

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

(b) Observer's postal address

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

(b) Agent's postal address

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.)

Dear Sirs,

The subject land is zoned within the SDCC Development Plan as RES to '*protect and / or improve residential amenity*', We strongly feel that the proposed development is in direct contravention to this objective. It does not protect the residents of Prospect or Springvale, neither does it improve the local residential amenity. We will outline below our reasons for believing the above statement.

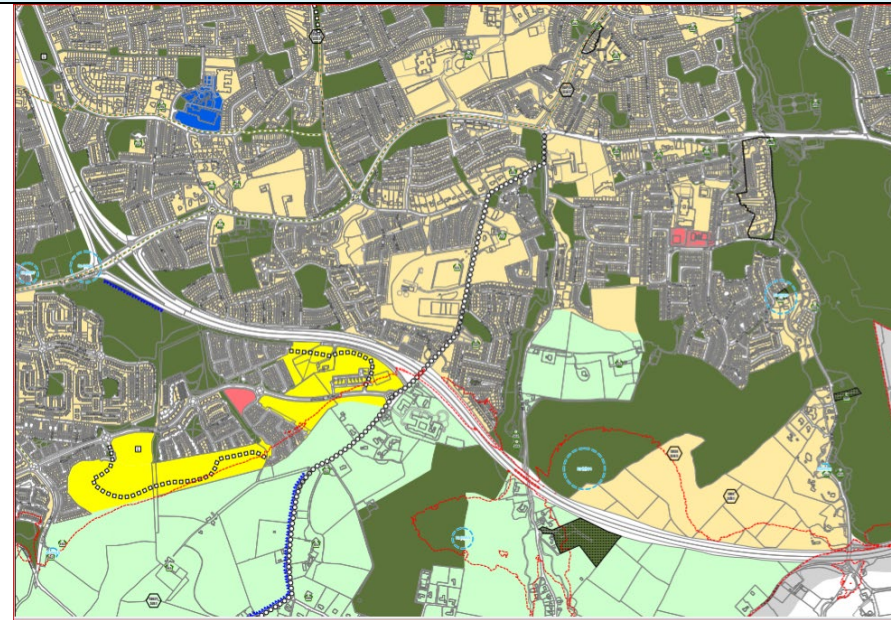
- 1) **Road** Infrastructure
- 2) **Traffic** implications
- 3) **Education** Availability
- 4) **Unsuitability** of Apartment blocks for the area
- 5) **Appearance** - Character of Stocking Lane
- 6) **Impact** on residence: daylight, noise, privacy

1. ROAD INFRASTRUCTURE

The two available road networks are the R115 Stocking Lane and R116 Edmonstown road. The R115 is an old country road leading up to the Dublin mountains, extremely popular with cyclists. It has a singular lane in each direction. There is no bus corridor. It is ill-equipped to cope with the vehicular demands that housing development has imposed on it over the last number of years. For example, Stocking Wood, Airpark, White Pines, Hunters Wood. Developments are still being granted, for example the most recent on Stocking Avenue granted 12th October for additional 329 Residential Units. Thousands of additional housing units have been built in recent years **yet there has been no improvement in road infrastructure or public transport**, in fact the roads have been impeded and lessened in access by works such as the Orlagh roundabout. While we appreciate the lands at Stocking Avenue (West of the M50) were identified and zoned by the Development plan for RES-N, **the road infrastructure or access to the M50 just isn't sufficient and the country lanes cannot cope with the density without further investment.**

We acknowledge that there is a strategy (TM Policy 3) to get people on bikes however it must be pointed out that, in reality, the **area is too far away from amenities** and employment for many people to use bikes. For example, **the area is closer to the rural boundary than it is to the next community amenities** (over 3km) and there are no safe cycle lanes. Ref image where you can see proximity of site to rural boundary (light green) Within the map below there are limited amenities within proximity of this site.

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Rural Boundary outlined in light green.

2) TRAFFIC MANAGEMENT

Traffic Impact Assessments are required to demonstrate that sufficient, realistic and verifiable levels of public transport carrying capacity and road capacity that will be provided for however, while the TTA was supplied and the applicant states that the 'road network on the western side of the site can accommodate the development', this would not be the opinion of the residents who use this road daily and we would strongly argue that this is untrue.

Anyone who lives on the R115 knows and experiences the daily challenges with traffic on this small, narrow, steep and windy country lane, especially in the morning where, in Prospect Manor, you may be 8 cars deep into the estate not even able to access the R115. The traffic was significantly impacted further by the recent upgrades to the Orlagh roundabout. The effects are catastrophic and access to the M50 has been significantly hindered. (Bikes are not an option if you need to access the M50)

Cosgrave's lands (SHD3ABP-305878-19) and the new approved application at Stocking Wood will only add to this congestion nightmare. The cars are backed up from the M50 exit all the way to Stocking Lane daily. Adding more housing onto this lane is going to make it impossible to get out of the estates on the R115 for local or M50 access.

The Development Plan, Traffic Management states the following objectives:

TM1 Objective 3: *To focus on improvements to the local road and street network that will better utilise existing road space and encourage a transition towards more sustainable modes of transport, while also ensuring sufficient road capacity exists*

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for the residual proportion of the trips which will continue to be taken by private vehicle.

TM1 Objective 6: *To support the delivery of sufficient public transport and road capacity to facilitate sustainable new development in the County.*

TM5 Objective 3: *To minimise the impact of new development on the County's road and street network.*

We believe that the proposed development contravenes all the above objectives for existing residents.

Furthermore, the impact statement provides the following table and supposes that the impact on to Scholarstown Road will only be 1.4% however, this appears to be based on a projection of **18 cars entering the junction between 8-9am** which we find highly unlikely. Given that the development is allowing for 131 units it would seem highly unlikely that only 18 cars will impact on the scholarstown junction. Logically, it looks as if the assessment proposes that 40 cars will exit the estate, and only 18 will turn right. I wonder where they suspect the 31 other cars are going up the hill? I can propose from experience that the majority of cars that go up the hill in the morning are those who are avoiding the long tail backs to the M50, **thus an infrastructural problem as opposed to a directional intent.**

Table 5.3 – Percentage Impacts

Junction	Traffic Flows	AM Peak (08:00 – 09:00)	PM Peak (17:00 – 18:00)
1. Scholarstown Road/ Stocking Lane	Base Flows at Junction	1224	1022
	Development	18	31
	% Impact	1.4%	3.0%
2. Site Access/Stocking Lane	Base Flows at Junction	928	907
	Development	49	46
	% Impact	5.3%	5.0%

Furthermore, there is a proposal for another pedestrian crossing, meaning there will now be three pedestrian crossings within a 100m straight.

3) EDUCATION - AVAILABILITY OF SPACES

The area has become so densely populated that school spaces for both primary and post primary are becoming a challenge for parents currently living in the area. It is proposed that this challenge will worsen as the density grows and there is insufficient infrastructure to cater for children's educational needs.

In the Development Plan, the Department of Education have already identified

“a need for additional post primary schools in South Dublin County up to 2026. Demand for further provision is also identified in the Lucan; Saggart/Citywest; Newcastle/Rathcoole; Knocklyon/Firhouse/Ballycullen areas”

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C9 Objective 2: To support and facilitate the provision of additional post primary schools in Kingswood (Tallaght); Lucan; Saggart/Citywest; Newcastle/Rathcoole; and Ballycullen/Firhouse/Knocklyon areas.

C9 Objective 10: That a secondary school be built in the Firhouse/Ballycullen area over the lifetime of this plan to cater for the school going children of that area.

We believe that the proposed development is too densely proposed and will out further pressure on already stretched educational spaces in the area.

4) UNSUITABILITY OF APARTMENT BLOCK

It is our belief that the site is unsuitable for high density, 4 storey apartment design based on

- Over-development
 - the *Sustainable Urban Housing: Design Standards for New Apartments 2020*
 - Housing (H) Policy 6 Sustainable Communities
 - Housing (H) Policy 9 Residential Building Heights
- 1) The planning guidelines recommend 35-50 dwellings per hectare. These lands are 2.47 hectares meaning it should range from 86-123 units. We strongly believe high density is unsuitable given it's picturesque location on the foot of the Dublin hills and the distance from amenities, being closer to the rural boundary than a local villae or community.
 - 2) Based on the NPF's, the *Sustainable Urban Housing: Design Standards for New Apartments 2020* our understanding would be that the site doesn't sit within the second category of **Intermediate Urban Locations** since it is:
 - o **NOT** within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions.
 - o **NOT** within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;
 - o Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15 minute peak hour frequency) urban bus services. **The site is in close proximity to one bus stop on Stocking Lane that serves the 15b every 15 minutes but it's highly unreliable.**

It is more reasonable to assume it falls into the category of **Peripheral and/or Less Accessible Urban Locations** which recommends that

Such locations are **generally suitable for limited, very small-scale (will vary subject to location)**, higher density development that may wholly comprise

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apartments, or residential development of any scale that **will include a minority of apartments at low-medium densities** (will also vary, but broadly <45 dwellings per hectare.

- 3) Objective two of the housing policy ask to consider high density in locations close to amenities. **We would argue that this location is closer to the Rural boundary than it is to any community or amenities**, with limited public transport of one bus serving one route every 15 minutes on a congested road with no bus corridor.

H8 Objective 2: To consider higher residential densities at appropriate locations that are close to Town, District and Local Centres and high-capacity public transport corridors in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009).

Height

The Development proposal includes 'higher buildings' that are greater than the prevailing building height in the area. We believe that the urban design rationale is not strong enough, the height is too imposing and the impact on us in terms of visuals, noise, and light is excessive. There is **no transition of height** from existing buildings to an **imposing** 4 storey apartment block, more suited to an urban area as opposed to a country lane.

The appropriate maximum or minimum height of any building will be determined by: The prevailing building height in the surrounding area. The proximity of existing housing - 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.

5) SITE SUITABILITY – CHARACTER OF THE LANE

The proposed development is on a country lane, the R115 which has a beautiful character as you ascend the hill the landscape character for this area is 'Urban' and has formed around existing natural features. The **River Dodder** is positioned across the centre of the neighbourhood with a section designated as a proposed **Natural Heritage Area**. The area is close to the Rural Boundary as identified on The Development Plan. As a long-established neighbourhood area, this area also has significant numbers of mature trees, all of which act as Green Infrastructure and Climate Adaptation measures.

We appreciate the requirement for housing however the placement of apartment blocks is completely out of character within this setting. There is also little 'Green Infrastructure' planning to compensate for the concrete jungle that will replace this vista:

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View up Stocking Lane, proposed site on the left.



View to Proposed site from no. 5 Prospect Avenue back garden.

G2 Objective 5: To integrate Green Infrastructure as an essential component of all new developments.

G2 Objective 9: To preserve, protect and augment trees, groups of trees, woodlands and hedgerows within the County by increasing tree canopy coverage using locally native species and by incorporating them within design proposals and supporting their integration into the Green Infrastructure network.

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HCL17 Objective 1: To review the number of Tree Preservation Orders within the County and maintain the conservation value of trees and groups of trees that are the subject of any Tree Preservation Order.

6) Impact on Residence

The impact of the proposal on the residence at Springvale and Prospect Manor will be great. I note that a visual Impact assessment was carried out. However, this assessment looks from mid-street in the estate! I find this somewhat amusing. Nobody will be impacted from the centre of a street! **The impact is seen, felt, heard, and lived from our homes, below is the view from ours.**



Projected visual impact, even with new 6ft raised fence.

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We will be impacted in terms of

- noise pollution for years of building works, disruption to lifestyle in that we will not be able to sit out the back, hang out clothes to dry or open windows for many, many months.
- Long term however, the impact on us will be noise, privacy, daylight, and quality of life. We are going from the above image with a picturesque, countryside view to a four-storey apartment block with no transition of building height.
- We believe we will be impacted drastically by daylight. While the assessment “Daylight Analysis & Overshadowing” addresses the issue it only gives projections of proposal, which they call ‘adequate’. **It doesn’t address the ‘impact’**, in other words a before and after.

Boundary treatment

We are not confident in the boundary treatment proposed in the landscaping plan PC Roche and Associates 1490-2012 Landscape Layout nor are we clear on the proximity of same to our boundary. Neither are we comfortable with this issue being left to be addressed in post planning conditions.

To conclude, we acknowledge the need from government to build houses however we strongly feel that the proposed development is not suited to its location. This is a country lane which currently does not have the infrastructure to support its current residence. There is already a lack of amenities and services with the nearest community 3km away. There is no dart, no luas and unfortunately no plans in the medium or long term to ever have one. The area is served by only one bus with no bus corridor. (The trip via bus can take 1.45-2 hours to access the city in the morning with traffic.) It is a real bottleneck for traffic as all amenities are far away and thus people require their cars. Bikes are not the answer in this instance. Furthermore, the residence in Springvale and Prospect, particularly the Avenue where we reside, will be severely impacted visually by an overpowering, imposing “U” of apartment blocks, completely out of character for the area.

Thank you for hearing our concerns.

Sinead & Rory O Donohoe

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