof storey.
 - 2 duplex apartment units (2 no. 2-bed) in a three storey high block.
 - 108 apartment units (29 no. 1-bed; 59 no. 2-bed; 20 no. 3-bed) in ten apartment blocks up to four-storeys
- A crèche of c. 128sqm at the ground floor of Block L.
- A shop of c. 65sqm at the ground floor of Block G, with associated storage.
- A total of 167 car parking spaces, of which:
- 88 are at surface level and 79 in the basement under apartment Blocks F and G, of which 5 are dedicated visitor parking spaces.
- A total of 288 cycle parking spaces and 5 no. motorcycle spaces.
- A new vehicular access onto Stocking Lane.
- A new pedestrian/cycle access to the Springvale estate to the east.
- New roads, footpaths and cycle paths and connections within the site
- A new pedestrian crossing on Stocking Lane to the north-west.

In terms of unit mix the proposal provides for:

- 29 no. 1 bedroom apartments;
- 61 no. 2 bedroom apartments;
- 20 no. 3 bedroom apartments;
- 1 no. 3 bedroom house;
- 11 no. 4 bedroom houses; and
- 9 no. 5 bedroom houses.

The proposed development also includes the expansion and upgrade of the existing pedestrian crossing on Stocking Lane to the south-west; as well as landscaped private and public open space, boundary treatment, lighting, play area, an ESB substation, site drainage works and all ancillary site development works above and below ground. Having examined the planning application plans and particulars we note that the statutory notices have not set out that the proposal includes the following:

- The provision of a management office of 24sqm
- The area of the proposed ESB substation is 14sqm
- The full nature of the pedestrian/cycle access to Springvale is to provide “emergency access” and includes sets of “retractable bollards” which appears on the proposed site layout plan. The details of this emergency access are not elaborated upon with the SHD application. Therefore the proposed link/access to Springvale is not purely for pedestrians and cyclists as set out in the statutory notices it also intended to serve as vehicular function in emergencies. However it is not clear under what precise circumstances it will be utilised nor who will manage this.

The key differences between the proposed SHD development and the previous refused scheme:

Whilst the number of units remains the same under the current application, the mix of unit types has been changed by the applicant so that there is a significant greater number of apartments; and that the access from Springvale will be pedestrian / cyclist only with emergency access also allowable with the removing of bollards.

In addition, the Planning Report, Statement of Consistency and Material Contravention Statement prepared by MDB sets out further amendments that have been made to reflect recommendations of the An Bord Pleanála Inspector relating to the previous SHD ABP-308763-20. These include:

- Waste storage for block M.
- Updated ecological surveys.
 - Amendments to dark zones and lighting proposals to avoid impacts on bats.
- House 15 in Block D was amended to a dormer bungalow.
- Minor amendments to blocks H,K,J and M to convert from duplex units to apartments.

It is clear however, that these changes were relatively minor in the context of the overall proposal.

5. Grounds of submission

The full grounds of our clients’ submission together with the arguments, reasons and considerations upon which it is based is set out below. We respectfully submit that the proposed development, by nature of its scale, density, design and layout at this location would be seriously injurious to the amenities of the area and would be contrary to the proper planning and sustainable development of the area and should be refused.

Height - Overbearing impact on Stocking Lane and Residential Amenity of adjoining residential properties

There are a range of heights proposed within the subject site, from 2 - 4 storeys. The apartment blocks are identified as 3 and 4 storey and the houses/duplexes range from 2 - 3 storey in height. The 3 storey apartment blocks are primarily positioned at the boundaries of the subject site, and the 4 storey blocks are generally located at the main entrance to the site (off Stocking Lane) and along the main internal route within the site, as shown in the building height key plan excerpt on the following page.

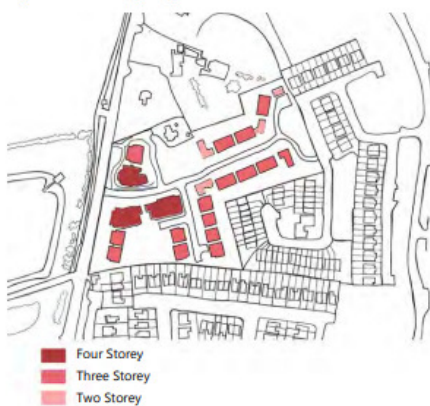
The South Dublin County Development Plan 2016-2022 includes the following objectives:

- H9 Objective 2 “*To ensure that higher buildings in established areas respect the existing context*”

The immediate surroundings of the subject site are characterised by detached dwellings and low density residential development at Prospect Avenue/Prospect Heath (adjoining the sites southern boundary) and

Springvale (adjoining the sites southern and eastern boundary). The increasing of heights at the boundaries of the site is in complete contravention of this policy objective, and is a strong grounds for refusing permission in this instance.

Figure 25: Building Heights



Extract from Figure 25 Building Heights (page 38) as per the Stocking Lane Concept Plan and Design Criteria Statement prepared by Matt Barnes Architects

Negative impact on Adjoining Residential Amenity

We refer the Board to the positioning of the proposed standalone apartment Blocks – including Blocks H, J and K (all 3 storey) that are all located in close proximity to the southern boundary of the subject site close to the rear gardens of the existing dwellings at Prospect Heath and Prospect Avenue. We also note that the Landscape drawing no. 1490-2012 prepared by PC Roche identifies that basement vents are to be located at the boundary of the site with adjoining properties to the south.

The proposed site layout plan (drawing no. 2183-12-A) prepared by Matt Barnes Architects identifies that Block H is c.4.2 m, Block J is c. 2.3 m and Block K is c. 6.6 m from the southern site boundary. The gable end of these blocks address the southern boundary of the site. The gables are 3 storey overall, designed as blank featureless elevations which will have an overbearing impact on the rear gardens of the existing residential properties at Prospect Avenue and Prospect Heath. The location of the proposed Apartment Blocks in close proximity to the boundary of the site as well as their orientation and poor articulation proximate to the existing dwellings will have a negative impact on the residential amenities (i.e the rear gardens) of these properties.

In addition, Apartment Block K (3 storey) is located between 12.3m and 12.9m from the boundary with part of the Springvale residential development (No. 65-73). Block K will significantly overlook the rear gardens of all these properties at Springvale materially denuding their privacy and amenity. In addition, the proposed houses that form part of the proposal back onto the side are c. 12.3m from the rear garden of no. 73 Springvale. Several units will be located in close proximity to no.73, and we note these houses will impact the side, rear and front of No. 73 Springvale. The property will be left with no amenity space that has any privacy and will be negatively impacted by Block K and the proposed new houses.

The positioning and scale of the proposed apartment blocks will be highly overbearing when viewed from the rear gardens of Prospect Avenue, Prospect Heath and part of the Springvale estate as well as when viewed from the main road at Stocking Lane. The massing and scale of the proposed development will be significantly overbearing to adjacent residential properties at the southern and eastern boundaries of the site and will result in the overshadowing of rear amenity spaces of surrounding residential properties.

The positioning as well as the proposed height, scale and form of the proposed apartment blocks and the heights of the proposed houses does not have regard to the existing built context of the area; have not been adequately designed, or positioned having regard to the specific topography of the subject site and are contrary to the proper planning and sustainable development of the area.

The noted exception to this is the existing property (which is identified as located within a blue line on the Architectural drawings – i.e in the ownership/control of the applicant) at the northern boundary of the site – which has been buffered by a large open space/amenity area (proposed within the subject site). This particular

consideration and approach has not been afforded to other existing residential developments adjoining the subject site at the southern and eastern boundaries. This amounts to a poorly conceived design rationale for the overall site.

Negative impact on Stocking Lane

The Ballyboden Water Treatment Plant located directly opposite the subject site is open in nature, with the existing buildings set well back from Stocking Lane. There is no built form directly addressing Stocking Lane. There is no “urban edge” at the opposite side of the lane, nor is there a “strong urban edge” created to the immediate north or south of the subject site along Stocking Lane. Stocking Lane has a particularly unique visual character within the existing wider urban context. When viewed from Stocking Lane (refer to the CGI Views 1 and 2 below as submitted with the SHD planning application) this will result in a form of development which is overbearing and highly dominant within the existing context which has a “rural feel” at present.

This proposal constitutes a large residential scheme with associated ancillary elements including a crèche and a shop, An Bord Pleanála recommendation to provide a strong urban edge (as referenced in the previous SHD application) along Stocking Lane should not be treated or interpreted as an invitation by the applicant to introduce a form of development at this location which would detract from the existing environment nor one which will dominate it visually.

The proposed form of development along Stocking Lane will remove the historical hedgerow and planting along this boundary that contributes significantly to the character of the area; at the detriment to the visual amenity as well as the biodiversity of the area and will create an overbearing, dominant and visually obtrusive form of development at this location.



CGI Proposed View 1 (addressing Stocking Lane)



CGI Proposed View 2 (addressing Stocking Lane)

New pedestrian/cycle access to the Springvale Residential Development – which is also reference as “emergency access” within the SHD documentation

Part of the proposals includes the creation of a new pedestrian/cycle access connecting the subject site to the existing residential development at Springvale. This is described in the statutory notices. The new access will be located at the eastern boundary of the subject site (as illustrated in CGI no. 4 of the SHD planning application and Figure 3.3 of Aecom’s Traffic and Transportation Assessment).



Figure 3.3 – Proposed Secondary Bicycle and Pedestrian Access into Springvale (AECOM Drawing: PR402491-ACM-01-00-DR-CE-10-0001)

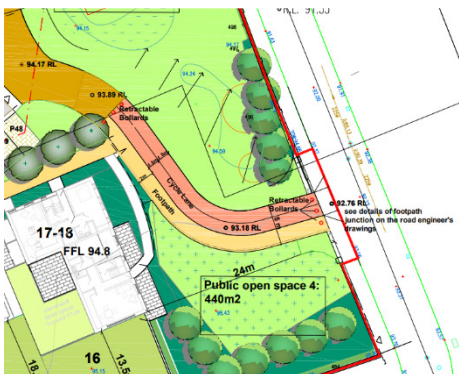
CGI Proposed View 4 (proposed cycle/pedestrian link to Springvale) and Extract from Aecom's Traffic & Transportation Assessment (Figure 3.3)

Contradictions in terms of the proposed linkage to Springvale

The proposed site layout plan (extract provided below) prepared by Matt Barnes Architects refers to the provision of “retractable bollards” at two points along the pedestrian/cyclist access to Springvale. The reference to “retractable” is of concerns as it leads one to believe that the proposed pathway could be potentially utilised by vehicles at some point in the future.

We note that section 12 of the Planning Report, Statement of Consistency and Material Contravention (which is a combined report) prepared by MDB refers to a “pedestrian, cyclist and **emergency access to Springvale**”. (bold our emphasis). We note that this statement is at odds with the wording in section 4.4 of the very same report by MDB which specifies that “The access road to the east to Springvale is proposed with **fixed bollards. The access will be used for pedestrians and cyclists**”. (our emphasis). There are conflicting descriptions within the applicant’s reports as well as the drawing material submitted with the SHD material.

The use of the access to Springvale for emergency access purposes is not expressly set out in the statutory notices nor is it referenced or addressed in the Traffic and Transport Assessment report prepared by Aecom. The notices simply refer to “A new pedestrian and cycle access to the Springvale estate to the east.” The application in this case has identified on the one hand that the access to Springvale is for pedestrian and cyclist linkages (as per the statutory notices) while on the other hand identifying it is also to provide emergency access (within the MDB report). There are no further details relating to the nature of the emergency access nor how it is to be management by whom and under what circumstances. Despite the applicants acknowledgement within the MDA report that “There was also significant local opposition to this link to Springvale from the residents of that estate” relating to the previously refused SHD development at the subject site, the SHD documentation and particulars has failed to provide, in our considered opinion, sufficient clarity in relation to the proposed link and access at Springvale and its intended function. These are fundamental omissions from this SHD planning application which are of particular concern to our clients.



Proposed Site Layout Plan extract which refers to provision of “retractable bollards” to the pedestrian and cycle link to Springvale

We note in that the previous SHD planning application (which was refused) provided for a vehicular/pedestrian and cycle access to Springvale. The Inspectors Report relating to the refused SHD recommended that the vehicular access be omitted if the scheme were granted. We note that the Boards Inspector stated that “the alignment of the road features relatively acute bends, steep inclines and the road is also used informally for car parking by residents”. In addition in section 12.7.18 the Inspector sets out “In conclusion, I am satisfied that sufficient rationale or justification for the vehicular route through Springvale, either in a permanent or for exclusive periods of the day, is not in evidence nor has it been provided as part of the application” and proceeds to state that “Consequently, this secondary vehicular access aspect of the proposed development should be omitted in the event of a permission and a revised layout for the associated area should be provided as a condition, in the event of a grant of planning permission. Accordingly, a grant of permission for the proposed development would need to ensure that the development would be capable of solely being served by the proposed vehicular access off Stocking Lane”.

The inclusion of a pedestrian and cyclist entrance from the proposed development as well as the provision of an “emergency access” via the existing residential development at Springvale is in our considered opinion completely unjustified, unnecessary, contrary to the proper planning and sustainability of the area and is of particular concern to local residents that currently enjoy the amenity of their residential area.

We note the An Bord Pleanála's commentary on the existing road network at Springvale (referenced above). The existing road network within Springvale is narrow and there are two 90 degree turns. Existing residences within Springvale can confirm that these turns are blind to approaching traffic. At present on a daily basis vehicles have to pull in, in order for cars to pass safely. It is notable that at present, bin trucks have to reverse around the existing bends due to the fact that there is not enough room to turn.

The proposed development will result in increased pedestrian and cyclist volumes within an established residential area which experiences high levels of self-generated vehicular, pedestrian and cyclist traffic within a confined internal road network, that is already subject to several local SHD developments that putting a significant strain on the local road and other transportation infrastructure. Coupled with this there is reference in the application to the use of the access for emergency purposes the nature of which is not set out.

There is particular concern in terms of increased pedestrian and cyclist activity within the Springvale estate, there remains concern that the additional road users will have limited vision of the traffic coming from the right when exiting the subject site. This would also apply to the use of the access for emergency vehicles. The existing road curves to the right so that there is no clear view of oncoming traffic. As a result there are road safety concerns arising which will impact on the residential amenity of this area, result in traffic hazards and conflicts between cycle, pedestrian and vehicular traffic and public safety concerns. In this regard it is considered that the proposed development is contrary to **TM Policy 3** on Walking and Cycling of the South Dublin Development Plan states: "*It is the policy of the Council to re-balance movement priorities towards more sustainable modes of transportation by prioritising the development of walking and cycling facilities **within a safe and traffic calmed street environment***".

While the intension of the proposed cycle and pedestrian access to Springvale is to promote east-west permeability through the SHD site, it is considered that the proposal is materially in contravention of the following objectives of the South Dublin Development Plan:

TM3 Objective 2: *To ensure that connectivity for pedestrians and cyclists is maximised in new communities and improved within existing areas in order to maximise access to local shops, schools, public transport services and other amenities, **while seeking to minimise opportunities for anti-social behaviour and respecting the wishes of local communities.***

TM3 Objective 3: *To ensure that all streets and street networks are designed to prioritise the movement of pedestrians and cyclists **within a safe and comfortable environment for a wide range of ages, abilities and journey types.***

The proposed access into Springvale is not supported by the local residents and the wider community. The proposal will negatively impact the residential amenity of the existing residents, result in road safety hazards, increased pedestrian and cyclist activity as well as increases in on-street car parking as a result of residents of the subject proposal utilising Springvale for quicker access to their places of work etc. and due to the lack of available parking within the proposal. In combination the proposed access will result in traffic, pedestrian and cyclists conflicts within the very narrow road network at Springvale, all of which is contrary to TM3 Objective 2 and TM3 Objective 3.

There is a clear lack of information in relation to the true nature of the proposed access to Springvale, this gives the residents of the area little comfort that over time if constructed that the proposed pedestrian and cycle path (which has its own particular concerns as referenced in this section of the submission) could potentially become a permanent vehicular access at this location over time. An Bord Pleanála should scrutinise this aspect of the scheme and it is incumbent that the emergency vehicle access, which appears unwarranted, is removed from the application, and if the Board are mindful to grant permission, irrespective of other issues, should remove by condition this vehicular access for emergency vehicles. Any need to retain it from a proper planning and sustainable development perspective indicates the poor quality of the main access to provide access to the site.

In addition to the above, by providing a pedestrian link between the proposed development, via the existing Springvale estate, we respectfully submit that the proposal will result in future residents and visitors parking within the narrow road network of the Springvale residential development. This will occur due to the provision of the proposed pedestrian/cycle link coupled with the limited car parking provisions proposed by way of the SHD application (167 spaces allocated to 131 new residential units – which includes 2 and 3 bed apartments as well as larger 4 and 5 bed roomed residences, a shop and a crèche). This will result in a loss of on-street

parking, residential amenities and a further deterioration of the already compromised internal road network at Springvale.

In this regard we refer An Bord Pleanála to table 3.1 of the Aecom Traffic and Transport submitted with the SHD planning application, the table sets out the maximum car parking requirements which Aecom identifies as 186 for the proposed development due to it being recognised that it does not have ready access to local facilities and high quality and frequency public transport. The lack of car parking provision is a material contravention of the County Development Plan that will result in a negative impact on the residential amenity of neighbouring residents.

Vehicular Traffic Proposals via a new entrance at Stocking Lane

All of the vehicular traffic generated by the proposed development will be channelled via Stocking Lane. The proposed development will generate a significant level of car borne traffic contrary to local and national planning policy. The public transport infrastructure is such that residents will favour the private car above that of the use of more sustainable modes and indicates that the proposed development site is not a suitable site for a high density SHD development, and should be refused.

The proposed development is not in a sufficiently accessible location for the scale of development proposed and would lead to significantly increased traffic congestion and road safety hazards which cannot be appropriately mitigated. Given this, we respectfully request that the application be refused. This is compounded by the lack of car parking spaces when balanced against the poor public transport connectivity that are significantly below even the most moderate interpretation of car parking requirements for a development such as this.

Drainage

As set out in the Planning History section it is noted that one of the key reasons for refusal (reason for refusal no. 4) of a previous scheme (for a 98 no. residential unit development) on the subject site related to the surface water arrangements. We note that a Feasibility Statement from Irish Water is submitted with the application that is dated the 30th May 2019 and relates to 122 units, compared to the . This is now over two years out of date, and relates to the original scheme that has been significantly altered under this application. We also note that the Statement of Design acceptance is from August 2020, and as it pre-dates the 2020 application being lodged it is reasonable to conclude, which is backed up by the documents attached to the letter that it relates to the original 2020 SHD application that was refused by the Board (Ref. 308763-20). The validity and ability to use these for the current application must be severely questioned by the Board, given the change in design and number of units as neither relate to the current application. This is even more relevant given that Ringsend Waste Water Treatment Plant is operating at or above capacity, and the delay in the Greater Dublin Drainage Scheme.

Notwithstanding the above issue, the Irish Water pipe that traverses the subject site remains a key constraint. The constraint of the 600 mm Irish Water pipe c.4 metres underground that requires a 10m wide wayleave is critical to the Ballyboden reservoir operation as it acts as an emergency overflow pipe and leads to the Owendoher River. The SHD application states that it has been designed around this key constraint within the site.

It is noted that basement car parking is proposed under apartment Blocks F and G. These blocks appear to be located in close proximity to the existing Irish Water pipe within the subject site. Having examined the material submitted with the SHD planning application it is unclear if the proposed basement has been the subject of detailed assessment by the applicant's Engineers in the material/reports submitted with the planning application in terms of its impact on the wayleave through the site. Any such impact must be considered as a material contravention of Policy IE1 Objective 1 of the County Development Plan.

In addition, having examined the Engineering Drainage Report prepared by OBA Consulting Civil and Structural Engineers, it appears that there is no reference to the previous refusal for residential development at the subject site, one of the reasons for refusal related specifically to surface water drainage (reason no. 4 attached to the refusal for South Dublin County Council Reg. Ref. SD18A/0225). The Engineering Report submitted with this SHD application has failed to reference, identify and demonstrate that South Dublin County Council's previous concerns relating to surface water drainage at the subject site have been adequately addressed by the applicant.

Inadequacy of the Ecological Surveys and Appropriate Assessment Screening Report

The applicant has included an Ecological Impact Assessment report as part of the SHD Planning Application material. The report was prepared by NM Ecology Ltd – Consultant Ecologists. We note that the water pipe through the site connects to the Owendoher River that is a feeding and commuting habitat for otters. This information is clearly set out in the Dublin City Council report dated August 2019 known as the *Dublin City Otter Survey : An Action of the Dublin City Biodiversity Action Plan 2015-2020*. The application, ecological survey and Appropriate Assessment submitted as part of the application completely fails to assess the impact of the proposed development on this important ecological habitat and biodiversity connection. In addition we note that the Appropriate Assessment fails to assess the impact of the proposal on the Owendoher River and its connectivity to Natura 2000 sites in Dublin Bay.

The nature and extent of the bat survey on the 16th September 2021 is unclear. The survey data appears to be entirely focussed on the western boundary of the site. The ability on such data, and a survey that is over 3 years old must be severely questioned by the Board.

We respectfully submit that the material submitted with the SHD planning application cannot therefore be relied upon in order to fully assess this application, and that the precautionary principle should be applied and the application be refused.

Screening for Environmental Impact Assessment

The Planning Report, Statement of Consistency Report and Material Contravention report prepared by MDB includes a screening for Environmental Impact Assessment section (section 8). We refer An Bord Pleanála to the recent recent judgment by Justice Humphrey on 10th May 2021 in *Waltham Abbey Residents Association v An Bord Pleanála & Ors*¹ which referred matters relating to screening for Environmental Impact Assessment. We refer An Bord Pleanála to the list of items that should be considered as part of the screening exercise as set out in paragraph 22 of the judgment. The screening report submitted as part of the proposed SHD development should be scrutinised in this regard.

Tree Survey Report – Based on outdated surveys

The applicant has included a Tree Survey Report prepared by CMK Hort and Arb as part of the SHD planning application material. The report identifies that the fieldwork was undertaken between 12th and 14th July 2017. There is no reference to any subsequent fieldwork after this date. Despite the fact that there was a recent refusal for an SHD application at the subject site there is no justification as to why the tree surveys were not updated in advance of lodgement of this SHD application. It is noted that the 2017 surveys are also referenced in the Arboriculture Impact Report prepared by CMK Hort and Arb.

This is despite the fact that the 1st SHD application was lodged in November 2020 (resulting in a refusal) and a 2nd SHD application (the subject of this submission) was lodged in October 2021. At the time the applications were made the tree survey fieldwork was well over 3 – 4 years old.

We would severely question the validity of the fieldwork given the lapse of time since it was undertaken, the date that the SHD was lodged and the further lapse of time up to the determination of the SHD by An Bord Pleanála. We are of the considered opinion that the Tree Survey fieldwork findings which forms the basis of the Tree Survey report and inform the Arboriculture Impact Report submitted with the SHD planning application is significantly out of date and cannot be relied upon in order to fully assess the proposed SHD application.

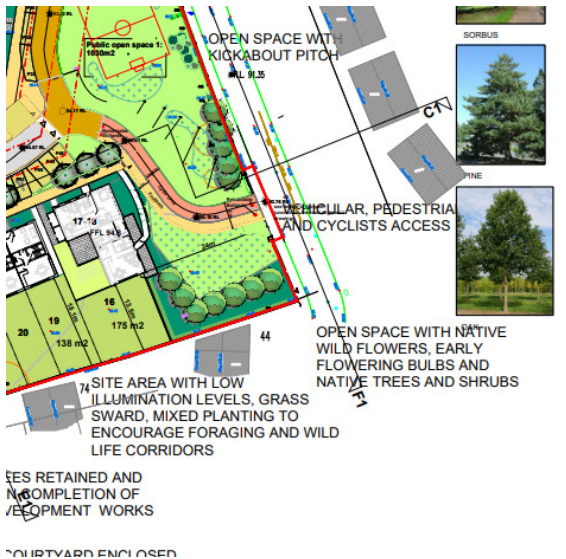
Traffic Surveys – based on outdated surveys

Section 5.6 of the Traffic and Transport Assessment prepared by Aecom identifies that the Traffic Survey Data were undertaken in December 2017. At the time that the SHD application was lodged in October 2021, the counts were almost 4 years old. Despite the refusal of the previous SHD and the opportunity to undertake new updated Traffic Surveys since that refusal in advance of submitted the second SHD proposal at the subject site the applicant has not taken the opportunity to do so. It is considered that the counts were outdated at the time of lodgement of this SHD proposal before An Bord Pleanála and cannot be relied upon as accurate in order to fully assess the proposed SHD application.

¹ [2021] IEHC 312

Landscape Plans – shows vehicular, pedestrian and cyclist access via Springvale

In addition we note that the Landscape Strategy Proposal drawing no. 1490 -2011 prepared by PC Roche includes a label in close proximity to Springvale which refers to a “Vehicular, Pedestrian and Cyclist Access” (refer to the extract from the drawing below). Again this drawing does not represent the proposals referenced in the statutory notices which identifies the access to Springvale as pedestrian and cycle not for vehicular purposes. The landscape drawing is at odd with the statutory notices.



Extract from Landscape Strategy Proposals drawing no. 1490-2011 prepared by PC Roche

This is in complete odds with the Landscape Report prepared by PC Roche and Associates (page 14), which refers to “vehicular link with controlled stainless steel bollards” in relation to the proposed pedestrian and cycle access to Springvale estate. This statement relates to the previous SHD application at the subject site which was refused. In addition page 15 of the Landscape Report refers to “River Suir”. This reference does not relate to this particular SHD proposal.

The Landscape report does not appear to be referring to the revised SHD development as per the statutory notices. It is not clear if the final version of the Landscape Report has been included on the SHD website.

Land Ownership

The applicant has identified in the SHD application form that they do not own any adjacent land. However we note the Site Location Map includes lands outlines in blue which are referenced in the drawing legend as being in the applicant’s ownership. We also refer the Board to the other lands to the north that are subject of the application that was refused by the Planning Authority under Reg. Ref. SD21A/0194 that is currently on appeal with the Board.

Impact on Property Values

The proposed development will have a negative impact on the value of properties adjoining the boundaries of the subject site given the profound overbearing nature of the proposed development, the decrease in light and overshadowing, privacy, significant loss of residential amenity, traffic impacts arising and safety concerns which will occur as a consequence of the proposed development.

6. Conclusion

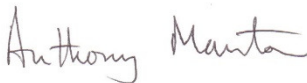
We respectfully submit that the applicant has failed to adequately address the concerns of our clients in terms of respecting the appropriate density and building heights that the subject lands should be developed at. Given the zoning, the principle of residential development on this site is not open to question, however what needs to be adjudicated upon carefully is the proposed layout; the lack of transition in scale to the edge of the site; and the lack of justification for the pattern and scale of development being proposed. When coupled with the planning history on the subject site that includes a very recent refusal of permission, we submit that this must lead the Board to a refusal of permission in this instance.

Furthermore, we are of the considered opinion that the residential density proposed in this instance is not justifiable at this location and will have a knock-on negative impact upon the quality of the development and layout but also more importantly on the residential and visual amenities of the surrounding residential areas which directly adjoin the subject site.

We respectfully submit that the uninspiring design reflects the ill-considered approach to the development of this site. The design will be incongruous and will be overbearing to adjoining residential properties. We respectfully submit that when considering all elements of this SHD application it is incumbent on the Board to reach conclusions that the proposal reflects a design and layout that has not addressed or respected the site or context. We respectfully submit that the proposal cannot be justified at the proposed mass, height and density proposed and that it would be contrary to the proper planning and sustainable development of the area.

We request the Board to assess this application based on these considered and objective planning matters and to refuse permission on the basis that the development will be contrary to the building height guidelines for the area; would result in excessive residential density for this location with inadequate high capacity public transport; and would therefore be contrary to the proper planning and sustainable development of the area including the preservation and improvement of amenities thereof. We trust that An Bord Pleanála will give due consideration to all matters raised in this submission and request that planning permission be refused for the proposed development.

Yours faithfully,

A handwritten signature in cursive script that reads "Anthony Marston".

Anthony Marston (MIPI, MRTPI)
Marston Planning Consultancy

TECHNICAL NOTE (TN01 – Traffic and Transport Considerations)

Stocking Lane SHD

Ballyboden

Dublin 16

Prepared
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INTRODUCTION

▪ Background

- 1.1.1 This Technical Note has been prepared by MPA Consulting Engineers on instruction from Marston Planning Consultancy and on behalf of Ballyboden Tidy Towns Group. It relates to the proposed Strategic Housing Development (SHD) on land at Stocking Lane in Ballyboden, Dublin 16.
- 1.1.2 A planning application has been submitted to An Bord Pleanála (Case Number: ABP-308763) by MacCabe Burney Barnes in accordance with the Planning and Development (Strategic Housing Development) Regulations 2017. The scheme comprises 131 residential units plus a retail unit and a crèche.
- 1.1.3 Ballyboden Tidy Towns Group object to this proposed development. This Technical Note provides a critical assessment of the proposed scheme (and the information submitted by MacCabe Burney Barnes) from a traffic and transport perspective.
- 1.1.4 The application documents contain information dealing with the potential impacts of the proposed development in relation to the following traffic and transport related issues:
- Site Access;
 - Parking and Servicing;
 - Trip Generation and Distribution;
 - Operational Capacity; and,
 - Road Safety.

▪ Site Location

- 1.1.5 The site is located on the southern outskirts of Dublin in the Ballyboden area of the City. It is located to the east of Stocking Lane (the R115) as shown overleaf in **Figure 1.1** and **Figure 1.2**.
- 1.1.6 The R115 leads along the western edge of the site providing a link between Scholarstown Road (the L4016/R115) to the north and the Dublin Mountains to the south (as Killakee Road).
- 1.1.7 Scholarstown Road provides a connection to the R116 Ballyboden Road to the north east of the site and, in turn, leads to the R113 Ballyboden Way/Taylor's Lane further to the north. The R113 provides access to the M50 at Junction 12 (Firhouse) 1.5km to the west and Junction 13 (Sandyford/Dundrum) 4km to the east. The M50 forms the strategic orbital route around the western suburbs of Dublin and connects with the various radial routes in and out of Dublin City Centre.
- 1.1.8 The R115 (as Ballyboden Road) continues 3km north to Rathfarnham and then on towards the city centre as the R114 passing through Terenure and Harold's Cross before crossing the Grand Canal at Portobello and entering the city centre area.
- 1.1.9 The R116 Edmondstown Road also leads to the Dublin Mountains to the south and becomes Ballyboden Road north of Scholarstown Road.

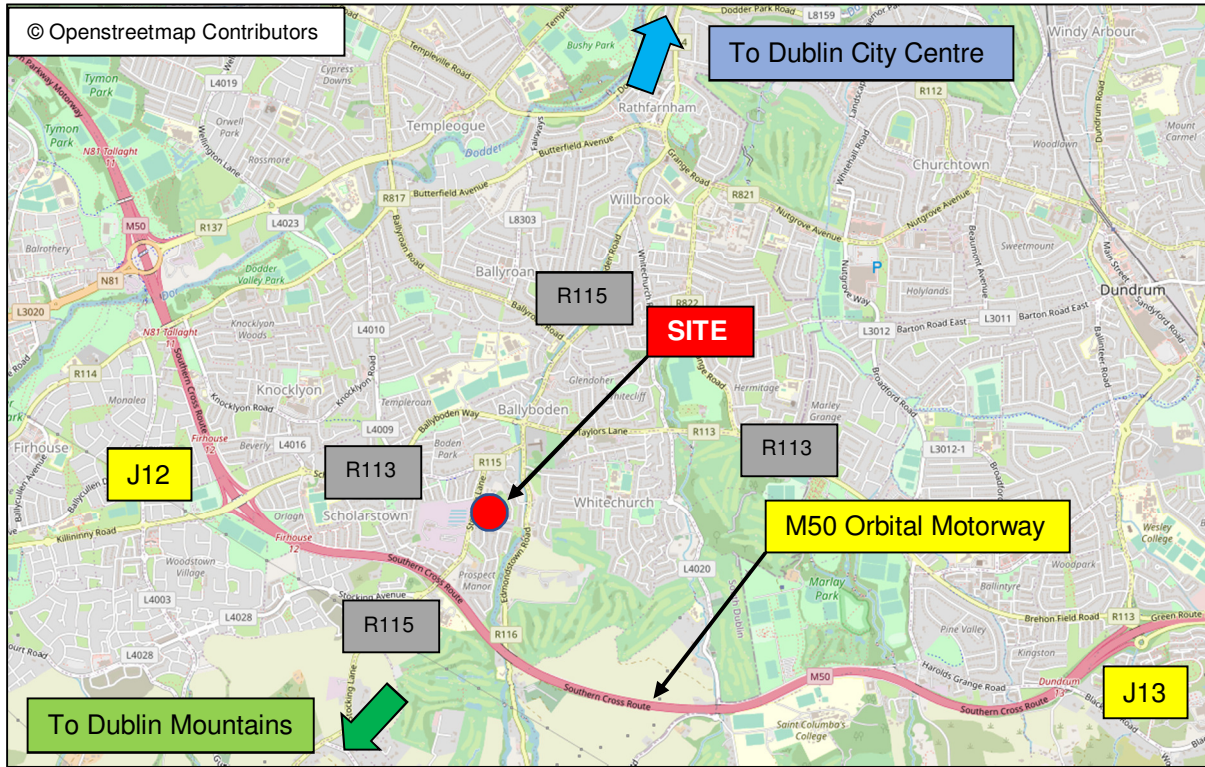


FIGURE 1.1: SITE LOCATION

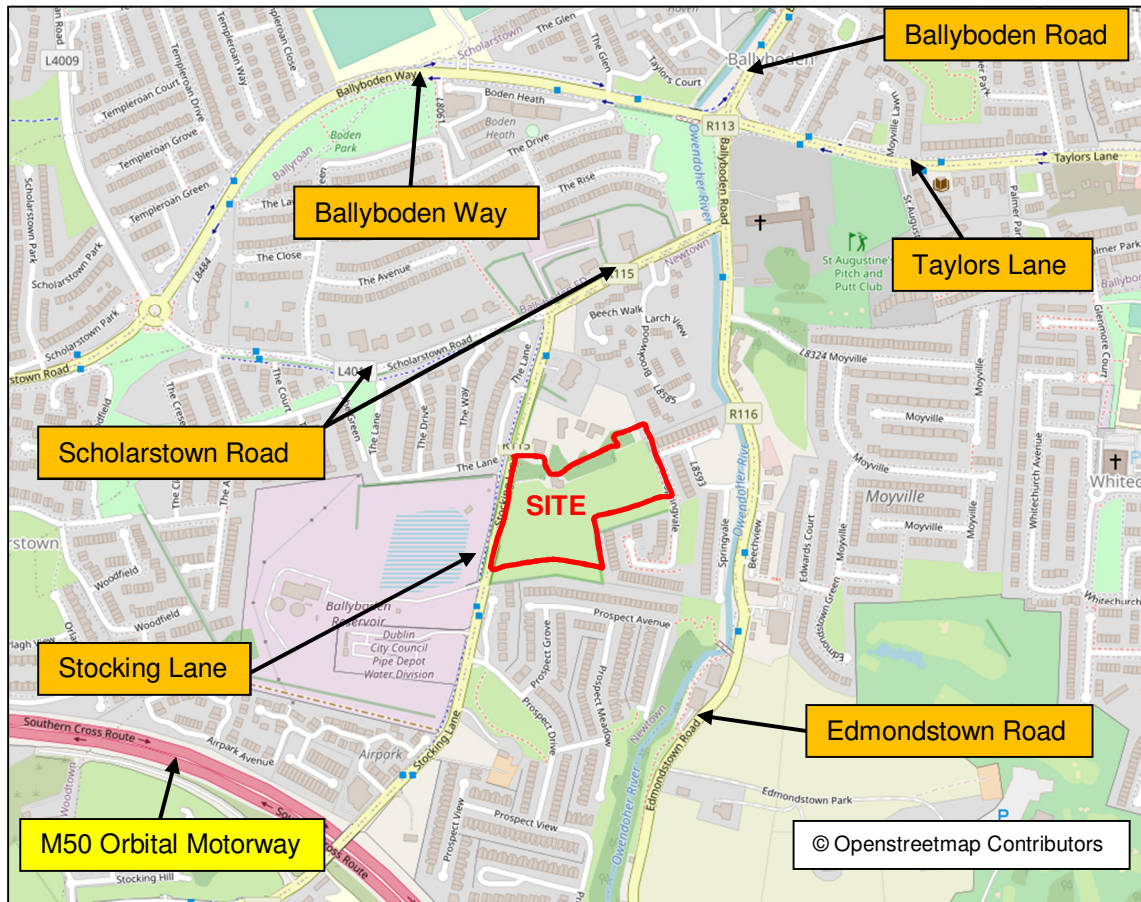


FIGURE 1.2: LOCAL ROAD NETWORK

PROPOSED DEVELOPMENT

▪ Land Use Mix

1.1.10 The proposed development involves the construction of a residential led development comprising 131 residential units (110 apartments and 21 houses) and a shop (65m²) and crèche (128m²).

1.1.11 The residential units would be provided in 14 separate blocks distributed across the site.

▪ Access

Vehicles

1.1.12 Vehicular access to the site is proposed from Stocking Lane, in the west, and Springvale, in the east.

1.1.13 The Stocking Lane junction does not provide direct pedestrian access and is just a vehicle access to the site. It is a simple priority junction (i.e. no right turning lane) and provides sightlines of 2.4m x 49m in accordance with the *Design Manual for Urban Roads and Streets* (DMURS) for a bus route with a speed limit of 50kph.

1.1.14 The Springvale access provides for both vehicular and pedestrian movements and was provided by the applicant in response to request made by South Dublin County Council (SDCC) and An Bord Pleanála (ABP) during the SHD Pre-Application process.

1.1.15 This junction provides sightlines of 2.4m x 23m in accordance with DMURS for a road with a speed limit of 30kph, such as Springvale. The applicant proposes that this access is blocked (using rising bollards) for vehicular traffic in the morning peak hours to prevent vehicles rat-running through the site between Edmondstown Road and Stocking Lane, presumably in an attempt to avoid traffic congestion on Scholarstown Road.

1.1.16 The applicant does not appear to have undertaken a Road Safety Audit (RSA) of either of the access proposals or the roads within the site itself as it is not referred to or included within the TTA. Section 1.5 of the *Traffic and Transport Assessment Guidelines* (TTAG, TII 2014) states that the “appropriate and correct implementation” of an RSA is “essential in the preparation of planning proposals”.

1.1.17 Thus, the road safety credentials of the proposed site access and internal road layout are unknown as they have not been independently audited as would be expected for such a scheme.

Pedestrians and Cyclists

1.1.18 In addition to the pedestrian/cycle access onto Springvale in the east, two further pedestrian access points are provided at the southwest and northwest corners of the site to/from Stocking Lane.

1.1.19 The TTA incorrectly states in section 4.4 that “pedestrian and cycle access will be available off Stocking Lane (the western boundary) at 3 no. locations” but this is not the case and access for

pedestrians and cyclists will only be available at the northwest and southwest corners of the site.

- 1.1.20 It is our view that residents will attempt to cross Stocking Lane in the vicinity of the vehicular access junction rather than route to the northwest and southwest corners of the site and, as such, create a road safety hazard.
- 1.1.21 A raised table is proposed less than 20m east of the Stocking Lane vehicular access junction that will enable pedestrians and cyclists to cross the access road as they travel north and south through the site. This is located close to the junction and could lead to safety issues as vehicles entering the development site would not necessarily expect to meet this kind of feature so soon after entering the site. The presence of perpendicular parking south of the access road to the east of this crossing will also lead to potential road safety conflicts. An RSA would have been helpful in assessing the road safety merits, or otherwise, of this proposed arrangement.
- 1.1.22 The southwest pedestrian access leads to an improved signal controlled pedestrian crossing arrangement on Stocking Lane close to the access to the Ballyboden Reservoir and the Prospect Manor estate. The TTA has not assessed the effect of the revised signalised crossing arrangement upon the access to the Ballyboden Reservoir site and so it is unclear if this facility will enable pedestrians and cyclists to cross Stocking Lane safely in this location.
- 1.1.23 The northwest pedestrian access leads towards a proposed new uncontrolled crossing of Stocking Lane that the site layout plans show will also potentially provide access to a pending planning application to the north of the site but does not explain what this means for the proposed crossing on Stocking Lane.

▪ Site Layout

DMURS Compliance

- 1.1.24 The site layout consists of a relatively straight vehicle access road in the centre of the site leading west to east.
- 1.1.25 The initial section of this access road (referred to as Road 1) is shown in **Figure 2.1** overleaf. It can be seen that the shop, crèche and associated parking/loading are all located in close proximity (50-60m) to the access junction with Stocking Lane. It is our view that this arrangement will lead to localised congestion on the access road when deliveries occur and at peak times for the crèche/shop, which could lead to road safety problems.
- 1.1.26 The internal access road east of the public open space is labelled Road 4. This provides perpendicular and parallel parking on both sides along most of its length together with intermittent street trees and footways running behind the parking spaces.
- 1.1.27 DMURS states in section 4.4.9 that “*perpendicular parking should generally be restricted to one side of the street to encourage a greater sense of enclosure and ensure that parking does not dominate the streetscape*”. Whilst the layout attempts to avoid this by providing parallel parking

opposite most of the perpendicular spaces, there is an area at the eastern end where perpendicular parking is proposed on both sides of the road.

- 1.1.28 It is our view that the presence of on-street parking (of any type) on both sides of Road 4 over a distance of more than 100m leads to a car dominated development, which is not helpful when seeking to encourage residents to travel by alternative modes of transport.

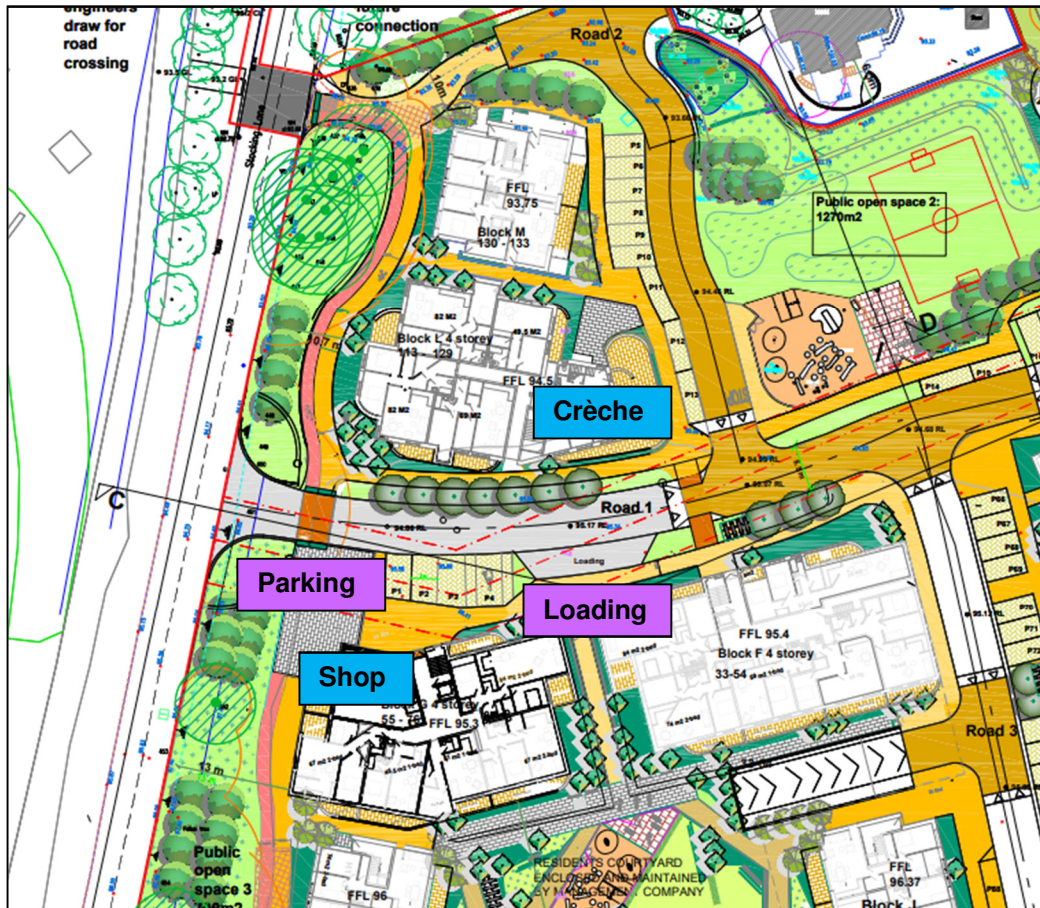


FIGURE 2.1: PROPOSED ACCESS ROAD FROM STOCKING LANE

- 1.1.29 SDCC's Opinion on the SHD submission dated 13th June 2019 states that the internal roads should be 6m wide due to the presence of perpendicular parking as "*they are going to be busy distributor streets with refuse and emergency vehicles using them*". However, the internal roads are proposed to be 5.5m reducing to 4.8m in places.
- 1.1.30 The reduced width and presence of car parking on both sides means that the main access road within the site (Roads 1 and 4) will lead to potential conflict between road users and resultant road safety problems.
- 1.1.31 The TTA states in section 4.4 that "*internal footpaths are proposed to be a minimum of 1.8m*". DMURS identifies 1.8m as the minimum width to allow two people to pass comfortably as shown overleaf in **Figure 2.2** (itself an extract from Figure 4.34 in DMURS) and suitable for areas with "*low pedestrian activity*".

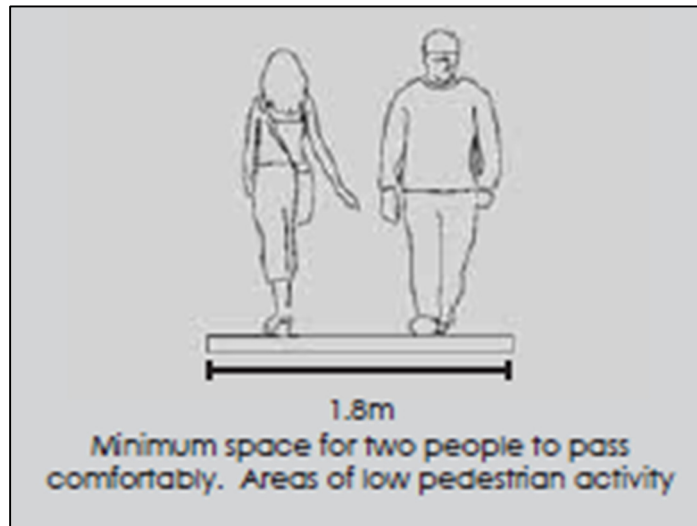


FIGURE 2.2: MINIMUM FOOTWAY WIDTH FROM DMURS

- 1.1.32 This appears to be at odds with Section 4.4 of the TTA, which states that *“it is proposed to provide high quality pedestrian and cycle access throughout the site”* as the minimum footway width is proposed and is hardly worthy of being described as *“high quality”* in space terms alone.
- 1.1.33 Moreover, such a width is suitable for areas with *“low pedestrian activity”* rather than within a new residential neighbourhood that purports to be sustainably located and where one of the objectives of the submitted Mobility Management Plan (MMP) is to *“increase and facilitate the number of people choosing to walk, cycle or travel by public transport”*.
- 1.1.34 It is more likely that this objective could be achieved if, at the very least, footways of 2.5m were proposed within the development site as deemed *“desirable”* in DMURS and shown below in **Figure 2.3** (also an extract from Figure 4.34 in DMURS).

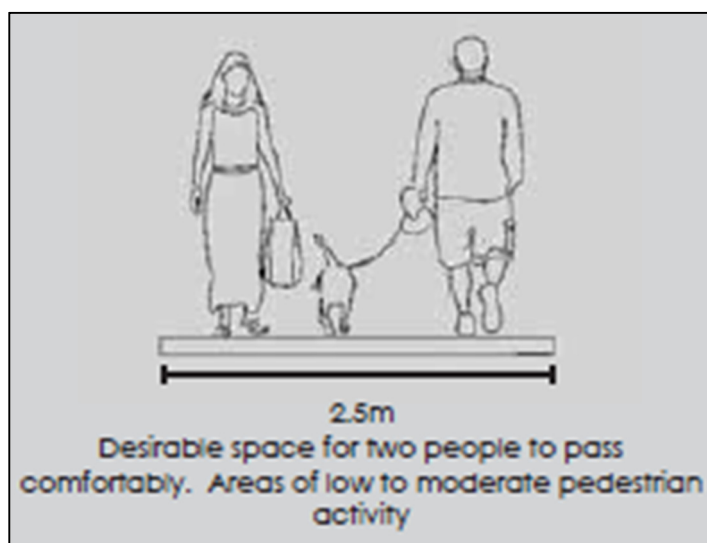


FIGURE 2.3: DESIRABLE FOOTWAY WIDTH FROM DMURS

- 1.1.35 Indeed, the Record of the Tripartite Meeting on the 27th November 2019 shows that SSDC requested that the width of footways should be at least 2m and so it is unclear why the applicant

has proposed 1.8m wide footways.

Servicing

AutoTrack swept path analysis shows that a 10.2m refuse lorry can access the site via the Stocking Lane access and use the loading bay located close to the retail units.

However, it is unclear how deliveries to the crèche will be managed and how delivery vehicles will turn once within the site without extensive reversing manoeuvres, which will have obvious adverse safety implications.

Parking

1.1.36 The development proposes the provision of 167 car parking spaces overall. These will consist of 79 within the basement areas and 88 at surface level.

1.1.37 The development also proposes 288 cycle parking spaces and 5 motorcycle spaces.

NON-CAR ACCESSIBILITY

▪ Pedestrian and Cycle

1.1.38 The existing non-car accessibility of the proposed site is discussed within the Traffic and Transport Assessment (TTA) submitted in support of the application.

1.1.39 It is acknowledged that the existing pedestrian and cycle infrastructure in the vicinity of the site is of a reasonable standard with street lit footways available beside Scholarstown Road, Ballyboden Road and Edmondstown Road.

1.1.40 An off-road shared footway/cycleway is provided along the western side of Stocking Lane and on-road cycle lanes are also provided on both sides of Taylor's Lane, Ballyboden Road and Edmondstown Road with off-road shared footway/cycleways heading west from the Taylor's Lane/Ballyboden Road roundabout beside Ballyboden Way. However, there are no cycle lanes on Scholarstown Road in the vicinity of the site.

1.1.41 It should be noted that on-road cycle lanes provide no physical protection for cyclists as they are identified only by road markings. They may help identify the likely presence of cyclists to drivers, but vehicles can and do overrun on-road cycle lanes particularly when turning. The presence of an on-road cycle lane does not in itself make it inherently safe to cycle or necessarily encourage a significant proportion of people who may otherwise drive to cycle instead.

1.1.42 There is a signal controlled pedestrian/cycle crossing of Stocking Lane south of the site and west of the Prospect Manor estate that forms part of the vehicular access to the Ballyboden Reservoir on the western side of Stocking Lane. There is also an uncontrolled pedestrian/ crossing of Stocking Lane approximately 160m north of the site opposite Rookwood View that provides access to the southbound bus stop located close to the access to Rookwood View.

1.1.43 The proposed development seeks to provide appropriate connections to this existing off-site pedestrian and cycle infrastructure.

1.1.44 The availability of pedestrian and cycle infrastructure is however only one part of the equation with the distance to local services and facilities also needing to be considered. If such services and facilities are beyond what might be taken as a reasonable walk or cycle distance / time from the site, then future residents may simply choose to drive.

▪ Local Facilities

1.1.45 There are small scale local facilities (Costcutter and Pharmacy) available within 925m of the centre of the site (an 11 minute walk). These facilities are unlikely to cater fully for the 131 new residential properties as access to higher order retail opportunities will also be required.

1.1.46 **Figure 3.1** overleaf shows the local facilities within 500m (as the crow flies) of the site, which is a 6 minute walk. This has been extracted from the *Stocking Lane Concept Plan and Design Criteria Statement* submitted with the SHD application. It can be seen that the only “facilities” within 500m of the site (the distance selected to be shown by the applicant presumably to identify an appropriate walking distance) are the Reservoir and part of Edmondstown Park; neither of which are likely to be frequented regularly, if at all, by future residents.

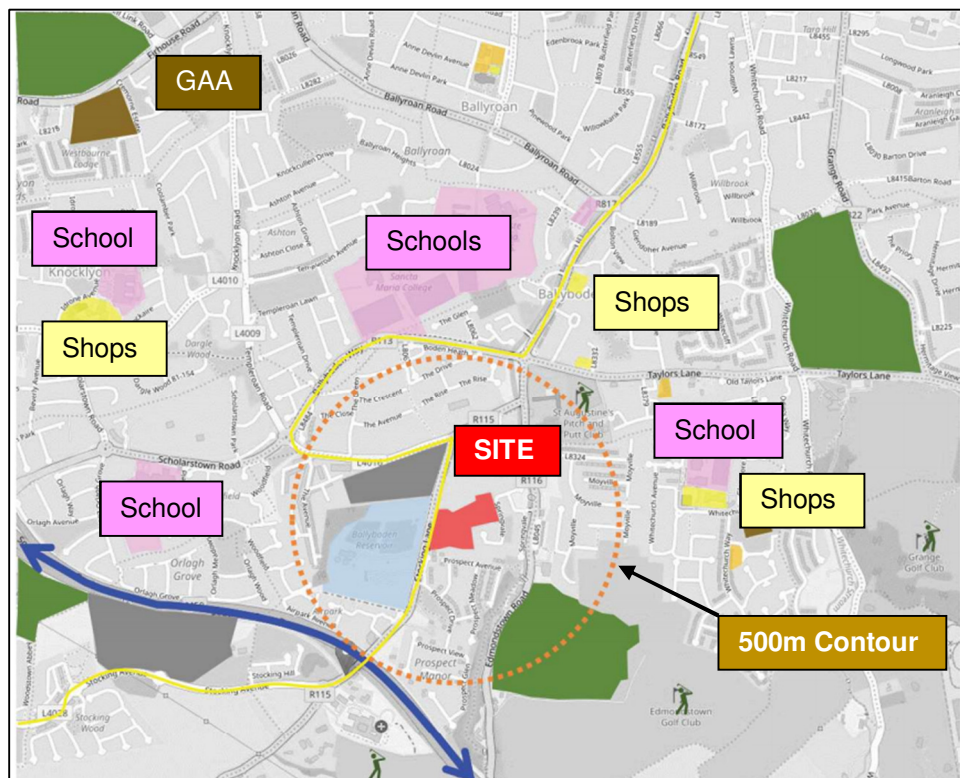


FIGURE 3.1: LOCAL FACILITIES WITHIN 500M OF THE SITE (FROM SHD APPLICATION)

The vast majority of the more useful facilities (schools, shops, community facilities, medical facilities, sports pitches etc) are located between 1km and 2km of the site (by the shortest walking route). These distances cannot be considered ‘close’ particularly if carrying shopping bags either by hand or on

a bicycle.

Acceptable walking distances will vary considerably depending on various factors such as fitness and land topography; however, the *Providing for Journeys on Foot* guidelines produced by the Chartered Institution of Highways and Transportation (CIHT) identifies suggested acceptable walking distances for different types of journey as shown below in **Figure 3.2**.

	Town centres (m)	Commuting/School Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

FIGURE 3.2: SUGGESTED ACCEPTABLE WALKING DISTANCES (CIHT)

Table 3.1 below identifies the walking distances (and times) to the local shops and schools in comparison to the acceptable distances suggested by the CIHT.

Facility	Distance	Walking Time	CIHT Acceptable Guidance
Taylor's Lane Shops	925m	11 mins	800m
Whitechurch Shops	1,900m	23 mins	800m
Knocklyon Shops	1,700m	20 mins	800m
St Colmcille's Community School	1,400m	12 mins	1,000m
St Colmcille's National School	2,100m	25 mins	1,000m
Sancta Maria College	1,000m	12 mins	1,000m
Colaiste Eanna C.B.S.	1,400m	3 mins	1,000m
St Patrick's Girls National School	1,600m	19 mins	1,000m
St Mary's National School	1,400m	12 mins	1,000m

TABLE 3.1: WALKING DISTANCES AND TIMES VERSUS CIHT GUIDANCE

It can be seen that all of the closest shops and schools are beyond the acceptable distances suggested by the CIHT.

Therefore, it is our view that it is very unlikely that future residents will walk to/from local facilities and will instead use their private car to access these facilities. Thus, the proposed residential development is not located so as to maximise travel by more sustainable modes of travel (such as walking and

cycling) and, if granted, will lead to the creation of a significantly car-borne development, which is contrary to local and national planning policy.

1.1.47 This could lead to an increase in the vehicle trip rates associated with the site and a corresponding increase in traffic impact on the adjacent road network.

▪ Public Transport

1.1.48 The above considers the pedestrian and cycle issues in the context of shorter distance trips to local services and facilities. However, it is noted that there are very few employment opportunities in the vicinity of the site meaning that the site will be reliant on the private car for longer distance trips unless there are extremely good levels of public transport in close proximity to the site.

1.1.49 The closest bus stops to the site are located on Stocking Lane approximately 220m (or a 3 minute walk) south of the centre of the site. These stops are served by the 15B bus service that operates between Ringsend Road and Stocking Avenue via the city centre at a broadly 20 minute frequency. The timetabled journey time to/from the city centre at peak times is around 45 minutes, although this will be affected by traffic congestion and so could increase towards 1 hour.



FIGURE 3.3: LOCAL BUS ROUTES (FROM AECOM TTA)

1.1.50 Additional bus services (15, 61 and 161) are available in the area as shown in **Figure 3.3**. However, only the bus stop on Edmondstown Road (for the 161 service) is located within a reasonable walking distance of the site (500-600m of the centre of the site) as identified in DMURS (800m). This bus service runs roughly every 1.5 hours and only operates during the day on a Monday to Friday (i.e. not at night or on weekends) and so is not suitable for all types of journey.

1.1.51 The 15 and 61 bus stops are located more than a 10 minute walk from the site and so are very unlikely to be used for regular travel to/from the site.

- 1.1.52 It is worth noting that the bus stops on Stocking Lane and Edmondstown Road do not provide any seating or shelter and so cannot be considered to be attractive for future residents of the site who might be tempted to travel by bus and will encourage car use.
- 1.1.53 Although the National Transport Authority's BusConnects scheme does not extend as far as the SHD site, it is acknowledged that the bus services from the site to the city centre will join up with the proposed Rathfarnham to City Centre Core Corridor (Number 12) and so journey times to/from the site will be enhanced in part in the future.
- 1.1.54 However, the BusConnects proposals do not alter the walking distances to the stops or the long journey times to and from the City Centre. As such, there would not be a step change increase in public transport provision that might encourage a significant transfer from the private car to public transport.
- 1.1.55 Although public transport provision appears reasonable, the routings and journey times are such that future residents are likely to favour use of the private car.
- 1.1.56 The application documentation includes an MMP which identifies how the applicant proposes to influence travel modes with the aim of reducing the overall proportion of trips undertaken by car when travelling to and from the site. Key to a successful MMP is the availability of accessible alternatives to use of the car particularly in respect of longer distance journeys, i.e. by public transport.
- 1.1.57 It is maintained that the available public transport will not encourage a significant modal shift away from the car over time and as such there is a high risk that the MMP will not achieve its aims. This illustrates that the proposed site is not a suitable location for a high density SHD.
- 1.1.58 In all of the above it should also be noted that the Stocking Lane SHD proposal is not the only proposed development site in the local area as shown in **Figure 3.4** below.

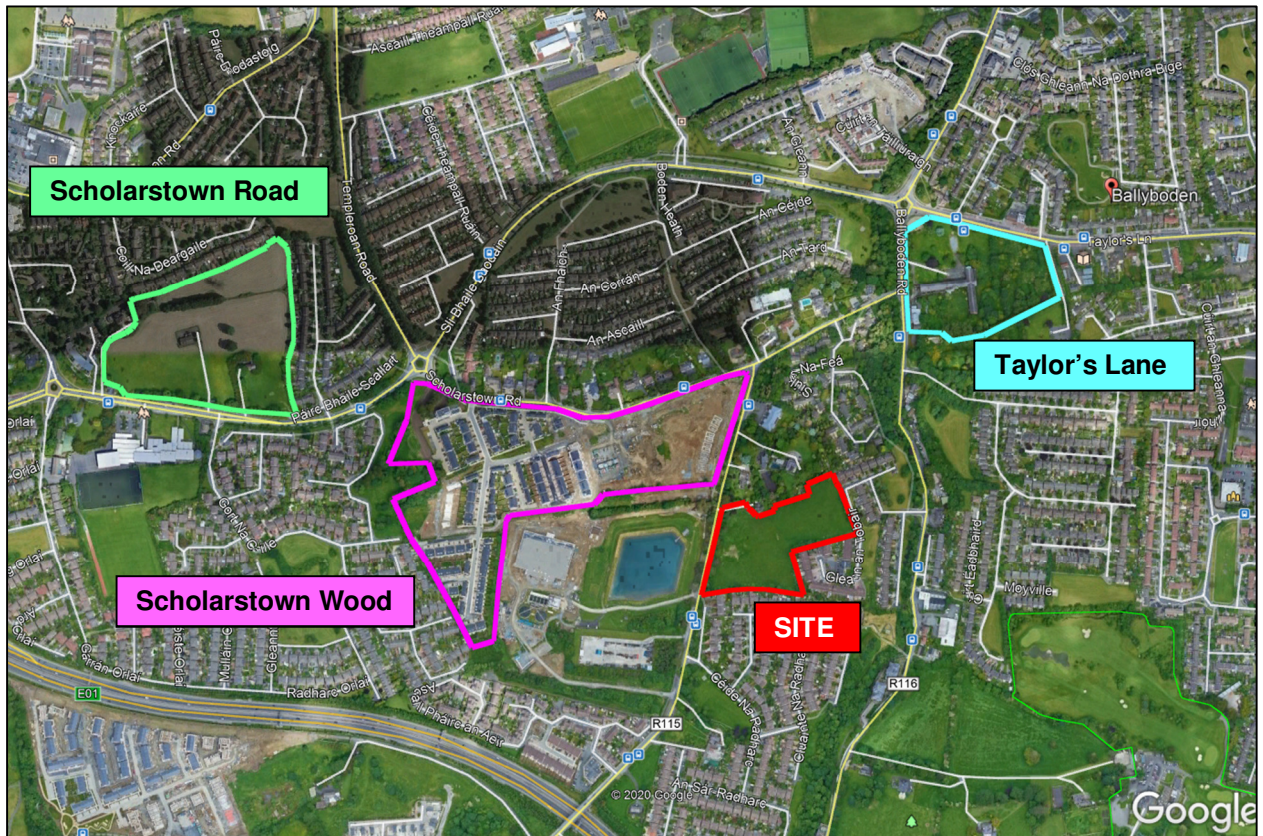


FIGURE 3.4: COMMITTED DEVELOPMENT IN THE AREA

1.1.59 In total, over 1,400 residential units have been permitted by ABP at the sites shown above in **Figure 3.4** as follows:

- Scholarstown Wood – Permission granted by ABP in 2015 for 317 residential units.
- Scholarstown Road SHD – Permission granted by ABP in 2020 for 590 residential units.
- Taylor's Lane SHD – Permission granted by ABP in 2020 for 496 residential units.

1.1.60 As such, the local population will increase significantly, which will be a considerable strain on the operation of the current/proposed public transport services. This is a fundamental issue as public transport services could be operating at capacity. No evidence has been provided to show that the public transport services will remain within capacity once all of the committed and proposed developments have been completed. This needs to be considered fully before planning permission can be granted.

1.1.61 The traffic impact of this cumulative development is addressed in Section 5.3 of this Technical Note.

PARKING PROVISION

▪ Car Parking Provision

1.1.62 The TTA identifies the car parking requirement using the standards contained in the SDCC Development Plan 2016 – 2022 on page 12, which is reproduced below as Table 4.1.

Land Use	SDCC Car Parking Standard	No. Units	Maximum Parking Requirement	
1 Bedroom Apartment	1 space per unit	29 units	29	135
2 Bedroom Apartment	1.25 spaces per unit	61 units	76	
3 Bedroom Apartment	1.5 space per unit	20 units	30	
4 Bedroom House	2 space per unit	11 units	22	42
5 Bedroom House	2 spaces per unit	10 units	20	
Crèche	1 space per classroom	4 classrooms	4	9
Retail Unit	1 space per 15 sq. m	65 sq. m	5	
Total			186	186

TABLE 4.1: CAR PARKING REQUIREMENTS (FROM SHD TTA)

1.1.63 Table 4.1 shows that the proposed development would require a maximum of 186 car parking spaces. The SHD proposed 167 spaces, split as follows:

- 152 residential spaces;
- 5 visitor spaces;
- 5 crèche spaces;
- 5 retail spaces.

It is worth noting that the TTA uses Zone 1 parking standards, which are applicable throughout the SDCC area. The fact that Zone 2 (Residential) standards have not been used demonstrates that the applicant acknowledges that the site is not well located to enable access to local facilities by sustainable modes of travel as Zone 2 is applicable “*within town and village centres, within 400 metres of a high quality public transport service*”.

1.1.64 As already stated, 79 spaces will be provided within the basement areas and 88 spaces at surface level.

1.1.65 The TTA does not provide an AutoTrack assessment for any of the proposed car parking spaces. It is our view that a significant number of the parking spaces in the basement (particularly those with a 6m aisle) will be difficult to access.

▪ **Cycle Parking**

1.1.66 The development proposes 288 cycle parking spaces, which is in excess of the SDCC Development Plan requirement for 129 spaces and the Design Standards for New Apartments requirement for 267 cycle spaces.

TRAFFIC IMPACT

▪ Traffic Data and Growth Factors

Traffic Data

1.1.67 The TTA identifies that a traffic survey of the Scholarstown Road/Stocking Lane junction was undertaken on a “*neutral weekday during term time in December 2017*” but does not specify which actual day the survey was undertaken on, which is unusual.

The *Project Appraisal Guidelines for National Roads Unit 5.2 - Data Collection* (TII 2016) states that “*in order to ensure an unbiased sample, all data collection should be carried out during a “neutral” or representative month*”. This document confirms that December is not a neutral period and so traffic conditions when the data was collected cannot be considered to be normal.

Moreover, this document also states that, as a minimum, the date of the survey should be specified.

The traffic data was nearly three years old when the TTA was prepared and it is our view that the applicant should have collected new data to reflect the amount of development in the area since 2017. **Figure 5.1** below shows the amount of additional development on the Scholarstown Wood site between July 2017 (before the traffic surveys) and January 2020 (during preparation of the SHD application). The traffic associated with this development has effectively been omitted from the TTA.



FIGURE 5.1: RECENT DEVELOPMENT IN THE AREA

Queue lengths do not appear to have been recorded; which is useful when calibrating any computer modelling undertaken in the TTA.

In summary, the traffic data used in the TTA is not “fit for purpose” as it is out of date, collected during abnormal traffic conditions and on an unknown date.

Growth Factors

1.1.68 Background traffic growth has been applied to the 2017 flows to represent the base situation in the 2022, 2027 and 2037 design years. Appropriate growth factors for the Dublin area have been used based on a predicted opening year of 2022 and future design years of 2027 and 2037.

▪ Trip Generation and Distribution

Trip Generation

- 1.1.69 The TRICS computer database is the recognised source for trip rates in Ireland and the UK. This allows the trip generating characteristics of different land uses to be compared and the impact of any new trips on the road network to be assessed.
- 1.1.70 The TTA states that the TRICS database has been used to identify trip rates for the various land uses proposed within the site with outputs for all the proposed land uses included as Appendix B of the report. The validity, or otherwise, of the TRICS trip rates used in the TTA is discussed below.
- 1.1.71 However, before looking at this in detail it is worth identifying that Tables 6.1 and 6.2 in the TTA (reproduced below as **Figure 5.2**) are strewn with arithmetic errors and so is not an accurate reflection of the TRICS data in any event.

Table 6.1 – Proposed Trip Rates

Development	TRICs Land Use	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (16:00 – 17:00)	
		Arrivals	Departures	Arrivals	Departures
Apartments	03 C – Flats Privately Owned	0.054	0.213	0.179	0.076
Houses	03 A - Houses Privately Owned	0.129	0.376	0.350	0.168
Creche	04 D – Nursery	4.107	2.934	2.212	2.889
Retail Units	01 M – Mixed Use Shopping Malls	0.285	0.060	0.273	0.565

Table 6.2 – Proposed Trip Generation

Development	Quantum	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (16:00 – 17:00)	
		Arrivals	Departures	Arrivals	Departures
Apartments	110 dwellings	6	19	17	5
Houses	21 dwellings	3	11	10	5
Creche	128 sqm	5	6	4	5
Retail Units	65 sqm	0	0	0	0
One Way Traffic Flows		14	35	30	16
Two Way Traffic Flows		49		46	

FIGURE 5.2: TRIP GENERATION TABLES FROM SHD TTA

These tables suggest that the anticipated trip generations associated with the development is 49 and 46 trips respectively during the morning (08:00 – 09:00) and evening (17:00 – 18:00) peak hour periods. .

- 1.1.72 A close examination of the survey sites used within the residential TRICS assessment shows inappropriate search parameters as only sites in “Greater London” or “Town Centres” have been excluded, which means the residential trip rates used are derived from surveys in locations in the UK and Ireland with 4 to 4,334 units.

- 1.1.73 Clearly, a development of 131 residential units will be very different, in traffic terms, to one with several thousand units as additional facilities (school, shops etc) are often provided as part of this scale of development.
- 1.1.74 Additionally, sites in an ‘edge of town centre’ location have been included when clearly the proposed site cannot be described as such. Similarly, the range of population within 1 mile of the site varies between 1,000 and 50,000 while the range of population within 5 miles of the site varies between 50,000 and more than 500,000. These wide ranges of local population (and by default accessibility to local services and facilities) could lead to significant variations in vehicle trip rates across the survey sites.
- 1.1.75 A more robust approach would be to select a restricted range of residential units to better reflect the proposed development and to select sites in Ireland only as parts of the UK are not comparable to the site’s location (even if Greater London has been excluded).
- 1.1.76 We selected a range of 18 to 372 residential units within TRICS and selected Irish sites only. Whilst this does restrict the amount of data available it does mean that the sites used are appropriate and reflect the likely travel patterns to/from the proposed development site. The TRICS output is attached as **Appendix A** and shows that the actual range presented by the database was 20 to 140 units, which is far more reflective of the proposed SHD.

The TTA selected the “Mixed Use Shopping Mall” land use category for the proposed shop provided within the site. A shop comprising a floor area of 65m² cannot, under any scenario, be likened to a shopping mall. It would have been more appropriate to use the “Retail/Convenience Store” category within TRICS.

The resultant trip rates using these refined selections are shown in Table 5.1 below.

	Morning Peak Hour (08:00 – 09:00)		Evening Peak Hour (16:00 – 17:00)		Daily
	Arrivals	Deps	Arrivals	Deps	Two-Way
Apartments Trip Rate (per unit)	0.056	0.230	0.101	0.073	2.260
Houses Trip Rate (per unit)	0.171	0.530	0.346	0.243	6.466
Crèche Trip Rate (per 100m ²)	6.008	3.715	1.818	1.897	57.387
Retail Unit Trip Rate (per 100m ²)	3.200	1.067	15.200	15.467	278.400

TABLE 5.1: REFINED TRICS VEHICLE TRIP RATES

1.1.77 If these trip rates are applied to the proposed SHD site then the number of trips predicted to be generated is as shown below in Table 5.2.

	Morning Peak Hour (08:00 – 09:00)		Evening Peak Hour (16:00 – 17:00)		Daily
	Arrivals	Deps	Arrivals	Deps	Two-Way
	Apartments Trips)	6	25	11	8
Houses Trips	4	11	7	5	136
Crèche Trips	8	5	2	2	73
Retail Unit Trips	2	1	10	10	181
TOTAL	20	42	30	25	888

TABLE 5.2: REFINED TRICS VEHICLE TRIP GENERATION

Table 5.2 shows that number of vehicular trips that the SHD site is likely to generate is actually 62 and 55 in the morning and evening peaks respectively. This represents a 26.5% and 19.5% increase in the level of trips associated with the SHD site when compared to the trips identified in the TTA. Furthermore, this shows that the SHD will result in 888 additional vehicular trips every day.

1.1.78 Thus it is clear that the proposed development is likely to generate considerably more traffic than allowed for within the TTA particularly in the morning peak period. The resulting assessments of junction capacity post development are therefore fundamentally flawed with the actual impacts likely to be significantly greater than reported.

Trip Distribution

1.1.79 The TTA simply states that the distribution of development traffic is based on the traffic movements at the Scholarstown Road/Stocking Lane junction as surveyed in 2017. This is a simplistic approach that can be appropriate in certain circumstances but not so in this case, particularly if the survey data has been interpreted incorrectly.

1.1.80 The surveyed directional split of traffic on Stocking Lane has been used to assign the trips generated by the SHD site. This approach is fundamentally flawed as it merely reflects the tidal nature of traffic on Stocking Lane in the morning and evening peak, i.e. roughly two-thirds of the total flows are to the north (M50 and city centre) in the morning and a similar proportion south bound in the evening peak. This reflects travel to work movements on Stocking Lane only and doesn't identify a trip distribution that can be used to assign the traffic generated by the SHD site.

1.1.81 The TTA suggest that 64% of all vehicular trips to and from the SHD site in the morning peak will originate/terminate to the south. In reality there is very little to the south along Stocking Lane and

the vast majority of trips are likely to travel north towards Scholarstown Road and onto the R115 and M50/Dublin city centre.

1.1.82 The TTA prepared by DBFL for the Scholarstown Wood site in 2015 identified a trip distribution to the south along Stocking Lane of 5%, which is a far more accurate estimate than the 64% and 33% (for the morning and evening peaks respectively) used in the Aecom TTA.

1.1.83 Therefore, the number of additional trips that will travel through the Scholarstown Road/Stocking Lane junction has been vastly underestimated and the conclusion that the traffic impact is below the 5% threshold in the TTAG is flawed and incorrect.

■ Traffic Impact

1.1.84 The impact of the proposed SHD upon the Scholarstown Road/Stocking Lane junction should have been assessed using appropriate computer modelling software (LINSIG) and not dismissed as being below 5% as it is not.

1.1.85 It has already been noted that over 1,400 residential units have been permitted by ABP at the sites in the Ballyboden area shown below in **Figure 5.3**.

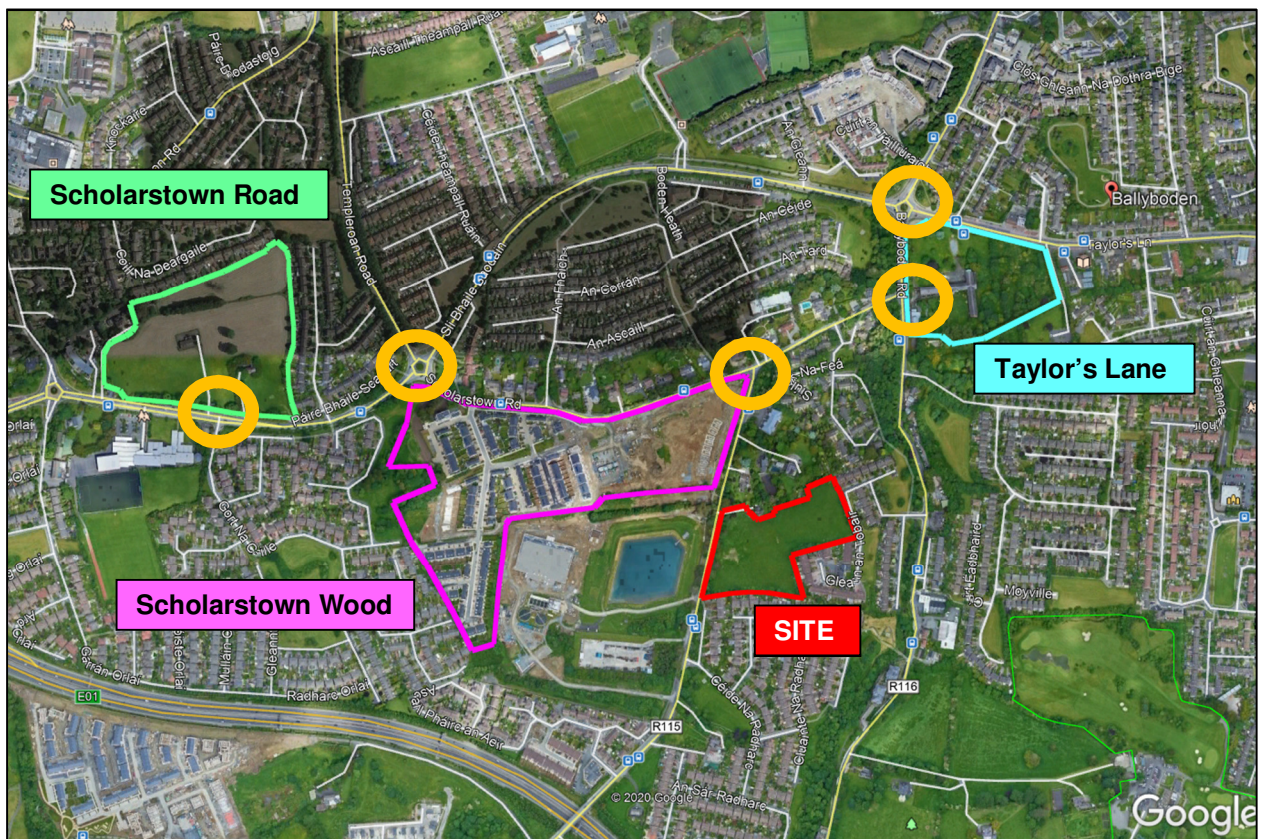


FIGURE 5.3: KEY JUNCTIONS AND COMMITTED DEVELOPMENT IN THE BALLYBODEN AREA

1.1.86 The junctions identified in **Figure 5.1** in orange been assessed as part of the various SHDs in the Ballyboden area. However, each TTA has only looked at the operation of these junctions in relation to their own specific development and so the cumulative impact of the additional traffic upon these key junctions is unknown/untested.

As an example, the Taylor's Lane TTA assessed the Ballyboden Road/Scholarstown Road/Edmondstown Road junction and the Taylor's Lane/Ballyboden Road/Ballyboden Way roundabout in terms of the impact of the traffic generated by the Taylor's Lane SHD only.

This assessment showed that the Ballyboden Road/Scholarstown Road/Edmondstown Road junction operated with a maximum Degree of Saturation (DoS) of 79% in the morning peak hour with a maximum queue of nearly 23 vehicles (approximately 140m in length) on the Scholarstown Road approach. However, significant doubt was placed on the accuracy of the additional traffic flows associated with the proposed development and so the DoS value and queue lengths could be significantly larger.

1.1.87 Given that traffic from the Scholarstown Wood and Scholarstown Road (as well as the SHD site being considered in this Technical Note) will also result in additional traffic routing via this junction, it is highly likely that queuing vehicles will extend back to the Scholarstown Road/Stocking Lane junction as it is located only 250m to the west. The queue was already at 140m with only the traffic from the Taylor's Lane SHD added and so will increase significantly when the three other SHD sites (comprising over 1,000 residential units) also send new traffic through this junction.

Similarly, the Taylor's Lane TTA assesses the operational capacity of the Taylor's Lane/Ballyboden Road/Ballyboden Way roundabout and identifies that the roundabout is already operating close to capacity with maximum Ratio of Flow to Capacity (RFC) values of 0.81 in the morning peak and 0.84 in the evening peak. These values are close to the 0.85 RFC value where operational difficulties begin to be felt. Without development and in the 2036 design year, these values increase to 1.18 and 1.22 respectively (i.e. overcapacity) with queues up to 113 vehicles long and delays of up to 6 minutes per vehicle. A closer examination of the 'with development' results for the roundabout also identified that the Ballyboden Road South approach was predicted to operate with a queue length of 116.5 vehicles or nearly 700m. This queue would extend back to and through the Ballyboden Road/Scholarstown Road/Edmondstown Road traffic signals. Clearly the addition of traffic from the other SHD sites in the Ballyboden area will cause this junction to fail and widespread traffic congestion will occur.

Therefore, we believe that the committed development in the area should have been assessed by the applicant as part of a cumulative traffic impact assessment as the proposed development cannot be looked at in isolation given the reality of the large scale development already permitted by ABP in this area.

If such an approach had been requested by ABP/SDCC then it is clear that several of the key junctions in the Ballyboden area would not be able to accommodate the increase in traffic associated with the various SHD sites in the area. As the other sites have already been permitted by ABP, the only realistic option is to refuse the Stocking Lane SHD application in a last ditch attempt to avoid widespread traffic congestion in this part of South Dublin.

▪ Springvale/Edmondstown Road

Traffic entering and exiting the site via the Springvale access will have a detrimental effect upon the amenity of residents of the Springvale estate in terms of traffic levels and the associated increase in noise, fumes and light spill.

Over the bulk of the day it is proposed that this access could be used as a rat-run to avoid congestion at junctions on Edmondstown Road to the north (as set out earlier in the context of the SHD sites permitted in the area) and Springvale is not designed to cater for such movements given its tortuous and bending nature.

The visibility (sight lines) at the junction of Springvale with Edmondstown Road is substandard and any increase in the levels of traffic as this junction will have an adverse effect upon road safety.

Edmondstown Road is already subject to traffic calming measures and there is a cluster of accidents as shown below in **Figure 5.4**. Any increase in traffic levels is likely to worsen road safety on this part of the road network.



FIGURE 5.4: EXTRACT FROM ROAD SAFETY AUTHORITY DATABASE (2005 TO 2016)

- **Road Safety**

1.1.88 As already noted, no reference has been made to a RSA within the TTA. It therefore has to be assumed that such an Audit has not been undertaken.

1.1.89 An RSA is an independent review of the site access proposals and on-site layout undertaken by a specialist safety auditor. It can help to identify safety issues that may otherwise be overlooked and suggest ways of overcoming any safety issues identified. The lack of an RSA to date is considered to be a significant oversight. As such, road safety has not been satisfactorily assessed or addressed in the TTA or the planning application submission.

SUMMARY AND CONCLUSIONS

▪ Summary

There are pedestrian/cycle safety concerns in relation to the following:

- Residents will attempt to cross Stocking Lane in the vicinity of the vehicular access junction rather than route to the northwest and southwest corners of the site.
- The raised table located close to the Stocking Lane vehicular access junction will lead to potential road safety conflicts, which will be further exacerbated by the proximity of the shop, crèche and associated parking/loading provision.
- The operation of the improved signal controlled pedestrian crossing arrangement on Stocking Lane close to the access to the Ballyboden Reservoir has not been assessed and so it is unclear if this facility will enable pedestrians and cyclists to cross Stocking Lane safely to the southwest of the site.

The minimum width footways provided throughout the site will do little to encourage and assist travel on foot and by other sustainable modes of transport.

It is unclear how deliveries to the crèche will be managed and how delivery vehicles will turn once within the site without extensive reversing manoeuvres, which will have obvious adverse safety implications.

The vast majority of the more useful facilities (schools, shops, community facilities, medical facilities, sports pitches etc) are located between 1km and 2km of the site (by the shortest walking route). These distances cannot be considered 'close' particularly if carrying shopping bags either by hand or on a bicycle.

Whilst acceptable walking distances vary considerably depending on various factors such as fitness and land topography, the closest shops and schools are beyond recognised acceptable distances and so it is our view that it is very unlikely that future residents will walk to/from local facilities and will instead use their private car to access these facilities.

Thus, the proposed residential development is not located so as to maximise travel by more sustainable modes of travel (such as walking and cycling) and, if granted, will lead to the creation of a significantly car-borne development, which is contrary to local and national planning policy.

1.1.90 Although public transport provision appears reasonable, the routings and journey times are such that future residents are likely to favour use of the private car. It is maintained that the available public transport will not encourage a significant modal shift away from the car over time and as such there is a high risk that the MMP will not achieve its aims. This illustrates that the proposed site is not a suitable location for a high density SHD.

1.1.91 In all of the above it should also be noted that the Stocking Lane SHD proposal is not the only proposed development site in the local area. As such, the local population will increase significantly, which will be a considerable strain on the operation of the current/proposed public

transport services. This is a fundamental issue as public transport services could be operating at capacity. No evidence has been provided to show that the public transport services will remain within capacity once all of the committed and proposed developments have been completed.

The TTA does not provide an AutoTrack assessment for any of the proposed car parking spaces. It is our view that a significant number of the parking spaces in the basement (particularly those with a 6m aisle) will be difficult to access

The traffic data used in the TTA is not “fit for purpose” as it is out of date, collected during abnormal traffic conditions and on an unknown date.

1.1.92 The TRICS data used in the TTA is not reflective of the proposed SHD. We have provided alternative trip rate data that will increase the number of trips generated by the development.

1.1.93 The trip distribution used in the TTA is fundamentally flawed as it merely reflects the travel to work movements on Stocking Lane and it is not appropriate to use this to assign the traffic generated by the SHD site.

1.1.94 The TTA suggest that 64% of all vehicular trips to and from the SHD site in the morning peak will originate/terminate to the south. In reality there is very little to the south along Stocking Lane and the vast majority of trips are likely to travel north towards Scholarstown Road and onto the R115 and M50/Dublin city centre. The TTA prepared by DBFL for the Scholarstown Wood site in 2015 identified a far more likely trip distribution to the south along Stocking Lane of 5%.

1.1.95 Therefore, the number of additional trips that will travel through the Scholarstown Road/Stocking Lane junction has been vastly underestimated and the conclusion that the traffic impact is below the 5% threshold in the TTAG is flawed and incorrect.

1.1.96 Thus the impact of the proposed SHD upon the Scholarstown Road/Stocking Lane junction should have been assessed using appropriate computer modelling software (LINSIG) and not dismissed as being below 5% as it is not.

Given over 1,400 residential units have been permitted by ABP at the sites in the Ballyboden area, the cumulative impact of the additional traffic upon these key junctions should have been assessed by the applicant as part of a cumulative traffic impact assessment as the proposed development cannot be looked at in isolation.

If such an approach had been requested by ABP/SDCC then it is clear that several of the key junctions in the Ballyboden area would not be able to accommodate the increase in traffic associated with the various SHD sites in the area.

As the other sites have already been permitted by ABP, the only realistic option is to refuse the Stocking Lane SHD application in a last ditch attempt to avoid widespread traffic congestion in this part of South Dublin.

1.1.97 Increased traffic using Springvale will have an adverse effect upon residential amenity and will caret

road safety issues due to the tortuous nature of the road and the substandard visibility at the junction with Edmondstown Road.

- 1.1.98 The applicant has not provided an independent RSA, which would have been helpful in assessing the road safety merits, or otherwise, of the transport infrastructure proposed as part of the SHD.

▪ **Conclusion**

- 1.1.99 In conclusion, it is clear that the proposed development is not in a sufficiently accessible location for the scale of development proposed and would lead to significantly increased traffic congestion and road safety hazards which cannot be appropriately mitigated. Given this, we respectfully request that the application be refused.