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20 June 2022

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Gerard Stockil  
20 June 2022

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 Broom Hill Rd SHD [313591](#). TCC are objecting to this development under the following headings

### Contents

Building Height Massively Exceeded with no demonstrated reasons.....	2
Does not blend with surrounding and surrounding do not justify any height increase over LAP recommendation.....	4
Unit Mix in inappropriate.....	7
Development is part of overall plan which is inconsistent with NPF population projections.....	8
Continuing Unanswered Questions about Fire Safety in High Rise Building In Tallaght .....	13

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 regulation, have excessively invoked exceptional circumstances in material contravention statements which on an examination are not in any way exceptional. 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 density in Tallaght Town Centre being out scale with the National Framework for Planning.

Yours etc

[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.

### **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

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

The development is austere in design, being abruptly angular in form, with no use of redeeming design features or materials to create a sense of gravitas, quality place making or adding to the broader streetscape and location. The building massing simply creates an austere, monotonous form with no architectural interest or finesse. The balconies should be recessed and opaque to allow comfortable outside space at the very least for tenants. The use of basic rendering on the exterior of blocks has been shown to weather poorly and create very poor public impressions as they age.

**Surrounding, established scale and height** . There is no established height in the area that is as high as that proposed, in fact looking at 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.

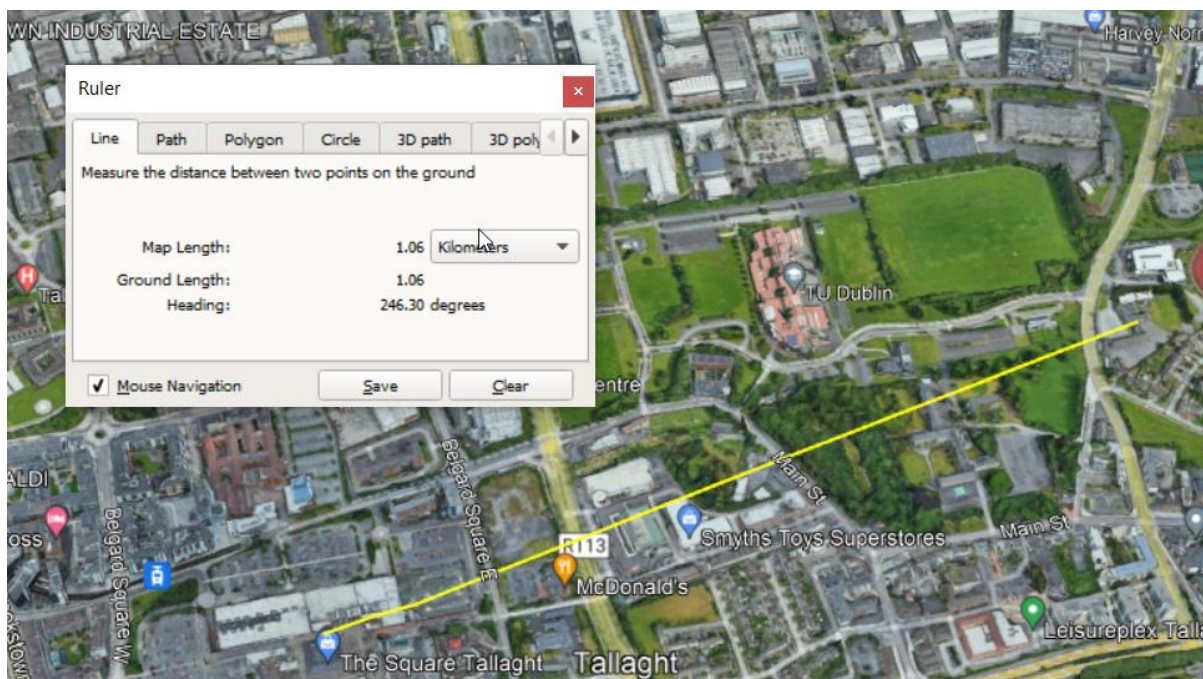
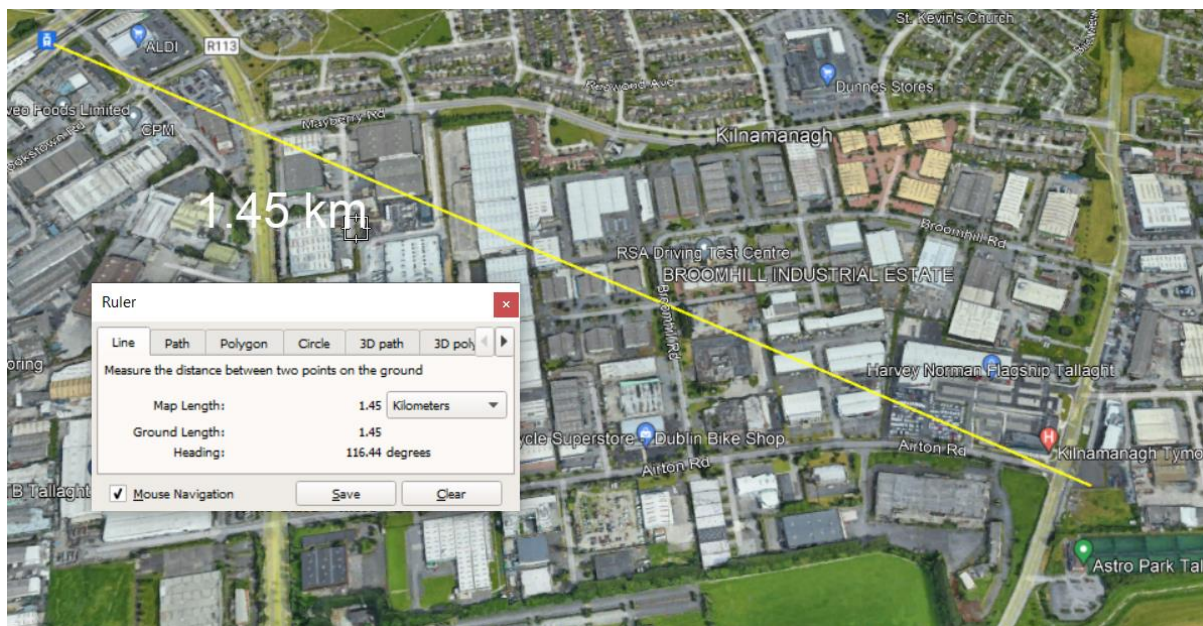
Across the road is a Health Centre, three stories max. Beside the development is the Astropark building, two stories, and a shopping Centre two stories. The nearby

### **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 XX is 1.45 km and the Luas Stop in the Town Centre is 1.0 km as the crow flies. The Greenhills Road is already overburdened with traffic and there are no proposals to increase the capacity of the bus routes, so it cannot be argued that the public transport in the vicinity is high quality.



## 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

Sites within easy walking distance (i.e., up to 5 minutes or 400-500m) to/ from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.

As both of these do not apply to the development , planning permission should be refused.

**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 as to why none of these apply

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 Kilnamanagh Primary Care Centre Bancroft Park Astro Park Tallaght Statement of Material Contravention April 2022

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\_\_\_\_\_ 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

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:

It is incorrect to argue 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 an area that needs larger apartments . A cursory look at all of the adjacent building shows they are four stories at a maximum and most are two stories.

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

'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

### Unit Mix in inappropriate.

An Bord Pleanála is aware the developers use the Apartment Guidelines 2018 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 they are not in breach of the Guidelines

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

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

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	<b>Design Standards for New Apartments - Guidelines for Planning Authorities (March 2018)</b> <a href="#">Download</a>
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	<b>Design Standards for New Apartments - Guidelines for Planning Authorities 2018 - SEA Pre-Screening Note (208.61 KB)</b> <a href="#">Download</a>
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The meaning of sustainable has to have a holistic integrated aspect, given that there are numerous development on this type 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.*

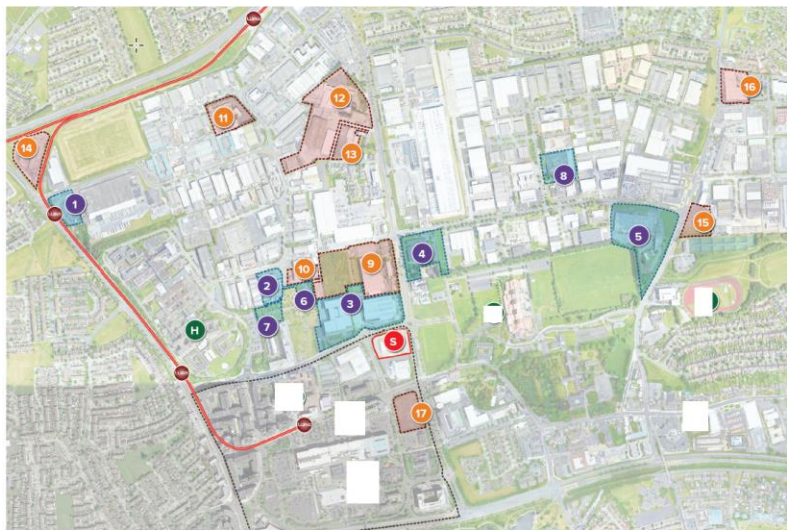
This and similar developments are not suitable for families of all kinds,

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 20<sup>th</sup> 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  
consideration



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

Urban ....

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 hospital, university, shopping centre, Luas etc **the excess of highly dense SHD all in a small place is going to overwhelm communities.**

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 is 25%.

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

City	Population 2016	Population Growth to 2040 <sup>27</sup>		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 and the LAP ( which we believe to have a mistaken figures and wish this to be corrected and clarified )/

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. In a response to TCC the CEO Report 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

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 TTCLAP 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.

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

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>

Year	Borough Of London	Tallaght Town Centre Area	Tallaght Town Centre Area
	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.

<sup>1</sup> 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

We note that the CEO report mentioned this query, and did not say that the TCC figures were incorrect, but stated 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 OPR 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 within the next 20 years and that if a statutory planning document like the LAP is 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 16<sup>th</sup>, 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 service that can deal with hight rise building, if we do not , do not give planning permission until this issue has been resolved.