Re: *Public Consultation Submission: Draft Plan of Action for Decision VIII/8h (Aarhus Convention)*

Dear Sir/Madam,

Balbriggan Community Council welcomes the opportunity to comment on the Draft Plan of Action concerning Ireland's compliance with the Aarhus Convention. As a representative community group for a rapidly growing coastal community, we recognise that transparent planning mechanisms, timely access to environmental data, and robust public participation are fundamental to sustained local democracy and environmental protection.

Please find our structured feedback on the proposals below:

Public Participation in Planning Extensions & Alterations (Section C, Para 2a/b)

Strong Support for Statutory Commencement: We strongly endorse the scheduled Q3 2026 commencement of the relevant provisions under the Planning and Development Act 2024. Ensuring that any material alteration or extension of a planning permission meeting environmental thresholds is subject to public participation is a crucial step forward.

Discretionary Materiality: We explicitly welcome the power granted to local planning authorities to mandate public consultation even when strict thresholds (such as EIA or AA) are not automatically triggered. In rapidly developing areas, cumulative local impacts can be severe; giving authorities the explicit flexibility to deem alterations "material" ensures community voices are not locked out of legacy planning extensions.

Timeliness of AIE Appeals & Judicial Backstops (Section C, Para 2c[i])

Accelerated OCEI Timelines: While we welcome the introduction of a statutory deadline for the Office of the Commissioner for Environmental Information (OCEI), a 4-month window is still highly problematic for volunteer community groups. Local development decisions often move much faster than a 4-month appeal timeline allows, risking a situation where critical environmental data is only released after irreversible planning decisions have been finalised.

Review Window Reduction: We strongly advocate that the proposed 2-year review period to shorten this target to 1 month be accelerated. The review should happen within 12 months of the plan's adoption to better protect the public's right to timely access to justice.

Enforcement Powers: We fully support granting explicit powers to the courts to set *strict*, mandatory compliance deadlines for public bodies once an appeal is determined.

Access to Economic & Proactive Information

Cost-Benefit Clarification: We welcome the clarification that financial cost-benefit analyses and economic studies linked to environmental decision-making cannot be withheld. Understanding the economic ***why*** behind environmental decisions is essential for informed public participation.

Proactive Disclosure: We strongly support the mandate for public authorities to proactively publish environmental information online. Transitioning away from a reactive, adversarial request system reduces the administrative burden on both community volunteers and local government staff, fostering a healthier culture of transparency.

We trust these comments will be taken into consideration as the final Plan of Action is refined.

Yours sincerely,

[redacted]

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