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Strategic Housing Unit,
An Bord Pleanála,
64 Marlborough Street,
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17 May 2022

**RE: 307784: Priorsland, located between the townlands of Carrickmines Great and
Brennanstown, within the Cherrywood SDZ, Carrickmines, Dublin 18**

Dear Sir/Madam,

My colleague, Cllr Melisa Halpin, and I would like to make the following observation on the proposed development of 307784: Priorsland, located between the townlands of Carrickmines Great and Brennanstown, within the Cherrywood SDZ, Carrickmines, Dublin 18 (case reference: TC06D.307784). We feel the application should be rejected on the following grounds:

Archelogy and Heritage

The recent findings contained in the EIAR submitted with the Priorsland SHD application, Chapter 13 of Volume One, are of some significance. Given the proximity of the site to Neolithic structures such as the Glendruid Dolmen and of the more recent medieval Carrickmines Castle. It is highly likely that more archaeological items will be discovered. Most notably the following extract details the level of major discoveries made in 2018.

"Testing did reveal seven previously unrecorded areas of archaeological significance, which have been designated as Archaeological Areas 1–7 (AA1-7). These comprise a probable Bronze Age penannular ditch enclosing at least four cremation pit burials and two pits (AA1,

Plates 13.10-12), two single pits (AA2 and AA3) and four areas containing disturbed spreads of burnt mound material (AA4–7, Plate 13.13). The latter features have been heavily truncated by modern drainage and in AA6 and AA7 scant remains of the presumed original archaeology. The archaeology identified in AA1 is significant in both its type and form. The presence and density of the urn burials within such an enclosure is indicative of its local importance."

These discoveries and any other such potential discoveries must be the subject of the relevant heritage policies contained within the Dún Laoghaire Rathdown County Council, County Development Plan 2022-2028. I also have concern that the proposed archaeological mitigation measures may be insufficient given the scale of historical discoveries made in the "test trenching" process.

The following policies are applicable, and consideration should be given by the planning authority in consultation with the National Monuments Service to keep the significant finds in situ:

Policy Objective HER2: Protection of Archaeological Material in Situ

It is a Policy Objective to seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places, and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the Council will have regard to the advice and/ or recommendations of the Department of Culture, Heritage and the Gaeltacht (DCHG)."

Policy Objective HER5: Historic Burial Grounds

It is a Policy Objective to protect historical and/or closed burial grounds within the County and encourage their maintenance in accordance with good conservation practice and to promote access to such sites where possible."

Part V

It is completely unacceptable that the application proposes all Part 5 social housing units to be contained within the one singular block, as opposed to being evenly dispersed among all housing blocks at the very least. No permission should be granted until a revised Part 5 is prepared. Unless this is done, it is inevitable that the Part 5 block will be stigmatised by other residents, and this is contrary to the spirit of mixed tenure. This necessity supersedes any maintenance issues that are associated with the convenience of putting all Part 5's in the one block.

Flood Risks

We have seen previous applications to develop on this land were refused by DLRCOCO because they were not consistent with the environmental parameters of the Strategic Development Zone for Cherrywood. This approach in the current application is consistent with previously refused proposals. The issue of possible flooding and the lack of appropriate mitigation measures should give consideration for refusal by the planning authority.

Lack of democracy of the SHD Process:

The Strategic Housing Development legislation is deeply flawed. It allows developers to override the democratic process and does not take into consideration the normal planning process, the Local Development Plans or the wishes of the community.

The original stated objective of the SHD as part of Rebuilding Ireland was to help solve the housing crisis, this has not been successful as the price of the properties in these developments is out of reach of most people and a good portion of them are being bought by foreign investment companies who are keeping the rents artificially high. The housing crisis continues to deepen despite the increased number of developments. The only people winning are the developers and the Vulture funds while the communities, environment and in this case the students are being harmed. While we are very aware of the desperate need for housing, it needs to be built sustainably and affordable to the general population.

Conclusion

We believe Priorsland SHD should not be permitted. On the grounds of scale, over development, threat to the integrity of history and heritage of the area, and the unacceptable danger of the local road network that the SHD is reliant on. I call on An Bord Plenála to refuse permission to this premature SHD.

Kind regards,

Deputy Richard Boyd Barrett TD and Cllr Melisa Halpin