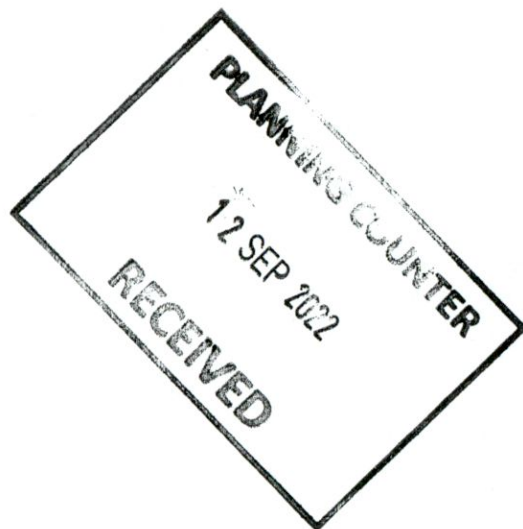


59 Lucan Heights
Lucan
Co. Dublin

9th September 2022

Senior Administrative Officer
South Dublin County Council
Town Centre
Tallaght
Dublin 24



Ref: Application SD22A/0324 - Demolition of an existing house, Hillhouse, Lucan Road and ancillary outbuildings and the construction of one 4 storey building accommodating 19 apartments comprised of 6 on- bedroom apartments and 13 two-bedroom apartments. Vehicular access to the proposed development will be solely via Lucan Road and Lucan Heights with 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 0.1925ha.

Dear Sir/ Madam,

We wish to strongly object to the proposed development which we consider to be totally at odds with the principles of proper planning and development for the area. We previously objected to a development at this site (Planning Ref. *SD20A/0142*), which was ultimately refused in an An Bord Pleanála decision. Aside from the vehicular access to the proposed development which is now solely via the Lucan Road (rather than via the Lucan Road and Lucan Heights in *SD20A/0142*), the application which is the subject of this objection is unfortunately, almost identical to the one that was previously refused. The reasons for our objection are outlined in the following paragraphs:

(1) Density

The planning application proposes a two to four-storey in-fill development comprising 19 apartments on a small site of 0.1925 ha. The only way that this can be achieved is through a development that is excessive in terms of both scale and bulk, the proposed development equating to a density of c. 100 dwellings per hectare. This is contrary to H8 Objective 6 (p. 34) in the SDCC Development Plan 2016 - 2022 which refers to “a density range of 35 – 50 units per hectare to greenfield sites that are zoned residential” and far exceeds the densities in the nearby so-called ‘high density’ developments of Adamstown and Clonburriss which attract 50-60 units per hectare and 36-40 units per hectare, respectively. Furthermore, the proposed development is clearly inconsistent and not in keeping with the existing dwelling density in Lucan Heights and The Cloisters which comprise low density semi-detached (for the most part) and detached properties.

For the reasons outlined above, this planning application should be rejected.

(2) Scale

This application follows from a previously refused planning application (Refs: SD20A/0142). Changes to the previously proposed development are minimal, and the proposed building remains largely the same as that in the previous proposal in terms of its overall footprint, its overall height of up to four storeys and its general proximity to the shared boundaries. Revisions to the previously rejected proposal are therefore not sufficient and the overall building has not been adequately scaled back in bulk or massing. As such, the proposed development, located in a very prominent position, appears overly dominant and overbearing, resulting in harm to the visual and residential amenity of the area.

In terms of building height, the proposed development does not align with the requirements in the SDCC Development Plan 2016 -2022 (p. 202) which notes that building height should be consistent with the "prevailing building height in the surrounding area", the "proximity of existing housing" and should in essence contribute to the "formation of a cohesive streetscape pattern – including height and scale of the proposed development in relation to width of the street, or area of open space". As noted in (1) above, Lucan Heights and The Cloisters comprise low density semi-detached (for the most part) and detached properties and we would argue that the current proposal makes no attempt to integrate cohesively and in 'character' with these existing estates.

For these reasons, this planning application should be rejected.

(3) Privacy

Following from (1) and (2) above, the proposed development will compromise the privacy of residents in The Cloisters and in Lucan Heights from direct overlooking. The local Pieta House is located adjacent to the proposed development, and it too will be directly overlooked with the consequent loss of privacy for attendees of this clinic.

For the reasons outlined above, this planning application should be rejected.

(4) Lack of Car Parking

The plans for the proposed development include 11 car parking spaces (two less than in SD20A/0142). While recognising the need to promote the use of public transport, 11 parking spaces for a development of 19 apartments is wholly inadequate (minimising the number of parking spaces does of course allow for the inappropriate scale and overdevelopment of the site referred to in (1) and (2) above). While parking requirements for urban developments in Ireland are not particularly prescriptive, Councils in the UK, our nearest neighbour, can require at least at least one allocated parking space for urban apartment developments, increasing to 1.3 spaces per property for central and suburban developments in some jurisdictions. It is not uncommon for two-bedroom properties to provide for an average of 1.4 cars in central areas, increasing to 1.6 in suburban locations. By any assessment, conservative or otherwise, a total of 11 parking spaces for the residents (up to 64 in number) and visitors to the proposed development is totally inadequate and will result in Lucan Heights and The Cloisters becoming an overflow carpark for the development.

For the reasons outlined above, this planning application should be rejected.

(5) Traffic Safety Issues

The proposal will present very significant risks to the health and wellbeing of the many residents, old and young, for two reasons:

- (a) Lucan Heights, The Cloisters and the laneway linking Lucan Heights and The Cloisters to the Lucan Road itself, currently provide access to schools, churches and other amenities in Lucan and its surrounds. Subject to traffic calming measures, vehicular access to the development via the Lucan Road is being proposed. The entrance to the development is located on the crest of a bend and in the immediate proximity of a traffic-controlled junction that is subject to significant tailbacks during the morning and evening commutes. Allowing access/ egress to the development via the Lucan Road, as is being proposed, is preposterous in that it will exacerbate significantly the dangers that already exist at this junction.
- (b) The site is within 200 yards of four schools (three of which are primary schools) and within 400 yards of two other schools (one a primary school). Walkways and footpaths in Lucan Heights and The Cloisters serve as primary access routes (walking, scooting and cycling) for the daily commute to schools for many children. The wholly inadequate parking provisions in the proposed development and the certainty that Lucan Heights and The Cloisters will be the overflow car park for the proposed development, will inevitably result in a significant increase in car movements through these housing estates. This in turn will create a whole new set of dangers and risks to the existing users of the walkways and pathways in the vicinity of the proposed development.

For these reasons, this planning application should be rejected.

(6) Noise Pollution

The proposed development could potentially accommodate up to 64 residents. This will represent a significant influx of residents into a settled and mature location with a significant number of elderly residents. Excessive noise pollution is therefore likely to be a significant and ongoing issue.

For this reason, this planning application should be rejected.

Summary

We fully understand the issues of people seeking access to residential properties as either buyers or renters of these properties. We also understand the challenges facing planning authorities in facilitating the provision of housing at a time when the shortage of housing is a national issue. However, the proposed development is wholly inappropriate for its location and setting and represents gross overdevelopment of the site.

We do not object to development of this site in principle, but what is currently proposed is unacceptable for all of the reasons outlined. This site is suitable for a much smaller development and one which is sympathetic to the existing character of Lucan Heights and the Cloisters. It is our view that a development that addresses the issues raised in this letter of objection, and which is consistent with the local planning profile can still make a meaningful contribution to meeting the housing needs of the locality.

Based on the reasons outlined, **the proposal in its current format should be rejected.** I enclose my fee of €20 and request that South Dublin County Council make the decision to refuse this application.

Yours sincerely,



John O'Sullivan



Gillian O'Sullivan

John & Gillian O'Sullivan
59, Lucan Heights
Lucan
Co. Dublin

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**