

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's
name

F Campbell & K Greenan

(b) Observer's
postal address

31 Prospect View, Rathfarnham, Dublin 16

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Not applicable

(b) Agent's postal
address

Not applicable

Postal address for letters

3. During the process to decide the application, we will post information and items to you **or** to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation on.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

311616

- (b) **Name or description of proposed development**

MacCabe Durney Barnes Ltd.

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Stocking Lane, Ballyboden, Dublin 16

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word** limit as the box expands to fit what you write. You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information.)

The proposed development contains too many residential units and the blocks are too high for buildings in this area.

Observations are made below on the following:

- Parking during construction
- Visitor parking
- Traffic
- Traffic Study
- Public Transport
- Height of blocks
- Bicycles and Cycle Safety
- Bicycle Parking
- Mobility Management Plan

Parking during construction

Have observed SDCC and Irish Water contractor parking on the footpath along Stocking Lane while doing small remedial works. For a development of this size there will be large numbers of contractors who will have tools to carry with them necessitating driving to the site. This will mean these vehicles will need to be parked somewhere which will mean that the neighbouring estates of Prospect Manor and Springvale will be used for parking while the building is going on as Stocking Lane is not wide enough to allow for such parking.

“It is proposed that all construction vehicles will be accommodated within the respective site location. The contractor will be responsible for ensuring no site operatives park outside the development site, to protect the amenity of the local residents.”

This is inadequate. There should be firm guarantees from the developer and a detailed plan. The developer should be penalized if their employees, partners, contractors, or sub-contractors park in neighbouring residential areas. In addition, any parking on Stocking Lane will cause traffic chaos that will impact all road junctions in the locality, and may prevent access for emergency services.

Visitor parking

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5 spaces for a development of this size is inadequate. This will result in unsafe parking, and parking in neighbouring estates.

Traffic

Due to the existing buildings around the site vehicular access for the proposed development can only be off Stocking Lane – there is no vehicular access to Springvale and thus Edmondstown Road. Since the modification of the roundabout adjacent to the M50 at Orlagh Estate and Scholarstown Road traffic along Stocking Lane has been greatly affected at all times of the day and not just at rush hour. This has been compounded by the opening of new estates on Stocking Avenue (more of which are currently under construction which will lead to yet more cars using Stocking Lane).

There is also a new estate Two Oaks under construction on Scholarstown Road (APB SHD ref. [305878](https://www.pleanala.ie/en-ie/case/305878), <https://www.pleanala.ie/en-ie/case/305878>) on the Cosgrave lands which will lead to more traffic accessing Scholarstown Road making it more difficult for traffic to progress along Stocking Lane. In addition, the proposed large development of nearly 500 residential units on the Augustinian Fathers lands at Good Counsel on Taylors Lane (APB SHD ref. [307222](https://www.pleanala.ie/en-ie/case/307222), <https://www.pleanala.ie/en-ie/case/307222>) will add further large volumes of traffic to the area. Adding another estate which will have 167 officially designated parking spaces, traffic from an on-site creche and also a convenience store will put further burden on an already congested road network. The addition of this extra traffic will also have an impact on the M50 during the evening rush hour. Junction 12 southbound already backlogs back onto the M50 during this period of the day and with more traffic accessing the junction this situation will only get worse.

Traffic Study

The traffic study ([‘Traffic and Transport Assessment’](#)) in the application is seriously flawed.

<http://www.sdublincoco.ie/Planning/ViewDocument?fileId=6541533>

- 1) Traffic numbers in the study are based on December 2017 traffic surveys. Traffic patterns on Stocking Lane have changed dramatically since December 2017 due to changes made by SDCC and NTA to the Orlagh Grove roundabout (near M50 jct 12) in the second half of 2018. These works have changed Stocking Lane from a rural / residential road to a busy route to avoid M50 J12 and the Orlagh Grove roundabout. These permanent changes to traffic flows cause tailbacks from Stocking Lane to Ballyboden Road and all the way to Ballyroan Road, and on to Taylors Lane.
- 2) The study does not allow for or model the serious increases in traffic volumes on Stocking Lane due to White Pines North and White Pines South on Stocking Avenue, and Scholarstown Wood on Stocking Lane / Scholarstown Road (all

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already completed.) No allowance is made for access to Dublin city centre, Dundrum/Rathfarnham, or the M50 for Two Oaks SHD ref. [305878](#) or Taylors Lane SHD ref. [307222](#) (under development.) Stocking Lane is being swamped by new SHDs, each one ignoring the impact of all the others. Stocking Lane is the primary access road to Dublin city for the proposed SHDs at the other end of Stocking Lane - [whitepinescentralshd.ie](#), [whitepineseastshd.ie](#), and <https://www.ballycullenshd.ie>. This traffic has all been ignored in the Traffic study. The small percentage increase per year used in this study is not applicable. Journey times north on Stocking Lane towards Ballyboden Road, Taylors Lane, or Scholarstown Road / Knocklyon have increased considerably in recent years due to traffic backlogging on to Stocking Lane from these other roads. Adding more houses will make this worse. And there is a risk that addition construction traffic and parking will bring the road to a standstill.

- 3) Another serious error in the traffic study is the weekday distribution of traffic from the development. This claims that 66% of traffic will enter and exit the development from the south. This is completely incorrect, and is another indication that the traffic study as a whole is not accurate. Anyone who has driven or walked on Stocking Lane during the morning rush 'hour' knows that the majority (probably over 80%) of the traffic from neighbouring developments turns NORTH on Stocking Lane – to drive towards the city and M50. 80% vs. 33% is a big miscalculation.

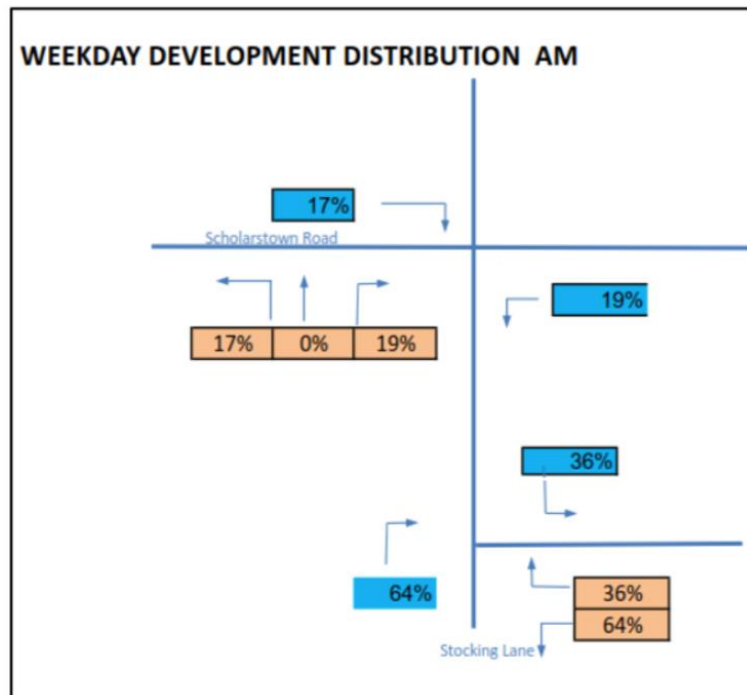


Figure 5.1 – Trip Distribution

Public Transport

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Currently the public transport for the area is as follows:

- Stocking Lane is serviced by the 15B bus route. This bus starts at Stocking Avenue and terminates in Dublin city centre and its maximum frequency is 4 times per hour in each direction but at off peak times this reduces to 2 times per hour
- Edmondstown Road is serviced by 2 routes
 - 61 which services the route twice per day to the city centre
 - 161 which service the route 8 times per day to the Luas at Dundrum
- There is one further bus within 10 minutes walking distance the 175 which runs between Citywest and UCD and its frequency is 2-3 times per hour at peak times and less frequently outside these hours. The nearest stops are at the Costcutter on Taylors Lane or on Ballyboden Way

As can be seen from the summary above, the area is underserved as regards public transport and additional residents in the area will further compound the problem.

Bicycles and Cycle Safety

It is noted that there are a large number of bicycle spaces in the proposed development (288) which is a commendable green initiative. However due to the re-configuration of the junction at Edmondstown Road and Scholarstown Road where an existing 2 lane road (1 lane in each direction) with cycle lane in both directions has been re-configured to a one lane (northbound in the direction of the Ballyboden Road/Taylors Lane roundabout) and one lane with a 2 car turning lane (southbound in the direction of Edmondstown Road) which has completely removed the cycle lanes in both directions and not contributed much in the way of traffic flow but has made cycling much more dangerous and a less desirable way to travel.

Bicycle Parking

The density estimated for bicycle parking in the application is unrealistic. The Schedule of Accommodation suggests 20 bicycles can be parked in 36m². The footprint of a 20 bay bike park is closer to 35m².

Bicycle parking			
Unit Type	No of Stands	Capacity storage	Total bike storage
Sheffield bike stands	25	2/stand	50
Bike Stores	12	2/store	24
2 Stacked in Basement	20 per 4.1 m	35 m of stands	170
Vistor bikes on surface	22	2/stand	44
Total bicycle space			288
Motorbike spaces	5		

See the diagram below from DLR County Council standards for cycle parking:

https://www.dlrcoco.ie/sites/default/files/atoms/files/dlr_standards_for_cycle_parking.pdf

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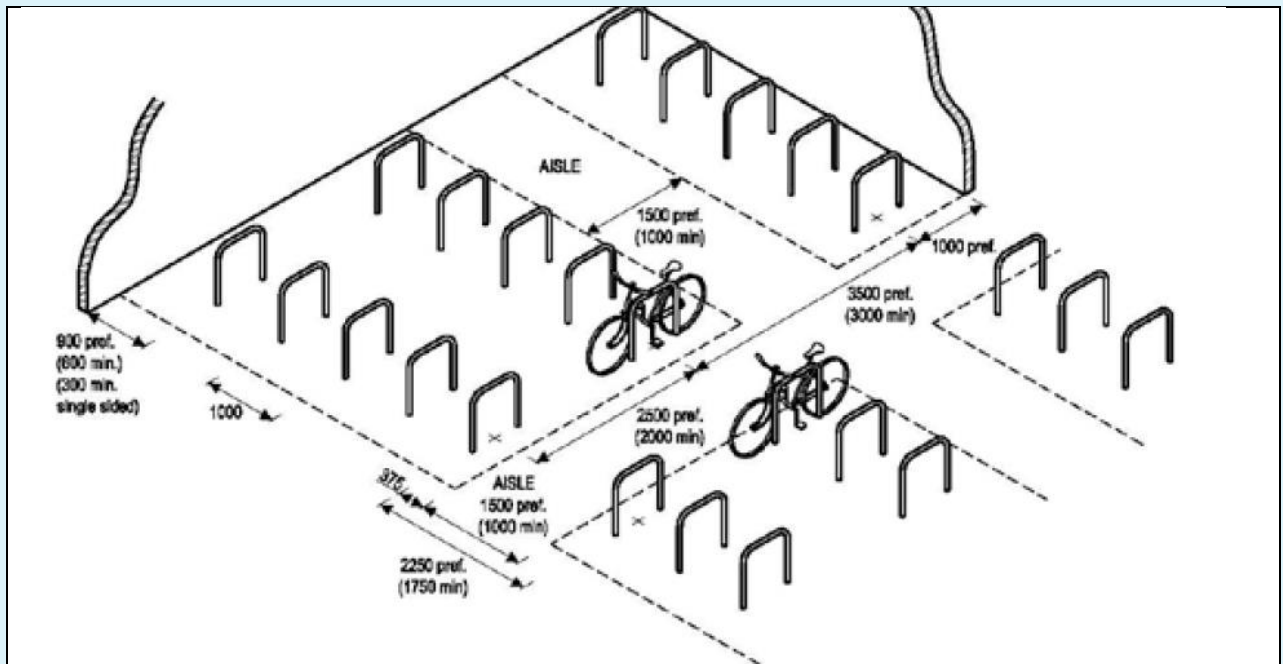


Figure 3.3 Indicative cycle parking layout

In addition, for bicycle parking to be used by many residents it must be secure and enclosed. Non secure parking will not encourage residents to purchase bicycles.

Height of blocks

It is noted on the map that the 3 story blocks are all proposed to be built beside existing 2 story dwellings in both Prospect Manor and Springvale. These blocks are also all concentrated together. This ignores the fact that the lands to the other side of the proposed development are currently green field sites and if the blocks were located on this side of the proposed development, then existing dwellings would not be overlooked. The SDCC Development Plan 2016-2022, Section 11.2.7 states for Building Height that “In regard to the proximity of existing housing where a new residential development that adjoins existing one and/or two storey housing (backs or sides onto or faces) shall be no more than two storeys in height, unless a separation distance of 35 metres or greater is achieved”. For this development the 35m distance has not been achieved and thus for residents of both Prospect Manor and Springvale that border the proposed development this raises concerns with regard to privacy, overlooking, noise and access to light. It should be noted that a previous planning application submission for these lands was refused by An Bord Pleanála for this specific reason:

“Having regard to the provisions 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 no more than two storeys in height, unless a separation distance of 35m or greater is achieved, and to the form,

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height and layout of the proposed development, it is considered that the proposed development materially contravenes the Housing (H) Policy 9 – Objective 3 of the South Dublin County Development Plan 2016-2022”
As the new proposed development for these lands has ignored the grounds for refusal by An Bord Pleanála and has not rectified it in this submission then it should be refused.

Mobility Management Plan

The Mobility Management Plan looks like a copy/paste from a different development. A few examples below –

<i>Car Sharing</i>
Initiatives
Encouragement of employees and visitors of the development to use other modes of travel other than private car.
Where it is necessary for car use to travel to and from work, staff should be made aware of other people who are either within close proximity of their homes (for staff).
Hold a coffee morning / launch event for potential car sharers

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Who are the employees here? Surely residents? Is having only 5 visitor parking spaces how they would encourage visitors not to come by car? This will just result in illegal or unsafe parking. Does the developer plan to hold an annual coffee morning for residents?

<i>Walking</i>
Initiatives
Provision of details on how to access the site on foot. Details would include safe walking routes and location of the nearest bus stops.
Promote walking events / lunchtime walks
Annual Team Walking Events i.e. Pedometer Challenge
Provide umbrella for employees of development on wet days
Offer in house health checks for staff of development interested in getting more active

Again, who are staff? Do they propose lunchtime walks for residents? And free umbrellas?

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Cycling
Initiatives
Launch Cycle to Work scheme for Staff of development
Establish a Staff Bicycle User Group
Encourage establishment of a cycling club / society
Provision for cyclist equipment i.e. pump, allen keys, lights, puncture repairs
Display maps of local cycle network on notice boards
Participate in national cycle week
Survey and monitor cycle parking occupancy
Install and or upgrade cycle lockers, showers and drying rooms

Lockers, Cycle to Work scheme for 'staff', cycling club?

This Mobility Management Plan looks to be a quick copy/paste exercise, or the unfiltered output from a quick brainstorm. It would be surprising if this MMP would be credible in any application to An Bord Pleanána, let alone a residential development.

In summary, this development (**311616**) is far too large for Stocking Lane, and the application should be refused.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

If your supporting materials are physical objects, **you must send** them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Remember: You can insert photographs and similar items in part 5 of this form – Observation details

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic housing observation **only** is €20.
- strategic housing observation **and** oral hearing request is €70

Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

Please note you will have to pay the correct **additional non-refundable fee** to request an oral hearing. You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observation

9. If you are sending us your observation using the online uploader facility, remember to save this document as a Microsoft Word document or a PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

The National Adult Literacy Agency (NALA) has awarded this document its Plain English Mark. Last updated: November 2020



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FEM – Received		SHU – Processed	
Initials		Initials	
Date		Date	

Notes