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20 June 2020

20 June 2022 Signed Gerard Stockil .

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Registered Charity Number (RCN): 20012335

SHDs in Tallaght Town Centre
planning zone.
8 approved, 9 more for consideration



9 SHDs
under
consideration



8 SHDs
Approved.



Dear Sir, Madam

Here is an observation on the Bancroft View SHD SHD3ABP -313590 from TCC (Tallaght Community Council) . We are objecting to this development under the following headings

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This is one of three recent SHDs in the Tallaght Area, the accumulation of SHDs in the Tallaght Town Centre area (380 hectares) is excessive, has breached numerous planning regulations, have excessively invoked exceptional circumstances in material contravention statements which on examination are not in any way exceptional and do not merit breaking rules in the local area plan.

The result is too many small apartments, that are overly dense and lack the capacity to create a thriving community in Tallaght, are not served by adequate greenspace, do not provide any mix of housing, and in many cases are build-to-rent which skews a competitive market and makes housing more expensive as family sized units are rare, as well as this they are eroding the industrial base in Tallaght.

This is all happening in a small geographic area, where the LAP is inconsistent with the NFP guidelines, this is unwise and will make it impossible to establish family units as the dwellings are just too small . We as An Bord to reject this and other recent applications and to address the inconsistency in overall projected populations density growth rates in Tallaght Town Centre being massively out of scale with the National Framework for Planning.

Yours etc

Gerard Stockil

Member TCC

Building Height Massively Exceeded with no demonstrated reasons.

The material contravention statement states the following

The Tallaght Town Centre Local Area Plan 2020-2026 acknowledged that deviations in prescribed building heights can be permitted in the interest of placemaking and improving legibility stating that:

The proposed development has a plot ratio of 2.68 which exceeds the maximum plot ratio of 1.5 as set out under the Tallaght Town Centre Local Area Plan 2020-2026

The excess it is seeking is 79% higher than permitted. This is an outrageous ask. This development is not in the interest of placemaking.

Please note the following from the council debates on building height, it is very clear that the massive height breaches go against a significant council majority.

Vote to Retain heights as in Original Plan.

M31/0120 Item ID:64947

Proposed by Councillor M. Duff and seconded by Councillor A. Edge

This Council call on the Manager to remove the new height band for The Centre, **and retain the heights set out in the Draft Tallaght Town Centre LAP**, as the 4 to 6 story heights already sit higher than the adjoining landmark buildings, due to the elevated nature of the area.

The Motions were put to a [Roll Call Vote](#), the result of which was as follows

FOR: 18 (Eighteen)
AGAINST: 1 (One)
ABSTAIN: Nil

The Motion was **PASSED**

Motion re retaining heights as in draft local area plan, and not agreeing to the CEO amendment.

M32/0120 Item ID:64954

Submitted by Councillor Alan Edge, Councillor F. Timmons, Councillor G. O'Connell, Councillor L. O'Toole, Councillor P. Gogarty

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Proposed by Councillor A. Edge and seconded by Councillor M. Duff

That this Council Rejects the new height band for the Centre and retains the heights as set out in the draft LAP. This area is already elevated and therefore 4 to 6 stories will already sit higher than adjoining landmark buildings

The Motions were put to a [Roll Call Vote](#), the result of which was as follows

FOR: 18 (Eighteen)

AGAINST: 1 (One)

ABSTAIN: Nil

The Motion was **PASSED**

Does not blend with surrounding and surrounding do not justify any height increase over LAP recommendation

Surrounding, established scale and height . There is no established height in the area that is as high as that proposed, in fact looking a pictures of the surrounding area shows predominantly two-story dwelling and factories, the latest building on the university will be three stories high. This argument is false.

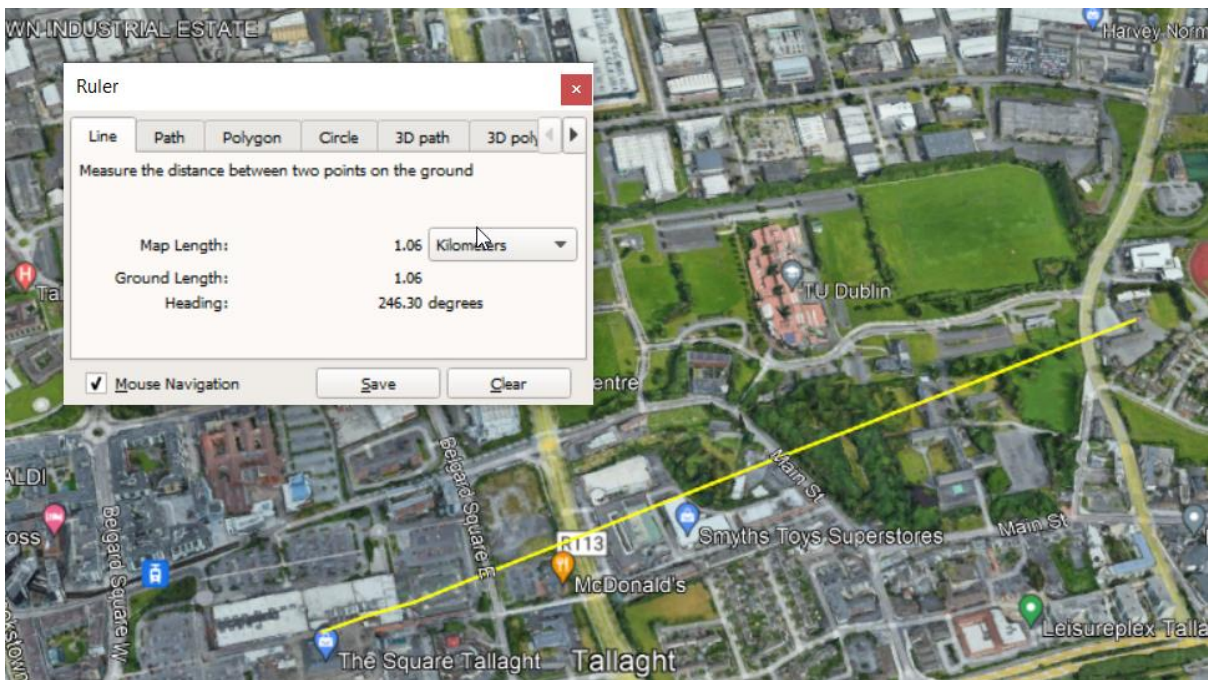
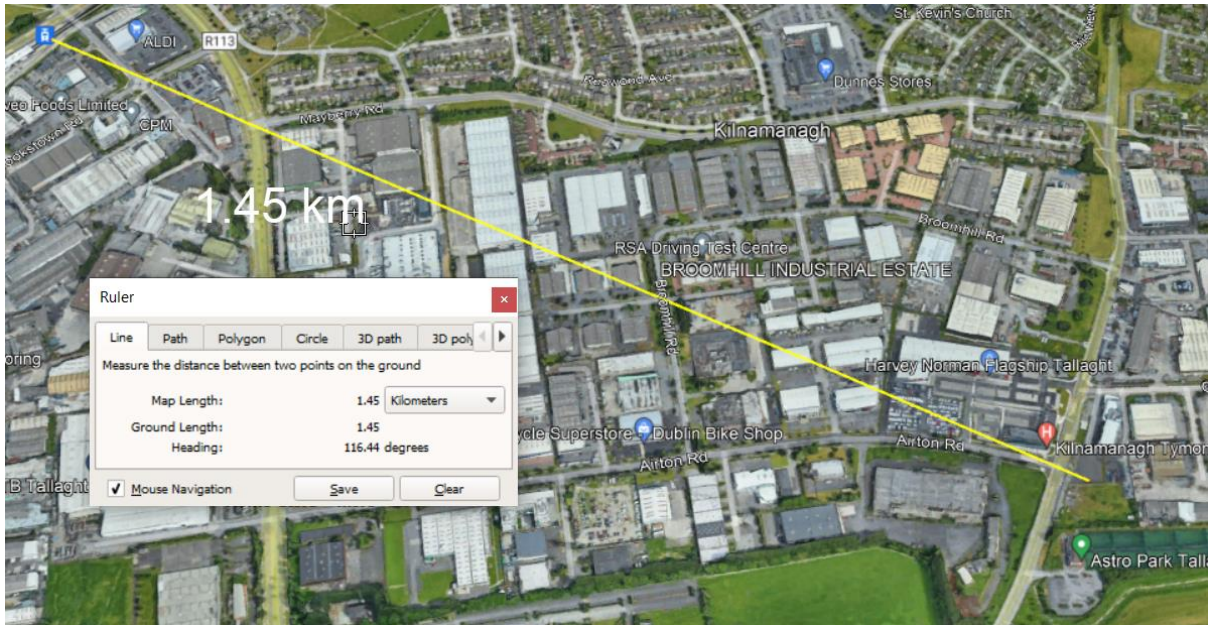
Across the road is a Health Centre, three stories max. Beside the development is the Astropark building, two stories, and a shopping Centre two stories. The nearby

Impact on skyline, urban silhouette or streetscape (including overbearing).

The impact on the urban silhouette will be overbearing.

Proximity to high quality public transport. There is no Luas stop with 500 m

The Luas Stop at Belgard is 1.45 km and the Luas Stop in the Town Centre is 1.0 km as the crow flies.



Section 2.4 of **Design Standards for New Apartments - Guidelines for Planning Authorities (March 2018)**

Sites within reasonable walking distance (i.e. up to 10 minutes or 800- 1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and

This is yet another reason why a development of such size is not viable at this site

Other social or physical infrastructural benefits from the development, such as public realm contribution .

- Impact on daylight and sunlight of the development, surrounding development and private, semi-private and public open spaces.
- Impact on skyline, urban silhouette or streetscape (including overbearing).
- Other social or physical infrastructural benefits from the development, such as public realm contribution.
- Proximity to high quality public transport.

The developer asks An Bord to consider the following, here are factual statements showing that exceptions should not in apply and that the guidelines of the local area plan should rigorously adhered to

The Tallaght Town Centre Local Area Plan 2020-2026 acknowledged that deviations in prescribed building heights can be permitted in the interest of placemaking and improving legibility stating that: Harvey Norman, Kilnarnagh Primary Care Centre Bancroft Park Astro Park Tallaght Statement of Material Contravention April 2022

Lands on Greenhills Road, Tallaght, Dublin 24 6 ‘Landmark Buildings are permissible at key locations that will punctuate urban areas. In general, buildings that exceed the prescribed general buildings heights should only be provided at the locations indicated as having ‘Potential for Higher Buildings’ in the Building Height Strategy (see Figure 2.4) and at locations adjacent to the key public transport stops and key public spaces identified in Section 2.6. A 2–4 storey increase on the above typical levels of the LAP Heights Strategy may be considered for key or landmark sites or where sites exceed 2 ha in area and can establish its own identity

It is incorrect to suggest that a development that has just 7% three-bedroom housing is in any way contributing to placemaking.

It is creating a problem of excessive small dwelling in a area that needs larger apartments . A cursory look at all the adjacent building shows they are four stories at a maximum and most are two stories. The site is not adjacent to key public spaced identified in Section 2.6 (page 25) of the LAP

<ul style="list-style-type: none">• High capacity public transport stops (i.e. a Luas stop or high frequency bus stop (i.e. 10-minute peak hour frequency) on a dedicated bus lane);• The proposed ‘New Urban Square’ within the Cookstown neighbourhood;and	<p>It is not the case it is adjacent to a Luas line. There is a high frequency bus line, but this does not justify on its own such a density</p>
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The proposed 'New Urban Square' north of Belgard Square North in the Centre neighbourhood; •	This is not the case
• The proposed 'New Urban Square' within the Cookstown neighbourhood; and	This is not the case.
• The proposed Transport Interchange and adjacent proposed 'Urban Space' in the Centre neighbourhood.	This is not the case

Breach of

Ref	SHD Website		Studio	1-bed	2-bed	3 Bed	4 Bed	Total	Area Hectares	Dwelling per Hectare
1	www.bancroftviewshd.ie	Greenhills Living	0	79	105	13	0	197	0.8	246
		%	0%	40%	53%	7%	0%	100%		

The material contravention statement states the following RE 2 objection, page 89, of the LAP

'It is policy of the Council to ensure an appropriate housing mix is provided within the LAP lands, therefore a minimum of 30% of units within any new residential development (in the form of either apartments or houses, but excluding student accommodation schemes) shall have a minimum of 3 bedrooms.' Of the 197 no. residential units proposed under the subject application, 6.6% have a minimum of 3 no. bedrooms and, as such, the development falls short of the required quantum of 3 no. bedroom units

An Bord Pleanála is aware that many developers use **Specific Planning Policy Requirement 1** the Apartment Guidelines to justify breaching any sensible unit mix. An Bord should be aware of the cumulative effect of numerous SHD is a small area and interpret the Apartment Guidelines in 2020 in such a manner as to **prevents more bad planning** in Tallaght. The developer argues the are not in breach of the Guidelines

<https://www.gov.ie/en/publication/15f0b-design-standards-for-new-apartments-dsfna-2018/>

However, SPPR1 this is a very selective reading of the guidelines which must be seen as a holistic document, and not overusing one clause SPPR1, which is this case does not do what the document want to obtain, sustainable urban development, this, and many similar SHDs, are or were never sustainable.


Consider the following statement from 1.6 of the Guidelines


The NPF also signals a shift in Government policy towards securing more compact and **sustainable** urban development, to enable people to live nearer to where jobs and services are located, which requires at least half of new homes within Ireland's cities to be provided within the current built-up area of each, i.e. on sites within the existing urban 'envelope'.

From [Department of Housing, Local Government and Heritage](#)

Published on 8 December 2020

Last updated on 6 January 2021

	<p>Design Standards for New Apartments - Guidelines for Planning Authorities (March 2018)</p> <p>Download</p>
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	<p>Design Standards for New Apartments - Guidelines for Planning Authorities 2018 - SEA Pre-Screening Note (208.61 KB)</p> <p>Download</p>
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The meaning of sustainable has to have a holistic integrated aspect, given that there are numerous development on this type in the Tallaght Town Centre Area that have already gained approval, this has turned the notion of sustainability on its head, this and other similar development are **unsustainable**, too dense, too small and all in the one place, so An Bord should consider using this clause of the Apartment Guidelines and reject this and similar developments on the area.

In the Local Area plan (page 6) it states

*An inclusive and vibrant Town Centre, a connected and accessible place with an attractive built environment for **families of all kinds**, workers, visitors and tourists.*

As the development will not cater for families with even just two children never find families who want a space requirement of a separate bedroom for two teenagers, there is no way this development adheres to the NFP or the LAP.

Note also that the Apartment Guidelines refer to the NHDA, the requirements for three-bedroom apartments has been documented by the council planning department . Given the results housing need and demand assessment of the NHDA it is clearly time to stop granting permission to developments which do not design housing solutions for the population profile.

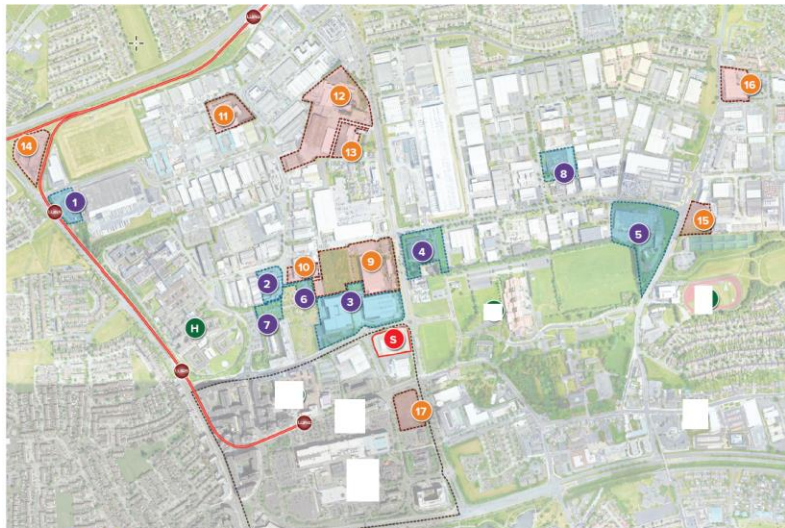
Census		2016		2011		SDCC - 2016	
No. of Families	%		%		%		
		1,609		1,113		74,141	
2 Person	49%	787	54%	605	37%	27,410	
3 Person	29%	464	33%	362	24%	17,935	
4+ Person	22%	348	13%	146	39%	28,796	

Table 5.3 Families by size of Family in LAP Area and SDCC

Development is part of overall plan which is inconsistent with NPF population projections.

There are 8 approved SHD in the small area called the Tallaght Town Centre Local Area Plan planning zone. Three more have closing observation dates around 20th June 2022 meaning that there are up to nine more for consideration. This should be blatantly obvious that this is excessive. See graphic below.

SHDs in Tallaght Town Centre planning zone. 8 approved, 9 more for consideration



9 SHDs
under
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8 SHDs
Approved.



The National Planning Framework for planning seeks to set the overall parameters for excellent in planning.

The NPF has this to say about community

*They offer **choice** and opportunity as well as connectivity and community.*

People are **not** being offered a choice in housing. The NPF goes on to say

*In other cases, the edges of cities and smaller towns within commuting distance of larger centres **have been overdeveloped at a pace that has overwhelmed***

existing communities. In combination, this pattern has undermined many of our urban places.

While many positive things have been planned and executed in Tallaght, **the excess of highly dense SHD all in a small place is going to overwhelm communities.** The cumulative effect of many SHDs in one area is damaging to the overall sustainability of the area.

We will demonstrate that the figures the council have in mind in the Local Area Plan (which they have not revised despite many reminder) will give a density level higher than the Borough Of London, this seems a starting claim but please read the figures, this is what the local area plan actually says.

For many years TCC has stated that the numbers in the existing Tallaght Town Centre Local Area plan are not consistent with that of the NFP. We have brought this to the attention of the council and they have never said our figures are incorrect.

The headline figure for growth in Table 4.1 for the NFP a max of 25%.

Table 4.1 | Ireland 2040: Targeted Pattern of City Population Growth

City	Population 2016	Population Growth to 2040 ²⁷		Minimum Target Population 2040
		% Range	People	
Dublin - City and Suburbs	1,173,000	20-25%	235,000 - 293,000	1,408,000

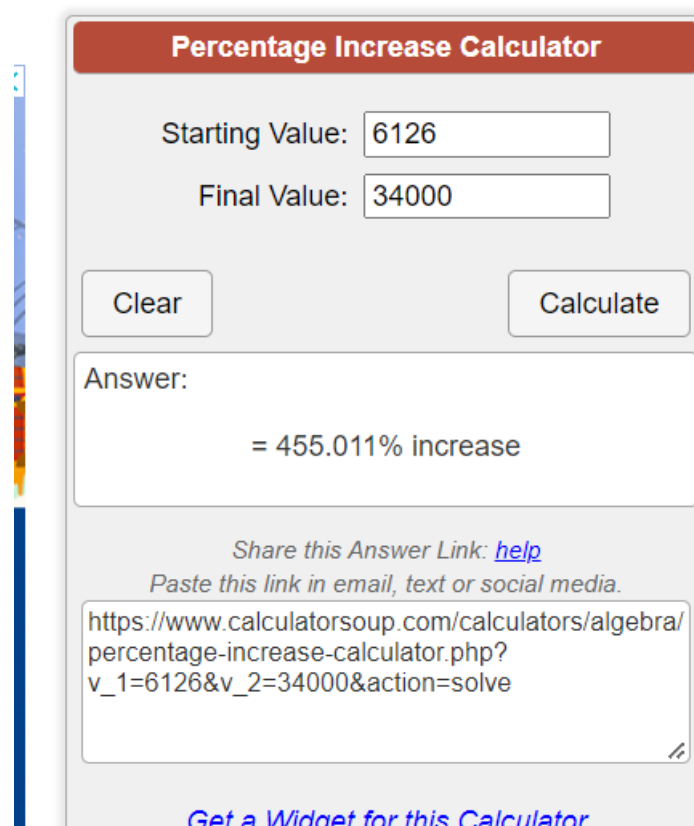
Now look at the comparative growth rates for the NFP plan, the CDP (County Dev Plan (and the LAP (which we believe to have a mistaken figures because the figures is unsustainable)_

Ref	Document	Census 2016 Population 2016	Future Population Future Date	What future date means.	Increase	% Increase
1	National Plan(Eastern and Midland Region) Ireland 2040, published Feb 2018	2,327,128	2,867,128	2040	540,000	23%
2	Proposed 2022 County Development Plan, adopted June 2020	278,767	329,000	2031	50,233	18%
3	Tallaght Town Centre Dev Plan 2022 Consultation published August 2020	6,126	34,000	"after a number of plan periods"	27,874	455%

The growth rate of 455% have never been contradicted by the council. It might read like a typo, maybe they meant 45.5% but this is not the case, **it is actually 455%, please check this**, and leaving such a statement in a planning document contradicts the NFP which asks Dublin to grow at 23%, why should one small part of Dublin Tallaght Town Centre 380 hectares, , have a proposed

Growth rate of 455%.

Dublin County has an area of 92,200 hectares, Tallaght Town Centre is just 0.4% of the County area, why is a growth rate of 455% envisaged over a number of plan periods which the recent CEO report on the CDP states is around 20 years, be allowed in an area for the overall growth rate is 23% for Dublin and 18% for the County, something is dramatically wrong. Please, if you can, confirm the calculation below.



Percentage Increase Calculator

Starting Value:

Final Value:

Answer:

= 455.011% increase

Share this Answer Link: [help](#)
Paste this link in email, text or social media.

https://www.calculatorsoup.com/calculators/algebra/percentage-increase-calculator.php?v_1=6126&v_2=34000&action=solve

[Get a Widget for this Calculator](#)

In a response to TCC the CEO Report (May 2022) suggested that a number of plan periods would be around 20 years.

*However, its full build out, which includes significant regeneration and intensification of brownfield lands and changing character areas, is envisaged over a longer **period of up to 20 years.***

Page 45 of CEO report
<https://www.sdcc.ie/en/devplan2022/stage-3-material-amendments/chief-executives-report-on-the-proposed-material-amendments-public-consultation/>

However even if this is the case, the growth is still excessive. Apart from being too big, it allows developers to state that the council seems to be promoting an aggressive growth rate, we feel this needs to be clarified or amended.

The TTC LAP contains population targets significantly more than the National Regional Plan, as outlined here. A 455% population growth Vs a 23% growth plan in 20 years outlined by the Government. This discrepancy is having a negative impact on the planning applications for Tallaght. Each application is compounding the negative impact.

Having a maximum population increase to 34,000, or even half that (and the revision figure is around 26,000, which is more than half), will drive up the density of the area, and create unrealistic expectations on what is to be allowed in planning. It will **have significant effects on the environment.**

We ask the Board to examine the guiding legislation on population growth for Tallaght and verify if indeed there are anomalies that are relevant to ensuring sustainable planning is achieved for Tallaght. TCC feel that SDCC have simply made a mistake, one that needs correction, we ask An Bord to check our estimate, if we have wrong and a calculation error is pointed out, we apologise in advance, but feel that this question has not been dealt with and it needs correction. We ask that this point be discussed in the Inspector's report if the inspector feels, as we do, that this is an important issue.

There is a clear indication in the local area plan that the number of 4+ Person families in the area is 39%, Page 90 of the LAP. This is included to remind the Bord that families live in Tallaght, not just singles and that the apartment sizes are way too small, and not sustainable and that this contradicts

Census		2016		2011		SDCC - 2016	
No. of Families	%		%		%		
2 Person	49%	787	54%	605	37%	27,410	
3 Person	29%	464	33%	362	24%	17,935	
4+ Person	22%	348	13%	146	39%	28,796	

Table 5.3 Families by size of Family in LAP Area and SDCC

The following is from page 6 of the LAP

With an area of approximately **380 hectares**, the full development of the Tallaght LAP area is expected to be able to accommodate between 8,410 to 11,090 new

homes; 7,800 to 15,300 additional jobs; and a population of up to **34,000** people, **over a number of plan periods.**

<https://www.sdcc.ie/en/services/planning/local-area-plans/tallaght-current/tallaght-town-centre-local-area-plan-2020.pdf>

Now compare Tallaght Town Centre (380 hectares) with the Borough of London (360 hectares), roughly the same size.

<https://data.london.gov.uk/dataset/londons-population>

	Borough Of London	Tallaght Town Centre Area	Tallaght Town Centre Area
Year	2020	2016	c 2042
Area	360	380	380
Number of Dwelling	6506		
Dwelling per Hectare 2019	20.7		
Population	10938	6126	34000
Person per dwelling	1.7		
Person per hectares	30	16	89

In 2016 there were 16 people per hectare in Tallaght Town Centre. In 2019 there were 30 people per hectare in the Borough of London 1. In 2042 the SDCC council figure 34000 in an area of 280 hectares give a density of 80 people per hectare. This number is clearly unsustainable yet it is still in the Local Area Plan.

¹ Population of London Borough in 2020 is 9721, estimate in 2020 is <https://data.london.gov.uk/dataset/londons-population> , source [h](https://data.london.gov.uk/dataset/number-and-density-of-dwellings-by-borough) and figures for dwelling per hectare from <https://data.london.gov.uk/dataset/number-and-density-of-dwellings-by-borough> Mayor of London

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We note that the CEO report (May 2022) mentioned this query, and did not say that the TCC figures were incorrect, but stated the the OPW stated that the CDP was consistent with the NFP

<https://www.sdcc.ie/en/devplan2022/stage-3-material-amendments/chief-executives-report-on-the-proposed-material-amendments-public-consultation/>

The OPW in its recent submission (SD-C226-65) to the Proposed Amendments specifically states the “....*the draft Plan to be generally consistent with policies in the National Planning*”

However, we note that the OPW was referring to the CDP not the LAP and we note that they said it was “generally consistent” and this is not the same as always consistent.

We note the OPW had given a general statement but that if they had seen the TCC comparison figures they may have thought differently

TCC have asked the council to point out to any inaccuracy in the TCC analysis and note that no inaccuracies were pointed out.

An Bord regulate planning matters, and we feel this is a serious error in estimation and that any SHD permissions should be put on hold pending a clear answer to our question on density and the comparative figure with the Borough of London. Tallaght is not London, and the density should not exceed those of London withing the next 20 years and that if a statutory planning document like the LAP in in error that this error needs to be corrected.

Continuing Unanswered Questions about Fire Safety in High Rise Building In Tallaght

All have a responsibility to address safety issues when they are aware of them, we are aware of the complexity in responsibilities involved but have reason to believe that we are building high rise building before we have a sensible and workable policy on combatting fire in High Rise Building. We have raised this before, what has changed in a fire in Tallaght in October, 2021 which to some appears a “near miss” and the question we are asking is are we granting permission to high rise building without having adequate local equipment available at local fire stations.

The Problem : A fire took place in the Glashaus Tallaght on Saturday October 16th 2021,

Terror as pregnant woman trapped on balcony during Dublin high rise fire

By [Aakanksha Surve](#)

- 18:00, 20 OCT 2021

"We were later told that they weren't sending the ladders because they couldn't reach us. They were waiting for a fire truck with a higher crane to bring us down."

<https://www.dublinlive.ie/news/dublin-news/terror-pregnant-woman-trapped-balcony-21910692>

Firefighters had to wait 24 minutes for the turntable ladder to arrive in Tallaght from Tara Street DFB HQ (Image – DFB)



No response to the questions as to if we have adequate fire firefighting equipment in Tallaght has yet been given that TCC has seen, this issue has been raised by the PPN (Public Participation Network) and is now on the Agenda of the Housing SPC of which the writer of this observation is currently a member .

We believe that that the Dublin councils have set up a committee on this, as this issue affect all, we ask An Bord in the interest of national safety to determine if this is an issue which is under control, and if so to state why, and if not to consider solutions, including the possibility of refusing SHD permissions on the ground that safety may not have been adequately addressed.

From TCC's perspective there was a fire in Tallaght in October 2021 which resulted in the press covered mentioned above, no adequate explanation of the long response time has yet been given , we ask An Bord to immediately work with other to remove **any doubt** about fire safety in high rise buildings.

If safety is to really come first, consider withholding any future permission until the question is crystal clear, have we got an adequately financed and resource fire

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service that can deal with high rise building, if we do not , do not give planning permission until this issue has been resolved.