

Cllr Dave Quinn, Dún Laoghaire Area, Dún Laoghaire Rathdown County Council  
20 Longford Terrace, Monkstown, Co. Dublin

## Letter of Observation:

Priorsland SHD, as described at <https://www.priorslandshd.ie/>

**Ref: ABP-313322-22**

“Development within the Cherrywood Strategic Development Zone (SDZ) subject to the Cherrywood Planning Scheme, 2014 (as amended). The development will comprise a mixed use Village Centre and residential development of 402 no. apartments”.

16/05/2022

Dear Sirs,

The Equal Status Acts 2000-2018 prohibit discrimination in the provision of goods and services, accommodation and education. They cover the nine grounds of gender, marital status, family status, age disability, sexual orientation, race, religion, and membership of the Traveller community.

According to data provided by DLRCoCo, 28% of social housing units are allocated to people with disabilities. The reasons behind such a large percentage are many, but primarily it is due to the higher levels of poverty and housing need amongst people with disabilities over the general population.

As a Councillor for the Dun Laoghaire area on the Dun Laoghaire Rathdown Council, I attended an Area committee meeting on 12/05/2022 at which the above SHD planning application was presented. I wish to submit that in my opinion, this application includes a highly compromised and flawed Part V submission which in effect, should be regarded as a breach of the Equal Status Act in that it will result in discrimination in the provision of housing services on the grounds of disability.

This discrimination is based on the following terms of this SHD's Part V submission:

1. All of the Part V units are located in a single block, Block D, thereby isolating those occupants from routine inclusion within the full breadth of the community of occupants of this development
2. Location of this Block D and all of these Part V units is concentrated in the most disadvantaged portion of this development site in terms of:
  - Distance from the Village Centre
  - Distance from the Luas stations
3. Mix of Part V housing units is not reflective of the mix of units throughout the application, resulting in the exclusion of those on the housing list who need a larger housing unit, as included in this application.

The remedy to this discriminatory delivery of housing service is to:

1. Allocate the relevant number of Part V housing units across all of the development's apartment blocks and houses in a manner that is fully inclusive within the community of occupants of the development
2. Adjust the mix of units to that it provides for the appropriate number of 3-bed houses, 4-bed houses, 1-bed apartments, 2-bed apartments and 3-bed apartments so as to widen the availability of the housing units to the full range of housing applicants.

In this specific SHD application, I suggest a mix such as:

- 15 1-bed apartments
- 22 2-bed apartments
- 4 3-bed apartments
- 2 3-bed houses
- 2 4-bed houses

This alternative mix comes to the same total of 45 housing units as proposed in this SHD application.

In the past, developers have tried to justify the concentration of Part V allocations into a single block based on "facilitating maintenance issues". Any such estate management conveniences or cost savings cannot be used to justify in any circumstances such egregious discriminatory actions.

Without these changes, and given that a large proportion of social housing units are allocated to people with disabilities, I therefore submit that this development's proposed Part V submission amounts to discrimination against the intended occupants of these specific housing units.

Yours faithfully,

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