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Ref: SHD3ABP-311616-21

The Secretary,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1

15th November 2021

Re: Planning application for strategic housing development consisting of 131 residential units, crèche, shop and associated site works on lands at Stocking Lane, Rathfarnham, Dublin 16
Applicants: MacCabe Durney Barnes Limited
Submission – Prospect Manor Residents Association

Dear Sir/Madam,

I have been requested by Prospect Manor Residents Association, 30 Prospect Meadows, Stocking Lane, Rathfarnham, Dublin 16 to make a submission in respect of the Strategic Housing Development proposed for site at Stocking Lane, Rathfarnham, Dublin 16.

The Prospect Manor Residents Association represents the residents of Prospect Manor, Stocking Lane which is located adjacent to the proposed development. Prospect Manor consists of circa 305 houses which were built between 1995 and 1999.

It should be noted that the applicants do not have authority to make application to carry out works on part of the lands included in the application. The proposed development includes for the construction of a new footpath from the development to connect to the existing footpath in Prospect Heath. I herewith attach extract from the Property Registration Authority website (landdirect.ie) which indicates that a section of land between the subject site and the footpath in Prospect Heath is in the ownership of No. 9 Prospect Heath. The applicants have not submitted a letter of consent from the owners of this property giving permission for this application.

The residents of Prospect Manor have concerns regarding this proposed development, particularly in relation to traffic congestion. I understand that individual residents have made submissions in respect of the application detailing their particular concerns. Prospect Manor Residents Association requests that the concerns of these residents be taken into account in the evaluation of the application. In particular, the concerns in respect of overlooking and loss of privacy of residents whose properties adjoin the site should be examined and addressed.

Prospect Manor Residents Association does not oppose development of this site for appropriate residential development purposes. However, the Prospect Manor Residents Association wish to raise particular concerns regarding traffic and transportation issues in respect of the development.

There are serious traffic issues in the surrounding area. The residents of this estate, Prospect Manor, have major difficulties with traffic on Stocking Lane and the adjoining roads most week-day mornings, particularly in the period of 7.45 am to 9.00 am. The situation is worse during school terms and during adverse weather conditions. Many mornings of the week, residents have difficulties exiting from Prospect Manor onto Stocking Lane with queues in excess of 100 metres long within the estate at peak times.

In addition to the current traffic, numerous housing developments have obtained planning permission with many developments under construction. These developments will add to the problems in the area until proper transportation plan measures are introduced. South Dublin County Council has effectively ignored these problems and the Council has no developed proposals to deal with these issues. The construction of this development will result in further problems for the existing residents as well as problems for any future residents.

The applicants submitted a Traffic & Transport Assessment with the planning application. The Assessment is deficient in many respects and it does not fairly represent the existing traffic situation in the area. The Assessment has been carried out on behalf of the applicants and clearly does not represent an independent assessment of the traffic issues in the area.

The Traffic & Transport Assessment states that the subject site is well served in terms of public transport provision. However, this claim is an extreme exaggeration. The only bus service that passes the site is the 15B Dublin Bus Route. The bus service on the Edmondstown Road has a stated frequency of 60 minutes. The other bus routes mentioned are very significant distances from the site and same will only serve a marginal need of residents. The distances involved are well beyond reasonable walking distances to be effective. It is not realistic to expect that many residents will walk long distances to access bus services and will therefore more likely travel by private vehicle.

According to the Assessment the nearest Luas line is circa 6.5 kilometers from the subject site. Again, it would be necessary to travel, most likely by private car, to access the nearest Luas Station. Hence, the primary mode of transportation for the residents of the proposed development will be private cars.

Stocking Lane is a narrow country lane which was not designed to cater for large residential developments. However, several residential developments have been constructed in the area over the past 25 years and no upgrading works have been carried out on Stocking Lane. Scholarstown Road is also a narrow country lane, with width circa 5.0 – 5.5 metres, and was also not designed to cater for large volumes of traffic.

Stocking Lane itself exits onto Scholarstown Road at an oblique junction. The layout of the junction impedes traffic turning left from Stocking Lane onto Scholarstown Road resulting in slower traversing of the junction by traffic. Buses have very severe difficulties in using the junction. This results in less traffic getting through the junction than a normal T-junction. The Assessment carried out takes no account of such difficulties. In addition, the proposed development does not provide for any upgrading of the junction.

The Traffic & Transport Assessment claims that traffic surveys were carried out on the Stocking Lane/Scholarstown Road junction. However, the actual date of the survey has not been identified in the Report stating only that the traffic surveys were undertaken in December 2017 i.e. four years ago. Clearly, the survey does not take proper account of the traffic situation in the area. The survey does not give any indication of the level of traffic waiting at the junction and the traffic queuing lengths.

The Traffic & Transport Assessment does not take account of the traffic flows which will be generated by the current housing developments which are under construction on Stocking Avenue and the many other large developments in the area which have received planning permission. In addition, there are significantly more zoned lands in the areas which will impact traffic-wise on the roads in the area.

I submit that the levels of existing traffic and the likely effect of the traffic which will be generated by the proposed development have been significantly underestimated. The proposed development will increase traffic congestion in the area. The proposed development does not provide for the necessary infrastructural improvements which would facilitate the carrying out of such development. Hence the proposed development will have significant adverse effect on traffic flows in the area.

The previous planning application (Planning Reference No. SHD3ABP-308763-20) incorporated a proposed access road into Springvale from the eastern side of the site to help to alleviate some of the extra traffic generated by the development. However, this link has been omitted from this application and all traffic shall be directed onto the sub-standard Stocking Lane.

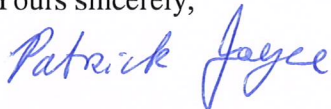
The statutory planning guidelines on sustainable residential development in this area suggest 35 -50 dwellings per hectare. Based on the declared site area of 2.47 hectares, the development size should be between 82 No. and 123 No. units. As the site is a development on a sub-standard country lane, over 3 kilometres from a main town centre and not on a quality public transport corridor, the maximum number of residential units should be towards the lower end of the suggested range. Hence, the proposal will result in overdevelopment of the site.

I submit that a proper Local Area Plan should be put in place for the overall Scholarstown Road/Stocking Lane area. The Plan should take account of existing and likely traffic in the area. An independent Traffic Impact Assessment should be carried out which would evaluate traffic in the overall area rather than the piecemeal partisan assessment carried out for this development.

Prospect Manor Residents Association considers that the commencement of the proposed development should be put on hold until such Local Area Plan is prepared and adopted. Subsequently, realistic limiting conditions should be put on the proposed development until the necessary improvement works are carried out.

Similarly, based on current progress, the likelihood of public transport services being significantly improved in the short to medium term is relatively small. We submit that any approval for the proposed development should be made contingent on proper public transport services being put in place prior to commencement of development.

Yours sincerely,



Patrick C. Joyce
Patrick Joyce Associates

Property Details

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Folio Number	DN173689F
Title Level	Freehold
Plan Number	BG2PA
Property Number	1
Area of selected plans	Not available.
Number of Plans on this folio:	1
Address	9A Prospect Heath, Dublin 16, D16 XF96

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*PRA Boundaries and Plan Areas are not conclusive. See Section 62(2) of Registration of Title Act 2006 and Rule 8(3) of the Land Registration Rules 2012.

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