

Declan Curran
132 Templeville Drive
Templeogue
Dublin 6W

Planning Department
South Dublin County Council
County Hall
Tallaght
Dublin 24

31st January 2023

Re: SD22A/0466 - 124 Templeville Drive, Dublin 6W. Demolition of an existing single storey plus dormer three bedroom dwelling house and the construction of four two storey three bedroom semi-detached dwellings; Three separate vehicular accesses are to be created off Templeville Drive with one to the south and two to east of the site with all ancillary site works and landscaping.

Dear Sir/Madam

We are the owners and occupiers of 132 Templeville Drive and I wish to note several observations and objections relating to the above planning submission for 124 Templeville Drive.

The proposal is a follow-on application from permission and outline permissions SD20A/0190, SD19A/0193 and SD18A/0311 which were all refused. As such, this further application is not standalone, but must be reviewed together with the previous application and associated rejections. Many of the issues which were relevant in the previous applications remain relevant in this application.

Section 1 below identifies a number of specific concerns which are the basis of the associated objections. Section 2 outlines the related planning objections arising from the SD22A/0466 application.

Section 1

- In relation to the assertion of the applicants' supporting documentation to the roads department stating Templeville Drive has "limited traffic movements": Templeville Drive is a busy through road during morning, afternoon and evening with traffic using the avenue to cut from Templeville Road to Cypress Grove Road, in addition to the congestion on the avenue from pupils being dropped off/collected to/from St Pius X national school. Parking at these times is limited to the opposite side of the road to the proposed development, and an additional entrance to off street parking would cause severe disruption and be a potential danger – particularly with high volumes of children using this road and the high walls on the 84 Templeville Drive side leading to a blind exit. This issue persists in the latest planning submission and is further exacerbated by the drive in-reverse out nature of the tight parking to the side of houses 3 and 4. I would invite the relevant SDCC representatives to attend the location during these periods to observe the depth of congestion.
- The provision of 2 very tight parking spaces to serve each of houses 3 and 4 is insufficient given the width and existing parking congestion on both Templeville Drive and the link road. The existing occupants of just one dwelling at this location are served by 4 vehicles and regularly park on the opposite side of the road to all other cars on the road, despite a significant off-street parking area, causing congestion and hazard. Therefore, even during quiet periods when not receiving visitors, these dwellings will significantly add to the on-street parking difficulties. Currently waste management service vehicles have difficulty navigating and making due progress along this road – the additional density of vehicles on this road may also hamper emergency service vehicles responding to distress calls in an efficient and timely manner.
- Following the previous point, the link road currently has sections of double yellow lines restricting parking. It is not clear from the submission whether these sections will be re-designated, extended or other.

- The addition of two entrances on the link road would furthermore detract from the security of the immediate neighbours. There is currently no access to rear gardens from the main road as all houses have garages to the side. This would erode that security and allow persons access to previously secure rear gardens. It should further be noted that the entrance of 122A Templeville Drive to this connecting road was required to be sealed off and is no longer in use.
- The proposed development, given its easterly orientation, will affect the morning sunlight in the gardens to its rear. In addition to light issues, the proposed development would create privacy issues for the gardens and houses to its rear. These gardens and houses are not directly overlooked at present, and a deviation from this would cause significant issues. The proposed "green wall" would not mitigate light issues and the roots of said green wall may cause damage to existing dividing walls. The current line of houses to the rear of the existing houses are separated by some 100ft plus of gardens. The proposed development would create an immediate overlook for some houses and drastically cut this distance for many houses down the line of rear gardens. The overlook must be considered in terms of a much closer overbearing structure on the rear gardens in addition to line of sight from the proposed rear windows.
- In relation to the water drainage pipe to the rear of the existing dwellings - I trust SDCC will perform their independent analysis of the drain in question prior to any decision on permission, as the analysis attached to the planning submission is not independent and relies on a number of assumptions made with no supporting documentary evidence including being only performed at one specific point in time. In the event of planning permission being granted, it should be ensured the applicants accept, in a legally binding and signed document, the responsibility for any future issues with drainage which may be caused by their associated works. This covenant must be attached to the deeds of the property, to ensure transference in the likely event of the applicant disposing of the property.
- The proposed development is completely out of character with the area – in addition to the nature of the build on a connecting road and its two-storey construction, the front façade and overall character is not in keeping with the existing dwellings in the area. Templeville Drive is a mature residential area, and as such the aesthetics must be respected and maintained in line with proper planning and development policies.
- Having regard to the existing pattern of development in the vicinity and to the number and layout of the proposed houses, this development would constitute overdevelopment of the site, would seriously injure the amenities of the area and of the property in the vicinity, and would therefore be contrary to the proper planning and sustainable development of the area.
- As noted in previous observations, there are no comparable examples of overdevelopment and exponential increased density of corner sites in the area. No. 122/122A were the addition of a single dwelling to a similar corner site. The proposed density of this application (serving up to 20 inhabitants as noted in the application) is detrimental to all but the applicants, who appear to have little vested interest in the immediate area – it is noted the applicants recently listed this property for sale and included planning permission for 4 houses in the associated listing. I would respectfully urge the planning department to ensure the concerns and objections of the many long-term residents directly affected by this overbearing application are adequately addressed and deeply considered when concluding with a decision.
- The existing water and sewerage services in the area are on dated lines, with low water pressure currently, and the exponential increase in population density on these dated lines is likely to cause issues in the ongoing provision of these services to the existing properties.

Section 2

Contrary to South Dublin County Council (SDCC) Development Plan 2016-2022

The SDCC Development Plan 2016-2022 sets out criteria for infill development in residential areas requiring full consideration to be taken of the surrounding built form. The criteria to be adhered to is as follows:

"RESIDENTIAL CONSOLIDATION 11.3.2

Infill residential development can take many forms, including development on infill sites, corner or side garden sites, backland sites and institutional lands.

(i) Infill Sites

Development on infill sites should meet the following criteria:

- Be guided by the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities DEHLG, 2009 and the companion Urban Design Manual.*
- A site analysis that addresses the scale, siting and layout of new development taking account of the local context should accompany all proposals for infill development. On smaller sites of approximately 0.5 hectares or less a degree of architectural integration with the surrounding built form will be required, through density, features such as roof forms, fenestration patterns and materials and finishes. Larger sites will have more flexibility to define an independent character.*
- Significant site features, such as boundary treatments, pillars, gateways and vegetation should be retained, in so far as possible, but not to the detriment of providing an active interface with the street.*
- Where the proposed height is greater than that of the surrounding area a transition should be provided (see Section 11.2.7 Building Height).*
- Subject to appropriate safeguards to protect residential amenity, reduced open space and car parking standards may be considered for infill development, dwelling sub-division, or where the development is intended for a specific group such as older people or students. Public open space provision will be examined in the context of the quality and quantum of private open space and the proximity of a public park. Courtyard type development for independent living in relation to housing for older people is promoted at appropriate locations. Car parking will be examined in the context of public transport provision and the proximity of services and facilities, such as shops.*
- Proposals to demolish a dwelling(s) to facilitate infill development will be considered subject to the preservation of the character of the area and taking account of the structure's contribution to the visual setting or built heritage of the area.*

(ii) Corner/Side Garden Sites

Development on corner and/or side garden sites should meet the criteria for infill development in addition to the following criteria:

- The site should be of sufficient size to accommodate an additional dwelling(s) and an appropriate set back should be maintained from adjacent dwellings,*
- The dwelling(s) should generally be designed and sited to match the building line and respond to the roof profile of adjoining dwellings,*
- The architectural language of the development (including boundary treatments) should respond to the character of adjacent dwellings and create a sense of harmony. Contemporary and innovative proposals that respond to the local context are encouraged, particularly on larger sites which can accommodate multiple dwellings,*
- Where proposed buildings project forward of the prevailing building line or height, transitional elements should be incorporated into the design to promote a sense of integration with adjoining buildings, and Corner development should provide a dual frontage in order to avoid blank facades and maximise surveillance of the public domain.*

And more recently in South Dublin 2022-2028 Development Plan

H2 Objective 3

To promote and facilitate the development of infill schemes throughout the County where it has been identified that such schemes will contribute towards the enhancement of communities within the County subject to the protection of residential amenity ensuring that sufficient and appropriate public spaces and amenities are preserved in existing residential estates.

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

Implementation and Monitoring 13.5.8:

Proposals to demolish a dwelling(s) to facilitate infill development will be considered subject to the preservation of the character of the area and taking account of the structure's contribution to the visual setting or built heritage of the area

It should be ensured that residential amenity is not adversely impacted as a result of the proposed development.

The architectural language of the development (including boundary treatments) should generally respond to the character of adjacent dwellings and create a sense of harmony

Avoid piecemeal development that adversely impacts on the character of the area and the established pattern of development in the area. à Development that is in close proximity to adjoining residential properties should be limited to a single storey, to reduce overshadowing and overlooking.

The SDCC Development Plan 2016-2022 and 2022-2028 identifies Templeogue as one of several consolidation areas which seek to promote the consolidation and sustainable intensification of the existing urban/suburban built form to the east of the M50 and south of the River Dodder. This seeks to direct development to underutilized industrial areas designated with Zoning Objective 'Regeneration' (REGEN) for enterprise and residential-led development while also supporting the development of undeveloped zoned lands.

Reason: The proposed development materially contravenes the land zoning (RES) as outlined in the Plan which seeks to protect and/or improve residential amenity. It is also in direct contradiction of Objective "To ensure that new development in established areas does not impact negatively on the amenities or character of an area".

The proposed developments also do not fulfil the criteria as set out in Section 11.3.2 of the SDCC Development Plan. The site is not of sufficient size to accommodate three additional properties and does not provide the appropriate setback from neighbouring properties. The applications do not give full consideration to the local context surrounding the application site and also does not acknowledge that no other property within Templeville Drive, Templeville Road or Templeville Avenue (including corner sites) has constructed multiple properties within a single plot. I therefore submit that a full understanding of the overall detrimental impact on neighbouring properties has not been given due consideration in the applications and respectfully request that it be given due consideration in their determination.

The proposed development in this established neighbourhood will materially impact upon our residential amenity, damaging the welcoming and distinctive character of Templeogue Drive. I feel that the development of these dwellings will set a precedent for such development in the area and result in a detrimental impact on our general amenity and use of the garden for our young children and other children residing in the street.

South Dublin County Development Plan Strategic Issues Consultation Booklet (2022-2028)

To inform the preparation of the SDC Development Plan (2022-2028), the Council have published a set of consultation documents outlining strategic issues to guide development in the County to 2028. It describes Templeogue as a family friendly area, recognizing the challenge of providing housing to meet population needs whilst also identifying appropriate infill development opportunities. It seeks to avoid adverse impact on existing amenities while complementing existing physical and community infrastructure. More widely, the SDC Development Plan (2022-2028) consultation document seeks to deliver sustainable communities with an appropriate mix of housing for the current and future populations of the area.

Reason: The proposed site of development does not constitute an appropriate infill development opportunity. To meet the demands of the growing population of South Dublin, this development would be more appropriately directed to an edge of village site or elsewhere in any of the consolidation areas as per the SDCC Development Plan 2016-2022. SDCC Development Plan 2023-2028 recognises the importance of complementing existing infrastructure and providing an appropriate mix of housing. The density of the proposed development on this site is not complementary to the housing in the area.

Pedestrian Amenity & Safety

The application proposes several alterations to the existing road layout. The applications show the creation of a new vehicular access onto Templeville Drive at the front of the existing property and two access points on Templeville link road in the eastern portion of the site, resulting in the creation of a total of eight parking spaces onsite. The existing vehicular access at the side of the property will be closed off.

Reason: The creation of the two new additional vehicular access points presents an enhanced road safety risk for walkers and especially the many young children who walk adjacent to the property line to get to school. The creation of the vehicle access at the north-eastern end of the site may present a blind spot for vehicles vacating either of the two parking spaces to be installed. I wish to make clear that the road running adjacent to the side of the site is a well-used route for local children to walk to both the St Pius X and Our Lady's School. This side of the street also has speed bumps installed to ensure pedestrian safety. I believe that the provision of a total of 8 parking spaces at the properties will impact the light trafficked nature of the street and provide a significant traffic safety issue.

Conclusion

The proposed developments are contrary to the adopted Development Plan and will directly impact residential amenity. While I recognise the need for additional housing throughout South Dublin, the site does not constitute vacant land or an appropriate site for infill development and such development should be directed to a more appropriate location.

The material reasons for the previous rejection of applications at this site in 2018, 2019 and 2020 have not changed. The developments will result in piecemeal and unacceptable overdevelopment which is out of keeping with the peaceful character of Templeville Drive. Should these applications be permitted and previously stated by the council and An Bord Pleanála in past refusals, this would set a precedent for this development in the area.

I trust that these observations may be considered when making your decision.

Please note the fee for this submission may be located in the cash office under receipt number #####

Yours faithfully,
Declan Curran

**This document has been sent by email and accordingly bears no signature*

Mr. Declan Curran
132 Templeville Drive
Templeogue
Dublin 6W

Date: 02-Feb-2023

Dear Sir/Madam,

Register Ref: SD22A/0466
Development: Demolition of an existing single storey plus dormer three bedroom dwelling house and the construction of four two storey three bedroom semi-detached dwellings; Three separate vehicular accesses are to be created off Templeville Drive with one to the south and two to east of the site with all ancillary site works and landscaping.
Location: 124 Templeville Drive, Templeogue, Dublin 6W
Applicant: Barry & Susanne Coleman
Application Type: Permission
Date Rec'd: 21-Dec-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.sdublincoco.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.sdublincoco.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. Crowley
for Senior Planner