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The Manager
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Date: 25th November 2022

Planning Application: Ref: SD22A/0401

Proposed development by Emmaville Ltd. at the site of Scholarstown House, Scholarstown Road, Dublin 16

Payment reference: OBSERVATION-99

Dear SDDC Planning Dept. Manager,

(I could not find your name on the SDDC website.)

I am writing to object to this development on the basis that the current (and planned) transport infrastructure, public services, and public amenities in the area are not adequate to support it *in addition to* the large Two Oaks development currently under construction.

Here are my observations and questions having read the planning application details available at <https://planning.agileapplications.ie/southdublin/application-details/63316>

- 1. The location map includes schools and local amenities but gives no indication of whether there is sufficient capacity to support this and other new developments in the area.**

The development plans do not contribute any new community or public recreational facilities, the plans only assume that current facilities are adequate to serve the needs of the future residents.

- 2. The Traffic and Transport Assessment Report (page 11) projects future traffic at Orlagh roundabout based on current 2022 levels plus an “assumed” growth rate of 1.46%.**

These calculations do not specifically consider additional traffic from the Two Oaks development. Nor do they examine the negative impact of extra traffic on Scholarstown road and beyond – for all users but especially public transport via that route. The roundabout is an access to and from a motorway junction and regularly causes a backlog of traffic on Scholarstown road. This is partly because the roundabout was designed to restrict and slow traffic flow – can it *safely* handle more traffic, including large vehicles?

- 3. The travel plan (Page 10) states that “The proposed development is ideally located with excellent public transport facilities” and that “this development will be well served by public transport with 175 & 15 Bus service available on the R113 Scholarstown Road.”**

Under what criteria were these services rated as “excellent?” At present these bus services are full at peak times and that is before the new Two Oaks 590 ‘unit’ development opposite Woodfield is even finished. This article highlights the issues experienced by commuters in the area - <https://www.thejournal.ie/real-time-information-issues-dublin-bus-driver-shortage-5913341-Nov2022/>.

4. The graphic on page 6 of the Traffic and Transport Assessment Report projects bus use increasing to 20% by 2028, how (and when) exactly will a reliable public transport service be provided for current and future residents?

The plan states the NTA plans for a new spine and orbital route but also states that they will be rolled out “over the coming years” and “as part of the Project Ireland 2040 program.” *Those vague statements (Travel Plan, page 10) could mean that residents will be waiting 18 years for a basic public transport service with no plans for metro, LUAS, etc. as available in other highly populated areas of the city and suburbs.*

5. Road safety was assessed in August under ideal weather conditions and during school holidays.

This should be regarded as a best-case scenario which is not representative of the conditions experienced during most of the school year. Bus users and cyclists are also more likely to drive in poor weather and more children require lifts to school.

The Safety Audit Brief Checklist shows that 7 out of the 10 of the listed sections have not been included, with no extra information provided.

Can the current footpaths/ cycle lanes deal with extra pedestrian, cyclist, and electric scooter traffic from the proposed and current developments while enabling children to travel safely to their schools?

6. Are there enough car parking spaces to prevent ‘overspill’ into existing areas nearby?

The car parking provision assumes availability of “a high-quality public transport service” which current residents are still waiting for. Illegal and dangerous parking at the entrance to Woodfield is an ongoing problem since work started on Two Oaks. Section 2.1.7 of the Road Safety report recognises a problem with existing on-street parking in Orlagh Grove. The report recommends solutions should be found but detail is not provided.

7. The Roof Plan shows a grass planted roof but does not include solar panels.

This does not meet the objectives for solar energy – described in the energy statement. Likewise, plug in cars accounts for over 20% of sales in 2022, are 8 EV charging spaces enough to meet future requirements, who will provide the service, what charging speed, and how much will it cost to charge?

As with other parts of this application, it is the omission of important detail that is concerning.

In summary, I find the application to be based on many assumptions and questionable statistics. The development plan which would further increase housing density in the area. It does not give due consideration to current and future residents in terms of availability and access to local services, transport infrastructure, or other amenities. The proposed development is out of proportion with existing developments and the school on Scholarstown Road which it overlooks.

I trust that my concerns will be given full consideration and that Planning Permission will not be granted to Emmaville for this proposed development.

Yours faithfully,



Enda Lee