

Strategic Housing Division
An Bord Pleanála
64 Marlborough Street
Dublin 1

Springvale Residents Assoc.
springvaleresidents@gmail.com

02/11/2021

Objection to Application: **ABP-311616**

- Strategic Housing Development Application at Stocking Lane, Ballyboden, Dublin 16

Dear Sir/Madam,

We are members of the Springvale Residents Association representing the residents of Springvale. We are writing to you in relation to the planning application submitted by MacCabe Durney Barnes Ltd, for permission for a Strategic Housing Development at Stocking Lane, Dublin 16.

Springvale is a small development consisting of approximately 80 houses. It is situated to the east of the proposed development sharing a site boundary.

It is planned to route drainage from the proposed site through the existing drainage facilities in Springvale and to link Springvale to the proposed site by pedestrian, cycle and vehicular access with controlled stainless-steel bollards.

It is important to note that the proposed site has an overflow pipe from Irish Water's Ballyboden Water Treatment Plant nearby, located on Stocking Lane.

The overflow connects the plant to the Owendoher river, crossing through the site and connecting in Springvale.

We intend to show that if approved, this SHD application will have a severe and detrimental effect on our estate. It will have a negative impact on the resident's day-to-day life in this quiet and self-contained estate of Springvale.

Yours faithfully,

Moira Byrne, Colm Byrne, Dermot Lambert, Syl Cotter, Bill Clohessy and Maria Brenner.

Springvale Residents Association,
44 Springvale,
Edmondstown Road,
Rathfarnham,
Dublin 16.

1. Drainage

It is our belief, having viewed the proposed plans, that if they go ahead in the current format the chance of flooding to our estate will greatly increase.

In the flood risk document, it says that there have been no examples of flooding in the area. This is incorrect, Stocking Lane itself has flooded as recently as March 2018.

Perhaps this is why the developers have not looked to engage with the storm water drainage system on that side. Instead, they've looked to send the water through Springvale with the belief that we have not suffered flooding and have adequate capacity to shoulder their excess without burden. This fallacy needs to be addressed.

Here is an example of our current storm water capacity in the middle of Summer 2019 submitted by one of our residents.

As clearly seen here, Springvale's current drainage system is failing. Residents themselves have even had to invest in flood mitigation solutions to protect their properties as per images attached. While this manages to stop some of the excess water entering this property, the water still needs to go somewhere. This remedy at the above property only sees one neighbour diverting water on to the next, entering properties from top to bottom. While thankfully not disastrous in recent times, it's a significant enough issue that even currently it causes concern.

The new development could bring disaster and here's why. The undeveloped greenfield site itself acts as a huge storage of water. The soil and grass of the field helps absorb a considerable amount but yet even with that, we see the effect the storm water above can have on our system. Now remove 90% of that soil and grass absorption and replace it with concrete. Where does that water go if no longer absorbed? The proposed plans intend to piggyback onto this already struggling system and plug directly into the same water system. It is clear from the plans the entirety of the proposed development will divert its stormwater into this already inadequate system and at the same point as the overflow pipe from Irish Water's Ballyboden Water Treatment Plant. That is outside 30 Springvale.

The flood risk document only looks at the flood risk to the site not to the adjoining properties. Development should not come at a cost to those already here.

1.1 Links to drainage video clips

[Springvale Drainage Video 1](#)

[Springvale Drainage Video 2](#)



2. Traffic

The landscape design document says there will be "Vehicular link with controlled stainless-steel bollard". It does not inform us when it intends to have the bollards up or down. Who will be controlling these bollards?

Who will be responsible for the maintenance and upkeep of the bollards?

Any vehicular access will result not only in an increase in the number of vehicles, but it will radically change how the existing roads in Springvale will function and as a direct result, the very nature and fabric of the estate itself. This proposal will also result in additional cars being parked in the estate.

Vehicles struggle on the bends on a daily basis and often have to pull in and even reverse in order to pass. Other problems include bin trucks being unable to turn due to space restrictions and larger vehicles like lorries being unable to get to the rear of the estate as the roads are too narrow. Consider emergency access. What if a fire truck is unable to pass during an emergency as the roads are congested due to traffic or additional parking blocking the road? The orientation and gradient of the roads, especially at these bends means that road surfaces are often frozen and extremely dangerous to drive on. Cars normally parked at the back of the estate have been left at the front of the estate during periods of ice and snow as they are unable to get up the hill.

Will future residents in the development facing difficulties exiting their estate via Stocking Lane in the morning due to congestion decide their best option is to park on the far side of the bollards in Springvale? This is a poor attempt at a solution and will lead to further traffic and parking chaos. 110 units will only have access to one car park space so where will any additional cars park. Springvale is their only option.

The links below provide footage of a truck meeting an oncoming vehicle and reversing around the blind bend adjacent to the site. Also shown is an example of the difficulty's drivers will face navigating the corners and captures perfectly the chaos that exists on a daily basis on Springvale's roads.

2.1 Links to traffic video clips

[Springvale Traffic Video 1](#)
[Springvale Traffic Video 2](#)

2.2 Link to Traffic photo

[Springvale Traffic Photo 1](#)

3. Amenity

If the proposal were granted the proposed houses would overlook houses in Springvale's front and back gardens resulting in a major loss of privacy. It would also result in a reduction of our natural levels of light. On their overshadowing report, you can clearly see the impact of shadow caused on Springvale from No. 65 to 73.

The new buildings have an overbearing effect on Springvale. Overall development will contribute to significant increase in noise pollution.

Major excavation works will be required due to different site levels between the site and Springvale resulting in instability.

Springvale shares an old stone wall with the site which dates back to 1843. It can be seen in the 1843 map of this area. This old wall adds greatly to the quality of the landscape character and there is no clear commitment on how it will be rebuilt. There has been no engagement with the residents about their views on the future of this shared wall. A shared wall means joint ownership.

4. Ecology

Documents from the developers to date have ignored the relevance of the specific flora and fauna in the area. Substantial local reports indicate the need for such investigation and we cite as examples evidence from the Dublin City Otter Survey (2019) and the Whitechurch Stream Flood Alleviation Scheme Ecological Impact Assessment Report (2020). Collectively the reports conducted of the local environment give an indication of the wealth of local flora and fauna and highlight the negative impact of increased population density on both protected species and other mammals and the aquatic environment. Given what is known of the local nature is it essential that a comprehensive assessment is completed of the specific area being proposed for development and the specific impact of this on the local environments.

In the Response to Opinion Report it says "A total of 29 trees have been shown for removal within categories B & C representing 28% of the total trees on the site."

The removal of trees and hedgerows will have a serious ecological impact on all wildlife in the area.

5. Misleading Information

We have found misleading information in a number of places.

The planning notice never mentioned the vehicular link to Springvale. It just said

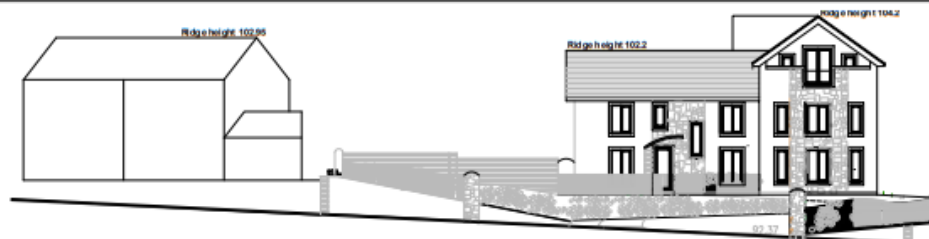
- A new pedestrian and cycle access to the Springvale estate to the east.



View 4 in CGIs.pdf is misleading. The new three-storey building on the left appears to be built below the level of the Springvale not above. The site level is actually at the top of the white dashed wall. The virtual view in the model has been created in such a way as to assist the suggestion that it will not have an overbearing effect on the view. This is misleading and the reality is that the scale and height will be overbearing and it will have a significant negative effect.



Site section F F1



Section F F1

Taking one of the elevation drawings from the proposal that depicts View 4 and again the fact that Springvale is actually lower than the site is not correctly represented.

44 Springvale has been moved so as to appear to be on the same level as the top of the white wall. You need only look at the photo above to see it is lower.

Another example is in the Stocking Lane Concept Plan and Design Criteria Statement the 2-meter drop between the site and Springvale is described as a gentle slope.

The field is relatively flat and also gently slopes towards the Owendower River making it relatively easy to drain.

The Landscape and Visual Impact Assessment document states that the site is actually two meters higher than Springvale "The ground level of the site is c2m higher than the surface of the carriageway."

A 2m drop is not a gentle slope.

In the Site-Specific Flood Risk Assessment document conclusion, it says



" The nature of the topography prevents standing water ponding."

This is not true. Shown here is a photo of ponding in the site.

Conclusion

We have attempted to show that the proposed development contains unique aspects that will have a severe and detrimental effect on our estate in terms of drainage and traffic disruption.

The overbearing nature of the proposed development will have a negative impact on families.

It will adversely affect the surrounding area including the loss of an old hedgerow on stocking lane and by increasing the risk of damaging the 600mm Irish Water pipe transiting the site which would affect the wider Dublin area.

Despite suggestions to the contrary, flooding is a concern in Springvale and the existing road layout is not designed to accommodate increased vehicular access. This development will add significant volumes of both traffic and stormwater into an already straining system. The application in its current state effectively aims to throw these major problems over the wall and into the next-door neighbours. Springvale should not be used as an unwilling partner in order to achieve the planning permission being sought.

In conclusion, it is clear that if approved, this Strategic Housing Development Application will have a significant and negative impact on the lives of every person in this quiet estate.

We ask that you consider fairly the reasons for our objections and request that this application is rejected.