

# Belgard Area Residents Association

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The Secretary,  
An Bord Pleanála,  
64 Marlboro Street,  
Dublin 1.

<b>AN BORD PLEANALA</b>	
LDG- <u>Peter Forde</u>	
ABP- <u>054675-22</u>	
21 JUN 2022	
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21 June 2022

Re: Landmarque Belgard Development Co., ABB Site, Belgard Road, Tallaght, Dublin 24.  
Planning Application Reference: SHD3ABP-313606 -22,

Dear Secretary,

On behalf of Belgard Area Residents Association I refer to the above planning application on the former ABB Site, Belgard Road, Tallaght. While we welcome new development in principle we have concerns as to what form this will take and what the long term consequences will be. In that context we submit that this plan does not comply either with the spirit or the letter of Tallaght Town Centre Local Area Plan (TTCLAP) - (2020-2026) and the proposed South Dublin County Development Plan (2022-2028).

## Housing Mix (1):

**Section 5.2 Residential Development** of the LAP states that "..... it is the objective of the Council to ensure that all new residential development in Tallaght enables the **delivery of a mixed and balanced community that is of high quality design and complies with government guidelines on sustainable residential development and residential streets...**" (**Objective RE1**).

**Section 5.2.1** states that "the mix of dwellings should contribute to the overall dwelling mix in the locality and should contribute to the delivery of a mixed and balanced community. **This should include a range of 1, 2 and 3-bedroom homes and should ideally include a mix of houses and apartments**"

**Section 5.2.1** also says "..... proposals that include a high proportion of one-bedroom dwellings shall be required to **demonstrate a need for such accommodation based on local demand and the demographic profile of the area**".

## Local demographics:

**Section 5.2.1** goes further by highlighting the fact that, based on 2016 census returns, (a) 79% of people in the area are under the age of 40, (b) 75% of families are at pre-family or early family stage of their lives compared to 32% in South Dublin County, (c) 22% of families are of 4 persons or more and (d) the proportion of 2 and 3 person families has fallen in the period 2011 – 2016.

**Section 5.2.1** concludes: "It is policy of the county to ensure an appropriate housing mix is provided within the LAP lands, therefore a minimum of 30% of units within any new housing development (in the form of



either apartments or houses, but excluding student accommodation schemes) shall have a minimum of 3 bedrooms". This is also referenced at paragraph 13.5.2 draft CDP pages 547 and 548.

**Housing mix (2):** The distribution of apartment types in this development is as follows: 193x1-bed (57.78% of total), 127x2-bed (38.02%), 11x3-bedroom (3.29%) and 3xWork/Live units (0.90%).

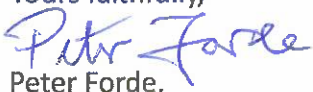
One-bed and 2-bed apartments make up 95.8% of the development which hardly makes it a sound basis for ".....delivery of a mixed and balanced community "..... There is also a limit of 50% on one-bedroom apartments under SPPR1 (Para 13.5.2) of the proposed CDP (2022- 2028) which states that "..... residential development may include up to 50% one-bedroom or studio type units....." One bedroom apartments in this case is 57.78% and under the LAP is "required to demonstrate a need for such accommodation based on local demand and the demographic profile of the area" (Para 5.2.1 of the LAP). Under Section 5.2.1 the LAP provides analysis of the demographics of LAP lands which we believe gives no grounds for a 57.78% allocation of one-bedroom apartments.

The second grouping of two-bedroom units at 38.02% may be broadly compliant with the LAP provisions but three-bedroom units at 3.29% comes nowhere near the required 30% laid down in the LAP as cited overleaf. Taken as a whole this development is not compliant with the provisions of Section 5.2.1 in the light of Housing Mix (1), (2) and (3) above (Objective RE1) and Local Demographics (Objective RE2).

**Conclusion:** To date private sector developers have put forward plans for Tallaght which are essentially high-rise apartment blocks of predominantly studio, one bedroom and two-bedroom apartments with a token gesture of three-bedroom units in some cases. Except for studios, this plan is more of the same. We have consistently argued in favour of housing for a cross section of the wider community to include singles, couples, the elderly, the disadvantaged and minorities but most of all for families who contribute greatly to the creation of community spirit, social cohesion and pride of place, and that they are good for the stability, continuity and sustainability in local neighbourhoods. They also need housing with a minimum of 3-bedroom accommodation.

**Overview:** As we see it this development marks the launch of an attempt to undermine and set aside the Tallaght Town Centre Local Area Plan (TTCLAP). The applicant has actually admitted breaching the provisions of the LAP and makes a plea *in the interests of national development* to override local development plans and objectives. This has echoes of breaking the law in a "very specific and limited way" in order to achieve an end. There are also other disturbing rumblings in the air about extending the boundaries of the LAP by up to a kilometre without any clarity as to what, if any, procedure would be applied for such a radical alteration to the LAP. It is difficult to escape the conclusion that if this proposed development is approved, that planning permission is granted, a precedent will have been set for copycat development on a free-for-all basis in Tallaght Town centre. If or when that game plays out developers will make their millions and decent people will be left to live with the consequences.

Yours faithfully,

  
Peter Forde,

Hon Secretary,

Belgard Area Residents Association.

