



HUGHES
PLANNING
& DEVELOPMENT CONSULTANTS

Planning Observation

Reg. Ref. SD22A/0324

Hillhouse, Lucan Road, Lucan, Co. Dublin

South Dublin County Council

September 2022

SUBMITTED ON BEHALF OF:
Bernard J. Coyne and Vivienne Coyne

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1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have been appointed by Bernard J. Coyne and Vivienne Coyne residents of No. 4 Lucan Cloisters, Lucan, Co. Dublin to prepare this planning observation in respect of the proposed development at Hillhouse, Lucan Road, Lucan, Co. Dublin for the following planning application:

Reg. Ref.: SD22A/0324
Applicant: Frances Dowling
Address: Hillhouse, Lucan Road, Lucan, Co. Dublin

Proposal: *Permission sought for the 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.*

This submission requests that South Dublin County Council consider and maintain the existing visual amenity of the locality, and the specific residential amenity of the adjacent properties in determining this planning application. As shall be indicated below, the proposed development will cause a substantial amount of disruption around Hillhouse by way of significant impact on residential amenity, impact on visual amenity and increase in traffic generation. In addition, the streetscape of the Lucan Road will be negatively impacted, and the existing pattern will be disrupted. It is also contended that the proposed apartment development represents the overdevelopment of the site and will unharmoniously overbear and overlook the private amenity space of adjacent properties, in particular dwellings located within Lucan Heights to the immediate south and Lucan Road to the east.

It would be prudent to note that a similar development was refused permission by An Bord Pleanála under ABP Ref. 309524-21 for the following reasons;

*'Having regard to the proximity of the primary site access to the controlled junction on the R835 regional road, to the proposed limited access by means of a "left in, left out" arrangement only, and to the proposed use of the secondary access point onto Lucan Heights across the existing pedestrian walkway which is considered inappropriate, it is considered that **the proposed intensification of traffic accessing and egressing the site would result in increased traffic hazard on a busy road and would result in unsafe traffic movements into and out of the site.** It is considered that the proposed development would endanger pedestrian safety by reason of creating a **traffic hazard** and would, therefore, be contrary to the proper planning and sustainable development of the area.*

*In deciding not to accept the Inspector's recommendation to grant permission, the Board considered that the proposed secondary access over the pedestrian laneway to the east of the site and through the cul-de-sac of Lucan Heights would present an unacceptable risk to pedestrians using this access point to the established estate and would introduce an unacceptable level of additional traffic onto this narrow roadway. Accordingly, in the context of not accepting the viability of the secondary access point to the site, and **taking account of the constrained nature of the primary access point onto the R835, where right-turning vehicles into and out of the site would cause a significant traffic risk under the current road arrangements**, the Board considered that the increased traffic accessing the site cannot be accommodated in the absence of the provision of safer and more sustainable road design solutions such as box junctions, traffic lights and/or pedestrian crossings to facilitate the development.'*

We consider that the proposed development has not adequately addressed the above refusal and we request that South Dublin County Council see fit to refuse permission accordingly. There is also a major concern in respect of the under provision of car parking spaces which would undoubtedly result in residents and visitors parking in adjacent residential estates. The proposal would also result in the intensification of the subject site, resulting in extreme residential densities, which is considered to be excessive given the low-density character of the immediately surrounding residential area.

It is a primary observation of our client that the application site is not suitable for any such development, and it is requested that planning permission be **refused** accordingly. The required observation fee of €20.00 is enclosed. Please forward all correspondence relating to this matter to this office. The grounds of objection are set out in the following sections of this submission

2.0 Site Description

The application site has an area of 0.1925 hectares and is located on the southern side of the Lucan Road. The site has a long frontage facing onto the Lucan Road, where it is accessed from the north eastern corner of the site. There is an existing dwelling on the site which has a gross floor area of 383.11sq.m. This building is located on the north-western portion of the site, forming part of the boundary walls onto the footpath at the Lucan Road. The site is located opposite the junction between Chapel Hill and Lucan Road.

There is a public pedestrian route that runs along the eastern boundary of the site and the southern boundary of the site bounds onto a residential estate, known as Lucan Heights. No. 4 Lucan Cloisters is located directly south of the subject site, only metres from the boundary. The western boundary bounds directly onto Presentation Mission House. The surrounding area is characterised by two-storey detached and semi-detached residential dwellings situated within an established residential setting. From the outset, we note that prior to the submission of the current application, to which this observation pertains, that a planning application for a residential development of a similar scale was submitted to South Dublin County Council on 24th June 2020 under Reg. Ref. SD19A/0198 and on the 23rd of December 2020 under Reg. Ref. SD20A/0142. Both these applications were subsequently refused by the Planning Authority and An Bord Pleanála respectively, the details of which will be discussed in further detail in the following section of this report.

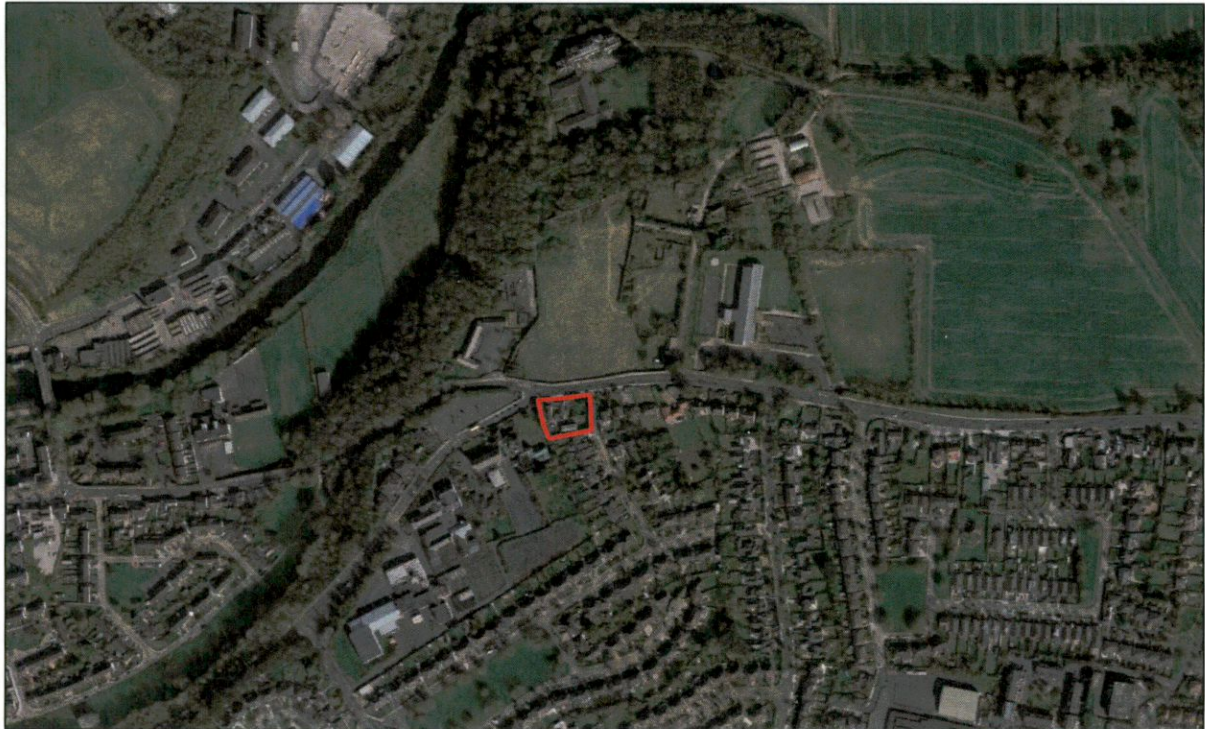


Figure 1.0 Aerial view showing the location of the subject site marked in red.



Figure 2.0 Aerial view from the east, showing the subject site outlined in red.

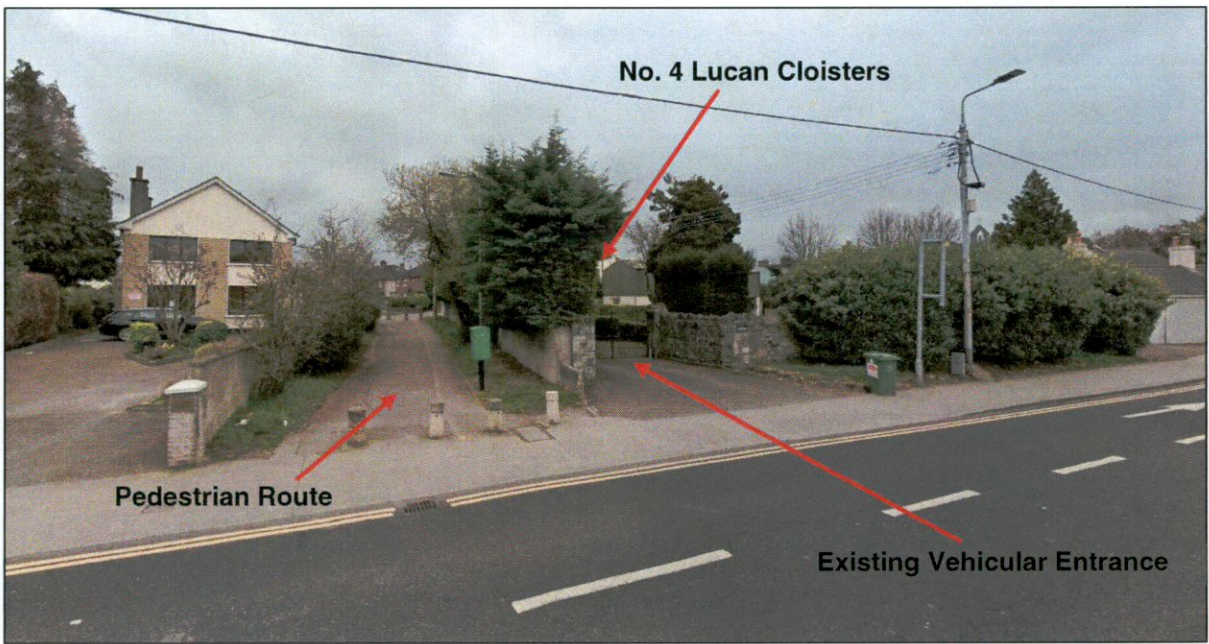


Figure 3.0 Street view of the subject site, showing the existing entrance, the public pedestrian routes, and No. 4 Lucan Cloisters in the background.

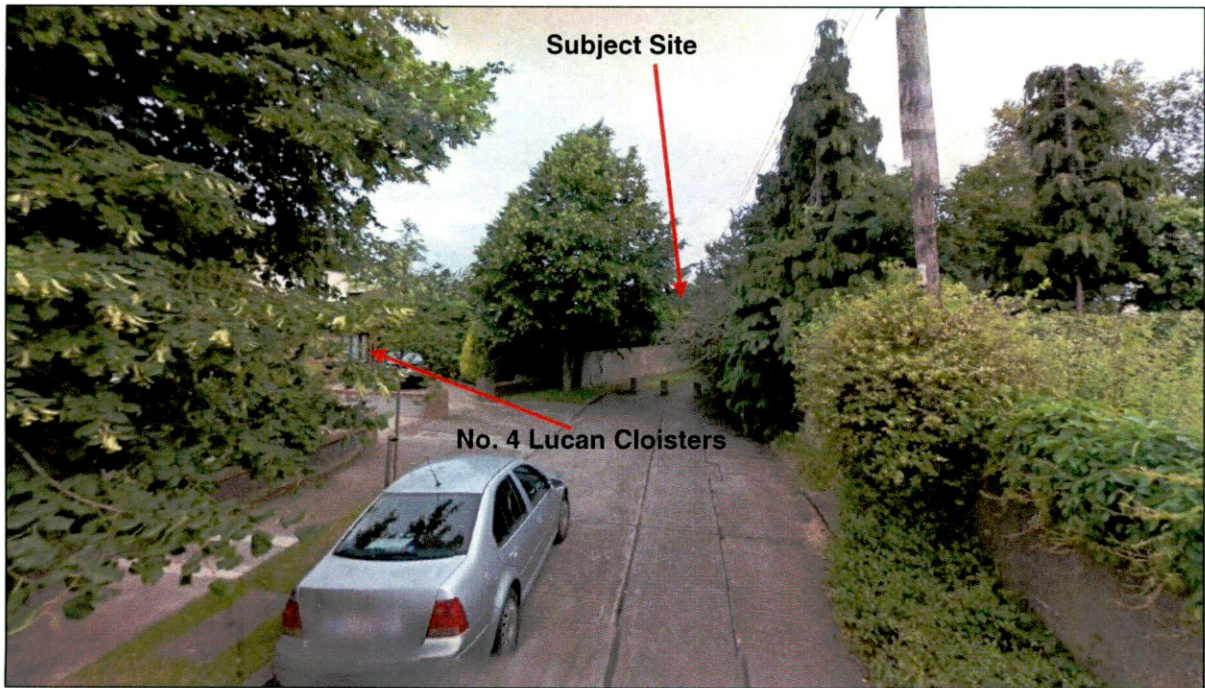


Figure 4.0 Streetview of our Client's home at No.4 Lucan Cloisters in relation to the subject site.

3.0 Proposed Development

The proposed development involves the demolition of the existing dwelling on the application site referred to as Hillhouse, Lucan Road and the demolition of the ancillary out-buildings. The development also proposes the construction of 1 no. two to four-storey building, accommodating 19 no. apartment units. The units mix in this building is broken down as follows: 6 no. one-bedroom apartments and 13 no. two-bedroom apartments.



Figure 5.0 North elevation of development proposed under Reg. Ref. SD22A/0324.

The location of the existing vehicular access will be maintained, accessed via the Lucan Road and a new pedestrian entrance will be provided to the subject site. 11 no. surface car parking spaces and 12 bicycle parking spaces are also proposed. The bin store is proposed to be located to the south of the application site, in close proximity to No. 4 Lucan Cloisters. Also near this dwelling is the water tank, which appears to be a mere 1.4m from the southern boundary. The ground-floor, and first-floor of the

southernmost element of the scheme will be 1.882m from the southern boundary which is shared with No. 4 Lucan Cloisters.



Figure 6.0 East elevation of development proposed under Reg. Ref. SD22A/0324.

The proposal, at its south, is 2-storeys in height, and steps up to 4-storeys at its northmost point, bordering the R835 Lucan Road. It is submitted that the revised proposal, which has illustrated a minimum reduction in the height, bulk and mass and has not addressed the poor separation distance between the proposed apartment building and the adjacent residential properties located immediately south of the subject site. It is further submitted that the proposed scheme remains overbearing in its relationship with adjacent residential properties, particularly the home of our client, at No. 4 Lucan Cloisters and would have an adverse effect on the residential amenity of the immediately adjacent properties.

4.0 Planning History

A number of applications in respect of residential developments have been proposed on the subject lands. A review of the South Dublin County Council planning register revealed the following:

Reg. Ref. SD20A/0142 Permission refused by An Bord Pleanála (ABP Ref. 309525-21) on the 22nd of December 2021, following a decision of South Dublin County Council to Grant for the demolition of an existing house, Hillhouse, Lucan Road and ancillary outbuildings and the construction of one 4 storey building accommodating 20 apartments comprised of 5 one-bedroom apartments and 15 two-bedroom apartments. Vehicular access to the proposed development will be via Lucan Road and Lucan Heights with 13 car parking spaces and 12 bicycle parking spaces and ancillary services including a detached water storage tank and bin store housing all on a site of 0.1925ha, located at Hillhouse, Lucan Road, Lucan, Co. Dublin.

The scheme was revised to 19 No. units within the four-storey block by the further information received on 23/12/2020.

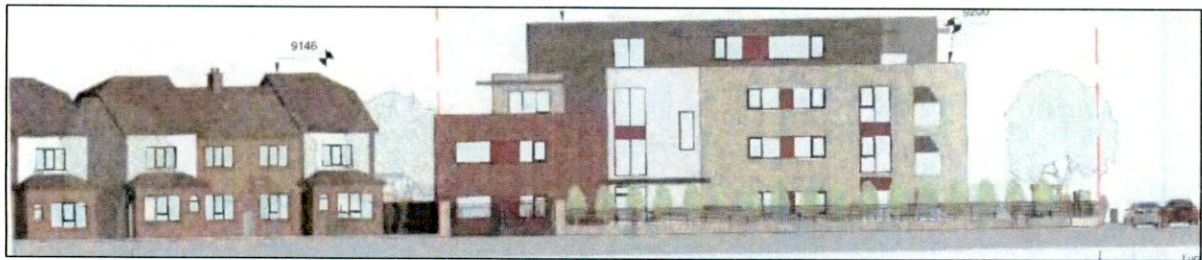


Figure 7.0 Contextual elevation proposed under Reg. Ref. SD20A/0142, as refused.

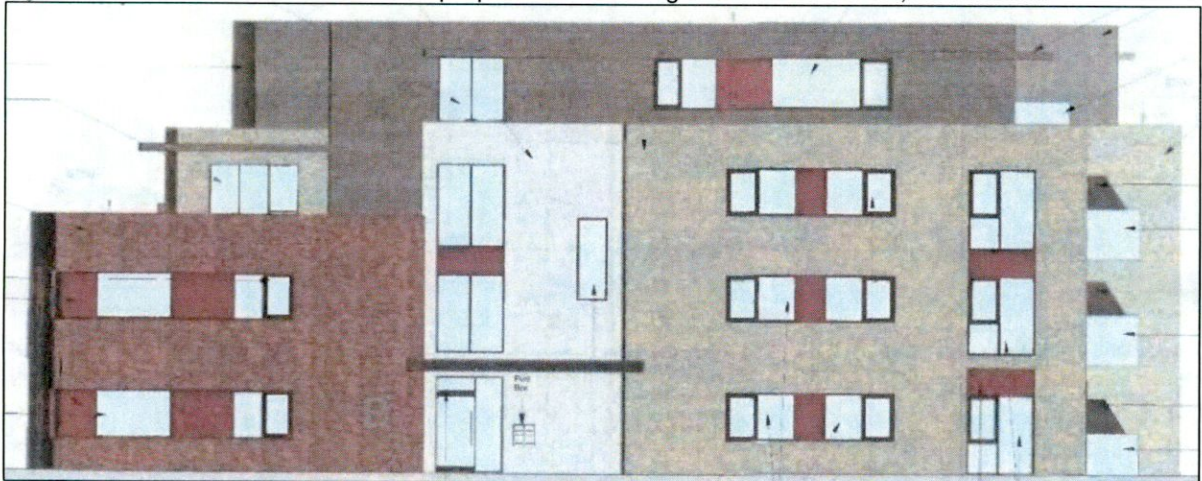


Figure 8.0 Eastern elevation proposed under Reg. Ref. SD20A/0142, as refused.

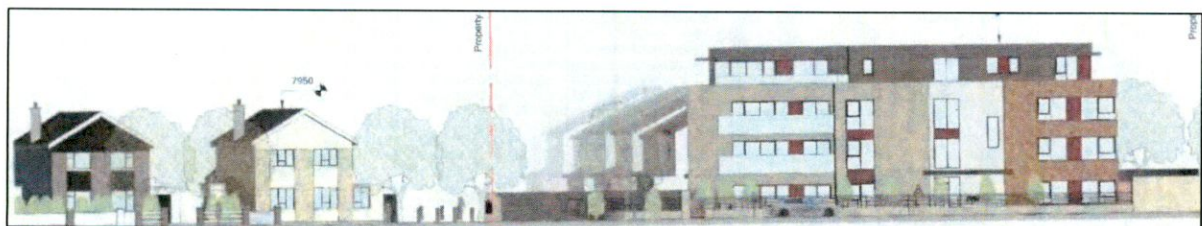


Figure 9.0 Roadside elevation proposed under Reg. Ref. SD20A/0142, as refused.

In their reasons for refusal, the board had concerns regarding the site's location in relation to the controlled junction on the R835, citing potential pedestrian hazards due to increased traffic levels.

*'Having regard to the proximity of the primary site access to the controlled junction on the R835 regional road, to the proposed limited access by means of a "left in, left out" arrangement only, and to the proposed use of the secondary access point onto Lucan Heights across the existing pedestrian walkway which is considered inappropriate, it is considered that **the proposed intensification of traffic accessing and egressing the site would result in increased traffic hazard on a busy road and would result in unsafe traffic movements into and out of the site.** It is considered that the proposed development would endanger pedestrian safety by reason of creating a **traffic hazard** and would, therefore, be contrary to the proper planning and sustainable development of the area.*

In deciding not to accept the Inspector's recommendation to grant permission, the Board considered that the proposed secondary access over the pedestrian laneway to the east of the site and through the cul-de-sac of Lucan Heights would present an unacceptable risk to pedestrians using this access point to the established estate and would introduce an unacceptable level of additional traffic onto this narrow roadway. Accordingly, in the context of

not accepting the viability of the secondary access point to the site, and taking account of the constrained nature of the primary access point onto the R835, where right-turning vehicles into and out of the site would cause a significant traffic risk under the current road arrangements, the Board considered that the increased traffic accessing the site cannot be accommodated in the absence of the provision of safer and more sustainable road design solutions such as box junctions, traffic lights and/or pedestrian crossings to facilitate the development.'

Reg. Reg. SD19A/0198 Permission refused by South Dublin County Council on the 19th of August 2019 for the demolition of existing house and ancillary out buildings and the construction of 1 four storey building accommodating 21 apartments comprised of 6 one bedroom apartments and 15 two bedroom apartments; vehicular access to the proposed development will be via Lucan Road with 13 car parking spaces and 12 bicycle parking spaces and ancillary services all on a site of 0.1925 hectares, located at Hillhouse, Lucan Road, Lucan, Co. Dublin.



Figure 10.0 Northern elevation proposed under Reg. Ref. SD19A/0198, as refused.

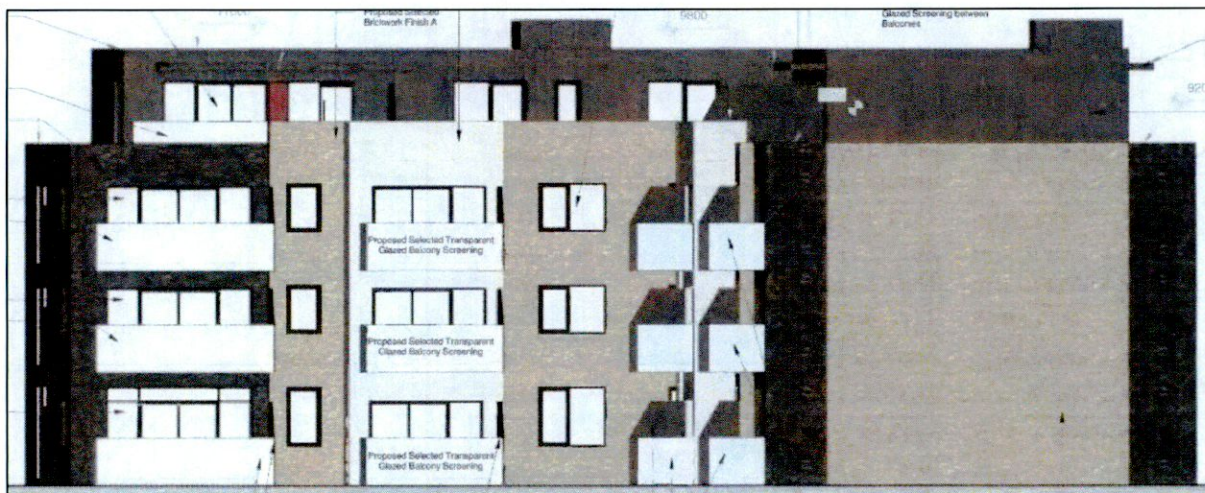


Figure 11.0 Southern elevation proposed under Reg. Ref. SD19A/0198, as refused.

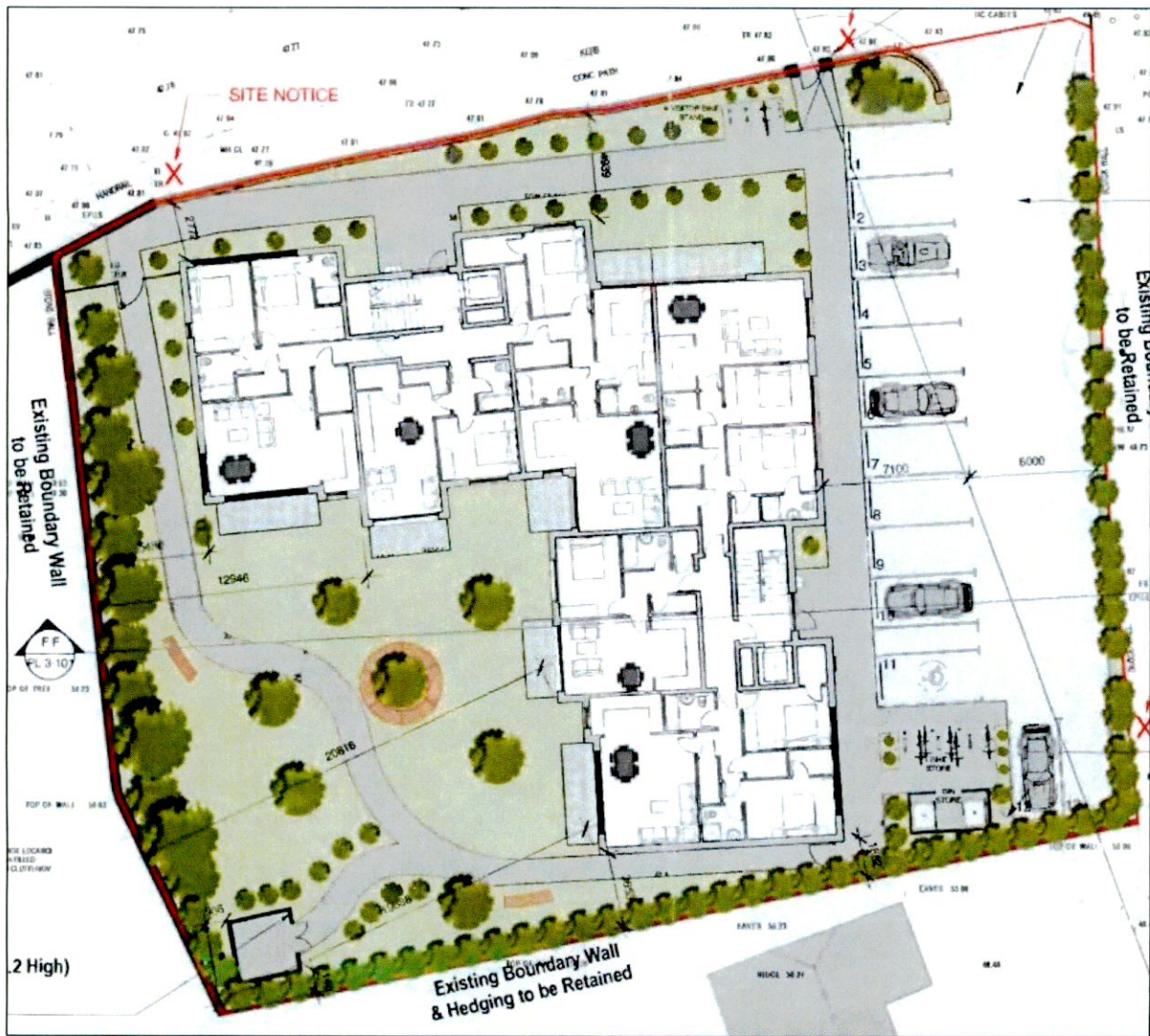


Figure 12.0 Proposed site layout plan under Reg. Ref. SD19A/0198, as refused.

The above was refused by the planning authority cased on the following 4 reasons:

1. *The proposed intensification of traffic at the access to the site in close proximity to a controlled junction and onto a heavily trafficked regional road would result in increased traffic hazard. It is considered that the proposed development would endanger public safety by reason of traffic hazard or obstruction of road users or otherwise.*
2. *Having regard to the overall bulk, scale and massing of the building, the proposed development would be visually obtrusive and would adversely impact on the visual and residential amenity of adjacent residential properties and the wider area and would set an undesirable precedent for similar type development in the area and would be contrary to the proper planning and sustainable development of the area.*
3. *The proposed development would have a significant overbearing impact on the dwellings to the south and would therefore not be in accordance with the zoning objective of the site 'to protect and/or improve Residential Amenity'. The proposed development would, therefore, seriously injure the residential amenities of the area,*

would conflict with the objectives of the County Development Plan and would be contrary to the proper planning and sustainable development of the area.

4. Having regard to the provisions of the Urban Development and Building Heights Guidelines for Planning Authorities (December 2018), the Planning Authority is not satisfied on the basis of the information submitted that the proposed development complies with criteria set out in Section 3.0 of said guidelines. The proposed development therefore would be contrary to SPPR 3 of the Ministerial Guidelines and contrary to the proper planning and sustainable development of the area.

It was the view of the council that the proposed was of inappropriate scale when assessed against its locational context. It is submitted that the current proposal also adversely impacts on the visual and residential amenity of adjacent residential properties and the wider area.

The above proposals were considered to be overbearing on surrounding properties, detracting from the amenity of existing residents. It is submitted that the proposed development is a poor amendment to the previous proposals and as a result is completely inappropriate in its entirety.

5.0 Planning Context

This section of the observation provides an overview of the planning policy framework which guides the use and development of the application site.

5.1 South Dublin County Development Plan 2022-2028

The relevant development plan against which the planning application would be assessed is the South Dublin County Development Plan 2022-2028.

5.1.1 Zoning

The subject site is zoned Objective 'RES' under the Development Plan 2022-2028, the objective of which is *'to protect and/or improve residential amenity'*. An extract from the South Dublin County Council zoning map is shown in Figure 13.0 below:



Figure 13.0 Extract from Zoning Map 9 showing the subject site (outlined in red) zoned objective 'RES' in the South Dublin County Development Plan 2022-2028.

With the above in mind, it is noted that 'residential' is an example of uses which are permissible in the zone as per the Development Plan 2022-2028. That said, this is merely not a prerequisite for permission and so, proposals for residential development must be compliant with the relevant policies, standards and objectives set out in the Development Plan 2022-2028.

5.1.2 Infill Development

Section 6.8.1 in the Development Plan 2022-2028 deals with 'Residential Consolidation in Urban Areas – Infill, Backland, Subdivision & Corner Sites'. This section notes that sensitive intensification is important to revitalise areas. Policy H13 in the Development Plan 2022-2028 has regard to Residential Consolidation and states that *'it is the policy of the Council to Promote and support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County.'*

The following objectives are relevant in this regard:

- H13 Objective 1:** *To promote and support residential consolidation and sustainable intensification at appropriate locations and to encourage consultation with existing communities and other stakeholders.*
- H13 Objective 2:** *To maintain and consolidate the County's existing housing stock through the consideration of applications for housing subdivision, backland development and infill development on large sites in established areas, subject to appropriate safeguards and standards identified in Chapter 12: Implementation and Monitoring.*
- H13 Objective 3:** *To favourably consider proposals for the development of corner or wide garden sites within the curtilage of existing houses in established residential areas, subject to appropriate safeguards and standards identified in Chapter 12: Implementation and Monitoring.*
- H13 Objective 4:** *To promote and encourage 'Living-Over-The-Shop' residential uses on the upper floors of appropriate buildings located in Town, District, Local and Village Centres within the County save for public houses and nightclubs and other inappropriate places where similar business is conducted.*
- H13 Objective 5:** *To ensure that new development in established areas does not unduly impact on the amenities or character of an area.*
- H13 Objective 6:** *To support the subdivision of houses in suburban areas that are characterised by exceptionally large houses on relatively extensive sites where population levels are generally falling and which are well served by public transport, subject to the protection of existing residential amenity.*
- H13 Objective 7:** *To support and facilitate the replacement of existing dwellings with one or more replacement dwellings, subject to the protection of existing residential amenities and the preservation of the established character (including historic character and visual setting) of the area (see Policy NCBH 22: Features of Interest and Chapter 12: Implementation and Monitoring).*

It is considered that the proposed development is not an appropriate infill development as it does not sufficiently protect existing residential amenities and also fails to preserve the established character of the surrounding residential area. It is submitted that the construction of the proposed apartment scheme would have a significant negative impact on residential amenities currently enjoyed by adjoining properties.

The dwellings to the south of the subject site at Lucan Cloisters, are two-storey semi-detached properties and the private garden to the rear of our clients' property at No. 4 Lucan Cloisters directly abuts the southern boundary of the subject site. The applicant has positioned the two-storey element of the proposed scheme adjacent to the boundary with our clients' property in a bid to reduce its impact on the properties immediately south, however the two to four storey apartment building would still have a serious negative impact on the dwellings aforementioned.

5.1.3 Residential Density and Building Heights

The application site has an area of c. 0.1925 hectares and proposes to provide 19 no. residential units. This results in a residential density of c. 98 units/ha. This is considered to be excessive considering that the surrounding area has a substantially lower density. Therefore, the development would be completely out of character with the surrounding area and as a result is considered to be unacceptable.

5.1.4 Construction and Demolition Waste

Section 12.11.3 (iv) of the Development Plan 2022-2028 has regard to construction and demolition waste. This section states that a construction and demolition waste management plan should be submitted as part of development proposals in excess of any of the following thresholds:

- New residential development of 10 units or more;
- New developments other than above, including institutional, educational, health and other public facilities, with an aggregate floor area in excess of 1,000 square metres;
- Demolition / renovation / refurbishment projects generating in excess of 100 cubic metres in volume, of Construction and Demolition (C&D) waste;
- Civil engineering projects in excess of 500 cubic metres of waste materials used for development works on the site.

We note that there is an absence of a Construction and Demolition Waste Management Plan within the submitted material. This causes a serious threat to environmental concerns for the surrounding area.

5.1.5 Car Parking

Section 7.10 of the Development Plan 2022-2028 has regard to car parking in South Dublin. This section notes that a balanced approach needs to be adopted, by limiting the number of spaces to be provided for any given development according to need and ensuring the efficient turnover of space. Policy 7 of the Development Plan 2022-2028 has regard to car parking and *'it is the policy of Council to implement a balanced approach to the provision of car parking with the aim of using parking as a demand management measure to promote a transition towards more sustainable forms of transportation, while meeting the needs of businesses and communities'*.

Section 12.7.4 of the Development Plan 2022-2028 outlines the car parking standards for South Dublin County. South Dublin is divided into three zones as follows:

- Zone 1: General rate applicable throughout the County.
- Zone 2 (Non-Residential): More restrictive rates for application within town and village centres, within 800 metres of a Train or Luas station and within 400 metres of a high-quality bus service (including proposed services that have proceeded to construction).
- Zone 2 (Residential): More restrictive rates for application within town and village centres, within 400 metres of a high-quality public transport service 5 (includes a train station, Luas station or bus stop with a high-quality service)'

It appears that the subject site is within 500m of a bus stop which forms part of the new BusConnects 'C-Spine'. This bus stop is served by Dublin Bus Nos. C3, C4, C5, C6, L54. Therefore, the site is situated

within Zone 2 (Residential) which requires 0.75 no. spaces per one-bedroom apartment and 1 no. space for two-bedroom apartments.

The proposed development on the subject site provides for 6 no. one-bedroom apartments and 13 no. two-bedroom apartments. Therefore, the development is required to provide approximately 17.5 no. car parking spaces. However, the proposal falls significantly short on this requirement, only providing 11 no. spaces.

Dwelling Type	No. of Bedrooms	Zone 1	Zone 2
Apartment Duplex	1 Bed	1 space	0.75 space
	2 Bed	1.25 spaces	1 space
	3 Bed+	1.5 spaces	1.25 spaces

Figure 14.0 Extract from Table 12.26 in the South Dublin County Development Plan 2022-2028

It is considered by the plan that where a deficiency of car parking provision is proposed, prospective applicants should provide a robust Mobility Management Plan. We note that there is no such plan submitted with this application.

The lack of car parking provisions will have an inevitable impact on the surrounding areas and more specifically, to Lucan Heights. The development is not located within an area of strong transport links and will therefore attract a high volume of car dependent users, not to mention visitors to the development. This will have a detrimental impact on road safety for all users and cause an undesirable precedent to the area. National policy has called for a reduction in car parking provisions in recent times, however, this is dependent on the proposal being close to strong transport links. This subject proposal does not warrant a relaxation of the car parking standards set by the Planning Authority.

5.2 Residential Amenity

The relationship of buildings to one another, including considerations of overlooking, overbearing and sunlight/daylight standards are key considerations in protecting the privacy and amenity of adjacent properties. These do not appear to have formed part of the design in the current proposal which is excessive and unsuitable for the subject site. The development along with its inappropriate scale and density, will have a negative impact on the existing levels of privacy and amenity enjoyed by the residents of Lucan Heights as a result of overlooking and loss of privacy. It is submitted that the impacts that arise from the development cannot be mitigated, and therefore we request that planning permission be **refused** by South Dublin County Council.

6.0 National Policy and Guidelines

6.1 Project Ireland 2040: National Planning Framework

The Project Ireland 2040 - National Planning Framework (2018) seeks more balanced and concentrated growth, particularly within the five major cities in Ireland. We note the following target in relation to this:

'We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan we are targeting these five cities for 50% of overall national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth.'

Upon reviewing the proposed development, it is evident that the proposal is in clear contrast with Objectives 4, 13, 33, 34 and 35 in the National Planning Framework. This is a clear oversight and failure by the applicants to consider the implications of a 4-storey development in a low-density area, which is characterised by two-storey dwellings.

This is outlined below as follows:

- NPF Objective 4: *Ensure the creation of attractive, livable, **well designed, high quality urban places** that are home to diverse and integrated communities that enjoy a **high quality of life and well-being**.*
 - The proposed development does not integrate with adjacent communities or properties.
- NPF Objective 13: *In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that **seek to achieve welldesigned high quality outcomes in order to achieve targeted growth**. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.*
 - It is acknowledged that the site provides opportunity for residential growth, however, the scale and height of the proposed development does not achieve a well-designed high-quality housing growth outcome.
 - Building height is completely inappropriate in the low-density residential setting.
 - Car parking and traffic implications, particularly given the location of accesses onto traffic intersection will add significant congestion and parking concerns to the already considerable presence of same.
- NPF Objective 33: *Prioritise the provision of new homes at locations that can support sustainable development and **at an appropriate scale of provision relative to location**.*
 - It is accepted that the site can accommodate residential development, however to the proposed scale, height and density is a considerable overdevelopment of the site.
 - Due consideration has been given in this Observation to the surrounding pattern of development and building heights.
 - The proposed development represents an audacious bid to overdevelop the site and does not respect the need to appropriately locate such apartment infill development within Dublin.
- NPF Objective 34: *Support the provision of lifetime adaptable homes that **can accommodate the changing needs of a household over time***
 - 100% of the proposed development consists of 1- and 2-bedroom apartments. This does not provide for flexibility in changing households or for families.
- NPF Objective 35: *Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, **infill development schemes, area or site-based regeneration** and increased building heights*
 - The proposed development is not an appropriate infill development and not area based for the surrounding context which is a low-density residential area.

6.2 Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)

The aim of the Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (Guidelines) is to identify the primary principles and criteria important to the design of housing and to highlight specific design features, requirements and standards. The document makes reference to infill development and states that, *'infill developments and urban redevelopment projects **should respect the character of the existing neighbourhood**'*.

In relation to the main considerations regarding infill development, the Guidelines also state the following:

'It is important to recognise the existing character, street patterns, streetscapes and building lines of an area, particularly in the case of infill sites or where new dwellings will adjoin existing buildings' and that 'the degree to which they will impact on any new development will need to be taken into account in assessing the development potential of any proposed site'.

As noted, these Guidelines provide Local Authorities with guidance on sustainable development in urban areas. Detailed advice on the criteria to be considered in the design and assessment of residential developments include:

- Acceptable building heights;
- Avoidance of overlooking and overshadowing;
- Provision of adequate private and public open space, including landscaping; and
- Suitable parking provision close to dwellings.

Privacy and Security

Furthermore, privacy and security are listed as important elements of residential amenity that contribute towards the sense of security felt by people in their homes. The Guidelines state:

'At the rear of dwellings, there should be adequate separation (traditionally about 22m between 2-storey dwellings) between opposing first floor windows'.

In relation to infill residential development, Section 5.9(i) of these Guidelines state the following:

*'Potential sites may range from small gap infill, unused or derelict land and backland areas, up to larger residual sites or sites assembled from a multiplicity of ownerships. In residential areas, whose character is established by their density or architectural form, **a balance has to be struck between the reasonable protection of the amenities and privacy of adjoining dwellings, the protection of established character and the need to provide residential infill.** The local area plan should set out the planning authority's views with regard to the range of densities acceptable within the area. **The design approach should be based on a recognition of the need to protect the amenities of directly adjoining neighbours and the general character of the area and its amenities, i.e. views, architectural quality, civic design etc.'***

There is a clear failure in meeting this policy in every facet, which is highlighted by the overdevelopment of the site and its complete disregard for the surrounding character, extent of built form and building heights. In respect of residential densities on outer suburban / greenfield sites, Section 5.11 states the following:

'Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.'

The proposed development provides for a residential density of c. 98 units per hectare. This far exceeds the recommended residential densities outlined in the Guidelines above. It is therefore submitted that the proposed residential density in this proposed development is completely unacceptable and would result in overdevelopment of the subject site, causing serious dis-amenity to adjoining properties.

6.3 Sustainable Urban Housing: Design Standards for New Apartments (March 2018)

In respect of the apartment development, it is submitted that the proposal does not fully comply with the standards set out in *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2018* (2018 Guidelines which supersedes the provisions of the South Dublin County Development Plan 2022-2028 as per the following commentary from subsections 1.20 & 1.21 of said guidelines:

'These guidelines have been issued by the Minister for Housing, Planning and Local Government under Section 28 of the Planning and Development Act 2000 (as amended). Planning authorities and An Bord Pleanála are required to have regard to the guidelines and are also required to apply any specific planning policy requirements (SPPRs) of the guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended) in carrying out their functions. 1.21 Accordingly, where SPPRs are stated in this document, they take precedence over any conflicting policies and objectives of Development Plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans should be amended by the relevant planning authority to reflect the content of these guidelines and properly inform the public of the relevant SPPR requirements.'

With respect to the overall design and layout of the proposed apartments, the development is considered to be inadequate and will result in poor residential amenity. The following points are considered to be of significant importance:

- The main area of communal open space is unsuitable and just meets the minimum standards as set out within the South Dublin County Development Plan;
- All of the proposed apartments are 1-bedroom and 2-bedroom apartments. This does not provide for flexibility in changing households or for families.

Given that the proposal is an overdevelopment, a significant reduction in the number of apartments and redesigning the layout of the proposal would benefit the residential amenity, flexibility in housing types and reduce the adverse amenity impacts on adjoining properties.

6.4 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)

The 'Urban Development and Building Heights Guidelines for Planning Authorities' (Report) sets out national planning policy guidelines for building heights in relation to urban areas. The Report recognises that:

'In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.'

This Observation acknowledges that infill development, increased densities and apartment development will occur within Dublin, however, it is critical that building heights must reflect the urban environment in which it lays. The proposed apartment development is completely out of context and is of an inappropriate scale and height. The Report comments further on the importance of local environment in accommodating higher residential densities:

'Areas to be included in this assessment are central and/or accessible locations and also intermediate urban locations where medium density residential development in excess of 45 residential units per hectare would be appropriate. Additional matters to be considered in such an assessment include:

- *Proximity to high quality public transport connectivity, particularly key public transport interchanges or nodes;*
- *The potential contribution of locations to the development of new homes, economic growth and regeneration in line with the compact urban growth principles as set out in the National Planning Framework and Project Ireland-2040;*
- *The resilience of locations from a public access and egress perspective in the event of major weather or emergency or other incidents;*
- *The ecological and environmental sensitivities of the receiving environment; and **The visual, functional, environmental and cumulative impacts of increased building height.***

It is this final point that strengthens the assertion that the proposed development is a serious overdevelopment of the site, with no visual, functional, or environmental gain from increasing the building height to such a level. As mentioned above, the proposed development provides 19 no. apartments on a c. 0.1925ha site which would result in a residential density of c. 98 units per hectare. This is considered to be inappropriate and excessive overdevelopment of the site. The cumulative impacts to the surrounding area are immense. Upon this assessment it is evident that the site cannot accommodate such a significant increase in residential density and building height without having an adverse impact on the adjacent residential properties, particularly those located to the south of the site.

6.5 Best Practice Urban Design Manual – Department of Housing

Chapter 10: 'Privacy and Amenity' of the Best Practice Urban Design Manual (Urban Design Manual) details how buildings can provide a decent standard of amenity. Privacy and amenity are described in the document as basic human needs. The Urban Design Manual also considers that as well as providing a good level of privacy from the street, *'it is important that rooms and private outside sitting areas are not directly overlooked by neighbouring residents'*. Notably, the Urban Design Manual also considers that rather than establishing a minimum window-to-window standard, such as the 22 metres previously mentioned in this Observation, the aim should be to assess the impact on privacy of each home design based on:

- The site's location and residents' expected levels of privacy;
- The size of the windows – both those overlooking and overlooked;
- Changes in level between overlooking windows; and
- Ability to screen/partially obscure views through design or judicious use of planting.

Overall, the proposed development will result in a significant loss of residential amenity of the immediately adjacent dwellings that are all within the Objective 'RES' under the Development Plan 2022-2028, the objective of which is *'to protect and/or improve residential amenity'*. As such, it is considered that the proposed four storey, 19 no. apartment development would seriously detract from the residential amenity of the immediate area and adjacent properties, and in particular the home of our client which is located less than 3 metres from the proposed development along its southern boundary. It is considered to be contrary to Section 5.9 (i) of the Guidelines.

7.0 Grounds of Observation

It is strongly considered that the proposal will be seriously injurious to the existing residential amenity of the area in the immediate vicinity of the subject site, will result in increased traffic congestion and create a road safety hazard. As discussed previously in this Observation, there is a clear breach of planning policy and a complete disregard for the sustainable development of the site, with no consideration for adjoining properties in terms of design and amenity. The grounds of this objection will be detailed in the following sections of this report.

7.1 Contravention of Zoning Objectives

As noted in Section 4 of this Observation, the site is zoned for residential development in the South Dublin County Development Plan 2022-2028. Under this zone, residential amenity must be protected as the principal consideration in assessing applications for new development. On this basis we submit that the proposed development in its current form gives rise to a loss of residential amenity and is inconsistent with the zoning objective. The proposal fails to comply with the bulk of the requirements for new residential development as follows:

- The proposal does not protect or complement existing amenities and character. The scale, design and layout of the site substantially impact on the amenity of all the surrounding established residential dwellings on the eastern and southern site boundaries.
- The South Dublin County Development Plan 2022-2028 provides that the quality of the residential environment will be of primary significance in determining planning applications. The proposed development is of poor quality due to the overlooking and overbearing nature which is inconsistent with the overall streetscape of the area. The proposal will have irreversible consequences for the quality of the residential environment.
- The relationship of buildings to one and other, including consideration of overlooking, overbearing and sunlight/daylight standards are key considerations in protecting the privacy and amenity of adjacent properties. It is considered that this form of proposed development is unsuitable and non-compliant with the South Dublin County Development Plan 2022-2028 requirements. The dominant form and scale of development will have a negative impact on the existing levels of privacy and amenity of the area. It is submitted that the impacts which arise from the proposed development cannot be mitigated, and as such we request the refusal of same by South Dublin County Council.

7.2 Loss of Residential Amenity

On the basis of each of the points made, it is considered that there will be a significant loss of residential amenity to all surrounding properties in the vicinity of the development. This will result from the negative visual impact associated with the development, the loss of privacy resulting from undue and unwarranted overlooking of the private amenity space of adjoining dwellings, loss of light, overshadowing and an overbearing impact arising from the dominant nature of the structure proposed.

As noted at Section 5.1.2 above, the subject site is zoned 'RES' which has the objective '*to protect and/or improve residential amenity*'. It is considered that the proposed development does not improve the residential amenity in the area surrounding the subject site. On the contrary, the proposed development will cause a serious dis-amenity to dwellings adjoining the application site, especially our clients' dwelling at No. 4 Lucan Cloisters. The South Dublin County Development Plan 2022-2028 states that it is a requirement to provide a 22m separation distance from any two-storey dwellings if the proposed development is over two-stories in height. The three-storey element of the apartment building on the southern section of the site is 14.06m away from our clients' boundary at No. 4 Lucan Cloisters, moreover, the balcony located on the most southern aspect of the third-floor fronts directly onto our clients back garden. We further note the lack of separation distance between the eastern elevation and the dwelling located to the east of the pedestrian route. This is considered to be unacceptable and will result in a significant loss of residential amenity for our clients.

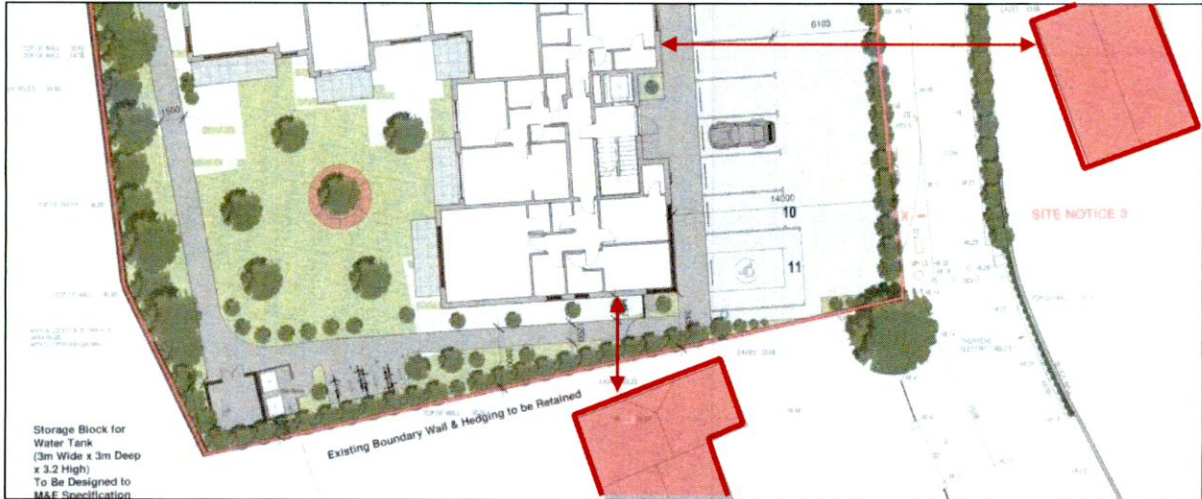


Figure 15.0 Extract from the site layout plan showing the lack of separation distances to existing dwellings (red outline).

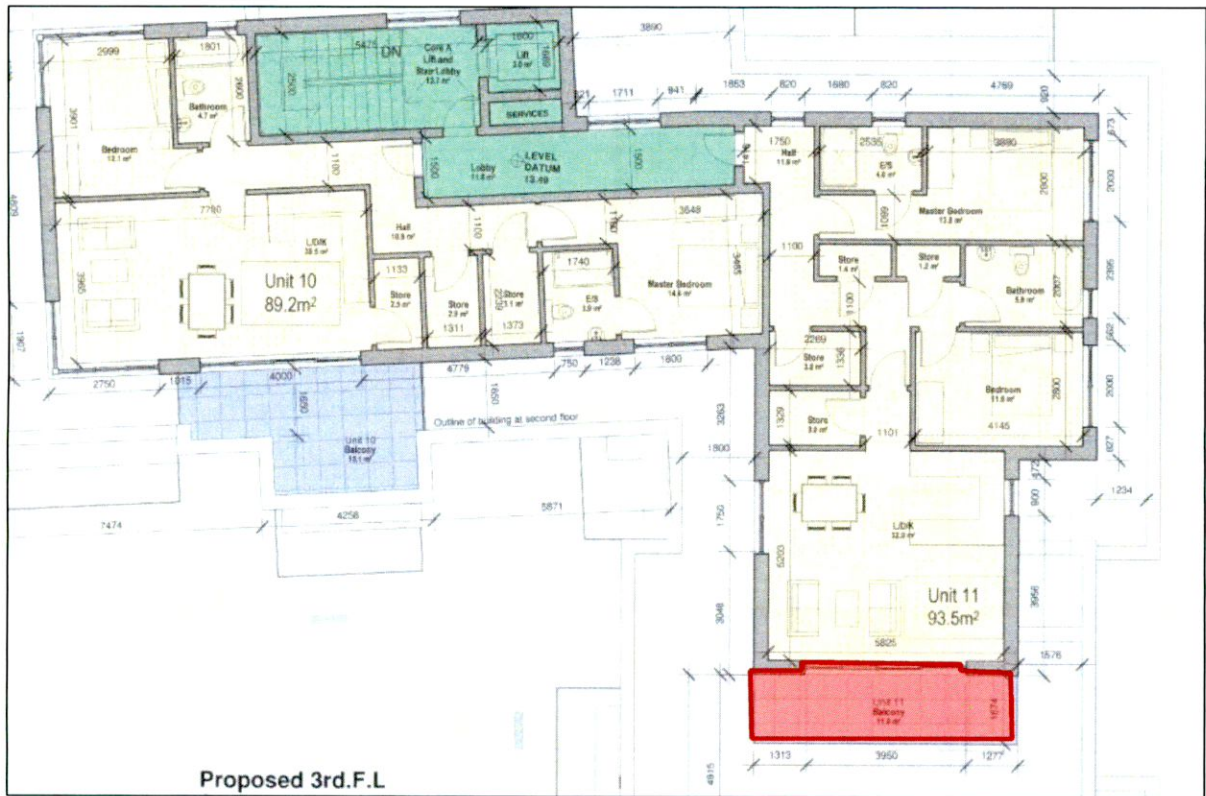


Figure 16.0 Proposed third floor plan showing the south facing balcony (red outline).

7.3 Visual Impact

The magnitude of the development that is being proposed in the current application is excessive and intrusive on the south and east facing residential properties. In the proposed development, a sizable, four-story residential structure with 19 apartment units will be constructed. The planned construction will result in an oversized development next to already existing homes in a well-established residential neighbourhood. Particular attention is being paid to the visual impact on our clients home at No. 4 Lucan Cloisters, which is located directly south of the subject site. A sample of the photomontages of the

planned development that were created and submitted with the planning application are shown in the photographs below. These pictures amply show how the proposed development would have a detrimental effect on the Lucan townscape.



Figure 17.0 Existing vs Proposed Street view of the proposed development site.

Further to the above, we note that photomontages from the viewpoint of the existing two-storey residential development to the south have not been submitted as part of the application, and whilst the southernmost section of the proposed apartment development, which directly opposes our clients' property at No. 4 Lucan Cloisters, is two-storeys in height, we submit that the proximity of the development, the proposed fenestration and overall design of the structure at this location would have a significant overbearing impact on our clients' property, which this Observation considers to be completely unacceptable.

7.4 Loss of Privacy

The proposed apartment building will be constructed extremely close to the boundary of No. 4 Lucan Cloisters, 3.456m from its boundary. This alone will result in an overbearing development for neighbouring dwellings. Whilst we acknowledge this is an improvement on the 1.8m distance previously submitted to the Council, we still content that this is insufficient and will result in significant loss of privacy to our clients resulting in the loss of reasonable use and enjoyment of their dwelling.

We further note that a number of balconies will protrude out from the side of the proposed building. As discussed above in section 7.2, the proposed balconies located southward and eastward will be detrimental to the privacy of the surrounding houses. It is submitted that these balconies will overlook our clients' dwelling and their rear private amenity space. This problem is a direct result of the application not following the important policy (as discussed in Section 6.0 of this Observation) set out in the Sustainable Urban Housing: Design Standards for New Apartments (March 2018) regarding separations distances and also given the proximity of the proposal to our clients' property. Moreover, the loss of privacy and overbearing effect is also evident due to the suffocating extent of the development which would result in a significant number of windows located on the rear (southern) and side (eastern) elevation.

7.5 Overbearing Impact

Another concern for our clients is the significant degree of overbearing that will result from the proposed development. This is due to the sheer extent of the development in terms of scale and mass. The subject site has an area of 0.1925 hectares, and it is proposed to provide 19 no. residential apartment units. The overall gross floor area of the proposed development would be 1,655sq.m. This would result in a residential density of c.98 units per hectare which is completely out of character of the surrounding area. As seen in the site plan of the proposed development below, the apartment scheme is situated extremely close to the boundary of our clients' dwellings at No. 4 Lucan Cloisters to the south of the application site. It is submitted that this will significantly reduce the amenities of our clients' dwelling.

In addition, it is clear that the proposed apartment scheme will dominate the streetscape when viewed from the Lucan Road. The image below shows the close proximity of the proposed apartment building on the southern section of the subject site adjacent to our clients' dwelling at No. 4 Lucan Cloisters. This image shows that the proposed building would be 3.456m away from the boundary shared with No. 4 Lucan Cloisters, and less than 5m away from the dwelling itself. This is in **complete contrast** to the requirement in the Sustainable Urban Housing: Design Standards for New Apartments (March 2018) to **provide a 22m separation distance from any two-storey dwellings**, if the proposed development is over two-stories in height. This is considered to be an unacceptable overdevelopment of the site. It is submitted that the proposed development disrespects and disregards the residential amenities of the surrounding area and simultaneously shows a complete disregard for the existing environment of our clients in particular.

The result of the proposed development, if permitted, would be an over-scaled scheme which is in contrast to the existing character and dwelling heights featuring within the area surrounding the subject lands. Currently, the Lucan Road is characterised by dwellings which are stepped back from the road within their curtilage. As such, approval of this proposal would result in an enclosure ratio uncharacteristic of the surrounding environment. The proposal is overbearing to both the adjoining residential properties immediately south of the subject site and to the wider Lucan Road area.



Figure 18.0 Existing streetscape of the Lucan Road displaying the existing built form.

7.6 Access and Traffic Hazard

As previously noted in the preceding sections of this report, the proposal comprises the construction of an apartment development, comprising 19 no. apartment units. 11 no. car parking spaces are proposed on the subject site to serve the development. As noted, this provision falls significantly short on the car parking standards, as set out in the South Dublin County Development Plan 2022-2028. The site is situated within Zone 2 (Residential) which requires 0.75 no. spaces per one-bedroom apartment and 1 no. space for two-bedroom apartments. The proposed development on the subject site provides 6 no. one-bedroom apartments and 13 no. two-bedroom apartments. Therefore, the development is required to provide for approximately 17.5 no. car parking spaces. However, the proposal only provides 11 no. spaces. This is substantially below the maximum required 17.5 no. required spaces. It is therefore likely that some residents living on the subject site will have to find elsewhere to park their car.

It is further submitted that the lack of parking provision will result in an overspill of street parking in surrounding residential areas which are already experiencing parking shortages. It is a concern of our clients that overspill parking will accumulate near their property due to its proximity to the Lucan Road pedestrian entrance. In addition to this, visitors to the subject site will not have space to park and will also need to find elsewhere to find a parking space in the adjacent Lucan Heights residential estate. Parking overspill is already a current feature in the residential estate due to the close proximity of three schools (St. Mary's National and Secondary School, and St. Andrews National School) and Pieta House.



Figure 19.0 Street parking in the Lucan Heights Housing Estate.



Figure 20.0 The pedestrian entrance to the Lucan Road in relation to our client's property.

We contend that the Stage 1 Road Safety Audit prepared by Bruton Consulting Engineers Ltd which has been submitted with the application under Reg. Ref. SD22A/0324 does not adequately assess the developments impact on the existing traffic issues on the Lucan Road. The Traffic and Transport Assessment Guidelines (May 2014) advises that;

'The Traffic and Transport Assessment should be written as an impartial assessment of the traffic impacts of a scheme and it should not be seen to be a "best case" promotion of the development. All impacts, whether positive or negative, should be recorded. The level of detail to be included within the report should be sufficient to enable an experienced practitioner to be able to follow all stages of the assessment process and to reach a similar set of results and conclusions'.

We submit that the Road Safety Audit submitted with the application is insufficient in response to the refusal reasons of the previous application under ABP Ref. 309525-21 and we request that South Dublin County Council request a full Traffic Impact Assessment in line with Transport Infrastructure Ireland's Traffic and Transport Assessment Guidelines (May 2014) be completed to properly assess the proposed developments impact on the existing high levels of traffic.

We submit that the refusal reasons from An Bord Pleanála under ABP Ref. 309525-21 have not been adequately addressed and the subject proposal will have an adverse impact on the R835 regional road. The Board considered that *'the proposed intensification of traffic accessing and egressing the site would result in increased traffic hazard on a busy road and would result in unsafe traffic movements into and out of the site'.*

The Board also stated that *'in the context of not accepting the viability of the secondary access point to the site, and taking account of the constrained nature of the primary access point onto the R835, where right-turning vehicles into and out of the site would cause a significant traffic risk under the current road arrangements, the Board considered that the increased traffic accessing the site cannot be accommodated in the absence of the provision of safer and more sustainable road design solutions such as box junctions, traffic lights and/or pedestrian crossings to facilitate the development'.*

We submit that the above statement from An Bord Pleanála applies to the current application due to the omission of the secondary access point to the application site from Lucan Heights. We contend that the current application will result in an even further traffic intensification on the Lucan Road and the mitigation measures proposed by the applicants are insufficient to reduce the impacts of the development. We submit that the proposed traffic calming measures as shown below do not sufficiently respond to or mitigate the concerns of An Bord Pleanála.

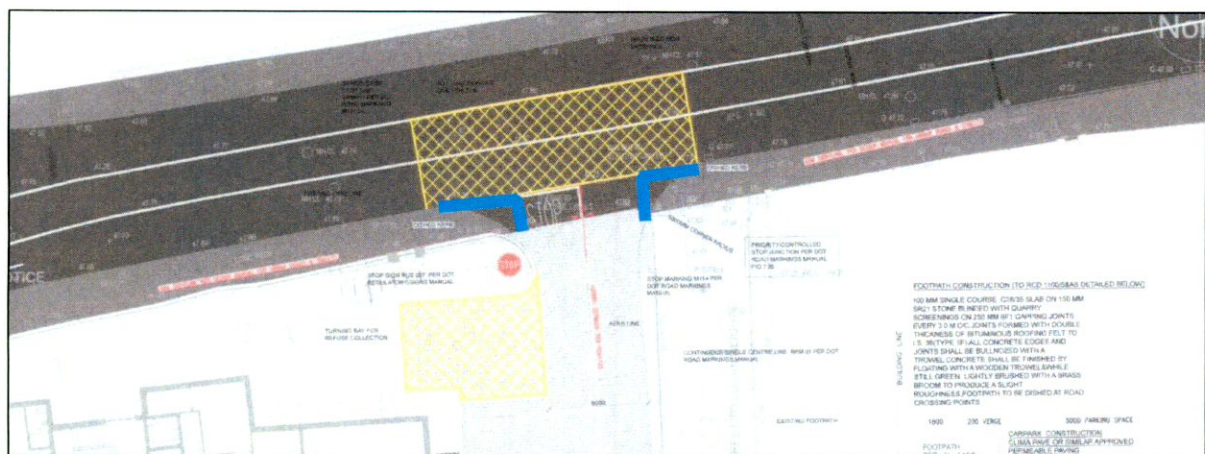


Figure 21.0 Site layout plan outlining the traffic calming measures proposed by the applicants.

We consider that the angle of the proposed vehicular access to the site is too wide and as a result vehicles entering the site may not reduce their speed to a sufficient level in order to prevent traffic and

pedestrian incidents. A more angular junction, as shown with blue lines in Figure 21.0, would mitigate these concerns and result in a safer access to and from the site for vehicles and a more appropriate pedestrian crossing.

We would contend that the level of parking required for the proposed development is entirely unsuitable. In order for the development to comply with the standards, the applicant should provide the required number of parking spaces or significantly reduce the density of the development, thereby reducing the level of car parking ultimately required.

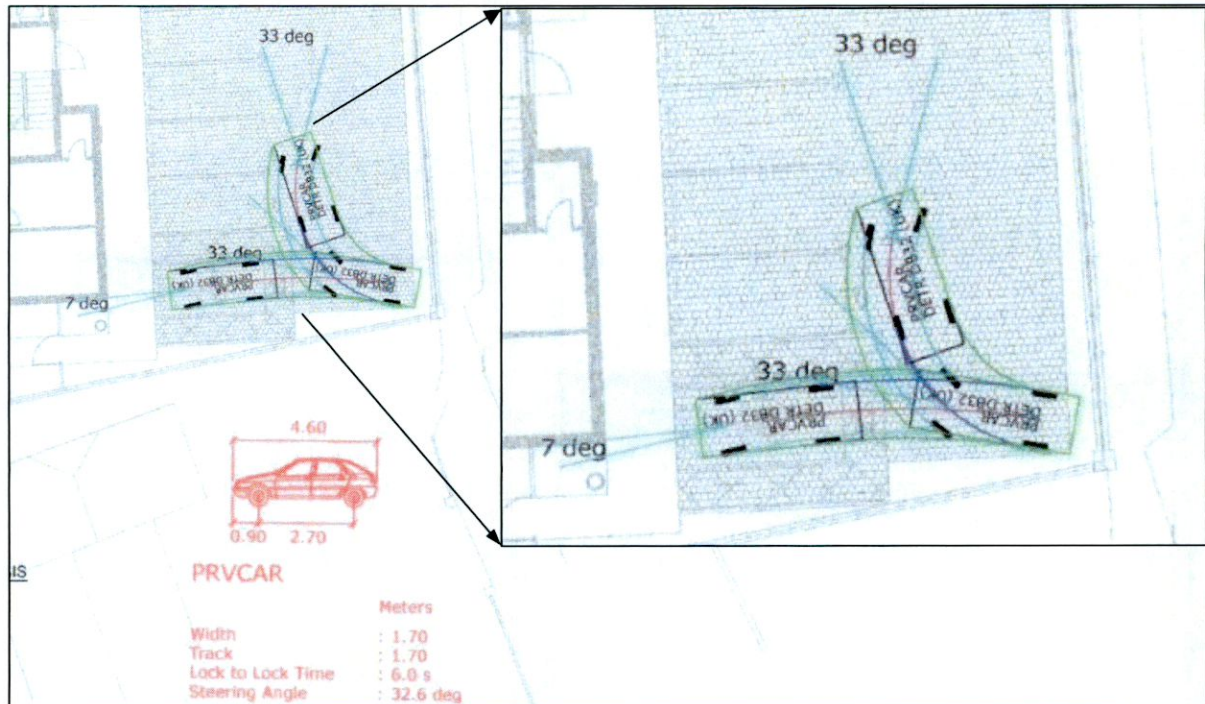


Figure 22.0 Proposed swept path analysis of the disabled car parking space.

Furthermore, we contend that the proposed location and usability of the disabled parking space is not appropriate. The above drawing outlining the space required when a vehicle is making its turning manoeuvre out of the disabled space is unsuitable in its location and would increase the likelihood of collisions with the boundary wall and vehicles parked in the parking space to the north of the disabled parking space.

It would also be prudent to note the following planning application outlined below for the widening of the vehicular entrance to St. Josephs Presentation Convent, Lucan, Co. Dublin which was granted by South Dublin County Council.

St. Josephs Presentation Convent, Lucan, Co. Dublin

Reg. Reg. SD21A/0020 Planning permission was granted by South Dublin County Council on 12th August 2021 for the removal of portion of existing boundary wall to front and construction of new vehicular and pedestrian entrances.

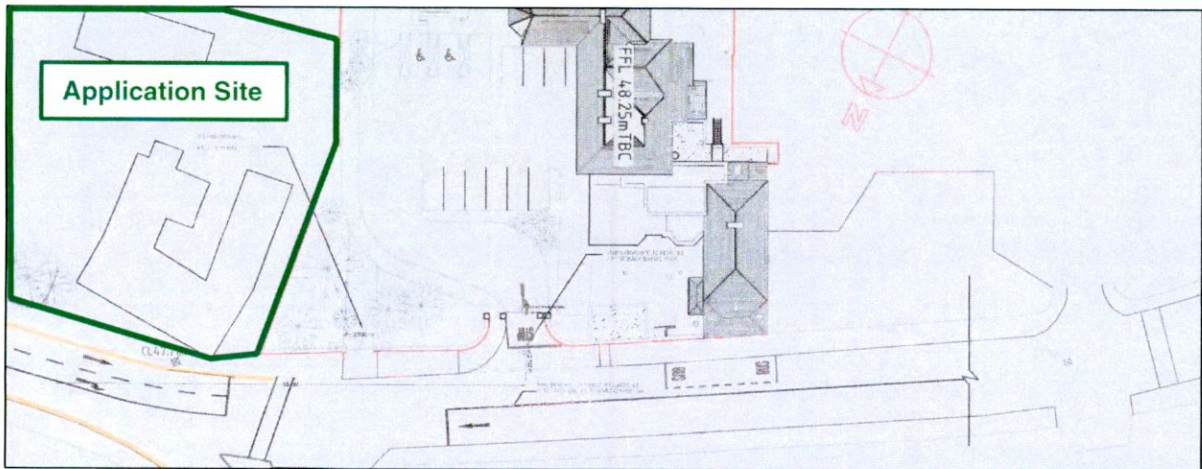


Figure 23.0 Revised proposed entrance to St. Josephs Presentation Convent submitted at further information stage and received by the council on 11th June 2021.

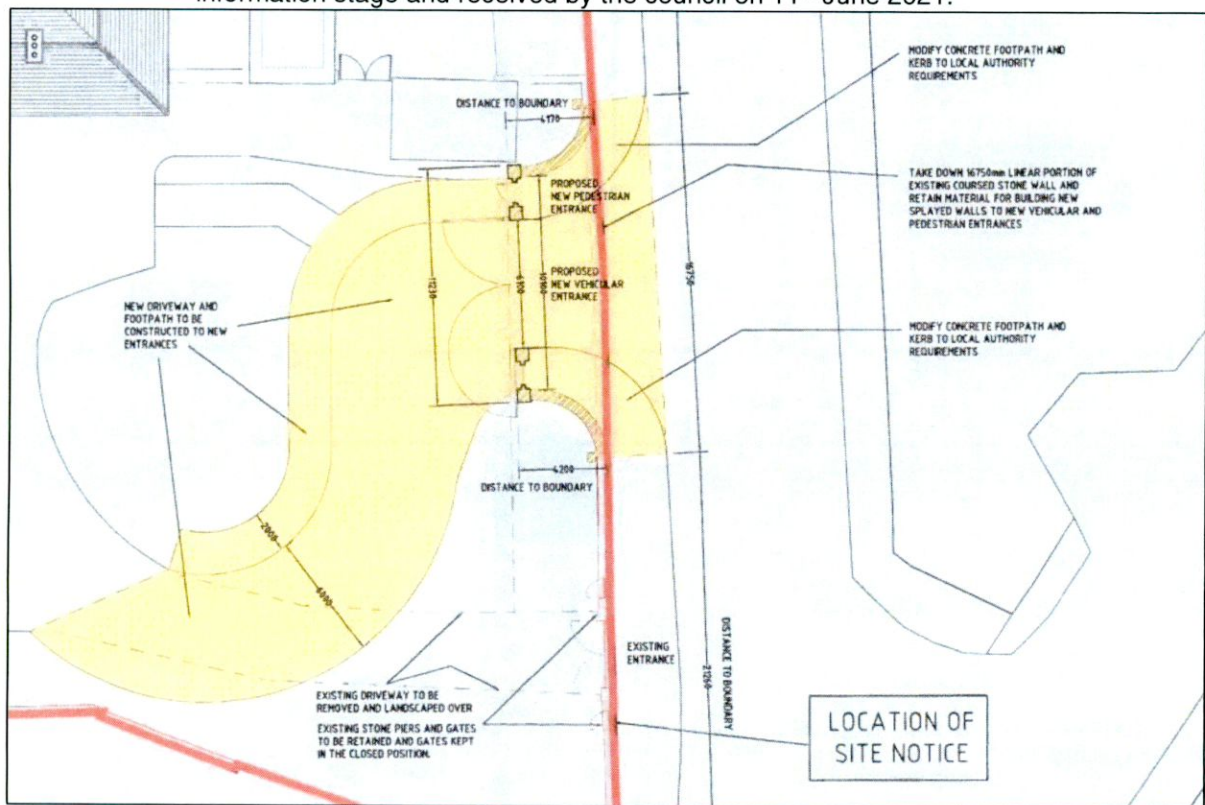


Figure 24.0 Proposed site layout of entrance arrangements to St. Josephs Presentation Convent.

We consider that this redevelopment of the vehicular entrance and rearrangement and slight increase of car parking to the site located to the west of the subject site, will result in a higher volume of traffic from the Convent onto Lucan Road. We contend that the applicants have not had due regard for the cumulative effects of the aforementioned application and the proposed development at Hillhouse, and the impacts they will create with further traffic issues than those existing at present. Should the subject proposal be granted, the proposed vehicular entrance and associated 11 no. car parking spaces, along with this intensification of traffic to and from the adjacent site will cause substantial traffic issues to the Lucan Road.

7.7 Odour and Noise Pollution

It is noted that the bin store is proposed to be located on the southern boundary, directly adjacent to the rear private amenity space of our clients' dwelling at No.4 Lucan Cloisters. This is considered completely unacceptable, as it would result in an odour on our clients' site. This would prove to be unsettling and possibly a risk to our clients' health over a prolonged period of exposure. Further, the location of the bins raises concerns regarding fly and pest infestations which may occur along the southern boundary. Given the proximity of the bin storage area to our clients' property, we view this as an additional risk to our clients' health. Moreover, residents at the proposed apartment units would have to wheel their bin to this location which would cause a lot of noise during all times of the day (and night). We also note the proximity of the water tank to the boundary walls which raises concerns relating to leakage and the impact on our clients' adjoining property to the south. Figure 24.0 below indicates the close proximity of the bin store and water tank to No. 4 Lucan Cloisters.

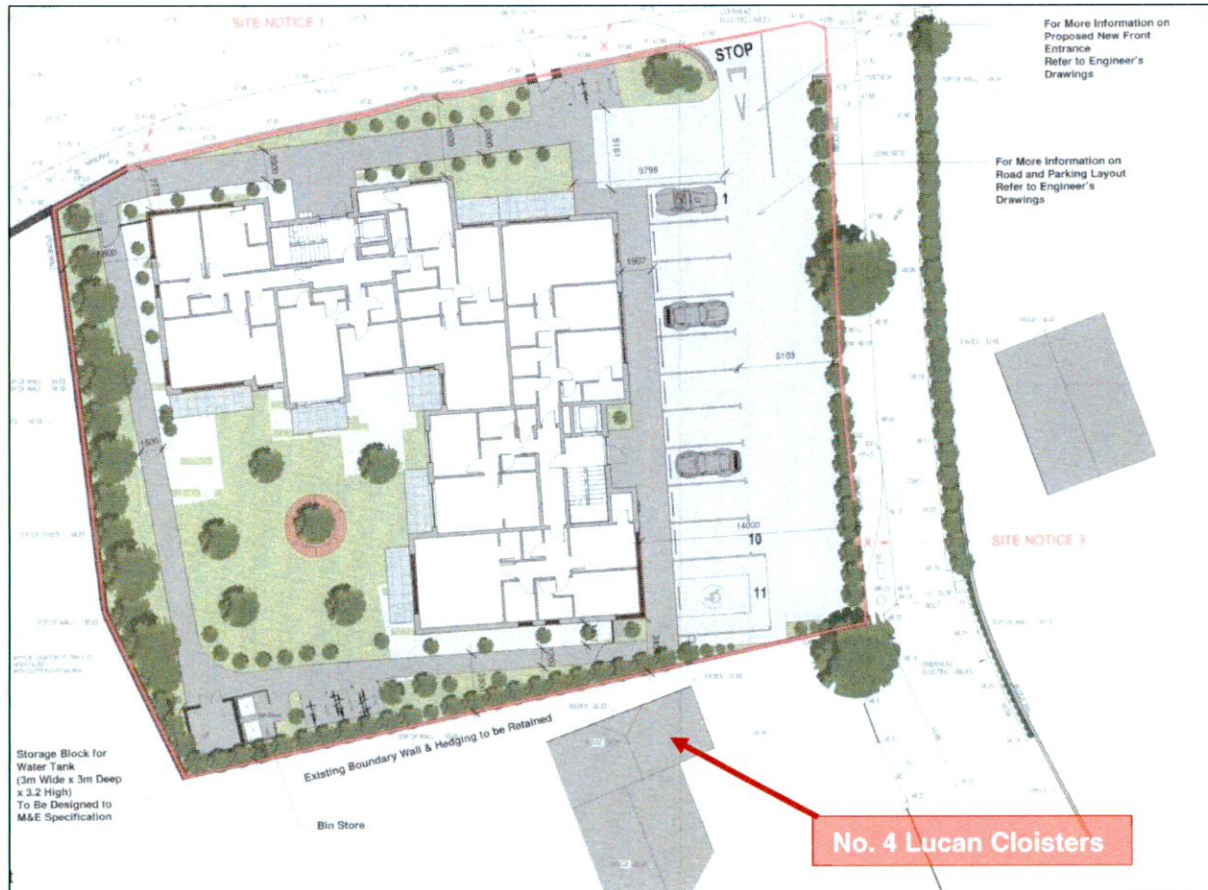


Figure 25.0 Extract from site layout plan, showing the close proximity of the bin to No. 4 Lucan Cloisters.

7.8 Construction Management Plan

It is noted that a Construction Management Plan was not submitted with the planning application. As noted already in this Observation, the South Dublin County Development Plan 2022-2028 states that a construction and demolition waste management plan should be submitted as part of development proposals that comprise 10 no. units or more or if the development exceeds 1,000sq.m. The proposed development provides 19 no. residential units and would have a gross floor area of 1,655sq.m. Therefore, it is a requirement for the application to provide some form of construction and demolition management plan. This is viewed as a total disregard to the requirements as set out in the South Dublin County Development Plan 2022-2028, and to residents in the surrounding area. This is particularly true for our clients at No. 4 Lucan Cloisters who would be as little as c. 5m from the proposed apartment building. Details of construction of the apartment building at the southern boundary would be beneficial to our clients.

7.9 Devaluation of Property

The proposed construction of a four-storey building comprising 19 no. apartments with ancillary facilities is completely inconsistent with the existing character and setting of the surrounding, established residential area, making it less attractive to potential buyers should the owners of any of the existing properties need to sell their respective property in the future. The amenity and accordingly the value of property will be seriously impacted upon by this development – if permitted. It is a primary objective of the development plan to ensure the protection of residential amenity and property value.

Due to the height, scale and associated visual impact of the proposed development, this does not only impact on directly adjoining properties but the wider Lucan Road area and environs. It is requested that the Planning Authority consider the financial implications on the existing residents should such a development be approved at the subject site.

8.0 Conclusion

The proposed development which relates to the demolition of an existing house, and ancillary outbuildings and the construction of a two to four storey building accommodating 19 apartments comprised of 6 one-bedroom apartments and 13 two-bedroom apartments. We contend that this development does not accord with the proper planning and sustainable development of the area and would represent overdevelopment on the subject site and in an established low-density area.

We contend that the proposal is unsuitable for the subject site and will irreparably compromise the amenity of adjacent residents by way of overlooking, overbearance and loss of privacy, particularly to the neighbouring properties of No. 4 Lucan Cloisters.

There are also implications in respect of parking overspill, densification, intensification of the site, devaluation of property value and the potential for inappropriate precedent to be set which could lead to further high-density development within the surrounding area.

We contend that very little changes have been made by the applicants in response to the refusal reasons under the previous applications submitted to South Dublin County Council under Reg. Ref. SD20A/0142 and SD19A/0198, in order to ensure there will be no traffic issues and to better protect the residential amenities of the residents of surrounding dwellings and the future residents of the proposed development.

We ask the council to acknowledge that the proposed development would be out of character with the Lucan Road area and is not site responsive. It is considered that the proposal has had little regard to the amenity of the surrounding properties and the consequences of developing in such close proximity to third party lands.

The proposed development is therefore not in the interests of the proper planning and sustainable development of the area and, if permitted would set a poor precedent for similar developments.

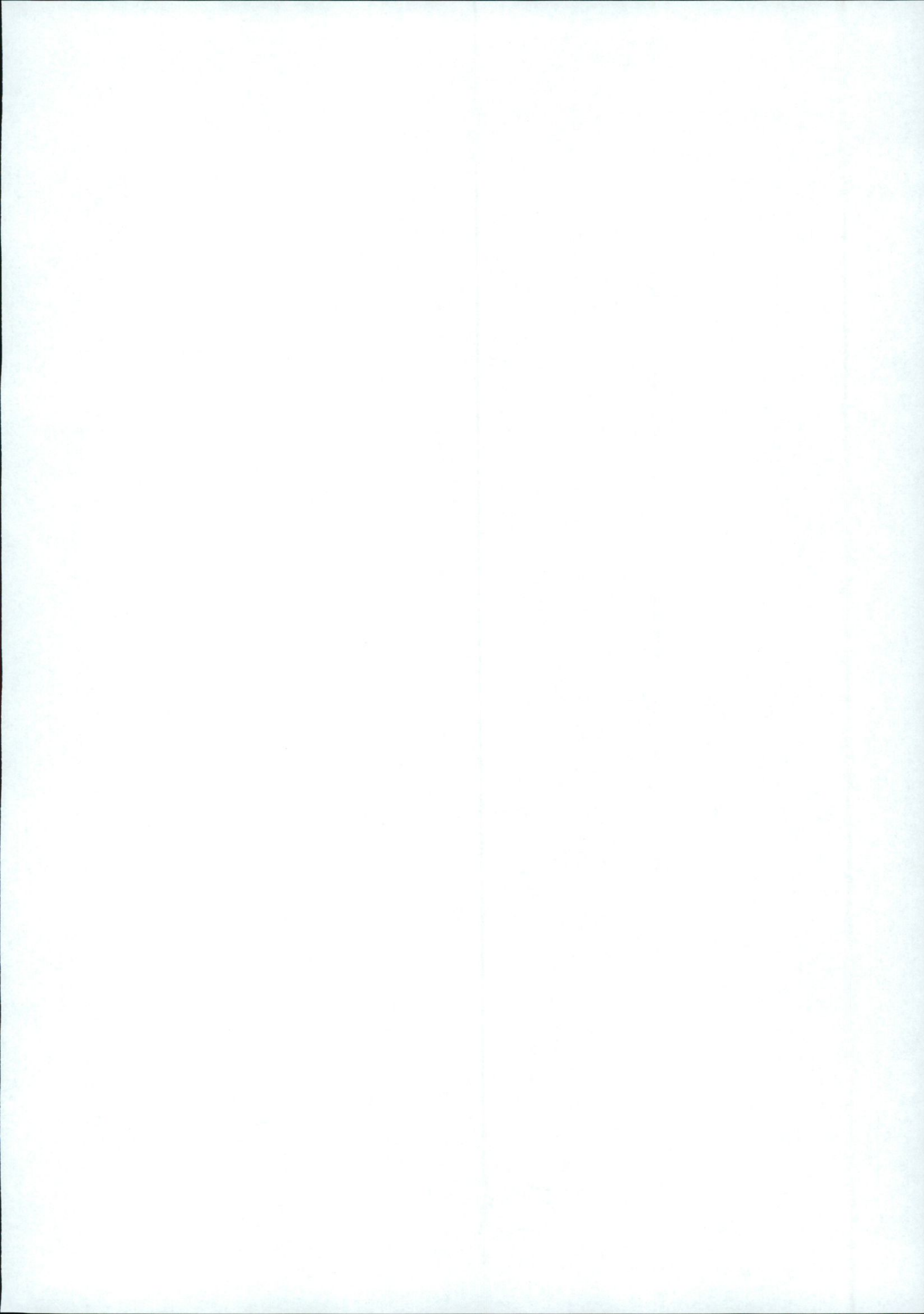
We trust that on the assessment of this application and along with an analysis of the visual impact of the development and the level of severe dis-amenity it will cause to the adjacent properties that South Dublin County Council will see fit to **refuse** permission for the development outright.

We look forward to the decision of the Council on this application and reserve our right to appeal to An Bord Pleanála.

Yours sincerely,



Kevin Hughes MIPI MRTPI for
HPDC Ltd.



Rory Phillips,
Hughes Planning
85, Merrion Square South
Dublin 2
D02 FX60

Date: 13-Sep-2022

Dear Sir/Madam,

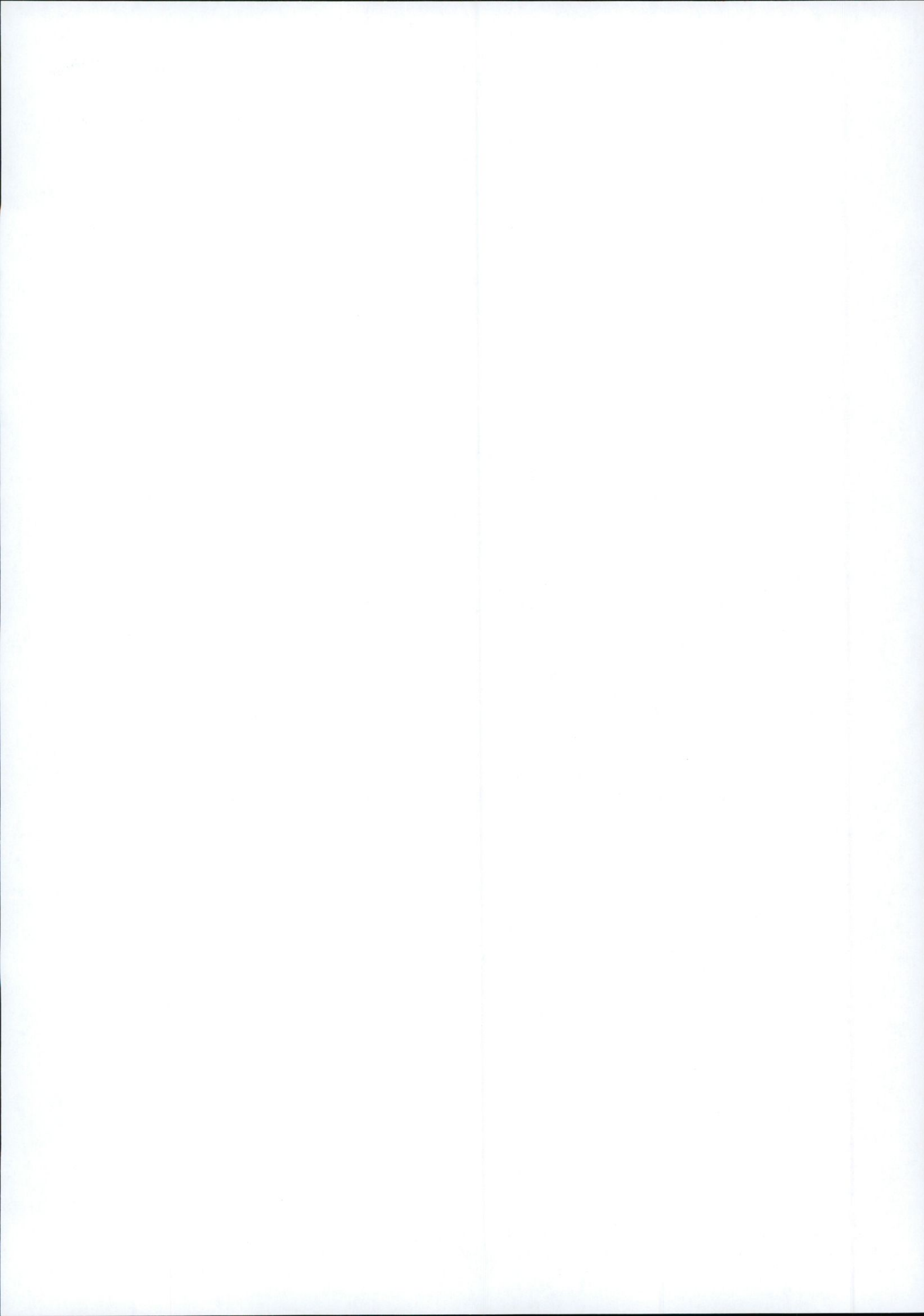
Register Ref: SD22A/0324
Development: Demolition of an existing house; Ancillary outbuildings and the construction of 1 two to four storey building accommodating 19 apartments comprised of 6 one bedroom apartments and 13 two bedroom apartments; Vehicular access to the proposed development will be via 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**

