



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

Submitted by: Sarah O'Donnell

St Edmundsbury: Material Alteration Reference 6

I strongly support the decision of SDCC Councillors against rezoning of land at St Edmundsbury. St Edmundsbury is an important part of the county's ancient heritage and it is hoped that that actions of SDCC Councillors will mean that St Edmundsbury will be retained as High Amenity Land.

Our elected representatives have ensured that the future use of St Edmundsbury is subject to the appropriate 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 a number of previous rezoning proposals, this area has consistently remained protected from development because of its exceptional landscape, ecological importance and outstanding natural beauty. Rezoning would inevitably diminish both the character of the landscape and its ecological integrity, contrary to the principles of compact growth set out in the National Planning Framework. Those principles seek to ensure that development works in harmony with the natural environment rather than consuming it, while also safeguarding our natural and cultural heritage. Allowing the rezoning of St. Edmundsbury would create a harmful precedent by opening the door to further incursions into protected green belt lands in highly sensitive landscapes.

A report prepared in 1987 in relation to the lands covered by the St Edmundsbury Special Amenity Area Order highlights the area's exceptional ecological value. It records the presence of habitats supporting several uncommon plant species, including figwort, hairy St John's Wort and Archangel, all of which are rarely found elsewhere in Ireland. These species continue to thrive today, with some located within the lands currently proposed for rezoning. The report also identified a rare species of millipede that, apart from a location in North County Dublin, exists only at two other sites worldwide, both situated in the Pyrenees. These unique plant and animal communities have endured for centuries alongside low-intensity agricultural activity and other limited human intervention. However, they would not withstand the scale of disturbance associated with the proposed rezoning and development. Simply retaining a narrow strip of parkland behind what would effectively become a new town would not preserve these habitats. The extensive disruption caused during construction, followed by the permanent environmental changes resulting from a large residential development, would irreversibly damage this fragile and previously undisturbed ecosystem.

The consequences of rezoning would also be inconsistent with Regulation 27 of the Birds and Natural Habitats Regulations 2011, which places obligations on public authorities to protect nature when exercising their statutory functions. The Regulations require authorities to take appropriate measures to prevent the deterioration of natural habitats and to avoid significant disturbance of species for which protected sites have been designated, where such disturbance could undermine the objectives of the Habitats Directive. The proposed rezoning area, together with its surrounding hinterland, contains numerous badger setts, bat populations, protected bird nesting sites and rare plant species. Given the ecological significance of these habitats and species, St Edmundsbury warrants the highest level of protection. Any loss or disturbance would be permanent and would directly conflict with both national and European objectives relating to sustainable land use and biodiversity conservation.

The precautionary principle is also directly relevant. Article 174(2) of the European Community Treaty establishes that Community environmental policy must be founded on this principle. Rezoning the St Edmundsbury lands for residential development would amount to an experiment with potentially serious consequences, both for the environment and for current and future generations. In an area distinguished by exceptional natural beauty and home to protected and rare species of flora and fauna, European environmental law requires that precaution should take precedence where uncertainty exists. Development on this scale would permanently alter the character of the area, undermine this long-established planning principle, and increase the risk of gradual fragmentation of an ecologically sensitive landscape.

More recent policy developments reinforce the need to retain the existing protections. The EPA's guidance on Landscape Character Assessment (LCA) encourages planning authorities to evaluate landscapes not solely on the basis of visual appearance but also with regard to ecological function, biodiversity, cultural heritage, green infrastructure and their contribution to local identity and sense of place. This reflects a modern understanding that landscapes such as the Liffey Valley derive their value from the interaction of these interconnected qualities rather than from any single characteristic.

The Planning and Development Act 2024 further strengthens the statutory emphasis on protecting landscape, biodiversity and natural heritage within the planning process. It requires development plans to include measures for the conservation, protection, management and enhancement of landscape character, biodiversity, ecological networks, natural heritage and areas of outstanding natural beauty. Maintaining the current High Amenity zoning for the St Edmundsbury lands is fully aligned with these national planning and environmental policy objectives.

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. There would be no public transport available for the residents of the homes proposed under the rezoning. 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. 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.

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, as evidenced by the fact that all Lucan has left to offer is its high amenity environmentally precious wild spaces.

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 7th 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, 7th 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 7th December 2025).

Finnstown Castle: Material Alteration Reference 3

I support the Councillors' decision not to rezone the Finnstown Castle lands. The site is bordered by extensive high-density residential development, making the open space and environmental relief provided by this historic woodland increasingly important for the surrounding community. The lands also serve as a valuable transitional area between established amenities and surrounding development,

helping to prevent inappropriate changes in scale and character in accordance with the objectives of the South Dublin County Development Plan 2022–2028.

Finnstown Castle is an area of exceptional historical and environmental significance. The former hotel is a protected structure, while the tree-lined avenue leading to it also benefits from statutory protection. In addition, the mature trees throughout the estate are individually identified and protected. Collectively, these features form the last remaining natural open habitat between Adamstown and Newcastle Road, providing an essential wildlife corridor within what has become an increasingly urbanised part of Lucan.

Given its unique combination of historical importance, protected heritage features and ecological value, the Finnstown Castle lands should continue to be safeguarded as an important green space. Preserving this area will protect both its environmental function and its heritage significance while ensuring that residents of this densely populated and traffic-constrained part of Lucan retain access to a valuable natural landscape.

Adamstown SDZ Dart + South West: Material Alteration Reference 2

I strongly support the amendment requiring that DART+ South West, or an equivalent rail service, be fully operational before any significant residential development is permitted to proceed. Lucan and Adamstown have experienced sustained housing growth over many years, while the delivery of essential transport infrastructure has consistently failed to keep pace. Making the availability of an operational rail service a prerequisite for development, rather than merely requiring that construction has commenced, provides much greater certainty that residents will have access to sustainable public transport when they move into the area.

Ensuring that high-quality public transport is in place before substantial housing is occupied is particularly important in the context of the current climate crisis. Without reliable rail infrastructure, many residents will have little alternative but to rely on private cars for commuting, increasing traffic congestion and undermining national climate objectives. Providing homes alongside effective public transport is essential if sustainable travel choices are to become a realistic option rather than an aspiration.

This amendment is fully consistent with the principles of proper planning, sustainable development, integrated transport policy and climate action. It represents a sensible and necessary safeguard to ensure that future residential growth is supported by the infrastructure required to make it sustainable, and it should therefore be retained without amendment.

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: 

Sarah O'Donnell