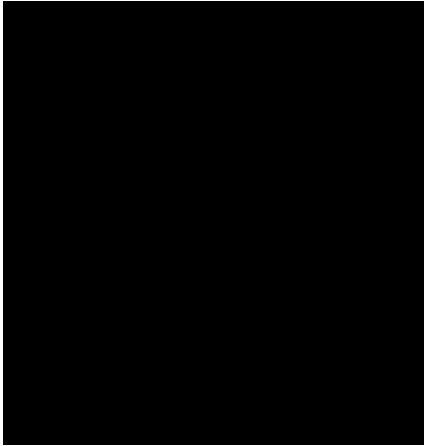




Director of Planning
South Dublin County Council
County Hall
Tallaght
Dublin 24

Submission on Proposed Material Alterations to Proposed Variation No. 2

Reference: MA6.1 — Omission of Amendment No. 6 (St. Edmundsbury) and related CS7/SLO6

Date: 04/08/2026

Dear Sir/Madam,

I am writing to make a submission on the above-named Proposed Material Alterations, open for public consultation from 7 July 2026 to 5 August 2026. This submission relates specifically to Material Alteration MA6.1, which proposes to omit Amendment No. 6 (St. Edmundsbury), including the associated CS7/SLO6 designations, from Proposed Variation No. 2.

Position: I fully support MA6.1 and request that South Dublin County Council omit Amendment No. 6 (St. Edmundsbury), including the related CS7/SLO6 designations, and retain the current High Amenity/Liffey Valley (HA-LV) zoning for the St. Edmundsbury lands.

I ask the Council to confirm and adopt this material alteration for the following reasons:

1. Environmental and landscape sensitivity

The St. Edmundsbury lands lie within, or immediately adjacent to, the Liffey Valley Special Amenity Area, a designation that exists precisely to protect this stretch of the river corridor from

inappropriate development. The mature treeline and riverside setting are not a peripheral feature of the site — they are the reason the land was designated High Amenity in the first place. Any rezoning of this land, whether at the original 14.97 ha scale or the Chief Executive's reduced 9.67 ha proposal, would represent a permanent loss of protected landscape character and beauty, and critical environmental habitats essential to biodiversity and climate sustainability that cannot be reversed once development proceeds.

2. Flood risk

The site's proximity to the River Liffey raises legitimate flood risk concerns that the Strategic Flood Risk Assessment accompanying this consultation should be weighed carefully against. Given recent flooding events affecting the wider Lucan area, introducing significant new residential density onto land bordering the river corridor runs contrary to the precautionary approach the planning system is required to take under the Planning and Development Act and the OPW's flood risk guidelines.

3. Infrastructure capacity

The surrounding road network, schools, and public transport capacity in Lucan are already under strain from the phased delivery of Adamstown and Clonburris, both of which remain incomplete. Adding a further c.460–640 units at St. Edmundsbury ahead of the completion of committed infrastructure in neighbouring SDZs would compound existing capacity pressures rather than deliver planned, sequenced growth.

4. Scale and weight of public opposition

Of the 2,678 submissions received on Proposed Variation No. 2 during the original consultation, 1,836 — by far the largest number relating to any of the sixteen sites under consideration — concerned St. Edmundsbury specifically. This is a clear and disproportionate signal of community concern that the Council should give significant weight to in finalising the Variation.

5. Consistency with proper plan-led development

The HA-LV zoning of this land was arrived at through the Council's own development plan process and reflects a considered judgement about where growth should and should not occur in South Dublin. Reversing that judgement under housing-target pressure, without the site itself having changed in any material way, undermines confidence in the plan-led system that the Development Plan is meant to provide.

For these reasons, I strongly support Material Alteration MA6.1 and request that the Council confirm the omission of Amendment No. 6 (St. Edmundsbury), including the related CS7/SLO6 designations, and retain the existing HA-LV zoning for these lands in the final version of Variation No. 2.

I would welcome confirmation that this submission has been received and will be considered as part of the Chief Executive's report on the Proposed Material Alterations.

Yours faithfully,

Liam Russell