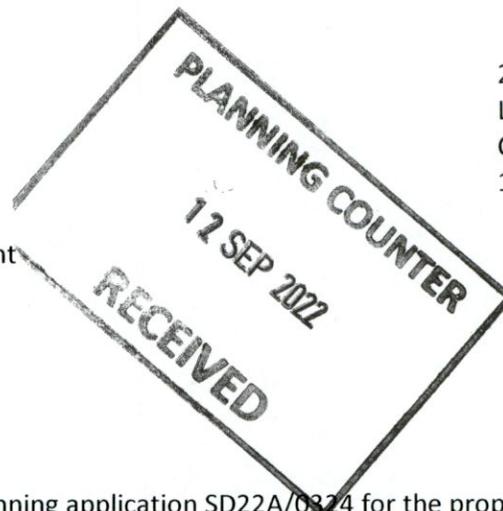


2 The Cloisters,
Lucan Heights,
Co. Dublin
11/09/2021



To: The Planning and Roads Department
South Dublin County Council
County Hall
Tallaght
Dublin 24

Re: We object to the following planning application SD22A/0324 for the proposed development located at Hillhouse, Lucan Road, Lucan Co. Dublin for the following reasons.

Application Re: Demolition of an existing house, Hillhouse, Lucan Road and ancillary outbuildings and the construction of one 2 to 4 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 0.1925ha. (Reg. Ref: SD22A/0324)

Dear Planning Department and Roads Department,

We are very disappointed that this planning application has been re-submitted for the third time with no effort made to address the safety issues and proposed overdevelopment on this site already identified as unacceptable by the local Community, South Dublin County Council and An Bord Pleanála. The previous two planning applications were refused by South Dublin County Council and An Bord Pleanála respectively.

Planning history:

Planning Reg. Ref. SD19A/0198 proposed a similar development at the site with vehicular access to the heavily trafficked R835 Lucan Road. This application was subsequently refused by SDCC.

"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."

A subsequent application under Planning Reg. Ref. SD20A/0142 proposed a similar access to R835 Lucan Road together with a secondary gated access to Lucan Heights. The access to R835 Lucan Road was in the same location close to the Chapel Hill signal junction and proposed the same layout. This application was refused by An Bord Pleanála stating the following Reasons and Considerations:

"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.

The decision 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.” (emphasis added)

This planning application Ref. SD22A/0324 proposes the same location for an access to R835 Lucan Road close to the Chapel Hill signal-controlled junction. The proposed geometry and layout of the access junction is the same as the previous 2 no. applications. The Applicant again proposes a left-in left-out junction and fails to incorporate any meaningful details on how right turning will be prohibited. There is no central barrier proposed on the R835 Lucan Road and drivers are not physically prevented from turning right. As per the previous determination of the Board, right turning traffic will be generated and will give rise to significant traffic hazard and endangerment of public safety.

As residents of 2 Lucan Cloisters, Lucan Heights with a young family we are not against a suitable development at Hillhouse, Lucan Road, which is in keeping with the area; our preference is for a two story housing development in keeping with the area, that addresses all health and safety and planning guidelines in full, including the objectives of the Planning Authority’s strategy to protect the realm and visual amenity of existing communities set out in South Dublin County Development Plan 2016 – 2022. This application Ref. SD22A/0324 does not reference or address the objectives of South Dublin County Development Plan 2016 – 2022.

There are fundamental problems with the current proposal that we are asking South Dublin County Council to consider and address, the problems are created by an attempt to overdevelop this site of 0.1925ha from a one dwelling development into a 19 dwelling development. The proposed scale, massing and height of the development has not been evaluated as the site is not placed to absorb this high density development in terms of access and location.



Current proposal of 19 Apartments over 4 stories.

- Based on current planning guidelines, recommendations call for the provision of 17 car parking spaces for a development of this size, there are 11 car parking spaces provided for in this application Ref. SD22A/0324 with no provision for charging electric vehicles. Resulting in a shortfall of 6 car parking spaces which will result in an un-acceptable spill over to the already congested streets of Lucan Heights.
- Based on current planning guidelines, recommendations call for the provision of secure storage for 32 bicycles belonging to residents and 10 number visitor bicycle parking spaces for a development of this size. There are a total of 20 bicycle parking spaces provided for in this application Ref. SD22A/0324, less than 50% of the recommendations.
- Based on current planning guidelines, recommendations state that new residential developments will be no more than two stories in height unless there is a separation distance of 35 meters or greater achieved between existing one or two story dwellings. This application Ref. SD22A/0324 provides for less than 50% of the recommended separation distance, demonstrating the proposals overbearing nature, visible above.

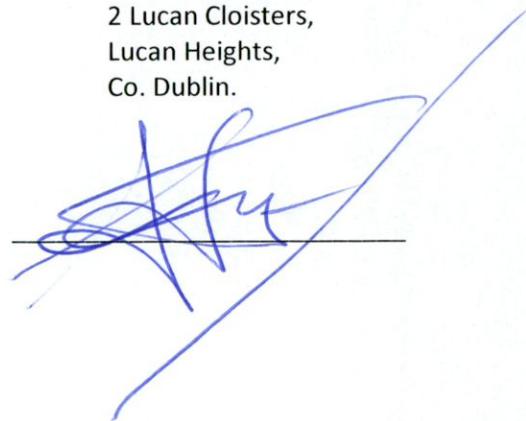
- Current planning guidelines, objectives and density recommendations, that provide the fundamental corner stone's to deliver appropriate planning for suburban infill sites of area less than 0.5 hectare, recommend that new residential developments will be between 35-50 units per hectare. This application Ref. SD22A/0324 provides for 100 units per hectare, again more than 50% of a discrepancy with recommended guidelines and best practice. The adjoining area of Lucan Road and Lucan Heights occupy single and two story homes with a density of approximately ~~12~~ units per hectare. (22 units per hectare)
- Refuse collection services are provided in the Lucan Heights and surrounding areas by a number of service providers, each of the service providers operate a large truck fleet that are 11.2 meters in length which will not be capable of safely entering and exiting the proposed site in forward gear given the geometry of the proposed access and turning area. Based on the current proposal refuse collection from this estate will have to be serviced from the busy Lucan Road that is the R835, crossing footpaths where thousands of children commute to and from the six local schools.
- Lucan Road and particularly the controlled junction close to the proposed development is heavily congested with traffic for a 2.5 hour period both morning and evening leading to very long traffic tailbacks in both directions. The current application Ref. SD22A/0324 have submitted a safety report that demonstrates that no meaningful due diligence around pedestrian and vehicle safety has been carried out by the applicant. The safety auditor demonstrates they are not aware of the traffic tail backs that exist on a daily basis. At Paragraph 3.2 the Auditor report identifies that the proposed yellow box extends into the eastbound carriageway of R835 Lucan Road and the Auditor confirms that the yellow box may exacerbate problems in that 'right turning' drivers might turn without looking. The Road Safety Audit clearly acknowledges that there will be right turning traffic, which was a significant factor in the Boards previous decision to refuse, grounded by the development giving rise to significant traffic hazard.

In conclusion we respectfully ask that South Dublin County Council refuse this planning application on the fundamental issues that exist with this proposal, namely pedestrian and vehicle access on the busy Lucan Road that is the R835 and the clear evidence that the current application SD22A/0324 represents overdevelopment of more than 50% based on South Dublin County Development Plan 2016 – 2022.

Peter O'Connor
2 Lucan Cloisters,
Lucan Heights,
Co. Dublin.



Ann O'Connor
2 Lucan Cloisters,
Lucan Heights,
Co. Dublin.



Peter & Ann O'Connor
2, The Cloisters
Lucan Heights
Lucan
Co. Dublin

Date: 15-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**