

SHD Review,
Planning Policy Section,
Department of Housing, Planning and Local Government,
Custom House,
Dublin, D01 W6X0

24th July 2019

Re. Public Consultation – Review of the planning provisions regarding Strategic Housing Developments

To Whom It May Concern,

We are a residents' association of approximately 400 households, based in Goatstown, in Dublin 14. We wish to make a submission regarding the proposed extension of the SHD process, based on our very recent experience of this process. A developer-owned (previously school lands) site that borders our area is currently with An Bord Pleanála, via the SHD process. A decision is due on or before August 29th.

Point 1 – Insufficient Time to Review Plans

There was insufficient time to review the multitude of documents and plans submitted by the developer. A huge amount of documentation was provided, making it very challenging to study it adequately. The timing difficulties also made it challenging to pass on information to our members. There wasn't much time to address queries, organise meetings, leaflet drops etc.

Point 2 – Insufficient Time for County Councillors to Review Public Submissions/ Discuss Issues

The deadline for receipt of public submissions in our case was only two working days before the Council meeting where this, (and three other SHD applications), was to be presented and discussed. This meant our local Councillors had an extremely short time to review the 50+ submissions received.

We were informed that in the case of the other three SHD applications discussed at this meeting, the deadline for receipt of public submissions came **after** this Council meeting. Meaning the Councillors present would not see the public submissions before their only opportunity to comment on the applications. Our deadline was changed in order to accommodate the elections, hence our timing "luck".

This is not democratic. Our elected representatives should be able to view, and consider, their constituents' public submissions, well in advance of the Council meetings where these SHD applications are presented and discussed. And where the Councillors make observations.

It is also worth nothing that this short Council meeting had to fit in a review of four SHD applications, as well as other Council business. Clearly for housing developments in excess of 100 units, much more time is required.

Point 3 – Lack of Facility to Appeal

There should be facility to appeal. Large scale developments have a huge bearing and influence on communities, and the people who will be directly affected by such developments should not be denied the right to ask for a reconsideration of issues that will affect them and their communities in perpetuity.

Point 4 – Rushed Approach will Lead to Bad Planning Decisions

Condensing the planning process, and removing the right to appeal, in order to speed up the building of much needed housing is simplifying things too much. Of course housing should be built. However badly planned and rushed development will be a blight on our communities in the future if insufficient time, and consideration, is given when making these decisions.

Yours sincerely,

Úna O'Shea
Roebuck Residents' Association