



25<sup>th</sup> July 2026'

Variation No. 2,  
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Land Use Planning & Transportation

29 JUL 2026

South Dublin County Council

**Submission on Material Alterations to Proposed Variation No 2 to the South Dublin County Council Development Plan 2022-2028.**

**Submitted by: Catherine O'Donnell**

***St Edmundsbury: Material Alteration Reference 6***

I strongly support the decision of SDCC Councillors against rezoning of land at St Edmundsbury. It is heartening to see our local elected members and elected members from other areas of South Dublin County Council coming together to show such strong support for the protection this important part of the county's ancient heritage. Thanks to them it is hoped that St Edmundsbury will be retained as High Amenity Land.

Michael O'Flynn, the potential future developer of the land if it were rezoned, has stated that "Land is our raw material. This land ticked all the boxes to get rezoned" (Irish Independent 2 July 2026). Thanks to the integrity of our councillors and all those who made submissions, in this case this does not mean that the raw material he considers St Edmundsbury to be, can be bought cheaply in times of financial crises, hoarded until it becomes a scarce commodity, then potentially rezoned resulting in it becoming a much more valuable asset for its owners. In the

case of St Edmundsbury, our elected representatives ensured that the use of this raw material is not unfettered but is subject to planning, environmental and infrastructural considerations. Some areas should be recognised as being more valuable as an amenity and St Edmundsbury is one such place.

The Council's own figures show that the revised National Planning Framework (NPF) baseline housing requirement has already been met for South Dublin County Council. The overall proposed rezonings provide approximately 30% more residential capacity than the Government's baseline requirement. Because of this, there is no planning necessity to remove the existing High Amenity (HA-LV) zoning from the St. Edmundsbury lands in order to comply with national housing policy.

### **Environmental Considerations**

Despite previous attempts at rezoning, this area has always been protected from development because of its unique nature and outstanding natural beauty, including the vista from the N4 over the Liffey valley. Rezoning would have withdrawn that protection and it is inevitable that the landscape would be changed forever. This erosion of landscape character and ecological function would be contrary to the National Planning Framework's principles of compact growth that complements, rather than consumes the surrounding natural environment and preserves heritage, and would set a damaging precedent for other green belt breaches in visually sensitive areas.

A report prepared in 1987 for the area of St Edmundsbury covered by the Special Amenity Area Order details how the area provides habitats which support rare plants, such as species of figwort, hairy St John's Wort and Archangel, rarely found elsewhere in Ireland. These plants still grow in the area and some can be seen in the area proposed for rezoning. The report also detailed how the area supports a rare millipede species which apart from a site in North County Dublin, is only found in two other locations in the world, both in the Pyrenees mountains. These flora and fauna have survived the light hand of man in farming *etc* for centuries but they would not survive the level of interference planned in the rezoning proposal. Leaving a strip of parkland behind the equivalent of a new town would not have worked. The fragile and undisturbed ecosystem, would not have survived the turmoil of construction so near and the permanent change to the environment when the new residential area became established.

The impacts that would follow from rezoning would directly conflict with Regulation 27 of the Birds and Natural Habitats Regulations 2011, which sets out the duties of public authorities relating to nature conservation. They oblige those authorities, when exercising their functions, to take appropriate steps to avoid the deterioration of natural habitats and disturbance of species for which a site has been designated insofar as this disturbance could be significant in relation to the

objectives of the Habitats Directive. Given the number of badger setts, bats, protected bird nesting sites and rare flora etc in the area proposed for rezoning, as well as in the hinterland, protection at the highest level should be afforded to St Edmundsbury lands. This should rule out the planners proposed rezoning. The loss or disturbance of these habitats would be irreversible and contrary to the objectives of sustainable land use and biodiversity protection set out in national and EU environmental policy.

*The Precautionary Principle:* Article 174 (2) of the European Community Treaty provides that all Community policy on the environment shall be based on the precautionary principle. To rezone St Edmundsbury land for housing would be an experiment with potential disastrous consequences for existing and future inhabitants and for the environment. When dealing with an area of such outstanding beauty and protected species of rare flora and fauna, the principles of EU environmental law dictate that the precautionary principle should prevail to protect the area from unintended consequences. Rezoning the area for development would have changed it irrevocably and would undermine this long-standing planning principle. It would also risk the incremental fragmentation of this sensitive ecological landscape.

Recent EPA guidance on Landscape Character Assessment (LCA) encourages planning authorities to assess landscapes not only for their visual qualities, but also for ecological function, biodiversity, cultural heritage, green infrastructure and contribution to a sense of place. This reflects a broader understanding that landscapes such as the Liffey Valley are valuable because of the way these qualities interact and support one another.

Similarly, the Planning and Development Act 2024 strengthens the role of landscape, biodiversity and natural heritage in plan-making. It requires planning authorities, through their development plans, to make provision for the conservation, protection, management and enhancement of landscape, biodiversity, ecological networks, natural heritage and areas of natural beauty. Retaining the existing High Amenity zoning on the St. Edmundsbury lands is consistent with this clear national policy.

It is my hope that the Councillors' decision against rezoning will preserve St Edmundsbury's landscape undisturbed until a time in the future when it will become part of a large Liffey Valley Park stretching from Island Bridge to Celbridge. The rezoning at St Edmundsbury would obliterate ancient ecosystems supporting rare fauna and flora, would change the face of Lucan forever and constitute an enormous environmental loss. This would not be in the interests of proper planning, environmental stewardship and heritage protection and I am relieved that the elected representatives recognised this and voted against rezoning.

### **Infrastructural Considerations**

The St Edmundsbury land is at a junction leading from a very high-density residential area which relies on an inadequate bus service and cars for transport. A planning report for the nearby Foxhunter site, carried out pre-Covid restrictions in 2020, showed public transport time of 22 minutes to reach the city centre. At times now, that same journey can take over 50 minutes.

There are no plans for Luas and there is no rail infrastructure in the area proposed by SDCC for rezoning, nor are there any plans to provide a rail service in the future. There are constant complaints that buses are full long before they reach St Edmundsbury and it is increasingly difficult for people to get to their employment or to the local schools. Lucan village is already difficult to enter or leave due to traffic congestion. Traffic on N4 is congested to the point of being unusable at peak times. It defies logic that South Dublin County Council considered rezoning to provide housing at this bottleneck. There would be no public transport available for the residents of these homes. Therefore, rezoning would have led to a car dependent town at one of the worst bottlenecks on the N4, this at a time when we are striving for transition to a climate resilient society. It is likely that the rezoning would have resulted in a residential development larger than Seven Mills new town which is also in the Lucan area. Seven Mills will have 607 homes and boasts that every home in the new town will be within 500 metres of a train station. Residents in the area complain that the trains are already full to capacity before they reach them. Many have resorted to buying cars to get to work, which they never planned for and do not have a parking space for. Imagine the disaster of an even larger town at St Edmundsbury with no public transport apart from buses which are already full when they reach St Edmundsbury.

Lucan has carried a disproportionate burden in the provision of housing. According to the Central Statistics Office's Q1 2024 data, Lucan recorded the highest number of new dwelling completions of any Dublin LEA during that quarter. In Q3 2025 Lucan had the second highest number of completions in Dublin, only behind Clondalkin which is now joined to Lucan by high density development. The rezoning of St Edmundsbury would have substantially increased new housing units in the area even though Adamstown and Clonburris are far from complete. The developer's stated intent to build 540 homes is unrealistic given the area which it was proposed to rezone. I submit that if rezoning had been approved, a planning application for the area would more likely have been for multiples of that figure.

Lucan has already absorbed a disproportionate share of SDZ and regional housing. This is not a question of "Not in my back yard" as suggested in the interview Mr O'Flynn gave to the Irish Independent. Lucan has no backyard left. If all Lucan has left to offer is its high amenity environmentally precious wild spaces it is a sign that we have already contributed our fair share.

Lucan does not have, and is not likely to have sufficient health, educational facilities and public amenities for its existing population. To give an example, an article in The Irish Independent dated 7<sup>th</sup> December 2025 states "These statistics suggest that among the worst areas in the country for GP coverage compared to population size are east Meath, **Lucan in Dublin**, (my emphasis), south Kildare, west Wicklow, Blakestown and Citywest " (Irish Independent, 7<sup>th</sup> December 2025). The statistics referred to show that the national average is 1759 people to one GP, whereas Lucan has 3985 people to one GP (Statistics were detailed by Marie Sherlock, Labour Party 7<sup>th</sup> December 2025).

Lucan has contributed significantly to housing delivery over the past four decades. Sustainable planning now requires consolidation, infrastructure investment, and protection of remaining unspoilt green assets. There is no compelling evidence to demonstrate that housing needs cannot be met without removing the protection from St Edmundsbury.

### ***Finnstown Castle: Material Alteration Reference 3***

I support the Councillors' decision against rezoning of Finnstown Castle. This area is surrounded by high density housing. The residents of the area deserve the breathing space and environmental respite that this ancient historical woodland provides. Finnstown Castle acts as a transitional zone, protecting local amenities and helping mitigate detrimental changes in scale as provided for in the South Dublin County Development Plan 2022–2028.

Finnstown Castle is a unique historical area. The old hotel itself is a protected structure. The avenue leading to it is also protected. The mature trees surrounding the grounds are preserved and individually tagged. It is the last remaining piece of natural open habitat between Adamstown and the Newcastle Road and functions as a much needed wildlife corridor, in an increasingly built up part of Lucan. Finnstown Castle lands should be protected as essential green space of historical and environmental value in this densely populated and traffic-congested area.

### ***Adamstown SDZ Dart + South West: Material Alteration Reference 2***

I strongly support the amendment requiring DART+ South West (or an equivalent rail service) to be operational before significant residential development commences. Residents of Lucan and Adamstown have experienced many years of rapid residential growth while essential transport infrastructure has lagged behind. Requiring the rail service to be operational rather than simply commenced provides a far greater level of security that sustainable transport will be available for future residents of the area in a timely fashion. It is absolutely essential in the present time

of climate crisis that housing and quality public transport is available to homeowners so that they are not forced to buy cars to get to work. This amendment is entirely consistent with the principles of proper planning, sustainable transport and climate action and should remain unchanged.

This support for the material alterations made by the elected members is given in the interests of proper planning, environmental stewardship, climate responsibility and the long-term wellbeing of residents of Lucan. I ask that the decisions of the elected members be respected and that the Chief Executive retain these Material Alterations in the final adopted Variation.

Signed:

A black rectangular box redacting the signature of Catherine O'Donnell.

Catherine O'Donnell