

An Bord Pleanála  
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14 November 2021

Dear Sir/Madam,

I am writing to make an **observation against SHD planning application 311616**, for a site development on lands at Stocking Lane, by MacCabe Durney Barnes Ltd.

It is my wish that An Bord Pleanála rejects this application. My main reasons for this are given below.

### **1. Rejection of previous application**

This is a revised version of a previous application (308763). The previous application was rejected by An Bord Pleanála on the grounds that it materially contravened the Housing (H) Policy 9 – Objective 3 of the South Dublin County Development Plan 2016-2022, because the new residential development proposed buildings of three storeys and above less than 35m from an adjoining estate having just one and/or two-storey housing (the estate in this case being Springvale).

Two changes to the plans have been made in the new application: duplex units have been changed to apartments and the planned vehicular access into Springvale has been replaced by a 5m footpath and cycle lane.

On this basis the new application should be rejected: Springvale is still an adjoining estate and the new development still proposes buildings of three storeys and above to be situated less than 35m from it.

### **2. The proposed footpath and cycle lane into the Springvale estate**

At face value the change looks like an improvement. I'm in favour of increased pedestrian and cycle access, provided it is implemented sensibly. However, there are difficulties with this proposal.

- a) The planned cycle lane is pointlessly short and of no intrinsic benefit. Therefore, will there be an extension of the cycle lane into Springvale and, if so, how will this impact the existing footpaths and roads in the estate?
- b) The plans propose that retractable bollards be added to the cycle lane. Such bollards can't stop cyclists from passing through. Why do these need to be added to a cycle lane that is of already of negligible length? It is reasonable to suppose that the intention is to convert the cycle lane into a road at some point in the future, in accordance with the original plans.

Clearly, the cycle lane will provide no benefit as currently proposed. It is my opinion that the addition of this cycle lane is a ruse designed to make it easier to apply for vehicular access to Springvale in the future, once approval for the overall development has been granted. Such access would spell disaster for Springvale: facilitating such a 'rat run' would drive up traffic congestion, noise and air pollution (now understood to be more harmful than previously thought, according to research published in the European Heart Journal), increase the volume of parked cars and inhibit residents' access to their homes, as well as compromising the safety of the many children and

domestic animals who live in the estate. Indeed, the Inspector's Report on application 308763 (Subsections 12.7.12 – 12.7.18) was critical of any planned vehicular access through Springvale and questioned the efficacy of retractable bollards in a residential context (12.7.16); this last point seems particularly pertinent given that there is apparently no vehicular access now planned.

### 3. The traffic assessment

The application is supported by a traffic and transport assessment completed by AECOM Ireland Limited. I would like to draw your attention to a number of concerns regarding this report.

- a) At the bottom of page 5 AECOM claim to have undertaken detailed traffic modelling of the proposed site access junction. However, in Section 5.4 (page 27), it is stated that traffic counts at the site were undertaken in December 2017 and that they are 'pre-pandemic and therefore represent a worst-case scenario with the appropriate growth rates being applied'.

This is a highly questionable statement. As everybody knows the first pandemic lock-down in Ireland took place in March 2020, and traffic volumes between December 2017 and March 2020 increased markedly in the area as the later phases of the neighbouring Scholarstown Wood development, comprising 314 residential units, were completed. Certainly, they increased beyond the forecasted generic growth (and thus inaccurate) rates stated in Section 5.5. Traffic on Scholarstown Road, Edmondstown Road and at the Taylor's Lane Roundabout (at the intersection of Taylor's Lane and Ballyboden Way) is heavily congested again at peak times, now that we have passed the height of the pandemic. This is simply not how things were in December 2017.

The proposed construction of an additional 131 residential units (with 167 car parking spaces), will raise traffic congestion in the area far beyond capacity, to an absolutely intolerable level. The local road network is clearly not designed for this level of traffic.

- b) Subsections 2.4.4 – 2.4.6 cover sustainable transport options. In 2.4.4 AECOM claim that the 'subject site is well served in terms of public transport provision', and then proceed to list just four Dublin Bus/Go-Ahead routes. Two of these have a frequency of an hour or more, hence are virtually useless during peak times. Evidently AECOM have not been thorough in their analysis, given that there is in fact a fifth route, Go-Ahead 175, which runs from Citywest to UCD Belfield and is one of only two routes serving the local area not having a terminus in the City Centre. In any case, during morning peak time, by the time the 175 passes through the area it is often late and already at capacity.

In subsections 2.4.5 and 2.4.6 AECOM briefly describe Luas Green Line Dundrum and Balally stops (approximately 6.5km and 5.7km from the subject site, respectively), and the GoCar hiring service, with a hiring station about 1.5km from the site. These options simply do not constitute viable long-term commuter solutions.

In summary, the area is emphatically not well served in terms of sustainable or public transport provision.

- c) On page 5 AECOM claim that the percentage impact of additional traffic generated by the area will be less than 10%. First, this is based on out-of-date data (see (a) above). Second, this claim does not take into account the fact that the local area is being besieged by new developments, either planned or under construction (e.g. 496 new apartments at Taylors Lane and Edmondstown Road, application 307222). It is patently disingenuous for such reports to ignore the cumulative impact of all these developments, and I implore the Inspector to take this into account in their assessment of this application.

#### 4. Waste water management and flooding

On page 5 of the Engineering Drainage Report, it is proposed that all roof, road and footpath run-off from Catchment B of the site (nearly 10,000 m<sup>2</sup> in area, according to page 25) will ultimately discharge into the existing public sewer under the Springvale estate.

I am seriously concerned about the potential for flood damage and sewage overflow in Springvale due to the added strain on the existing sewage network precipitated by the proposed development, which doubtless would be exacerbated by the effects of climate change in the coming years. I have witnessed the road drain outside 35 Springvale overflow during storms. I don't have photographic or video evidence to support this statement, but I know that other Springvale residents do and no doubt they will submit such evidence in their observations.

#### Conclusion

I recognise the need for a general increase in housing stock and acknowledge that it may be necessary to affect existing developments in the interests of the greater good, but the latest iteration of this plan, like the last one, is a cash-grab that will benefit the landowner and developers and few others. In particular, the apartment blocks, which comprise most of the projected accommodation, will spoil the character of the area (and are in contravention of the existing development plan, as pointed out above) and will likely end up in the hands of private or institutional landlords, so doing little to alleviate the lack of housing availability for prospective owner-occupiers. Meanwhile, the local road and public transport infrastructure is hopelessly ill-equipped to deal with the influx of hundreds of new residents alongside the thousands of others coming from other developments, either newly built, under construction or approved.

I object in the strongest possible terms to a proposal that will so adversely affect the local area and the estate in which we live, particularly given the recently completed or approved developments that are having and will continue to have such a detrimental effect.

Yours Faithfully,



Mrs Michelle Smith