

Submission of updated Development Plans Guidelines for Planning Authorities , Gerard Stockil SDCC Housing Strategic Policy Committee and Lecturer in Engineering TU Dublin Tallaght Campus. 8 Oct 2021

RE <https://www.gov.ie/en/consultation/ef157-public-consultation-on-the-draft-development-plan-guidelines-for-planning-authorities/>

Submission draft updated Development Plans Guidelines for Planning Authorities

Gerard Stockil
52 Bancroft Pk
Tallaght
D24

Gerard.stockil@tudublin.ie
Gerard.stockil@gmail.com
085 7551005

Minister Darragh O'Brien Minister
for Housing, Local Government and
Heritage
Copy
Minister Peter Burke, Minister of
State at the Department of Housing,
Local Government and Heritage
Minister Malcolm Noonan, Minister
of State at the Department of
Housing, Local Government and
Heritage

nrupconsultation@housing.gov.ie

8th October 2021

Dear Minister O'Brien,

Thank you and you colleague ministers for the opportunity to comment on Development Plan Guidelines. I wish you well in your task of improving our planning system so that it can delivery housing is the shortest possible time using quantitative methods.

My name is Gerard Stockil. I am a sectoral ,member representing the PPN community pillar of the South Dublin County Council Strategic Housing Policy Committee¹ This submission is written in that capacity , as one member of this committee.

I am a senior lecturer in Electronic Engineering at TU Dublin Tallaght Campus with over twenty-five years' experience . I am also a member and former chair of Tallaght Community Council², one of the oldest community organisations in Ireland and a

¹ List of SPC Members as <https://www.sdcc.ie/en/services/our-council/council-meetings/strategic-policy-committees/> as of 3rd October 2021.

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registered charity. I have taken an interest in planning matters for the last 15 years and read as much of planning regulation details as time allows me.

In my job at the University in Tallaght I see young people (and some not so young) , including my own children who stand no chance of affordable housing unless drastic changes are made **in the way the planning guidelines are interpreted**. The same applies to many young people I meet who are employed.

I am making this submission because I believe there are many corrections necessary to the process by which planning can be dramatically improved. The framework in the legislation , with some notable exceptions (such as the SPPRs which contradict common sense) , are generally solid and can create a modern planning system if contradictory interpretations are avoided and parts of the legislation are brazenly ignored for some reason. It is the contradictory interpretation of the process that causes problems.

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%

In short, we need to use maths more clearly, in particular simple calculation on density applied to a region. The calculations, showing excessive growth in Tallaght. above have never been denied by SDCC in numerous submission made by TCC over the years , however **ignoring them is guaranteed to prolong the housing crisis**. I sometime feel that planners and politicians are caught in the middle of a big systems error and Gordonian knots need to be severed to fix this.

Minister you can cut the knots. I will make some suggestions based on evidence and sound engineering practice and a concern for the well-being of all or all who seek housing .

We have a planning system, which despite some positive outcomes, ignores evidence that show certain interpretation of a **one-sided meaning to the term compact growth** (for this read ONLY overly dense high rise, small mainly BTR (built-to-rent) developments that repeated too many mistake and I will provide firsthand data Tallaght and elsewhere which backs up this argument.

I will not rely on overused platitude-like mantras from some in the building sector that says that the only solution is high rise one bedroom (mainly) , instead of apartments that do not cater for the factual population profile. Yes, we have smaller family size that before, but Ireland (with Croatia) still has the largest family size in the EU countries³ (and in Tallaght it is higher than that number)

Experience on the Housing SPCC

There are some good things to note. The Council staff are doing all they can to reduce homelessness, they are juggling the resources well and things have improved despite COVID. They performed heroically during COVID. They are also introducing a new computerised system which will help in the longer term. The meetings are well run, and everybody (from different parties and external reps) cares.

However, the **Housing SPCC** and other the **planning system at large** continue to **ignore massive long-term errors which I am hoping you will put right and cut the knot(s)**. These systematic errors and one solution are proposed below. I am under time pressure to write, so it will be brief.

There is no mechanism on the SPC level for getting meaningful answers to quantitative questions (all of which are in the TCC submissions to the County Development plan), it gets kicked from one committee to another and no one seems to be responsible, at the moment, for avoiding **train crash planning errors** in Tallaght.

I am speaking for a detailed knowledge of many planning matters in Tallaght. Many years ago, I and many others correctly warned about too many apartment being built in

³ Household Composition Statistics Eurostat, https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Household_composition_statistics Date of data extraction for article *Data extracted in May 2021*

Tallaght and that would end in a bad way, we were told we were holding Tallaght back ten years.

Then most of Tallaght apartments were taken over by Nama and now are effectively BTR and the property market is skewed, there is an excess of one-bedroom apartments and not enough larger apartments .

So please consider what I and many like me, who live in Tallaght, are saying. , I think I am predicting another problem but am also suggesting solutions, this can be fixed but requires corrective action soon.

I will focus on just one massive discrepancy.

“There are no proposals to increase the population of any settlement beyond 30%over 2016 census levels “but Tallaght Town Centre Figures Massively Exceed this

In the draft Development Plan Guidelines for Planning Authorities, it states of page 124

There are no proposals to increase the population of any settlement beyond 30% over 2016 census levels

This is eminently sensible. According to the Wikipedia article on population densities Ireland is the 146th most densely populated country , it is not even in the top 100. So why this super-emphasis on massively over dense growth in Tallaght in particular. There is an upper limit to ‘compact development’, and it does not mean 8 story plus development with 5% three-bedroom allocation instead of the minimum recommended size of 30%.

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145	Samoa *	196,129	2,842	1,097	69	179	2018
146	Ireland *	4,818,690	69,825	26,959	69	179	2018
147	Ukraine * [note 4]	44,246,156	603,500	233,011	73	190	2018

Location	Units		Locations	BP REF	Granted
6 Glen Abbey Complex	163	BTR	Glen Abbey Complex Belgard Rd		c Sept 20`
5 Cookstown Cross	252	BTR	Units 66 and 67 Fourth Avenue, Cooksotwn	308398	28/01/2021
4 Gallagher Site	502	Private	Former Gallaher's cigarette factory site at th	306705	16/06/2020
3 Airton Plaza	328	Private	Site at the Corner of Airton Road and Belga	305763	20/02/2020
2 Cooktown Crescent	196	BTR	Units 5A-C 2nd Av Cookstown	303803:	25/07/2019
1 Belgard Gardents	841	Private	The junction of Belgard Road and Belgard S	303306	15/04/2019
Overall	2282				
Occupance	1.5				
Population	3423				
Belgard Gardens has 403 student apartments, instead of studion apartments.					

Figure 1 Planning Permission for six SHD in Tallaght Town Centre, all is close proximity to each other. None meet the minimum requirement for 30% three-bedroom apartments recommended by the council planners.



Figure 2 Location of 6 SHD in Tallaght Town Centre which have planning permission.

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There are 2282 apartments with planning permission under the SHD process for one small area of Tallaght. See the above table and map., If the average occupancy is a very, very conservative 1.5 people per apartment, this is an extra $2282 \times 1.5 =$

$$>> 2282 * 1.5$$

ans =

$$3423.00$$

According to the Tallaght Town Centre Local Area Plan page 6 the 2016 population is 6126 people.

Marked changes in the economic climate occurred in recent years and particularly since the adoption of the previous Local Area Plan in 2006. The economic downturn presented new challenges for Tallaght and that adversely affected the successful delivery Plan. Notwithstanding this, the population of the Tallaght Town Centre Core area has grown 46% from 2011, increasing from 4,202 persons to 6,126 persons (2016 Census).

30% of 6126 is 1838

$$>> 6126 * .3$$

ans =

$$1837.80$$

34226 is greater than 1838,

This simple calculation alone should be enough to make the planning system see it is doing things massively wrong.

Here is a check with a program called MATLAB, which I am sure some of the technical people have in your department, if you can find an error in the calculations let me know, and I will correct it,

$$\text{SHDAprts} = 2282$$

$$\text{AvOccupancy} = 1.5$$

$$\text{PopIncrease} = \text{SHDAprts} * \text{AvOccupancy}$$

$$\text{TallPop2016} = 6126 \quad \% \text{ in } 2016$$

$$\text{IncreasedPop} = \text{TallPop2016} + \text{PopIncrease}$$

$$\text{PercentIncrease} = (\text{IncreasedPop} - \text{TallPop2016}) / \text{TallPop2016}$$

Run the program

```
>> PopTallaght
```

```
SHDAprts =
```

```
2282.00
```

```
AvOccupancy =
```

```
1.50
```

```
PopIncrease =
```

```
3423.00
```

```
TallPop2016 =
```

```
6126.00
```

```
IncreasedPop =
```

```
9549.00
```

```
PercentIncrease =
```

```
0.56
```

So why is Tallaght going to get a minimum of 56% increase when the national guidelines state 30%?

Here is the solution. Find a way of reducing the amount of SHD or resizing them to that the increase is constrained to 80%.

I suggest that all the six Tallaght Town Centre SHD have them planning permissions revoked and that they resubmit and design less dense development with larger number of three bed apartments. They reason is that they contravene the planning process and work against the national interest.

At the moment one of the SHD in Tallaght are on the market, another site which had permission refused in also for sale . SHDs should not be for speculation but solving the housing crisis and NONE of them have stated yet.

This is all happening is **one relatively small area which will be massively overdeveloped**, it will not be compact it will have **central London style densities without a metro system**. Is this easy to do, no, **but not doing it, or an equivalent step. is really much worse and**

will create another planning mess in Tallaght. Tallaght is for home and communities not just a speculators play space.

Minister I could point out many other figures that are in the plan that blatantly break all sensible planning rules , for example

- (1) Less than 5% of SHD have three-bedroom apartment, the recommendation is 30%, this will NOT solve the housing crisis.

- (2) Tallaght RGEN lands will have twice the density of Clonburriss and no greenspace
- (3) The TCC submission shows that the minimum requirement for greenspace in the County Development plan is not being met in Tallaght by a very large margin.
- (4) The extension of the border of Tallaght Town Centre by up to 1km is wrong. The council already have enough zoned land so this should not be done.
- (5) The proposed densities in Tallaght are Central London densities not that of a county town.

Minister I know you have a difficult job, but I am frustrated by the lack of quantitative accuracy in the planning process and by excessive spin on the term 'compact', which in practice means apartments that are way too small on average and will prolong the crisis.

Can you check the calculations with your officials re exceeding the 30% growth which is on page , if you find the calculation are incorrect, please tell me where, if they are right, please "*cut the knots*" and take action to prevent another avoidable planning mistake?

Wishing you and all Oireachtas members and civil servants all the best that thanking you all for your efforts.

Your sincerely

Gerard Stockil

Community PPN Member of SDCC Housing Strategic Policy Committee

Senior Lecturer, Electronic Engineering, TU Dublin Tallaght Campus