

South County Dublin Association
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Dundrum, Dublin 14
Tel: 01-298 2832

Strategic Housing Unit,
An Bord Pleanála,
64 Marlborough Street,
Dublin 1

12 July 2022

By email to strategichousing@pleanala.ie

Dear Sir/Madam,

Planning Application for Strategic Housing Development

ABP-313760-22: Lands at Belgard Square East, Belgard Road and Blessington Road, Tallaght, Dublin 24. (www.thehavenshd.ie)

Applicant: Ravensbrook Limited

We make this observation on behalf of An Taisce in relation to the above application. No fee is payable for this observation on behalf of An Taisce.

We support the development of these lands as a Place to Live within the 'Town Centre' zoning objective but not in the scale or the proportions proposed in this Strategic Housing Development ("SHD").

1. Material Contravention of the existing and draft Development Plan in relation to non-residential uses.

As indicated in the Applicant's Statement of Consistency, the site is on land which is zoned 'Town Centre' under the South Dublin CDP 2016-2022 and draft South Dublin CDP 2022- 2028. The site is identified as a 'Retail Opportunity Site' within the Core Retail Area of Tallaght. The commercial floor space in the development as proposed represents c. 7% of the overall gross floor area.¹ While "residential" is permitted in principle under the 'Town Centre' zoning, the concept of a Town Centre and Retail Opportunity Site is incompatible with the Applicant's proposal for a development which is only 7% commercial. As the contravention is in relation to zoning, it is not open to the Applicant to make a statement under Section 8(1)(a)(iv) of the Planning and Development (Housing) and Residential Tenancies Act, 2016, indicating why permission should nonetheless be granted.

2. Building bulk, height, massing and design

The application proposes 310 apartments in three blocks that range in height from 6 to 12 storeys. We consider that the scale of the blocks at up to 12 storeys is too great for this site. The nearest neighbouring buildings cited by the Applicant go up to 7 storeys. The impact on the immediate and surrounding environment would be negative, due *inter alia* to the dominant and visually obtrusive nature of the buildings.

¹ Statement of Consistency Section 2.19

The development would be a Material Contravention of the Tallaght LAP. With regard to the Material Contravention Statements provided by the Applicant, we note *inter alia* the following:

At County Level: we consider that the proposal would not successfully integrate into or enhance the character and public realm of the area.

At District/Neighbourhood Level: we consider that the proposal would not respond to its overall natural and built environment or make a positive contribution to the urban neighbourhood and streetscape. The proposal would be monolithic and provide long walls of buildings. The proposal would not respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring properties.

3. Density and Open Space

The proposed development at a net density of 347 units per hectare would represent serious over-development of the site. The open space provision would be inadequate for a development of this scale. It would set a poor precedent for the Town Centre in Tallaght.

General

Absence of comment from us about any issue is not to be taken as implying that we accept the Applicant's position on that issue.

Yours faithfully,

Andrew Parkes, for the Planning Sub-committee,
An Taisce South County Dublin Association