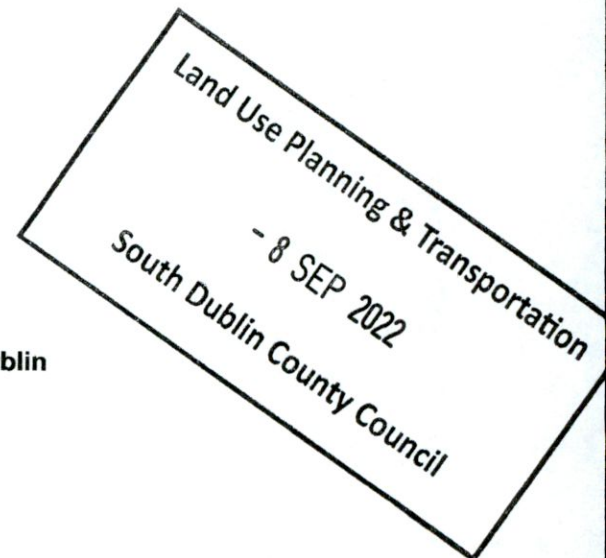


3 Lucan Cloisters,
Lucan Heights,
Lucan Village,
County Dublin.

4th September 2022

The Principal Planning Officer,
Planning Department,
South Dublin County Council,
PO Box 4122,
Town Centre,
Tallaght,
Dublin 24.

**Re: Planning Reference SD22A/0324
Objection to Planning Application SD22A/0324
Development at Hill House, Lucan Road, Lucan, County Dublin
Applicant - Frances Dowling**



Dear Sir/Madam,

We wish to make observations and an objection to the above planning application and would request that planning permission for the development be refused.

We enclose the requisite fee of €20.00 and would be obliged if you would confirm receipt of same together with this submission.

Introduction

By way of introduction, we live in 3 Lucan Cloisters, which is one of two semi-detached private residences which abut the south of the Hill House property.

In our opinion the proposed development is not in compliance with the proper planning and sustainable development of the area. If permitted it would detrimentally impact on our home (3 Lucan Cloisters), our neighbouring house (4 Lucan Cloisters), and numerous other residential properties in the area.

If granted, it would also set a precedent that would ultimately have a negative impact and seriously damage the character of the Lucan Village area.

We are acutely aware that Dublin has a serious housing crisis, and that there is a requirement that the development of residentially zoned land be realised. However, the densification of any property, and Hill House in particular, must be balanced with respect for the receiving environment of low rise residential and village related properties.

In the context of the proposed development, one must consider the suitability of the site in principle, and the ability of the receiving environment to absorb the proposed development, which are very different considerations.

Whilst there is no obligation to do so, it is worth noting that the applicant has chosen not to engage, converse with or consult with any local residents that will be affected by the proposed development, prior to the making of this and previous applications.

We have set out below, under a number of headings, our observations/reasons as to why we believe that planning permission be refused.

Historical Applications

A planning application for an almost identical development was lodged with SDCC on 24th June 2019 (SD19A/0198) and this application was refused by the Planning Authority on 19th August 2019, for a number of reasons, including

- Traffic access in close proximity to a controlled junction and onto a heavily trafficked road – traffic hazard/obstruction of road users
- Bulk, scale and massing – visually obtrusive/adversely impact on visual and residential amenity of area – undesirable precedent – contrary to proper planning and sustainable development
- Significant overbearing impact on dwellings to the south – not in accordance with zoning objective to protect/improve residential amenity – would seriously injure the residential amenity of the area – contrary to objectives of County Development Plan
- Non-compliance with Section 3 of Urban Developments and Building Heights Guidelines for Planning Authorities

The current proposed development does not in any way overcome these previous reasons for refusal.

Traffic Movement

The proposed development has paid scant regard to the current traffic problems and congestion in the area, and to the previous concerns expressed by the Planning Authority. As the Planning Authority/SDCC is aware, currently Lucan Village and approach roads are choked with traffic in the morning (school opening times/travel to work times) and similarly in the evening, and experiences very heavy traffic during weekdays, with seriously restricted traffic movement. The proposal by the applicant to requires direct access onto Lucan Road, which currently has two lanes in the west direction and one lane in the east direction, and is extremely close to an already very busy and dangerous junction.

The junction is incapable of dealing efficiently with the levels of traffic already passing through it. For example, in the evening the level of traffic travelling west along the Lucan Road and then turning right at the junction to cross the Liffey in the village is such that it tails back well past the entrance to Chalet Gardens. On most evenings this tailback forms in the right turn lane and then tails back over the hatched area, and on into the lane designated as a right turn into Chalet Gardens, making this lane unusable for those seeking to turn right to access Chalet Gardens.

The proposed addition of a box junction traffic control measure at the entrance, be it over the two west bound traffic lanes, or over the three lanes (full road width) will not serve to prevent additional congestion. On the contrary, it will serve to exacerbate the current traffic congestion, difficulties and create a traffic hazard at/near the junction. For example, a car exiting the proposed development and seeking to turn east will in many instances cause serious disruption and create accident hazards, when unable to enter the east bound lane (which experiences regular traffic queues/tailbacks) will block the westbound lanes when they get a green light to progress. By way of further example, a car seeking to enter the proposed development from the eastbound lane/coming from the village will have to wait until oncoming westbound traffic halts, and in the meantime will block all eastbound traffic behind it, further creating tailbacks.

Given the very limited number of parking spaces proposes (11 spaces) and the number of apartments proposed (6 x 1 bed and 13 x 2 bed) the largest volume of traffic entering the proposed development will be cars seeking/hoping for a parking space, and then on finding no space available, given the limited availability, will then have to exit to find alternative parking. Thus, the entry of these cars will cause congestion and traffic hazard issues, to be immediately followed by exit, causing further congestion and traffic hazard issues. Those exiting will either turn left to drive towards the village and into Lucan Heights, or will turn right to drive into Chalet Gardens, and eventually around to Lucan Heights, in search of alternative parking.

Additionally, with several self-contained units nearing completion in the very nearby Presentation Convent, the problems at this junction will be further problematic.

Height/Scale/Design

Referencing SDCC Development Plan 2016/2022, H9/Objective 2 is *"To ensure that higher buildings in established areas respect the surrounding context."* and H9/Objective 3 is *"To ensure that new residential developments immediately adjoining existing one and two storey housing incorporate a gradual change in building heights with no significant marked increase in building height in close proximity to existing housing."*

It is very clear that neither of these objectives have been meaningfully considered into account with the proposed development. There is absolutely no respect for the surrounding buildings/area, which comprises one and two storey houses east of Hill House along Lucan Road, a two-storey convent (which is a listed/protected structure), church and two storey schools west of Hill House along Lucan Road, and an open space and one storey school opposite the proposed development, and a two-storey residential development (Lucan Cloisters and Lucan Heights to the rear of the proposed development).

Furthermore, the proposed development would be immediately adjoining 3 and 4 Lucan Cloisters, with a very severe, abrupt and significant marked increase in building height, with the two-storey element not serving to ease this given the short distances involved. The stepping of the south elevation, between two, three and four stories, in no way eases this severe, abrupt and significant increase in building height.

The four-storey height is totally out of scale and proportion with adjoining properties, and utterly fails to consider the adjoining listed building/the convent, and the single and two storey dwellings along Lucan Road, and would interrupt the line of sight in a most negative manner.

In the case of all houses in Lucan Cloisters and many in Lucan Heights, gross overlooking, together with loss of light and loss of privacy would result from a development of this scale.

The density of the proposed development is inappropriate, with far too many units being proposed given the total site area.

The proposed development has not been designed to ensure that it respects the character of the area and represents an incongruent visual element in the wider setting of Lucan village. The design does not respond to local character, and does not serve to protect or enhance the local built heritage. In fact, to the contrary, local built heritage would be adversely affected in terms of scale, height, massing, alignment and materials. The proposed building height and location in the context of Lucan Road and Lucan Cloisters/Lucan Heights does not reflect the prevailing height of the surrounding area.

Parking

The proposed provision of 11 car parking spaces cannot be considered as anything other than derisory, inadequate and not in compliance with requirements. At a very conservative estimate taking one car per each one-bedroom apartment, and two cars per each two-bedroom apartment, that would require 37 car spaces. The net result of this would be, given that there is no parking on Lucan Road, that occupants will seek to use Lucan Cloisters and Lucan Heights for parking, which would create difficulties for residents there, including greatly increased traffic volumes, traffic hazards and difficulties for emergency vehicle access.

This is a residential area with many children that access and play on the green. This, what might be correctly termed overflow parking from the proposed development, will result in the blocking of footpaths, driveways and local roads, and will most likely result in serious injury, and potentially a loss of life, as a result if a decision were to be made to allow this development.

Whilst there may be an expectation that people would use public transport, public transport in the vicinity is already at capacity in the mornings, and often one cannot access a bus as they are already

full by the time they arrive at St Mary's Church and/or Chalet Gardens bus stops. Furthermore, the local bus routes do not serve many areas of employment in west, northwest and southwest Dublin.

Furthermore, given the location of Lucan, people will require cars for travel other than commuting to work.

There is absolutely no provision for visitors' cars, delivery vans or tradesmen vehicles.

Pedestrian Hazard

The footpath in front of the proposed development has a very significant footfall being used by many children walking to and from numerous schools including Scoil Mhuire girls NS, St. Marys boys NS, St. Andrews NS, the St. Joseph's Presentation secondary school, Colaiste Phadraig secondary school, Nexus pre-school in the old St. Andrew's school building and the Montessori school in the old St. Andrew's school building.

Furthermore, this footpath is in regular use by people/residents (many elderly) of the locality walking to the village and to attend St. Mary's church.

The proposed entrance/exit for this development represents a very serious risk for these pedestrians.

Cyclist Hazard

The footpath in front of the proposed development has a very significant use by many children cycling to and from numerous schools including Scoil Mhuire girls NS, St. Marys boys NS, St. Andrews NS, the St. Joseph's Presentation secondary school and Colaiste Phadraig secondary school.

The proposed exit for this development represents a very serious risk for these children/cyclists.

Privacy

The scale and height of the proposed development will have a very significant and negative impact on the privacy of residents in adjoining properties. The windows/glazed balconies will overlook the rear gardens of all houses in Lucan Cloister and many houses in Lucan Heights, and in some instances will be looking in the back windows of some houses in Lucan Heights. Existing residents have a right to have their privacy, and the proposed development comprises this severely.

Furthermore, in the context of privacy there is a child protection issue. The age profile in Lucan Heights and Lucan Cloisters is undergoing rapid change with an increasing number of young children living in the area. These children play in their back gardens, and it is reasonable to expect that no development should be allowed which has the potential to compromise their safety. The proposed development, which would serve a gated community not integrated with the community that comprises Lucan Cloisters and Lucan Heights, through its height and scale, would allow persons unknown and unobservable to watch children at play, etc. in their own back gardens. There is a very clear duty on SDCC planning authorities to ensure no development which could serve to compromise child safety and protection.

Public Right of Way

It is our belief that there is likely to be a public right of way over part of the property on which the proposed development is to be constructed. The surfaced area immediately to the north of the existing dwelling house/Hill House abuts and essentially forms part the public footpath. There are local authority signs erected on this area and the public currently has, and historically has had, access to and use of this portion of the property for many years, and certainly more than 20 years. It is regularly used to park cars dropping children to school and collecting children from school, is used as part of the public footpath, and is regularly used for people stopping to chat out of the way of the pedestrians/cyclists using the footpath.

It would not be in order for planning permission to be granted for development over what is essentially a public area.

Refuse Collection

Refuse collection is problematic. Whilst the proposed development indicates a turning bay for refuse/waste collection immediately inside the entrance/exit, it is quite clear that this is inadequate for easy turning and, in practice, will not be used as such. The refuse holding area is at the furthest end of the site. If the bins are to be wheeled to the exit, they will be of such a number as to create an obstruction for any truck stopping to collect same. The most obvious result will be trucks having to reverse out into traffic on the Lucan Road, thereby creating a serious traffic hazard and traffic movement issue - reversing onto this road was prohibited in the planning permission for the close by Pieta House. If a refuse truck is to reverse into the property, because of an inability to turn on site, this will require substantial manoeuvring on Lucan Road, thereby creating a serious traffic hazard and traffic movement issue.

Noise

During construction, which would be of a considerable duration for a development on the scale of that proposed, there would be very considerable dust and noise pollution. Whilst this would obviously impact on all those living close to the proposed development, it has not been adequately addressed in the application.

Furthermore, given the number of balconies, and the scale of same, these present a very realistic likelihood of same being used into the night for BBQs, parties, etc. which will result in considerable noise pollution and disturbance for current residents in the area.

Historical Building

We understand that Hill House appears on 1770s maps of the area, and as such is of historical significance, and is much older than people and/or SDCC might think. No historical research or report has been provided in the application, and we consider the application to be inadequate because of this omission.

South Dublin County Council Proposals for the Future of Lucan Village

South Dublin County Council is proposing to develop Lucan Village as a tourist destination in County Dublin. The site of the proposed development is located at the main point of entry to Lucan Village from Dublin City. The scale and mass of the proposed development will have a very negative impact on the appeal of Lucan Village as such a tourist destination. The proposed development is completely out of keeping with the existing character of the area. Furthermore, the additional traffic arising from the proposed development will have a very direct and negative impact on this proposal for the village.

Conclusion

In our opinion the proposed development would materially contravene South Dublin County Council's Development Plan's policies and objectives for the Lucan area, and would have a detrimental impact on the character of Lucan Village.

Thus, it would not be in the interest of proper planning or sustainable development for the area. The development proposal appears ill thought with a focus on unreasonably high density with scant other considerations. Whilst we have no desire to object to every development proposal, it is imperative to only have appropriate development in terms of scale and height.

The proposed development would

- create a traffic hazard/obstruction of road users with traffic access in close proximity to a controlled junction and onto a heavily trafficked road
- have an overbearing and overpowering visual impact and be seriously injurious to the setting, amenity and appreciation of neighbouring properties
- be visually overbearing and obtrusive when viewed from the public realm and adjacent properties
- result in an overly dominant and incongruous insertion into the streetscape at this location

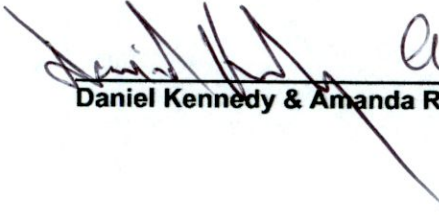

- constitute overdevelopment of the site and would be out of character with the pattern of development in the area
- give rise to a significant overlooking effect on the adjoining properties in Lucan Cloisters and others houses in Lucan Heights
- be seriously injurious to the visual and residential amenities of the area and of the property in the vicinity
- depreciate the value of property in the vicinity

Thus, the proposed development would be contrary to proper planning and sustainable development for the area.

We trust that South Dublin County Council will take these issues into consideration in its review of the application and in reaching its decision.

We would appreciate an acknowledgement of this submission.

Yours faithfully,



Daniel Kennedy & Amanda Roche

Daniel Kennedy & Amanda Roche
3, Lucan Cloisters
Lucan Heights
Lucan
Co. Dublin

Date: 12-Sep-2022

Dear Sir/Madam,

Register Ref: SD22A/0324
Development: Demolition of an existing house; Ancillary outbuildings and the construction of 1 two to four storey building accommodating 19 apartments comprised of 6 one bedroom apartments and 13 two bedroom apartments; Vehicular access to the proposed development will be via Lucan Road with traffic calming measures onto Lucan Road; 11 car parking spaces and 20 bicycle parking spaces and ancillary services including a detached water storage tank and bin store housing all on a site of 0.1925 hectares.

Location: Hillhouse, Lucan Road, Lucan, Co. Dublin
Applicant: Frances Dowling
Application Type: Permission
Date Rec'd: 08-Aug-2022

I wish to acknowledge receipt of your submission in connection with the above planning application. The appropriate fee of €20.00 has been paid and your submission is in accordance with the appropriate provisions of the Planning and Development Regulations 2001(as amended). The contents of your submission will be brought to the attention of the Planning Officer during the course of consideration of this application.

This is an important document. You will be required to produce this document to An Bord Pleanála if you wish to appeal the decision of the Council when it is made. You will be informed of the decision in due course. Please be advised that all current applications are available for inspection at the public counter and on the Council's Website, www.sdblincoco.ie.

You may wish to avail of the Planning Departments email notification system on our website. When in the **Planning Applications** part of the Council website, www.sdblincoco.ie, and when viewing an application on which a decision has not been made, you can input your email address into the box named **"Notify me of changes"** and click on **"Subscribe"**. You should automatically receive an email notification when the decision is made. Please ensure that you submit a valid email address.

Please note: If you make a submission in respect of a planning application, the Council is obliged to make that document publicly available for inspection as soon as possible after receipt. Submissions are made available on the planning file at the Planning Department's public counter and with the exception of those of a personal nature, are also published on the Council's website along with the full contents of a planning application.

Yours faithfully,

M. Furney
for **Senior Planner**