

SUBMISSION MATERIAL ALTERATIONS VARIATION. NO. 2

South Dublin County Development Plan 2022-2028

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Executive Summary

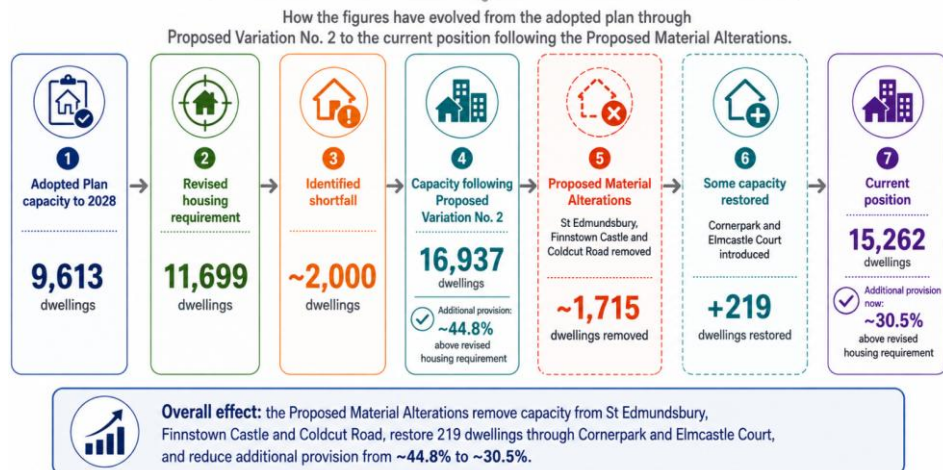
South Dublin County Council initiated Variation No. 2 because the existing County Development Plan did not provide sufficient residential capacity to meet the revised housing requirements arising from the National Planning Framework and the Housing Growth Requirements Guidelines. The Chief Executive responded by identifying a balanced portfolio of residential sites capable of accommodating approximately 16,937 dwellings, representing 44.8% additional provision above the identified housing requirement. This additional provision was intended to provide resilience against the uncertainties inherent in housing delivery, including infrastructure delivery, environmental constraints, market conditions and implementation risk.

Following statutory consultation, the Chief Executive refined the St. Edmundsbury proposal by reducing the residential area to 9.67 hectares, retaining 5.31 hectares as High Amenity, reducing the estimated residential yield and strengthening the Specific Local Objective. The final recommendation therefore reflected a materially revised planning framework developed in direct response to environmental, landscape and infrastructure concerns.

The Proposed Material Alterations subsequently removed St. Edmundsbury 464 homes, Finnstown Castle 1,017 homes and Coldcut Road 234 homes while introducing Cornerpark 217 homes and Elmcastle Court 2 homes. Consequently, estimated residential capacity falls from 16,937 to 15,262 dwellings¹, reducing the additional provision above the housing requirement from 44.8% to 30.5%.

¹ The reduction of 1,675 dwellings (from 16,937 to 15,262) reflects the aggregate housing capacity published by South Dublin County Council in the Proposed Material Alterations. The gross site changes illustrated above identify approximately 1,715 dwellings removed and approximately 219 dwellings added. The difference reflects the Planning Authority's wider Core Strategy housing-capacity methodology and associated refinements, which are not disaggregated on a site-by-site basis in the published documentation.

HOUSING CAPACITY: ORIGINAL POSITION TO CURRENT POSITION



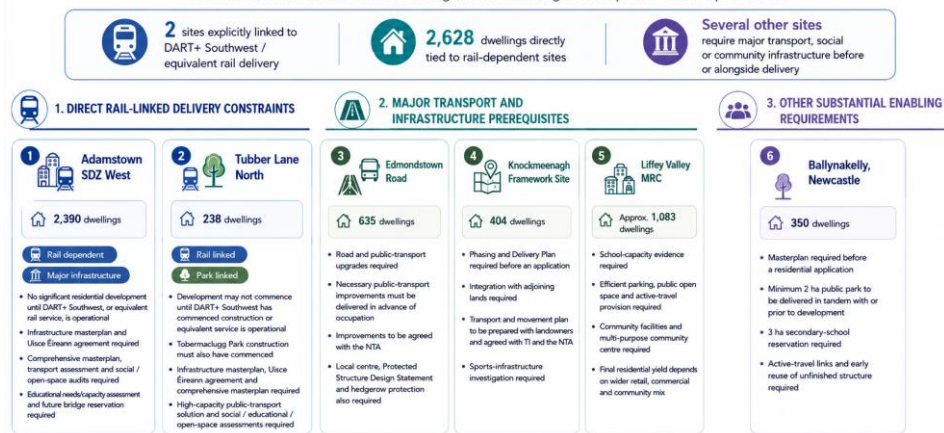
The assessment undertaken in this submission demonstrates that this reduced housing strategy is increasingly dependent upon a relatively small number of constrained sites.

Approximately 4,642 dwellings, representing approximately 30.4 per cent of the Planning Authority's published residential capacity following the Proposed Material Alterations, are associated with strategic transport infrastructure, comprehensive masterplanning, major enabling infrastructure or multi-party delivery arrangements.

Of these, the approximately 2,390 dwellings associated with Adamstown SDZ West cannot proceed until DART+ Southwest, is operational, while further allocations are dependent upon rail construction, major infrastructure delivery or complex implementation frameworks. This demonstrates why the Chief Executive originally recommended a broader portfolio of residential sites rather than relying upon a smaller number of constrained allocations.

SITES WITH MAJOR INFRASTRUCTURE AND RAIL DELIVERY REQUIREMENTS

Selected residential allocations with significant enabling or transport-related dependencies



The comparative assessment also demonstrates that significant planning constraints were generally addressed through strengthened Specific Local Objectives, masterplanning and infrastructure requirements rather than by removing residential zoning. St Edmundsbury was treated differently notwithstanding the Planning Authority's substantially refined recommendation, coordinated ownership, advanced technical evidence and comprehensive implementation framework.

This submission respectfully submits that the Planning Authority's own technical and environmental evidence continues to support Amendment No. 6. Reinstating the Chief Executive's recommendation would not simply restore approximately 464 dwellings. It would restore a strategically located site that had already been substantially refined through the statutory plan making process and would strengthen the resilience, flexibility and deliverability of the residential land strategy over the extended lifetime of the Development Plan.

The key issue arising is whether having regard to the Planning Authority's own refined recommendation, the Proposed Material Alterations continue to provide a sufficiently robust, flexible and resilient residential land strategy to fulfil the purpose for which Variation No. 2 was initiated.

1. Introduction

This submission is made on behalf of the O'Flynn Group, acting in partnership with the owners of lands at St. Edmundsbury, Lucan, Co. Dublin, in response to the Proposed Material Alterations to Proposed Variation No. 2 of the South Dublin County Development Plan 2022–2028.

Our client previously made a comprehensive submission on Proposed Variation No. 2 setting out the planning, policy, environmental, infrastructure and placemaking case supporting the inclusion of a limited residential zoning at St Edmundsbury. That submission is included as **Appendix A** and is incorporated by reference. Rather than repeating those submissions, this document focuses on the planning issues arising from the Proposed Material Alterations and the implications of the elected members' decision to remove Amendment No. 6 from the proposed residential rezonings.

This submission addresses two key issues.

1. Firstly, it considers the planning implications of removing the significantly reduced and refined proposal recommended by the Chief Executive following the statutory consultation process. In doing so, it examines the evidence upon which the Chief Executive reached the recommendation, the environmental and technical assessments supporting that recommendation, and the reasons advanced in the elected members' motions.
2. Secondly, it considers the wider implications of the Proposed Material Alterations for the housing strategy underpinning Variation No. 2. To assist that assessment, a comparative review has been undertaken of the residential sites proposed for rezoning through the Variation. The review, contained in **Appendix B**, examines the estimated housing capacity of each site together with the principal delivery characteristics identified by the Planning Authority, including ownership, servicing, masterplanning requirements, Specific Local Objectives, infrastructure dependencies and other implementation considerations. The purpose of that exercise is to examine whether the amended suite of residential rezonings continues to provide a sufficiently robust, deliverable and resilient basis upon which to implement the revised housing requirements.

This submission also considers the implications of the introduction of the additional residential sites at Cornerpark, Newcastle and Elmcaster Court, Kilnamanagh through the Material Alterations process. While these lands may make a positive contribution to housing delivery, the question is whether the amended strategy, when considered as a whole, remains

consistent with the objectives of Variation No. 2, the Housing Growth Requirements Guidelines, the recommendations of the Office of the Planning Regulator, and the Planning Authority's own technical evidence, and within the scope of the County Development Variation procedure.

The submission therefore examines the planning, environmental and implementation consequences of the Proposed Material Alterations having regard to:

- i. the purpose of Variation No. 2;
- ii. the Chief Executive's recommended amendment following public consultation;
- iii. the elected members' motions and the resulting Material Alterations;
- iv. the McCutcheon Halley Planning comparative assessment of the residential sites proposed for rezoning;
- v. the Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment;
- vi. the recommendations of the Office of the Planning Regulator;
- vii. the available evidence concerning servicing, transport, environmental capacity and deliverability; and
- viii. the planning implications of introducing additional residential sites through the Material Alterations process.

Accordingly, it is respectfully submitted that the CE should recommend that the proposed variation should be made as originally proposed by planning authority in accordance with s.58(17)(a)(i), or at least that material alteration MA 6.1 omitting Amendment No. 6 should not be made and that Amendment No. 6, in the form recommended following statutory consultation and detailed technical assessment, should be reinstated.

2. St. Edmundsbury

The St. Edmundsbury estate extends to approximately 110 hectares and represents one of the largest privately owned landholdings within South Dublin County. The estate occupies a strategically located position adjoining the existing built-up area of Lucan and contains a diverse range of landscape, environmental, institutional and heritage assets which have informed the planning history of the lands over many years.

The scale of the overall landholding is an important consideration because it provides essential context. Throughout the Variation process, the residential proposal has frequently been characterised as relating to the St Edmundsbury estate. That is not an accurate reflection of either the proposal advanced by our client or, more importantly, the recommendation ultimately made by the Chief Executive.

Approximately 61 hectares of the estate lie within the Liffey Valley Special Amenity Area Order (SAAO). The SAAO is a separate statutory designation established to protect the exceptional landscape, ecological, recreational and amenity value of the Liffey Valley. It operates independently of the Development Plan zoning objectives and provides an additional statutory layer of protection over the designated lands. Those lands were not proposed for residential development and would remain subject to the provisions of the SAAO irrespective of the outcome of Variation No. 2.



Figure 1 Liffey Valley Special Amenity Area Order

Our client's original submission acknowledged the significance of these environmental and landscape assets. Residential development was not proposed within the SAAO lands. Rather, the proposal sought to accommodate a limited area of residential development while securing the long-term protection, enhancement and public accessibility of the wider Liffey Valley.

Following the statutory consultation on Proposed Variation No. 2, the Chief Executive undertook a detailed planning assessment of Amendment No. 6, having regard to the submissions received, the Strategic Environmental Assessment (SEA), Appropriate Assessment (AA), Strategic Flood Risk Assessment (SFRA), technical consultation responses and the environmental, landscape, heritage and servicing characteristics of the lands. That assessment did not simply endorse the original proposal. It resulted in a substantial refinement of the amendment.

The residential area recommended for rezoning was reduced to 9.67 hectares, representing approximately 8.8 per cent of the overall estate. A further 5.31 hectares remained under the HA-LV zoning objective as part of the wider environmental and park framework.

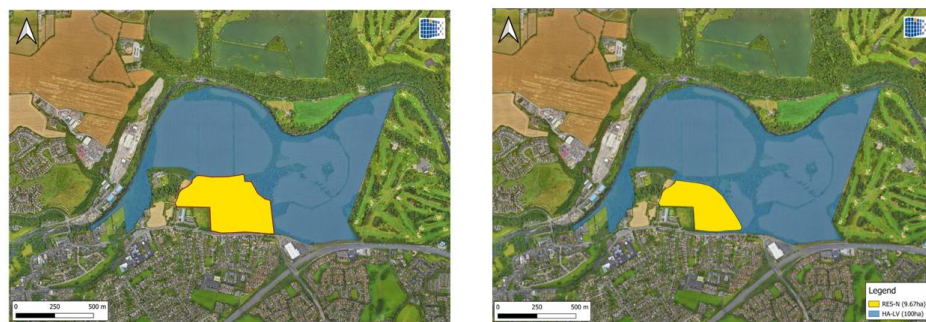


Figure 2 St. Edmundsbury: Reduction in RES-N allocation

The accompanying Specific Local Objective was also strengthened to require, amongst other matters:

- delivery of a substantial public park within the Liffey Valley;
- enhanced public accessibility through the lands;
- protection and enhancement of biodiversity and green infrastructure;
- comprehensive masterplanning;
- detailed transport, landscape, ecological and heritage assessment; and
- appropriate infrastructure planning and phasing prior to the submission of any planning application.

Accordingly, the proposal before the elected members was not one for the comprehensive redevelopment of the St Edmundsbury estate. It comprised a carefully defined residential allocation on a limited part of the landholding, coupled with strengthened environmental safeguards and a comprehensive implementation framework intended to secure significant public benefits alongside future housing delivery.



Figure 3: St Edmundsbury Estate – Total Landholding and Recommended Residential Area

The ownership and delivery characteristics of the lands are also relevant. St. Edmundsbury is owned by two landowners acting on a coordinated basis. This provides a clear implementation framework for the coordinated delivery of housing, parkland, access arrangements, green infrastructure, heritage assets and supporting infrastructure.

As demonstrated by the comparative assessment outlined in Section 7, a number of the other residential sites proposed for rezoning involve multiple ownership interests together with significant infrastructure requirements. That does not suggest those sites are necessarily incapable of delivery. However, coordinated ownership is a positive delivery characteristic which reduces the complexity associated with land assembly and implementation. In the case of St. Edmundsbury, this is complemented by the substantial body of technical and planning work already undertaken in support of the lands, including the preparation of detailed environmental, infrastructure and planning assessments and the ongoing consideration of the adjacent estate through the separate

Strategic Infrastructure Development application relating to St Patrick's Mental Health Services.

The coordinated ownership of the lands, the advanced stage of the technical work and the comprehensive planning framework recommended by the Chief Executive provide a credible basis upon which the residential development, public park, environmental enhancements and associated infrastructure can be planned and delivered together.

These characteristics are particularly relevant having regard to the purpose and timing of Variation No. 2. The Variation was initiated to respond to the revised national housing requirements by identifying additional serviced or serviceable lands capable of contributing to housing delivery during the lifetime of the current Development Plan, while distinguishing those lands from locations intended for longer-term strategic planning. Amendment No. 6 was included among the residential amendments proposed for progression through the current Variation; it was not identified as a future reserve or longer-term study area. Its coordinated ownership, active promotion and advanced planning work therefore directly support the delivery-focused purpose for which Variation No. 2 was undertaken.

Removing Amendment No. 6 would therefore omit from the proposed rezonings a site which had been specifically assessed and recommended as capable of contributing to the immediate housing delivery purpose of the Variation.

3. South Dublin County Development Plan: Variation No. 2

Variation No. 2 was initiated by South Dublin County Council in response to the First Revision of the National Planning Framework, the Housing Growth Requirements Guidelines and the Sustainable Residential Development and Compact Settlements Guidelines. Its purpose was to update the South Dublin County Development Plan so that it could respond to the revised housing requirement and support housing delivery during the lifetime of the current Plan.

The Council's Settlement Capacity Audit estimated that lands already zoned under the adopted Development Plan could deliver approximately 9,613 dwellings by the end of 2028, against a revised housing requirement of 11,699 dwellings. The Council therefore identified a shortfall of approximately 2,000 dwellings and commenced a targeted process to

identify additional lands capable of contributing to housing delivery within the relevant period.

That process was not confined to closing the shortfall. The Housing Growth Requirements Guidelines included a Policy and Objective to include an additional provision of up to 50 per cent above the baseline requirements. The purpose of this was, as set out in the Guidelines, to support choice and delivery *“in light of the urgent need to increase housing delivery and to optimise the ability to deliver on the housing requirements of the Revised NPF”*.

Notably, the requirement to provide an addition 50 per cent represents a 100% increase on the headroom previously required under the “Housing Supply Target Methodology for Development Planning” (2022) Guidelines, where only 20 - 25% headroom was required.

Following the Call for Sites process, the Settlement Capacity Audit, environmental assessment and site by site review, Proposed Variation No. 2 identified approximately 156 hectares of additional residential land with an estimated capacity of 7,324 dwellings.

This increased the stated overall housing capacity of the Development Plan to approximately 16,937 dwellings, equivalent to approximately 44.8 per cent above the baseline housing requirement, and just shy of the 50 per cent envisioned by the guidelines as necessary to ensure the delivery of targets set out in the NPF.



Figure 4 Proposed Variation No. 2: Housing Capacity

The scale of the additional provision is important. It demonstrates that the Council did not approach the Variation as an exercise in identifying the minimum additional area of land necessary to produce a mathematical match with the revised housing requirement. The strategy recognised that zoned capacity does not translate automatically into completed housing and that delivery may be affected by infrastructure programmes, planning processes, environmental constraints,

masterplanning requirements, land ownership, viability and market conditions.

The additional provision therefore provided a range of residential sites with differing characteristics and delivery programmes, reduced reliance on any single location and allowed for the possibility that some nominal capacity would not be realised within the relevant period.

The Council also distinguished between two categories of land:

1. sites capable of contributing to housing delivery during the current Development Plan period; and
2. longer-term strategic locations requiring further planning, infrastructure coordination or consideration through the next statutory plan-making process.

Amendment No. 6, St. Edmundsbury, formed part of the first category. It was included among Amendments 1 to 16 proposed for residential zoning through the current Variation. It was not identified as a strategic residential reserve, a future study area or a location whose consideration should be deferred to the next County Development Plan.

Proposed Variation No. 2 was supported by a substantial evidence base. This included the Call for Sites process, the Settlement Capacity Audit, SEA, AA, SFRA, consideration of servicing and infrastructure, engagement with prescribed bodies and the statutory public consultation process.

The sites ultimately recommended by the Chief Executive were therefore not simply those promoted through the Call for Sites exercise. They were the outcome of a professional planning assessment in which lands were evaluated against the objectives of the Variation, refined where necessary and recommended only where the Planning Authority considered that they could appropriately contribute to the revised housing requirement.

3.1 Planning and Development Act 2024, as amended

The position should also be viewed in the context of the transition to the Planning and Development Act 2024, as amended. Proposed Variation No. 2 has been prepared against the background of significant changes to the statutory development plan process and will inform the residential land strategy of the current South Dublin County Development Plan until that Plan is replaced in accordance with the new legislative framework. This reinforces the importance of ensuring that the residential rezonings progressed through the Variation provide a robust, deliverable and resilient basis for housing delivery over the remaining lifetime of the current Development Plan and during the transition to the new statutory planning framework.

The South Dublin County Development Plan 2022–2028 was made on 22 June 2022 and came into effect on 3 August 2022. The Planning and Development (Amendment) Act 2026, the Plan is eligible to be extended until 31 August 2030, upon commencement of the relevant provisions, compliance with the applicable Strategic Environmental Assessment and Appropriate Assessment requirements, and either a resolution of the elected members or a direction of the Minister. Accordingly, the residential land strategy established through Variation No. 2 may remain the operative planning framework for a considerably longer period than originally envisaged. This reinforces the importance of ensuring that the strategy is sufficiently robust, flexible and resilient to accommodate uncertainty in housing delivery over the lifetime of the Plan.

4. Amendment No. 6: The Chief Executive's Recommended Planning Response

Proposed Variation No. 2 was informed by statutory consultation, detailed technical assessment, environmental appraisal and consideration of the submissions received. The recommendation ultimately placed before the elected members therefore represented the Planning Authority's own professional planning judgement following completion of that process.

Following consideration of the submissions received, the Chief Executive revised the zoning boundary to align with the Avenue/access road. Within the resulting 14.98 hectare amendment area, 9.67 hectares were recommended for RES-N zoning and 5.31 hectares retained under the HA-LV zoning objective, meaning that approximately 35.4 per cent of the amendment area remained under High Amenity zoning. Importantly, the retained HA-LV lands broadly correspond with the areas identified by the landowners throughout the Call for Sites and Proposed Variation processes as part of the green infrastructure, landscape and open-space framework. The Chief Executive's recommendation therefore refined and formalised an approach that was already embedded in the landowners' submissions.

The recommendation reflected planning balance between the need to identify additional residential lands capable of contributing to housing delivery and the protection of the environmental, landscape and amenity qualities of the wider St Edmundsbury estate.



Figure 5 – Evolution of Amendment No. 6

The accompanying Specific Local Objective linked any future residential development to the coordinated delivery of a substantial public park within the Liffey Valley, enhanced public accessibility, biodiversity enhancement, green infrastructure, comprehensive masterplanning and detailed environmental and transport assessment.

The significance of that recommendation extends beyond the residential zoning itself. It represents the Planning Authority's conclusion that the environmental sensitivities identified during the consultation process did not require the complete omission of the lands from the proposed residential rezonings. Rather, those sensitivities could be appropriately addressed through a combination of a substantially reduced development area, retention of extensive HA-LV lands and a strengthened implementation framework.

Therefore, the consultation process did not demonstrate that residential development was fundamentally incompatible with the proper planning and sustainable development of the area. Instead, it informed a revised planning solution which sought to accommodate a limited residential allocation while securing significant public, environmental and recreational benefits.

The recommendation therefore reflected the outcome of the statutory plan-making process. It incorporated the conclusions of the various environmental assessments, consultation with prescribed bodies,

consideration of the public submissions and the Planning Authority's own assessment of the environmental, servicing, transport and infrastructure characteristics of the lands.

The issue arising now is whether any new planning evidence has emerged which demonstrates that the Chief Executive's refined recommendation no longer represents an appropriate planning response to the objectives of Variation No. 2.

The Material Alterations identify the elected members' reasons for removing Amendment No. 6 from the proposed residential rezonings. Those reasons require careful consideration. However, they also require assessment against the evidence base prepared by the Planning Authority itself, including the Settlement Capacity Audit, the environmental assessments, the consultation responses, the servicing information and the detailed planning analysis and the recommendation of the OPR which informed the Chief Executive's recommendation.

Accordingly, the removal of Amendment No. 6 should not be viewed simply as the omission of one residential site from the proposed rezonings. It represents a departure from the Planning Authority's own recommended planning solution following the completion of the statutory assessment process. The question is therefore whether the evidence now available supports that departure when considered in the context of the objectives of Variation No. 2, the revised housing requirements and the overall residential land strategy.

5. The Elected Members' Decision

The proposed material alteration gives effect to the elected members' decision not to progress a number of sites, including Amendment No. 6. During consideration of Proposed Variation No. 2, Motions 74, 75, 76, 77 and 78 each sought to retain the existing HA-LV zoning and to set aside the Chief Executive's recommendation for a limited area of residential zoning. Separate motions proposed additional Specific Local Objectives concerning parking provision, Part V housing and restrictions on bulk purchase in the event that residential zoning proceeded.

The reasons advanced in support of retaining the existing zoning were broadly consistent. They referred to the landscape and visual amenity value of the Liffey Valley, biodiversity and ecological connectivity, the function of the lands within the wider green infrastructure network, climate resilience, proximity to the Liffey Valley Special Amenity Area and proposed Natural Heritage Area, the continued appropriateness of the HA-LV zoning objective, the perceived availability of alternative residential

lands, the incomplete build-out of Adamstown and Clonburris, and concerns regarding access and the capacity of the surrounding road network.

These are legitimate planning considerations. They are also precisely the matters that the Chief Executive was required to assess in determining whether, and in what form, Amendment No. 6 should proceed. The central issue is therefore not whether the concerns were relevant, but whether they justify setting aside a recommendation that had already substantially modified the site to respond to these very same concerns.

The proposal considered by the elected members was not the original Call for Sites proposal. It was the Planning Authority's own revised planning response following statutory consultation, environmental assessment and detailed technical review. The Chief Executive expressly acknowledged the sensitivity of the wider estate and revised the proposal by limiting the RES-N zoning to 9.67 hectares, retaining 5.31 hectares within the amendment boundary under HA-LV zoning, reducing the associated residential capacity and materially strengthening the Specific Local Objective. The retained HA-LV area broadly corresponded with the lands consistently identified by the landowners as forming part of the green infrastructure, landscape and open-space framework. The recommendation therefore represented a materially refined and more restrictive planning framework, not an endorsement of unrestricted residential development.

The consultation process had already resulted in a substantive planning response. The residential area was limited, extensive landscape protections were retained, and residential development was made dependent upon the prior or tandem delivery of a substantial public park, comprehensive masterplanning, public access, ecological assessment, landscape and heritage protection, transport assessment and coordinated infrastructure. The Chief Executive's recommendation was therefore the mechanism through which the concerns raised during consultation were to be addressed. In so doing, the recommendation advised adopting a proposed variation to the development plan that would be materially consistent with the housing requirements set out in the NPF, First Revision, and that would be cognisant of and in alignment with the implementing Guidelines.

Motion 76 expressly acknowledged that the Chief Executive had reduced both the extent of the lands proposed for residential zoning and the associated development capacity in recognition of the sensitivity of the site. It nevertheless concluded that the existing zoning should be retained, primarily on the basis of the environmental and amenity value of the

lands and the asserted availability of alternative sites to accommodate housing growth. The motion did not identify a defect in the technical evidence supporting the revised boundary or explain why the strengthened SLO was incapable of protecting the interests relied upon.

Motion 77 characterised the proposed rezoning as premature having regard to the incomplete build-out of Adamstown and Clonburris, disproportionate in the context of the revised National Planning Framework and unduly burdensome upon Lucan. It also referred to green infrastructure, biodiversity, heritage, access and road capacity. Those concerns had, however, already been considered in the Chief Executive's assessment. The Chief Executive concluded that zoning did not equate to immediate development and that the masterplanning, phasing, environmental and transport requirements contained in the SLO provided the appropriate plan led mechanism through which those matters could be addressed.

The motions therefore represent a different planning judgement, but they do not identify materially new technical evidence. They do not point to a revised transport assessment, ecological assessment, landscape assessment, servicing assessment, flood risk assessment or infrastructure assessment concluding that the Chief Executive's refined recommendation was unsound. Nor do they demonstrate why the safeguards embedded in the reduced boundary and strengthened SLO were incapable of addressing the concerns relied upon.

The motions also do not provide an alternative means of securing the public benefits embedded in the Chief Executive's recommendation. Retention of the existing zoning does not, of itself, deliver the proposed public park, improve public access to the Liffey Valley, provide a coordinated landscape and biodiversity management framework, secure heritage measures or establish a masterplanned basis for infrastructure delivery. The decision therefore removes not only the residential allocation but also the principal planning mechanism through which those wider environmental, recreational and public-access benefits were intended to be delivered on privately owned lands.

The proposition that alternative residential lands are available also requires closer examination. The elected members' decision removed St Edmundsbury, Finnstown Castle and Coldcut Road from the Chief Executive's recommended strategy and introduced Cornerpark and Elmcaster Court at material-alteration stage. Even taking those newly introduced sites into account, the Planning Authority's published residential capacity is reduced by approximately 1,675 dwellings (9.9 per cent), while the level of additional provision above the identified housing

requirement falls from approximately 44.8 per cent to approximately 30.5 per cent, representing a reduction of approximately 14.3 percentage points.

Moreover, the comparative assessment in Appendix B demonstrates that a significant proportion of the retained capacity is subject to major transport, infrastructure, masterplanning, ownership and sequencing requirements. The existence of theoretical capacity elsewhere does not therefore establish that the sites are equivalent in planning, delivery or implementation terms delivery or implementation terms, and calls into question the consistency of the material alteration with the Revised NPF and its ability to meet with the housing targets set out in same.

In this regard, the prematurity argument also sits uneasily with the stated purpose of Variation No. 2. The Variation was initiated because the existing zoned-land strategy, assessed on a business-as-usual basis, did not provide sufficient capacity to meet the revised housing requirement. It was intended to broaden the range of residential opportunities and provide resilience against uncertainty in delivery. Requiring the completion of Adamstown and Clonburris before additional suitable lands can be zoned would undermine that purpose and reintroduce the very concentration of delivery risk that the Variation was designed to address.

5.1 Comparative Assessment of the Elected Members' Decisions

The treatment of Amendment No. 6 must be considered in the context of the entire material alteration, including the other residential rezonings, that arose from the elected members' decision. Across the Variation, significant transport, infrastructure, environmental, ownership and sequencing constraints were generally addressed through amended Specific Local Objectives, masterplanning requirements, phasing measures and development preconditions rather than by removing the zoning itself. The table below summarises the outcome for each site and illustrates the differing degree of intervention applied by the elected members.

The comparison demonstrates that the elected members generally accepted that significant delivery constraints could be managed through plan-led mechanisms. Adamstown SDZ West and Tubber Lane North were retained notwithstanding express dependencies on DART+ Southwest, comprehensive infrastructure masterplanning and other substantial preconditions. Ballynakelly, Citywest, Edmondstown Road, Knockmeenagh and Liffey Valley MRC were similarly retained subject to

major public infrastructure, environmental, community or agency coordination requirements.

By contrast, St Edmundsbury, Finnstown Castle and Coldcut Road were removed in full. In the case of St Edmundsbury, this occurred notwithstanding the defined residential boundary, coordinated ownership, advanced technical evidence and comprehensive SLO already recommended by the Chief Executive. The comparative issue is therefore not whether St Edmundsbury required safeguards, but why safeguards considered sufficient to manage substantial constraints elsewhere were treated as inadequate in this instance.

Table 1 Comparative Planning Outcomes Following the Elected Members' Decisions

Site	Indicative yield	Elected members' treatment / degree of pushback	Planning implications
Ballynakelly, Newcastle	350	Strong qualification zoning retained. The members did not reject the principle of residential development; instead, they imposed a substantial masterplanning and public-infrastructure framework.	Masterplan required before an application; minimum 2 ha public park in tandem with or prior to development; 3 ha secondary-school reservation; active-travel links; early reuse of the unfinished structure. Up to 5 ha is committed to the park and school before roads, other open space and infrastructure are considered.
Adamstown SDZ West	2,390	Very strong delivery restriction, but zoning retained. The response was to defer significant development until strategic rail infrastructure is operational rather than remove the zoning.	No significant residential development until DART+ Southwest is operational; infrastructure masterplan and Uisce Éireann agreement; comprehensive masterplan; transport, social-infrastructure, open-space and education assessments; reservation for a future railway bridge.

Finnstown Castle	1,017	Residential zoning rejected.	Amendment omitted in full. No alternative SLO or reduced zoning framework was retained.
Tubber Lane North	238	Very strong delivery restriction, but zoning retained. The members accepted residential zoning notwithstanding major rail, park, infrastructure and ownership dependencies.	Development may not commence until DART+ Southwest has commenced construction or an equivalent service is operational and Tobermaclugg Park has commenced. Infrastructure and site masterplans, Uisce Éireann agreement, high-capacity public-transport access and social, educational and open-space assessments are also required.
Citywest	625	Strong qualification, but zoning retained. Environmental, transport, drainage and community-facility concerns were addressed through an expanded SLO rather than deletion.	Masterplan, Ecological Impact Assessment, Transport and Traffic Assessment, active-travel link, site-specific FRA, nature-based drainage measures and a community centre or sports hall of approximately 1,500 sq m.
St Edmundsbury	464	Residential zoning rejected.	Amendment omitted in full. No alternative SLO or reduced zoning framework was retained.
Edmondstown Road	635	Strong qualification, but zoning retained. Concerns regarding roads, public transport, heritage and the adjoining golf course resulted in additional safeguards, not removal.	Local centre; Design Statement addressing the Protected Structure; hedgerow protection; road and public-transport upgrades in advance of occupation; agreement with the NTA; protection of the amenity and

			function of Edmondstown Golf Course.
Kiltipper Road	235	Zoning retained.	Principal additional intervention concerned tenure and bulk purchase.
Knockmeenagh Framework Site	404	Moderate to strong qualification, but zoning retained. Multiple ownership and transport coordination were addressed through phasing and agency agreement rather than rejection.	Phasing and Delivery Plan before an application; integration with adjoining lands; transport and movement plan prepared with landowners and agreed with TII and the NTA; investigation of sports infrastructure.
Stonewall	138	Zoning retained with a tenure-related SLO.	Bulk-purchase restriction; site remains within the wider Adamstown implementation context.
Coldcut Road	234	Residential zoning rejected.	Amendment omitted in full.
Cherryfield Way	165	Zoning retained. additional intervention related principally to bulk purchase.	Additional intervention related principally to bulk purchase.
Rathcoole	69	Zoning retained following removal of the reserve designation, with a tenure-related SLO.	Bulk-purchase restriction added.
Foxhunter	57	Moderate qualification, but zoning retained. Access and national-road concerns were addressed through an SLO rather than rejection.	Any application must address vehicular access, adjoining residential amenity and protection of the national road network.
Ninth Lock Road	24	Small urban infill allocation retained;	Bulk-purchase restriction added.

		principal intervention related to tenure.	
Liffey Valley MRC	Approx. 1,083	Strong policy and implementation qualification, but zoning principle retained. Motions sought controls relating to schools, parking, community facilities, public open space and tenure rather than removal of residential potential.	Evidence of school capacity; efficient basement or undercroft parking where feasible; protection of land for public open space, active travel, community facilities and biodiversity; multi-purpose community centre. Final yield depends upon the balance with existing and future commercial and retail uses.
Cornerpark, Newcastle	Approx. 217	New site introduced by motion. The members accepted the principle of residential zoning but imposed an absolute masterplanning precondition linked to sports provision.	No development may commence until a masterplan is agreed integrating up to approximately 2 ha for a pitch, clubhouse and training facilities.
Elmcastle Court, Kilnamanagh	Approx. 2	New site introduced by motion with limited qualification.	Small infill area rezoned from Open Space to Residential; no site-specific enabling-infrastructure requirement in the published Material Alterations.

Approximately 2,628 homes at Adamstown SDZ West and Tubber Lane North are expressly linked to the delivery of DART+ Southwest. Of these, approximately 2,390 homes are subject to the more stringent requirement that the rail service be operational, while a further 238 homes cannot commence until construction of the railway has begun. The timing of delivery for a significant proportion of the retained residential capacity therefore depends upon the implementation of strategic transport infrastructure outside the control of the relevant landowners.

As shown in the following table, approximately 4,642 dwellings, representing approximately 30.4 per cent of the 15,262 dwelling capacity

identified in the Proposed Material Alterations, are associated with strategic transport infrastructure, comprehensive masterplanning, multi-party coordination or other major enabling works. This illustrates the extent to which delivery of the retained housing strategy relies upon significant external infrastructure and implementation requirements.

Table 2 Capacity subject to strategic infrastructure triggers

Category	Homes
DART+ Southwest operational	2,390
DART+ Southwest construction commenced	238
Masterplan + major infrastructure	350
Multi-owner / TII / NTA coordination	404
Mixed-use framework dependency	1,083

The Chief Executive must now report on the submissions received in relation to the Proposed Material Alterations. That assessment should extend beyond recording the level of support for or opposition to the elected members' decision. It should consider whether the reasons advanced in the motions are supported by new or materially different technical evidence; whether the reduced boundary and strengthened SLO remain capable of addressing the identified planning concerns; whether the public park, access, environmental and heritage objectives can otherwise be secured; and whether the amended set of residential rezonings continues to provide the capacity, flexibility and implementation resilience necessary to fulfil the purpose of Variation No. 2.

The following sections examine those matters in turn, including the implications of the Proposed Material Alterations for housing capacity and delivery, the comparative characteristics of the residential sites, the recommendation of the Office of the Planning Regulator, the planning and procedural issues arising from Cornerpark and Elmcastle Court, and the continuing technical and environmental basis for Amendment No. 6.

6. Implications for the Housing Strategy

Variation No. 2 was required by the NPF, first Revision, and was intended to provide South Dublin County with a sufficient supply of serviced and serviceable residential lands capable of contributing to housing delivery during the lifetime of the current Development Plan. It was not conceived as an exercise in identifying the minimum amount of additional land necessary to satisfy a numerical housing target. Rather, it sought to establish a robust and deliverable strategy capable of responding to the practical realities of housing delivery.

The Chief Executive's recommendation reflected that approach. Following the Call for Sites process, detailed technical assessment and statutory consultation, the Planning Authority recommended a range of residential sites with differing characteristics, capacities and delivery programmes. Collectively, the proposed rezonings increased the estimated housing capacity to 2028 from approximately 9,613 dwellings to approximately 16,937 dwellings, representing additional provision of approximately 44.8 per cent above the baseline housing requirement. The Council's Settlement Capacity Audit confirms that the 9,613 figure represented forecast delivery from existing zoned lands to 2028, against a baseline requirement of 11,699 dwellings.

The proposed variation prepared by the Chief Executive would have resulted in a Development Plan that was materially consistent with the requirements of the NPF and does not depart from the implementing guidelines. Likewise, and as addressed below, the proposed variation as set out by the chief executive also received the full endorsement of the OPR, evidenced by their recommendation to progress all identified sites.

The Proposed Material Alterations materially alter that position. The Planning Authority's published figures record a reduction in additional zoned land capacity from approximately 7,324 dwellings to 5,649 dwellings, and a corresponding reduction in aggregate housing capacity from approximately 16,937 dwellings to 15,262 dwellings. This represents a reduction of approximately 1,675 dwellings and reduces additional provision above the baseline housing requirement from approximately 44.8 per cent to approximately 30.5 per cent.²

² The figures of 16,937 and 15,262 dwellings are the aggregate housing-capacity figures published by South Dublin County Council. Based on the individual site yields identified in Appendix B, the removal of St Edmundsbury, Finnstown Castle and Coldcut Road and the introduction of Cornerpark and Elmcastle Court produce an estimated net site level reduction of approximately 1,496 dwellings. The published aggregate

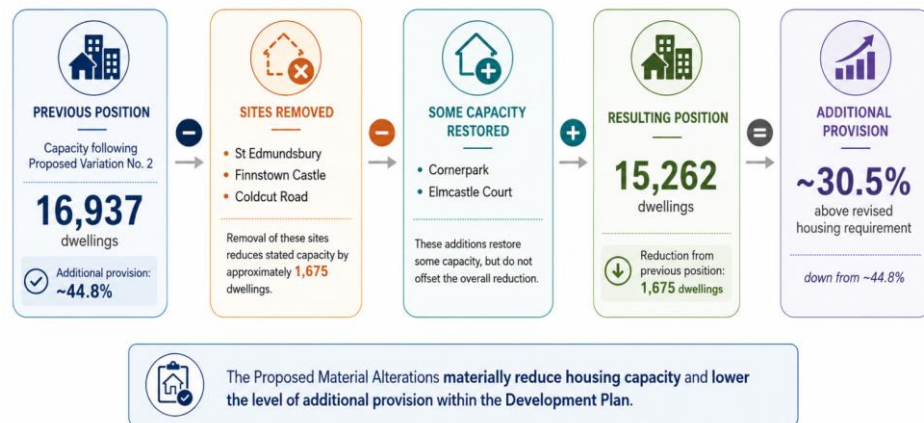


Figure 6 Impact of Proposed Material Alterations

The significance of this change extends beyond the reduction in dwelling numbers. The Housing Growth Requirements Guidelines recognise that housing capacity should not be viewed solely as a mathematical exercise. Additional provision is intended to provide flexibility, choice and resilience, recognising that not all sites will progress at the same rate or deliver their theoretical capacity within the relevant plan period. Infrastructure constraints, environmental requirements, market conditions, ownership structures, masterplanning and development management processes all influence delivery.

Consequently, the question arising from the Proposed Material Alterations is not simply whether the amended strategy continues to exceed the baseline housing requirement. It is whether the revised set of residential rezonings continues to provide the degree of flexibility and delivery resilience that the Planning Authority originally considered appropriate in responding to the revised National Planning Framework.

That question becomes particularly important when regard is had to the characteristics of the remaining sites. As demonstrated in the comparative assessment contained in Appendix B, many of the retained residential sites are subject to comprehensive masterplanning, significant infrastructure requirements, Specific Local Objectives and the delivery of schools, parks, community facilities and strategic transport infrastructure. These are appropriate planning requirements. They also demonstrate that housing delivery across the County will not occur simultaneously or at a uniform rate.

reduction of 1,675 dwellings reflects the Planning Authority's wider Core Strategy methodology and associated capacity refinements, which are not fully disaggregated on a site-by-site basis in the published documentation.

The comparative assessment also illustrates the importance of distinguishing between gross site area and realistic net developable area. The Sustainable Residential Development and Compact Settlements Guidelines recognise that a significant proportion of larger sites may be required for roads, parks, schools, community infrastructure, environmental mitigation and other non-residential uses. The Council's Settlement Capacity Audit similarly confirms that net developable-area assumptions exclude land required for strategic open space, ecological considerations, flood risk, link routes, schools and utilities.

As the number of residential sites proposed for rezoning is reduced, the housing strategy becomes more reliant upon the capacity assumptions and delivery programmes associated with the remaining allocations. The removal of strategically located sites such as St Edmundsbury reduces the flexibility originally built into the strategy and increases reliance upon the timely progression of sites subject to substantial infrastructure, masterplanning and implementation requirements.

It is important to emphasise that this submission does not suggest that the retained sites are unsuitable or incapable of delivery. On the contrary, each has an important role to play in meeting South Dublin's housing needs. The issue is whether the removal of three residential rezonings, together with the introduction of two materially different sites, results in a strategy that provides the same degree of robustness and implementation resilience as that recommended by the Chief Executive.

That question is considered further in the comparative assessment set out in the following section.

7. Comparative Analysis

The Comparative Assessment in Appendix B examines the planning and delivery characteristics of the sites proposed for rezoning in order to consider whether the amended suite of residential rezonings continues to provide the level of robustness, flexibility and deliverability originally envisaged through Variation No. 2.

The assessment has been prepared using the information contained within Proposed Variation No. 2, the Chief Executive's Report, the Proposed Material Alterations and the accompanying environmental assessments. Each site has been reviewed against a consistent range of planning considerations, including estimated housing capacity, ownership, masterplanning requirements, Specific Local Objectives, strategic infrastructure dependencies, servicing, environmental

constraints and the principal implementation measures identified by the Planning Authority.

The aggregate housing capacity figures referred to throughout this report (16,937 dwellings under Proposed Variation No. 2 and 15,262 dwellings following the Proposed Material Alterations) are those published by the Planning Authority as part of the revised Core Strategy. The individual site capacities presented in this appendix have been compiled from the Planning Authority's published documentation together with the comparative assessment undertaken for the purposes of this report. As the Planning Authority's published aggregate figures reflect wider Core Strategy calculations and refinement of development assumptions, the individual site estimates in this appendix should not be interpreted as a recalculation of the Planning Authority's overall housing land budget.

The following is a summary of our findings.

Table 3 Comparative Delivery Characteristics of the Proposed Residential Rezonings

Ref.	Site	Indicative housing yield	No. of Owners	Delivery requirements
1	Ballynakelly, Newcastle	350	2	Masterplan required before a residential application; minimum 2 ha public park in tandem with or prior to development; 3 ha secondary-school reservation; active-travel links; early reuse of the unfinished structure for an appropriate use. The park and school requirements together account for up to 5 ha before other roads, open space and infrastructure are considered.

2	Adamstown SDZ West	2,390	1	No significant residential development until DART+ Southwest, or an equivalent rail service, is operational. Infrastructure masterplan, Uisce Éireann agreement, comprehensive masterplan, Transport and Traffic Assessment, Social Infrastructure Audit, Public Open Space Audit, educational-capacity assessment and reservation for a future bridge over the railway are required.
3	Finnstown Castle	1,017	3	Residential zoning removed. The site represented a substantial element of the capacity recommended by the Chief Executive.
4	Tubber Lane North	238	4	Development may not commence until DART+ Southwest has commenced construction or an equivalent service is operational, and until Tobermaclugg Park has commenced construction. An infrastructure masterplan, Uisce Éireann agreement, comprehensive masterplan, high-

				capacity public-transport solution and social, educational and open-space assessments are also required.
5	Citywest	625	1	Masterplan, Ecological Impact Assessment, Transport and Traffic Assessment, direct active-travel link, site-specific FRA, surface-water strategy and a community centre or sports hall of approximately 1,500 sq m are required.
6	St Edmundsbury	464	2	Residential zoning removed through MA6.1. The Chief Executive had fixed a defined 9.67 ha residential area following consultation and linked development to comprehensive masterplanning, park delivery, public access, biodiversity and green infrastructure, heritage protection and supporting infrastructure. Extensive technical work has already been completed.
7	Edmondstown Road	635	Not established in Appendix B	Local centre, Design Statement addressing the Protected Structure,

				hedgerow protection and road and public-transport upgrades are required. Necessary public-transport improvements must be delivered in advance of occupation and agreed with the NTA.
8	Kiltipper Road	235	1 owner	The Material Alterations add the restriction on bulk purchase but no additional site-specific transport or masterplanning prerequisite.
9	Knockmeenagh Framework Site	404	6 owners	Phasing and Delivery Plan required before an application; integration with adjoining lands; transport and movement plan prepared with the landowners and agreed with TII and the NTA; sports-infrastructure investigation.
10	Stonewall	138	1 owner	The Material Alterations add a bulk-purchase restriction. The lands remain within the wider Adamstown implementation context.
11	Coldcut Road	234	2 owners	Residential zoning removed.

12	Cherryfield Way	165	2 owners	The Material Alterations add a bulk-purchase restriction but no further site-specific transport or masterplanning prerequisite.
13	Rathcoole	69	1 owner	A bulk-purchase restriction is added.
14	Foxhunter	57	2 owners	Any application must address vehicular access, adjoining residential amenity and protection of the national road network.
15	Ninth Lock Road	24	1 owner	Small urban infill allocation; the Material Alteration adds a bulk-purchase restriction.
16	Liffey Valley MRC	Approx. 1,083	Multiple commercial ownership interests	Evidence of school capacity, efficient parking arrangements, public open space, active travel, community facilities and a multi-purpose community centre are required. The stated capacity is significant, but the eventual residential yield depends on the balance with existing and future retail, commercial and community uses.
N/A	Cornerpark, Newcastle	Approx. 217	1	New residential site introduced at material-alteration stage. No

				development may commence until a masterplan is agreed integrating up to approximately 2 ha of the residentially zoned land to provide a sports facility, pitch, clubhouse and training pitches.
N/A	Elmcastle Court, Kilnamanagh	Approx. 2	1	New residential site introduced at material-alteration stage. Small infill area rezoned from Open Space to Residential, with no specific enabling-infrastructure requirement in the Material Alterations text.

*Subject to the Planning Authority's estimated capacity.

Several important matters emerge from the analysis. First, the Planning Authority clearly assembled a residential land strategy comprising sites with different characteristics, capacities and delivery programmes. The strategy was not dependent upon every site progressing simultaneously or delivering its stated capacity within the same timeframe. Rather, it reflected the practical reality that strategic residential sites progress at different rates depending upon infrastructure delivery, environmental assessment, planning processes, market conditions, ownership and implementation.

Secondly, the assessment demonstrates that comprehensive masterplanning, Specific Local Objectives and significant enabling infrastructure are common characteristics across many of the proposed rezonings. A number of the larger allocations are linked to the preparation of comprehensive masterplans, the delivery of schools, strategic parks, community facilities and transport infrastructure before substantial housing development can proceed. Other sites are expressly dependent upon strategic transport interventions, including passenger rail services, infrastructure masterplans or wider area infrastructure delivery. These

requirements reflect good planning practice. They also demonstrate that Variation No. 2 was prepared on the basis that housing delivery would occur through a range of sites with differing implementation pathways rather than through a small number of immediately deliverable allocations.

The scale of those dependencies is significant. Adamstown SDZ West and Tubber Lane North have a combined capacity of approximately 2,628 dwellings. Both are linked to DART+ Southwest or an equivalent rail service and require infrastructure and site masterplans. Tubber Lane North is also dependent upon the commencement of Tobermaclugg Park. A further 635 dwellings at Edmondstown Road are linked to road and public transport improvements required in advance of occupation. Knockmeenagh, with a stated capacity of approximately 404 dwellings, extends across six ownership interests and requires a Phasing and Delivery Plan and a transport and movement plan agreed with TII and the NTA. Ballynakelly and Citywest, with a combined stated capacity of approximately 975 dwellings, are subject to substantial masterplanning, park, school, community, environmental and infrastructure requirements.

Collectively, these allocations account for approximately 4,642 dwellings. The delivery of almost one-third of the housing capacity proposed under Variation No. 2 is therefore contingent upon major transport infrastructure, strategic masterplanning, public facility provision or multi-party landowner coordination. This illustrates why the Variation No. 2 incorporated a broad range of residential opportunities and why reducing that portfolio inevitably increases reliance on the successful and timely delivery of the remaining allocations.

Thirdly, the assessment demonstrates that the use of Specific Local Objectives is not unique to St. Edmundsbury. Similar mechanisms have been applied throughout the proposed rezonings to secure coordinated development, strategic infrastructure, environmental protection and high-quality place-making. The presence of a comprehensive SLO at St. Edmundsbury therefore reflects the Planning Authority's broader approach to managing growth rather than a characteristic unique to Amendment No. 6.

The assessment also highlights the importance of realistic assumptions regarding housing capacity. The Sustainable Residential Development and Compact Settlements Guidelines distinguish between gross site area and net developable area, recognising that larger sites must accommodate roads, schools, parks, community infrastructure, environmental mitigation and other non-residential uses. The Office of the Planning Regulator has similarly emphasised that assumptions regarding net

developable area should be evidence based and should reflect the particular characteristics of individual sites. This is especially relevant where strategic allocations are required to accommodate significant public infrastructure or environmental protection measures. In such circumstances, the practical residential yield available from a site may differ materially from broad gross-area estimates.

This issue assumes greater significance as the number of proposed residential rezonings is reduced. The removal of sites from the strategy increases reliance upon the timely delivery of the remaining allocations and upon the assumptions underpinning their stated capacity. The purpose of the additional provision incorporated within Variation No. 2 was to provide resilience against those uncertainties and to avoid over-reliance on any single site, ownership grouping or infrastructure programme.

St. Edmundsbury should be considered in this context. Unlike a number of the other proposed rezonings, the Chief Executive's recommendation did not rely upon a broad Call for Sites estimate. Following statutory consultation and detailed technical assessment, the Planning Authority identified a defined residential area of 9.67 hectares together with an estimated capacity of approximately 464 dwellings. The recommendation was accompanied by a comprehensive Specific Local Objective requiring the coordinated delivery of a substantial public park, enhanced public access, biodiversity and green infrastructure measures, heritage protection, comprehensive masterplanning and supporting infrastructure.

The coordinated ownership of the lands is also a positive implementation characteristic. The wider estate and the proposed residential lands are controlled by two landowners acting together through a single planning strategy. Appendix B demonstrates that a number of other allocations involve greater numbers of ownership interests, including four owners at Tubber Lane North and six at Knockmeenagh. That does not mean that those sites are incapable of delivery. It does, however, introduce an additional coordination requirement which may affect timing, phasing and certainty of implementation. In contrast, the ownership structure at St Edmundsbury reduces land assembly risk and provides a clear basis for coordinating housing, parkland, access, green infrastructure, heritage and supporting infrastructure within a single framework.

Importantly, the planning framework for St. Edmundsbury is also relatively advanced. As demonstrated in Appendix A, substantial work has already been undertaken in relation to planning strategy, landscape, ecology, transport, servicing and environmental assessment. In addition,

the adjacent land is currently the subject of detailed planning and technical consideration through the separate Strategic Infrastructure Development application relating to St Patrick's Mental Health Services. While that application must be considered on its own merits, it nevertheless demonstrates that the wider planning context, transport considerations and environmental characteristics of the estate are already the subject of detailed professional assessment.



Figure 7 St. Patricks Strategic Infrastructure Development Application

The comparative assessment does not conclude that St. Edmundsbury is more important than any other proposed rezoning, nor does it suggest that the remaining sites are incapable of delivery. Rather, it demonstrates that the Planning Authority intentionally identified a range of residential sites with differing scales, ownership structures, infrastructure requirements and delivery programmes. That diversity formed an important part of the housing strategy recommended by the Chief Executive.

Accordingly, the removal of Amendment No. 6 should not be viewed solely as the loss of approximately 464 dwellings. It also removes one of the sites specifically assessed, refined and recommended by the Planning Authority, with a defined residential area, coordinated ownership, confirmed servicing feasibility and an advanced technical evidence base. In doing so, it reduces the breadth of the proposed residential rezonings and increases reliance upon the timely delivery of a smaller number of allocations, several of which are subject to substantial transport,

infrastructure, ownership and sequencing requirements. The implications of that conclusion are reinforced by the recommendation of the Office of the Planning Regulator, considered in the following section.

8. Office of the Planning Regulator (OPR)

"The OPR considers the progression of Amendments 1–16 to be vital to housing delivery during the current Development Plan period."

In its submission on Proposed Variation No. 2, the OPR welcomed the Council's response to the revised housing requirements arising from the First Revision of the National Planning Framework and the Housing Growth Requirements Guidelines. In particular, the OPR supported the progression of Amendments 1 to 16, describing those residential amendments as "vital" to supporting housing delivery during the lifetime of the current Development Plan. The Chief Executive accepted that recommendation and recommended that the residential amendments proceed.

The importance of that observation should not be understated. The OPR's recommendation was directed towards the residential strategy as a whole following completion of the Planning Authority's technical assessment. It was made in the context of the range of residential sites identified through Proposed Variation No. 2, the level of additional housing provision recommended by the Chief Executive and the Planning Authority's assessment of servicing, environmental capacity and deliverability.

The Proposed Material Alterations materially change that strategy. Three of the residential rezonings supported by the Chief Executive have been removed and two alternative sites introduced. The question that arises is does the Variation continue to satisfy the basis upon which the OPR concluded that the residential amendments were vital to achieving the objectives of Variation No. 2.

The OPR's wider guidance on housing capacity is also relevant. In recent observations on development plans and variations, the OPR has consistently emphasised the importance of applying realistic assumptions regarding net developable area and avoiding undue reliance on upper-end capacity estimates where sites are subject to significant infrastructure, environmental or place-making requirements. The OPR has also encouraged planning authorities to ensure that sufficient flexibility exists within residential land strategies to accommodate the normal uncertainties associated with implementation.

Those observations reflect the same planning principle which underpins the Housing Growth Requirements Guidelines. Housing strategies should not be assessed solely by reference to theoretical dwelling capacity. They should also be assessed by reference to deliverability, implementation resilience and the availability of a sufficiently broad range of residential opportunities capable of contributing to housing delivery over the lifetime of the Development Plan.

The comparative assessment contained in Appendix B demonstrates why those considerations remain important in the context of Variation No. 2. A number of the retained residential allocations are subject to significant masterplanning, infrastructure delivery and environmental requirements before substantial housing development can occur. Those planning requirements are appropriate. However, they also reinforce the rationale for maintaining a sufficiently resilient range of residential sites rather than relying upon a smaller number of strategic allocations progressing in accordance with optimistic implementation assumptions.

Illustratively, if the practical net developable area achieved across the sites were 65 per cent rather than 80 per cent, the overall residential capacity would reduce by approximately 18.75 per cent. On that basis, the capacity associated with the Chief Executive's recommended strategy would fall from approximately 16,937 to 13,761 dwellings. Relative to the baseline requirement of 11,699 dwellings, the level of additional provision would reduce from approximately 44.8% to approximately 17.6%, a reduction of approximately 27.2 percentage points.

Applying the same illustrative sensitivity to the published Material Alterations would reduce capacity from approximately 15,262 to 12,400 dwellings, leaving additional provision of only approximately 6.0% above the baseline requirement. Without reliance on Cornerpark and Elmcastle Court, additional provision would fall further to approximately 3.3%. This demonstrates how rapidly the apparent margin above the housing requirement can be eroded where higher-end net developable-area assumptions are applied across a reduced range of strategic sites.

Illustratively, if the net developable area achieved across the relevant sites were 65 per cent rather than 80 per cent, the overall residential capacity would reduce by approximately 18.75 per cent. On that basis, the capacity associated with the Chief Executive's recommended strategy, which included St Edmundsbury, Finnstown Castle and Coldcut Road, would fall from approximately 16,937 to 13,761 dwellings. Relative to the baseline requirement of 11,699 dwellings, additional provision would reduce from approximately 44.8 per cent to approximately 17.6 per cent.

Applying the same illustrative sensitivity to the published Material Alterations, under which those three sites are removed but Cornerpark and Elmcastle Court are included, would reduce capacity from approximately 15,262 to 12,400 dwellings, leaving additional provision of approximately 6.0 per cent. If Cornerpark and Elmcastle Court cannot properly be relied upon, capacity would reduce further to approximately 12,080 dwellings, representing additional provision of only approximately 3.3 per cent.

Accordingly, it is respectfully submitted that the Council should consider whether the amended residential land strategy continues to reflect the basis upon which the OPR supported the progression of the residential amendments and whether the removal of Amendment No. 6 is consistent with the implementation focused approach advocated by the OPR.

9. Introduction of Additional Residential Sites

The Proposed Material Alterations introduce two additional residential sites at Cornerpark, Newcastle and Elmcastle Court, Kilnamanagh.

These lands did not form part of the Proposed Variation published by the Chief Executive. Rather, they were introduced through motions of the elected members and now form part of the Proposed Material Alterations. Consequently, they have not formed part of the Planning Authority's recommended residential land strategy since the commencement of the Variation process.

The housing capacity associated with the two additional sites is approximately 219 dwellings. While these lands may make a positive contribution to housing delivery, they do not replace the 1,715 dwellings removed through the omission of St Edmundsbury, Finnstown Castle and Coldcut Road. The amended strategy therefore reflects a net reduction in housing capacity together with a materially different spatial distribution of residential growth.

The reduction in additional provision also warrants consideration in the context of the Housing Growth Requirements Guidelines. Those Guidelines recognise that planning authorities may provide up to 50 per cent additional residential capacity above the baseline housing requirement in order to accommodate uncertainty in delivery, infrastructure constraints, market conditions and implementation risk. The Chief Executive's recommended strategy provided approximately

44.8 per cent additional provision, reflecting that policy approach. Following the Proposed Material Alterations, the Planning Authority's published additional provision reduces to approximately 30.5 per cent.

Furthermore, the exclusion of Cornerpark and Elmcastle Court would reduce the level of additional provision to approximately 27 per cent. This is materially below the level of flexibility originally recommended by the Planning Authority and significantly below the scope for additional provision envisaged by the current Housing Growth Requirements Guidelines. It also approaches the range of additional provision previously contemplated under the Development Plans Guidelines for Planning Authorities (2022), which generally envisaged headroom in the order of 20–25 per cent above the National Planning Framework housing targets. In those circumstances, the Planning Authority should carefully consider whether the revised strategy continues to provide the degree of flexibility and implementation resilience intended by the current national policy framework.

The significance of the additional sites extends beyond dwelling numbers. The issue is not whether Cornerpark or Elmcastle Court are capable of accommodating residential development. The Planning Authority's environmental assessments conclude that, subject to appropriate mitigation and planning safeguards, both sites are capable of being considered for residential zoning. Rather, the relevant question is whether their introduction through the Proposed Material Alterations provides an equivalent planning response to the strategy recommended by the Chief Executive.

That question requires consideration of the differing planning characteristics of the sites.

Cornerpark comprises a significant strategic allocation requiring comprehensive planning and environmental coordination. The Proposed Material Alterations, together with the accompanying environmental assessments, identify a range of matters requiring careful consideration, including the protection and enhancement of green infrastructure, biodiversity, landscape character, sustainable drainage, open space provision and coordinated masterplanning. The site is also accompanied by a comprehensive Specific Local Objective requiring the preparation of an integrated planning framework before development can proceed.

Elmcastle Court is of a different character. It represents a relatively modest urban infill opportunity within an established suburban context. While capable of contributing to housing supply, its scale and planning

function are materially different from the larger strategic sites considered through Variation No. 2.

The additional sites are not direct substitutes for any of the lands removed through the Proposed Material Alterations, and certainly not St. Edmundsbury. They differ in scale, location, environmental context, implementation requirements and their role within the wider residential land strategy.

By comparison, the Chief Executive's recommendation for St Edmundsbury had already progressed well beyond the Call for Sites stage. Following statutory consultation and detailed technical assessment, the Planning Authority identified a defined residential area of 9.67 hectares together with an estimated capacity of approximately 464 dwellings. The recommendation was accompanied by a comprehensive Specific Local Objective securing the coordinated delivery of a substantial public park, enhanced public access, biodiversity and green infrastructure measures, heritage protection, comprehensive masterplanning and supporting infrastructure.

Importantly, St Edmundsbury also benefits from a number of positive implementation characteristics identified elsewhere in this submission. The lands are under coordinated ownership, are being actively promoted, have confirmed feasibility from Uisce Éireann and have been the subject of substantial planning, environmental and technical assessment. As demonstrated in Appendix A, significant work has already been undertaken in relation to landscape, ecology, transport, servicing and planning strategy. The adjacent land is also currently the subject of detailed planning consideration through the Strategic Infrastructure Development application for St Patrick's Mental Health Services, which is examining many of the transport, landscape and environmental considerations relevant to St. Edmundsbury.

The comparison is not advanced to suggest that St Edmundsbury is inherently superior to the additional sites. Rather, it illustrates that the sites perform different functions within the housing strategy and possess different planning and implementation characteristics. The introduction of Cornerpark and Elmcastle Court therefore cannot be regarded simply as replacing the residential capacity removed elsewhere.

The Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment support the inclusion of the additional sites subject to appropriate mitigation. Equally, those assessments continued to evaluate St Edmundsbury, Finnstown Castle and Coldcut Road and did not conclude that those lands were unsuitable for

residential zoning from an environmental or flood risk perspective. The environmental assessments therefore do not identify a technical basis upon which the removal of those sites is required. Instead, they demonstrate that all of the proposed residential rezonings require site-specific mitigation and detailed planning assessment as part of the normal plan-led process.

Accordingly, the introduction of Cornerpark and Elmcastle Court should not be viewed solely as an increase in housing numbers. It represents a change in the composition of the residential land strategy originally recommended by the Chief Executive. It is therefore appropriate that the Council considers whether the amended strategy continues to provide the same level of flexibility, deliverability and implementation resilience as that originally supported by the Planning Authority.

9.1 Procedural Consideration

The introduction of these additional sites also gives rise to an important procedural issue under the statutory plan-making process.

Section 58 of the Planning and Development Act 2024 provides for the making of a modification that constitutes a material alteration of the proposed variation following consideration by the elected members and a further period of public consultation. The statutory language consistently refers to a material alteration of the proposed variation, thereby linking the material alteration back to the proposal originally placed on public display.

Our client is advised that there is a substantial legal argument that this statutory process does not permit the introduction, at material alteration stage, of entirely new residential rezonings relating to lands that were not included within the Proposed Variation originally published by the Planning Authority. This interpretation arises from the language of the Act, which expressly links the material alteration to the proposed variation that has already been the subject of public consultation and assessment by the Chief Executive. An alteration that constitutes the rezoning of a previously unassessed site does not constitute a “modification that constitutes a material alteration of the proposed variation”. Rather such a proposed amendment to a development plan ought more correctly to be subject to the variation procedure set out in section 58 in its own right. It is understood that a number of authorities have concluded that submissions seeking the rezoning of additional lands outside the scope of the published Proposed Variation cannot properly be progressed through the material alteration process.

It is respectfully requested that the Chief Executive in preparing the report required under section 58 address the legitimacy of rezoning additional sites at material alteration stage, or whether such sites fall outside the scope of the proposed variation that is being materially altered. This is particularly important if the additional sites are relied upon to offset the removal of residential lands previously assessed and recommended by the Planning Authority.

Without prejudice to the above, if the Chief Executive concludes that the additional residential sites have been lawfully introduced through the material alteration process, it nevertheless remains necessary to consider whether the amended residential land strategy continues to achieve the objectives for which Variation No. 2 was initiated. As demonstrated throughout this submission, the introduction of Cornerpark and Elmcastle Court does not simply replace the residential capacity removed elsewhere. It introduces sites with different planning characteristics, environmental considerations and implementation pathways while simultaneously reducing the overall housing capacity and level of additional provision originally recommended by the Planning Authority.

If the introduction of new residential lands through the material alteration process is considered to be permissible, the Chief Executive should nevertheless assess whether the resulting residential land strategy remains consistent with the revised National Planning Framework, the Housing Growth Requirements Guidelines, the recommendations of the Office of the Planning Regulator and the Planning Authority's own evidence base.

The legal process within which a variation takes place, and what may and may not constitute a material alteration under that framework, should be expressly addressed by the Chief Executive's report. This is particularly important where the additional sites are relied upon to offset the removal of residential lands previously assessed and recommended by the Planning Authority. Therefore, in such circumstances, it should be considered whether the material alteration in the absence of Cornerpark and Elmcastle Court could produce a varied development plan that is materially consistent with the NPF, and does not depart from the implementing guidelines."

Finally, the Applicant notes that the Office of the Planning Regulator retains statutory powers to issue recommendations or directions where it considers that a development plan or variation is inconsistent with national or regional planning policy or has not been prepared in accordance with the statutory requirements. Having regard to the issues identified above, it is respectfully submitted that the Chief Executive

should expressly consider the statutory implications of the Proposed Material Alterations before making a recommendation to the elected members.

10. The Planning Evidence Support Amendment No. 6

The recommendation to include Amendment No. 6 within Proposed Variation No. 2 was not based upon a single planning consideration. Rather, it reflected a comprehensive assessment of the suitability of the lands having regard to planning policy, serviceability, transport, environmental capacity, flood risk, landscape, biodiversity, public consultation and the ability to secure significant public benefits through a strengthened planning framework.

The Proposed Material Alterations do not introduce any additional technical assessment which concludes that the Chief Executive's refined recommendation is no longer appropriate. The planning evidence prepared in support of Proposed Variation No. 2 therefore remains directly relevant to the Chief Executive's consideration of the submissions received during the current consultation process.

10.1 Serviceability and Deliverability

A central objective of Variation No. 2 was to identify serviced or serviceable lands capable of contributing to housing delivery during the lifetime of the current Development Plan. Amendment No. 6 satisfies that objective.

The lands are actively promoted by the landowners, are under coordinated ownership and form part of a coherent planning strategy. Confirmation of Feasibility has been received from Uisce Éireann confirming that water supply and wastewater infrastructure can be made available, subject to the normal connection process.

Unlike many strategic allocations, the delivery of the residential lands does not depend upon the assembly of fragmented ownership interests before comprehensive planning can commence. The proposed residential area, public park, access arrangements, green infrastructure and supporting infrastructure are capable of being planned and delivered through a single coordinated framework.

The Planning Authority had already progressed beyond a broad Call for Sites assessment. Following statutory consultation and detailed technical review, the Chief Executive identified a defined residential area of 9.67 hectares together with an estimated housing capacity of approximately 464 dwellings. As demonstrated in Appendix A, substantial technical work has already been undertaken in relation to planning strategy, transport, landscape, ecology, servicing and environmental assessment. The wider estate is also currently the subject of detailed technical consideration through the Strategic Infrastructure Development application relating to St Patrick's Mental Health Services. While that application must be considered on its own merits, it nevertheless demonstrates that the planning and environmental context of the wider lands is already well understood.

These are important implementation characteristics. They demonstrate that Amendment No. 6 formed part of the category of serviced or serviceable lands which Variation No. 2 was intended to identify and progress.

10.2 Sustainable Location and Accessibility

The lands adjoin the existing built-up area of Lucan and lie within the Dublin Metropolitan Area. They are located within easy reach of existing schools, neighbourhood services, community facilities and public transport.

The National Transport Authority recognised that the Lucan area benefits from an established network of radial and orbital bus services together with significant planned investment through the Lucan and Liffey Valley Core Bus Corridor schemes. The Chief Executive accepted those observations and retained Amendment No. 6 within the recommended residential rezonings.

Future residential development would remain subject to the normal development management process, including the preparation of a detailed Transport Assessment, Mobility Management Plan and any mitigation measures considered necessary by the Planning Authority. Residential zoning does not predetermine those matters. Rather, it provides the statutory planning framework within which they can be comprehensively assessed and appropriately addressed.

The separate Strategic Infrastructure Development application for St Patrick's Mental Health Services also provides important planning context. That proposal recognises the need for improvement of the Chapel Hill/Lucan Road junction and safeguards land to facilitate that

objective. While the hospital proposal is not advanced as transport infrastructure for residential development, it demonstrates that South Dublin County Council is already considering the coordinated planning of transport infrastructure within adjacent lands. That is entirely consistent with the infrastructure-led approach embodied in the Chief Executive's recommendation.

10.3 Landscape, Green Infrastructure and the SAAO

The environmental and landscape importance of the wider St Edmundsbury estate is fully recognised. Indeed, those considerations fundamentally shaped the Planning Authority's recommendation.

Approximately 61 hectares of the wider estate lie within the Liffey Valley Special Amenity Area Order. Those lands were not proposed for residential development and remain subject to the statutory protections afforded by the Order irrespective of the zoning objectives contained within the Development Plan.

Rather than recommending residential zoning across the wider estate, the Chief Executive substantially reduced the proposed residential area, retained extensive HA-LV lands and significantly strengthened the accompanying Specific Local Objective. The recommendation therefore sought to achieve a balanced planning outcome whereby limited residential development could facilitate the coordinated delivery of a substantial public park, enhanced public access, biodiversity enhancement, green infrastructure, heritage protection and comprehensive masterplanning.

The planning choice before the elected members was not between development and environmental protection. It was between retaining the Planning Authority's integrated planning framework or removing Amendment No. 6 altogether.

Retaining the existing HA-LV zoning alone does not secure the delivery of the public park, improved public access, coordinated habitat management or long-term environmental stewardship envisaged by the Chief Executive. The strengthened Specific Local Objective provides the planning mechanism through which those public benefits can be secured alongside carefully managed residential development.

The approach adopted by the Chief Executive is also consistent with the wider planning context. The Strategic Infrastructure Development proposal for St Patrick's Mental Health Services demonstrates that development within the adjoining lands is capable of being considered

through a plan led process which responds to landscape, heritage, ecology and transport constraints through appropriate assessment, mitigation and design. The principle underpinning both proposals is the same: environmental sensitivity does not preclude development, but requires that it be carefully planned, comprehensively assessed and appropriately managed.

10.4 Flood Risk

The Strategic Flood Risk Assessment reaches a clear conclusion in relation to Amendment No. 6. The proposed residential lands are located within Flood Zone C.

There are no known watercourses within the proposed residential area and the River Liffey lies approximately 250 metres to the north. The Strategic Flood Risk Assessment concludes that residential zoning is appropriate and that no Justification Test is required.

Flood risk therefore does not provide a technical basis for removing Amendment No. 6.

Importantly, the same assessment concludes that Finnstown Castle and Coldcut Road are also appropriate for residential zoning from a flood risk perspective. The Strategic Flood Risk Assessment therefore does not identify flood risk as a reason for the omission of those sites from the proposed residential rezonings.

10.5 Public Consultation

The level of public interest in Amendment No. 6 is acknowledged. A significant number of submissions were received during the consultation process raising concerns relating principally to traffic, infrastructure, schools, landscape, biodiversity, flood risk, green infrastructure and the cumulative scale of development in the Lucan area.

Those matters were carefully considered by the Planning Authority. They directly informed the Chief Executive's recommendation and resulted in a materially different proposal to that originally promoted through the Call for Sites process. The residential area was substantially reduced, the estimated housing capacity lowered, extensive HA-LV lands retained, and the Specific Local Objective significantly strengthened.

The consultation process therefore achieved its intended purpose. It did not demonstrate that residential development was fundamentally incompatible with the proper planning and sustainable development of

the area. Rather, it informed a revised planning framework which sought to balance housing delivery with enhanced environmental protection and the delivery of significant public benefits.

The statutory process is not determined by the number of submissions received but by the planning merits of the issues raised and the Planning Authority's assessment of those issues. The Chief Executive's recommendation represented that assessment.

10.5.1 Submissions on MA6.1

Based on the consultation export available as of 4 August 2026, the consultation on the Proposed Material Alterations had generated 208 submissions comprising 243 observations. Of those, 156 observations related to MA6.1 and St Edmundsbury.

The observations concerning MA6.1 are concentrated around a recurring set of matters, principally the landscape and amenity value of the Liffey Valley, biodiversity and wildlife, green infrastructure and open space, infrastructure and community services, heritage, climate resilience and flood risk, traffic and the perceived availability of alternative housing lands.

These are legitimate planning considerations. They are also substantially the same matters that were before the Chief Executive following the original consultation on Proposed Variation No. 2. They resulted in the residential area being reduced to 9.67 hectares, the associated housing capacity being reduced, extensive HA-LV lands being retained and the Specific Local Objective being substantially strengthened to secure parkland, public access, biodiversity and green-infrastructure measures, heritage protection, comprehensive masterplanning and detailed transport and environmental assessment.

The submissions reviewed do not appear to disclose materially new technical evidence demonstrating that the Chief Executive's refined planning response is incapable of addressing those concerns. They principally express continued opposition to the planning judgement reached by the Chief Executive.

11. Planning Balance

The purpose of Variation No. 2 is not simply to identify additional residential land. It is to establish a robust, evidence-based and deliverable housing strategy capable of responding to the revised housing requirements arising from the First Revision of the National Planning Framework and the Housing Growth Requirements Guidelines.

The Planning Authority undertook a comprehensive process to achieve that objective. Following the Call for Sites process, technical assessment, statutory environmental assessment, prescribed body consultation and public consultation, the Chief Executive recommended a refined package of residential rezonings designed to increase housing capacity while responding to environmental, infrastructure and place-making considerations. Amendment No. 6 formed part of that recommended strategy.

Importantly, the recommendation before the elected members was not the proposal originally promoted by the landowners. It represented the Planning Authority's own planning judgement following detailed assessment. The residential area was substantially reduced, housing capacity refined, extensive HA-LV lands retained, and the accompanying Specific Local Objective significantly strengthened to secure the coordinated delivery of a substantial public park, enhanced public access, green infrastructure, biodiversity enhancement, heritage protection, comprehensive masterplanning and supporting infrastructure.

The Planning Authority therefore concluded that a carefully managed residential allocation could be accommodated, and consistency with the NPF achieved, while simultaneously securing significant environmental and community benefits. That planning balance, and in particular compliance with overarching national housing policy, remains the central issue.

This submission fully acknowledges the planning considerations relied upon by the elected members in removing Amendment No. 6. The protection of the Liffey Valley, biodiversity, landscape character, green infrastructure and infrastructure-led development are all legitimate planning objectives. However, those same considerations were central to the Chief Executive's assessment and directly informed the refined recommendation ultimately placed before the elected members.

The evidence considered throughout this submission demonstrates that the removal of Amendment No. 6 has implications extending beyond the omission of a single residential site.

First, it materially reduces the additional housing provision originally recommended by the Planning Authority and narrows the range of residential opportunities identified through Variation No. 2.

Secondly, it removes one of the sites which had progressed beyond the Call for Sites stage and for which the Planning Authority had already established a defined residential area, estimated housing capacity and comprehensive implementation framework.

Thirdly, the comparative assessment contained in Appendix B demonstrates that the retained residential allocations are characterised by differing ownership structures, infrastructure requirements, masterplanning obligations and delivery programmes. Those differences are entirely appropriate and reflect good planning practice. They also illustrate why the Planning Authority originally sought to identify a broad portfolio of residential opportunities capable of contributing to housing delivery over different timescales. The removal of Amendment No. 6 reduces that flexibility and correspondingly increases reliance upon the timely implementation of a smaller number of strategic allocations.

Fourthly, the independent evidence does not indicate that Amendment No. 6 should be omitted from the residential land strategy. The Office of the Planning Regulator supported the progression of the residential amendments as a critical component of the Council's response to the revised housing requirements. Similarly, the Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment do not conclude that Amendment No. 6 is unsuitable for residential zoning. Rather, they identify the planning framework and mitigation measures through which development can proceed while safeguarding the environmental qualities of the wider area.

Finally, the Proposed Material Alterations introduce two additional residential sites that were not included in the Chief Executive's recommended Variation. While this submission does not suggest that those sites are unsuitable for residential development, they possess different planning characteristics, implementation requirements and environmental considerations. Their introduction therefore changes the composition of the residential land strategy originally recommended by the Planning Authority and gives rise to important statutory and procedural issues which should be expressly considered by the Chief Executive and risk undermining the variation process as a whole.

When these matters are considered collectively, it is respectfully submitted that the planning evidence continues to support the recommendation made by the Chief Executive following completion of the statutory assessment respect of the proposed variation as originally proposed by the planning authority. The Proposed Material Alterations do not introduce new technical evidence demonstrating that the refined recommendation for Amendment No. 6 is unsound. Rather, they reflect a different planning judgement on matters that had already been comprehensively assessed, and if carried out, would result in a development plan that is varied contrary to the recommendation of the OPR, that departs from the Implementing Guidelines and is overall less capable of delivering on the housing targets set out by the NPF, and therefore is at risk of giving rise to a material inconsistency with same.

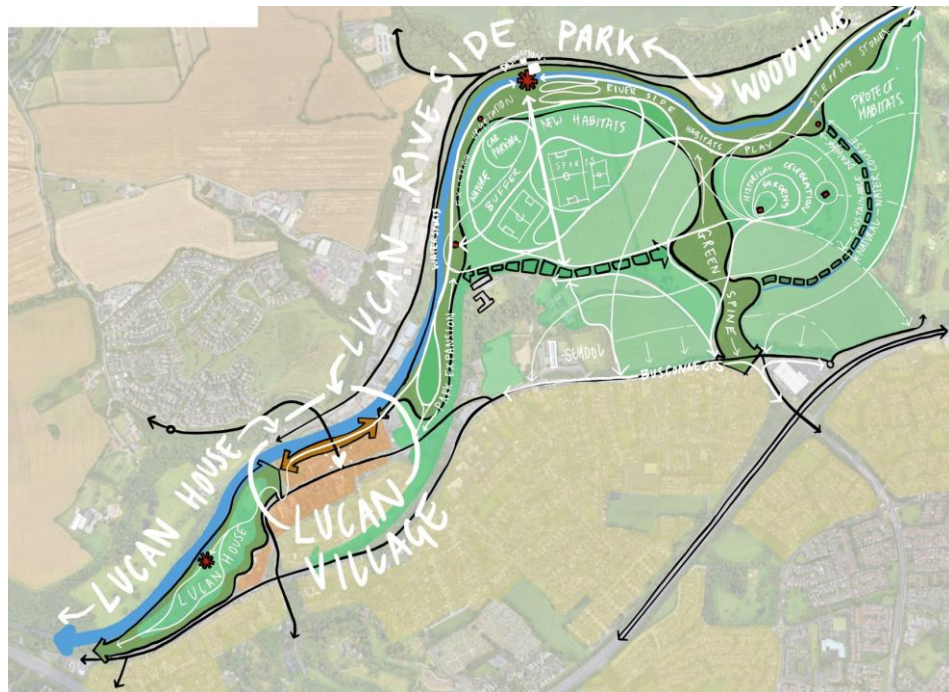
In those circumstances, it is respectfully submitted that the Council should reconsider whether the removal of Amendment No. 6 remains the most appropriate planning response having regard to the objectives of Variation No. 2, the Planning Authority's own evidence base, the recommendations of the Office of the Planning Regulator, the environmental assessments prepared in support of the Variation and the need to maintain a robust, deliverable and resilient housing strategy for South Dublin County.

12. Conclusion

Variation No. 2 was initiated by South Dublin County Council because the Housing Growth Requirements Guidelines identified that current County Development Plan did not provide sufficient residential capacity to respond to the revised housing requirements arising from the First Revision of the National Planning Framework.

The Council's Settlement Capacity Audit identified a baseline housing capacity of approximately 9,613 dwellings against a revised requirement of 11,699 dwellings, prompting a targeted review of additional residential lands. Rather than simply addressing the identified shortfall, the Planning Authority assembled a broader portfolio of residential sites capable of delivering approximately 16,937 dwellings, representing approximately 44.8 per cent additional provision above the baseline requirement. That approach reflected the recognition that zoned capacity does not translate directly into completed housing and that delivery is inevitably influenced by infrastructure programmes, planning processes, environmental constraints, land ownership, market conditions and implementation risk.

The Planning Authority's recommendation in respect of St Edmundsbury ultimately presented to the elected members was not the original Call for Sites proposal. Following statutory consultation, detailed technical assessment and environmental appraisal, the Chief Executive reduced the residential area from approximately 14.98 hectares to 9.67 hectares, representing a reduction of approximately 35 per cent, retained 5.31 hectares under the HA-LV zoning objective and substantially strengthened the accompanying Specific Local Objective. The resulting residential area represented only 8.8 per cent of the overall 110-hectare estate and was supported by a comprehensive implementation framework requiring delivery of a public park, enhanced public access, biodiversity and green infrastructure measures, comprehensive masterplanning, heritage protection and supporting infrastructure.



The Proposed Material Alterations now depart from that refined planning recommendation. The removal of St Edmundsbury approximately 464 dwellings, Finnstown Castle approximately 1,017 dwellings and Coldcut Road approximately 234 dwellings, together with the introduction of Cornerpark approximately 217 dwellings and Elmcastle Court approximately 2 dwellings, reduces the estimated residential capacity associated with the Variation from approximately 16,937 dwellings to 15,262 dwellings. Consequently, the level of additional provision above the baseline housing requirement falls from approximately 44.8 per cent to approximately 30.5 per cent, materially reducing the resilience originally built into the Planning Authority's housing strategy.

The comparative assessment undertaken in this submission also demonstrates that the amended strategy is increasingly dependent upon the timely delivery of a relatively small number of sites. Approximately 4,642 dwellings, representing 30.4 per cent of the residential capacity identified through the Proposed Material Alterations, are dependent upon strategic transport infrastructure, comprehensive masterplanning, multi-party coordination or other significant enabling infrastructure. This includes approximately 2,390 dwellings at Adamstown SDZ West, where no significant residential development may proceed until DART+ Southwest, or an equivalent rail service, is operational, together with further strategic allocations that depend upon major infrastructure programmes, agency agreements or coordinated land assembly. The Planning Authority's original strategy recognised these uncertainties by providing a broader portfolio of residential opportunities. The Proposed Material Alterations narrow that portfolio and, in doing so, increase reliance upon the successful and timely delivery of a smaller number of highly constrained strategic sites.

The evidence considered throughout this submission does not demonstrate that the Chief Executive's refined recommendation for St Edmundsbury has been superseded by new technical, environmental or infrastructure evidence. On the contrary, the recommendation reflected the outcome of the statutory consultation process and the Planning Authority's own assessment that the identified planning sensitivities could be appropriately addressed through a significantly reduced residential area, retention of extensive HA-LV lands and a strengthened Specific Local Objective. The elected members reached a different planning judgement, but that judgement should now be reconsidered in light of the Planning Authority's own evidence, the objectives of Variation No. 2 and the need to provide for a robust, deliverable and resilient residential land strategy over the remaining lifetime of the Development Plan to achieve consistency with the Housing Targets set out in the NPF, First Revisions, compounded by the potential that the plan may be extended until 31 August 2030 under the transitional provisions of the Planning and Development (Amendment) Act 2026.

Accordingly, it is respectfully submitted that the CE should recommend that the proposed variation should be made as originally proposed by planning authority in accordance with s.58(17)(a)(i), or at least that material alteration MA 6.1 omitting Amendment No. 6 should not be made and that Amendment No. 6, in the form recommended following statutory consultation and detailed technical assessment, should be reinstated. Doing so would not simply restore approximately 464 dwellings to the residential land strategy; it would restore a site that had already been substantially refined through the statutory plan-making

process and which the Planning Authority itself concluded formed an appropriate component of a balanced, evidence-based and resilient housing strategy for South Dublin County.

Scenario	Housing Capacity	Additional Provision
Chief Executive's Proposed Variation No. 2	16,937	44.8%
Material Alterations (as published)	15,262	30.5%
Material Alterations (without Cornerpark & Elmcastle)	14,867	27.1%



Response to Proposed Variation No. 2: South Dublin County Development Plan 2022-2028

St. Edmundsbury: CS7 SLO2

Reference:

Issue | 13 March 2026



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Executive Summary

This submission responds to Proposed Variation No. 2 to the South Dublin County Development Plan 2022–2028 relating to lands at St Edmundsbury, Lucan. The proposed variation would rezone approximately 15.95 hectares of land from High Amenity, Liffey Valley (HA-LV) to New Residential (RES-N) and introduce Specific Local Objective CS7 SLO2, establishing a structured framework for the future planning of the lands.

The lands occupy a strategic location at the interface between the established urban area of Lucan Village and the wider Liffey Valley landscape. Importantly, the proposed RES-N lands are located outside the boundary of the Liffey Valley Special Amenity Area Order (SAAO). The lands form part of an established institutional landscape which already contains significant built development including St Patrick’s Hospital and St Andrew’s National School.

The proposed zoning has the potential to facilitate the delivery of approximately 540 homes in a highly accessible and serviced urban location. Based on the national average household size recorded in Census 2022 (2.74 persons per household), this would support a population of approximately 1,479 residents, while applying the higher South Dublin household size (2.97 persons) suggests a potential population of approximately 1,600 residents. Applying a more conservative household size assumption of 2.5 persons per household would indicate a population of approximately 1,350 residents.

The lands are located within walking distance of Lucan Village, schools, community facilities and existing public transport services along the Lucan Road corridor. The location therefore strongly aligns with national and regional planning policy objectives promoting compact growth and transport-oriented development within existing settlements. Specific Local Objective CS7 SLO2 also presents an opportunity to facilitate enhanced walking and cycling connectivity between the site, Lucan Village, Chapel Hill and the wider Liffey Valley landscape, supporting active travel and reducing reliance on private car use.

Transport and congestion issues were frequently raised in submissions. The development of approximately 540 homes (subject to zoning & planning permission) would generate approximately 191 vehicular trips during the morning peak hour. Importantly, the majority of these trips (approximately 85% or 163 vehicles) are expected to travel eastwards toward the N4 and Dublin City, reflecting established commuting patterns and the location of major employment centres.

Only a small proportion of trips, approximately 15% or 29 vehicles are expected to travel westwards toward Lucan Village. This equates to approximately one additional vehicle every two minutes on the Lucan Road corridor during the peak hour, representing a relatively modest incremental change when considered in the context of existing traffic volumes.

While traffic congestion within Lucan Village is a recognised concern raised in submissions, the analysis indicates that only a small proportion of trips generated by the proposed development would travel in that direction. The majority of peak hour trips are expected to distribute eastwards toward the N4 corridor and Dublin City employment centres, meaning the development would result in only a limited incremental increase in traffic movements toward Lucan Village itself.

The development is also expected to support increased use of sustainable transport modes. Preliminary analysis indicates that approximately 126 additional public transport passengers may utilise bus services during the morning peak period, supporting the viability of existing services along the Lucan Road corridor, including BusConnects C-Spine routes. The additional residential population will therefore contribute to the critical mass required to sustain and enhance public transport services.

The lands sit adjacent to the Liffey Valley landscape which is protected through the Liffey Valley Special Amenity Area Order (SAAO), High Amenity zoning and the wider policy framework of the Development Plan. The proposed variation does not introduce development within the SAAO lands themselves and does not alter the existing policies protecting these designated lands. Instead, it introduces Specific Local Objective CS7 SLO2, which requires the delivery of parkland, enhanced recreational access and strengthened green infrastructure connections within the adjoining HA-LV lands in tandem with, or prior to, residential development.

Given the scale of the Liffey Valley landscape and the fragmented pattern of land ownership within it, the development of a Liffey Valley Park will necessarily occur through a phased and collaborative approach involving the local authority, State agencies and landowners. The St Edmundsbury lands represent one of the few locations where a substantial and coherent landholding exists capable of facilitating meaningful progress toward this long-standing objective.

The proposed variation also introduces a requirement for a comprehensive masterplan to be prepared by, or in consultation with, and approved by the Planning Authority prior to the submission of any planning application. This masterplan must be informed by ecological, landscape, heritage and transport assessments, ensuring that development proceeds in a coordinated, plan-led and environmentally informed manner.

Environmental safeguards form a central component of the proposed variation. Strategic Environmental Assessment and Appropriate Assessment have been undertaken as part of the Development Plan variation process, and further ecological and landscape studies will be required at masterplanning and planning application stage. Flood risk considerations will similarly be addressed through detailed site-specific assessment in accordance with national flood risk management guidelines.

It is also important to note that zoning does not confer development consent. The proposed rezoning simply identifies lands that may be considered for residential development in principle. Any future development proposal will remain subject to the full statutory planning process, including detailed environmental assessment and compliance with all relevant policies and objectives of the Development Plan.

Submissions received during consultation highlight the strong public appreciation of the Liffey Valley landscape and raise concerns regarding environmental protection, visual impact and infrastructure capacity. These concerns are acknowledged. However, the proposed variation demonstrates how residential development, environmental protection and the delivery of parkland and recreational amenity can be advanced together through a coordinated planning framework.

In this context, the proposed variation represents a balanced and plan-led approach which supports the delivery of much-needed housing in a sustainable urban location while simultaneously contributing to the protection, enhancement and long-term accessibility of the Liffey Valley as a major environmental and recreational asset.

The proposed rezoning of the St Edmundsbury lands can therefore be considered consistent with the principles of proper planning and sustainable development, supporting compact growth within the existing settlement of Lucan while safeguarding and enhancing the landscape, ecological and recreational value of the Liffey Valley.

1. Strategic Policy Context & Statutory Compliance

1.1 Call for Sites

This submission relates to the proposed zoning change for lands at St Edmundsbury, Lucan, under Proposed Variation No. 2 to the South Dublin County Development Plan 2022–2028.

Proposed Variation No. 2 follows the non-statutory public consultation undertaken by South Dublin County Council in November 2025 following publication of the National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities (July 2025).

That consultation sought proposals for lands capable of contributing to the revised housing growth requirements arising from implementation of the National Planning Framework to 2040.

In response, O’Flynn Group submitted proposals relating to approximately 110 hectares of land at St Edmundsbury and Woodville, Lucan, Co. Dublin. Under Proposed Variation No. 2, a zoning change has now been proposed for approximately 16 hectares of these lands at St Edmundsbury from High Amenity, Liffey Valley (HA-LV) to New Residential (RES-N). This report provides an updated planning submission focused specifically on the St Edmundsbury lands, having regard to the form and content of the proposed Variation. The original Call for Sites submission is included in the Appendix and should be referred to for additional background, including a broader planning policy review and site suitability assessment relating to the wider St Edmundsbury and Woodville landholding.

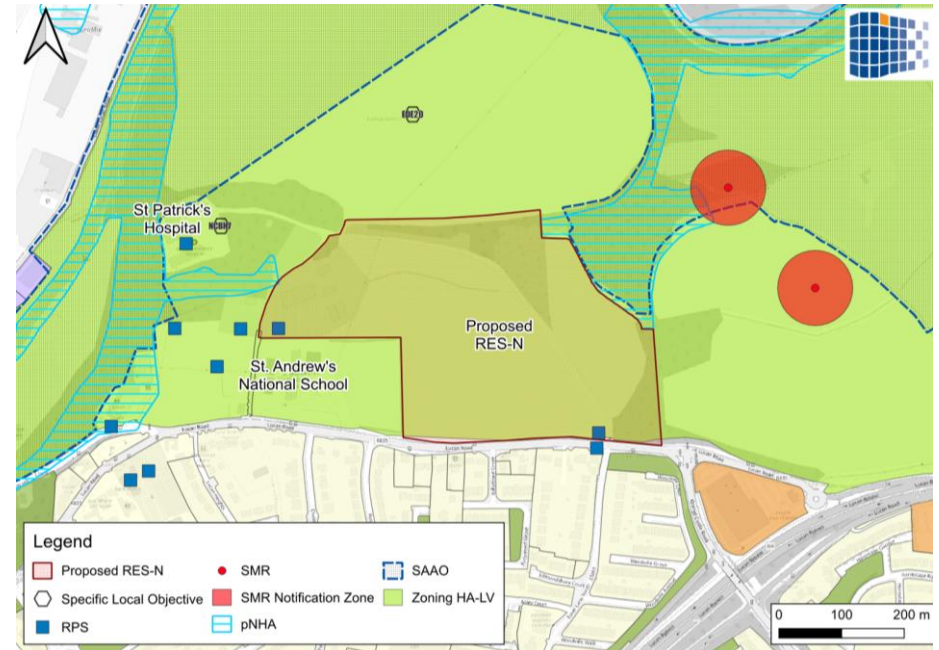


Figure 1-1 St. Edmundsbury Proposed RES-N

1.2 Introduction

We welcome the opportunity to respond to Proposed Development Plan Variation No. 2 and to contribute positively to the future planning of this strategically located site.

National planning policy places a strong emphasis on the consolidation and renewal of existing settlements, rather than continued outward expansion of towns and cities. The National Planning Framework (NPF) identifies compact growth as a central objective of the planning system and supports housing delivered at the edge of settlements.

In this context, the identification of suitable lands adjoining existing settlements represents an important component of national and regional housing policy.

The St Edmundsbury lands occupy a strategic position at the interface between Lucan Village and the Liffey Valley, one of the most significant landscape and ecological assets within the Greater Dublin Area. The site lies immediately adjacent to the established urban area of Lucan and within walking distance of the village centre, schools, community facilities and existing public transport services along the Lucan Road corridor.

This location provides a strong basis for compact, sustainable and transport-oriented development (TOD), consistent with national and regional planning policy which seeks to prioritise housing delivery in serviced urban locations.

The lands also align strongly with the Council's 10-minute settlement concept, whereby residents can access daily services, schools, public transport and recreational amenities within a short walking or cycling distance. Lucan Village, nearby schools, community facilities and the Liffey Valley landscape together create the conditions for a highly walkable and sustainable neighbourhood environment.

The delivery of housing in locations such as St Edmundsbury is consistent with national planning policy which seeks to accommodate population growth within existing settlements where infrastructure, services and public transport networks are already present rather than through more dispersed development patterns.

At the same time, the lands sit within the wider landscape context of the Liffey Valley, a distinctive river corridor recognised for its scenic, ecological and recreational value. The valley is protected through the Liffey Valley Special Amenity Area Order (SAAO), originally designated in 1990 to safeguard areas of outstanding natural beauty and recreational importance while enabling their appropriate management and enhancement.

The South Dublin County Development Plan (SDCDP) 2022–2028 recognises the Liffey Valley as an exceptional regional asset and provides a strong policy framework to protect and enhance its landscape, ecological and heritage value. Lands within the valley are zoned High Amenity Liffey Valley (HA-LV), the objective of which is “to protect and enhance the outstanding character and amenity of the Liffey Valley.”

The proposed rezoning relates to approximately 15.95 hectares of land currently designated HA-LV but outside the SAAO. Within the administrative area of South Dublin County Council, the overall HA-LV designation extends to approximately 441.2 hectares. The proposed rezoning therefore represents a very small proportion (3.6 per cent) of the overall High Amenity designation, with the overwhelming majority of the Liffey Valley lands remaining protected under the existing zoning objective and associated Development Plan policies.

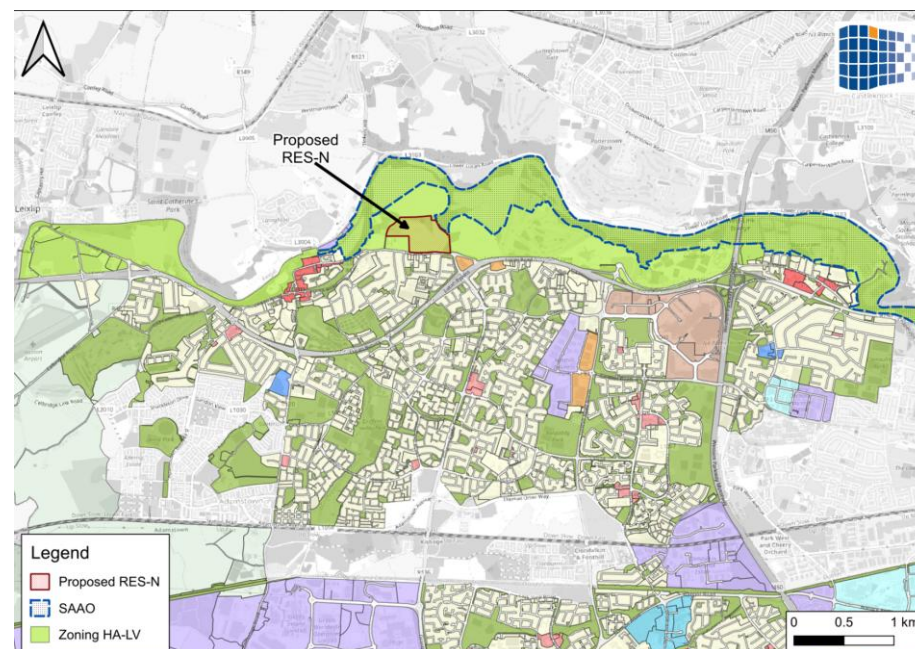


Figure 1-2 Proposed RES-N in the context of wider High Amenity Zoning

Policy NCBH7 of the SDCDP Liffey River Valley and Special Amenity Area Order further seeks to protect the landscape, visual, ecological and recreational qualities of the valley while supporting its development as an interconnected network of parklands and green infrastructure.

The Development Plan also recognises the importance of strengthening public access, recreational amenity and green infrastructure connectivity within the

Liffey Valley, supporting the long-term objective of developing the valley as a major regional parkland resource.

Within this wider context, the St Edmundsbury lands present a rare opportunity to contribute to these objectives while also supporting sustainable residential development within the existing urban footprint of Lucan.

It is also important to recognise that the lands do not form part of an undeveloped valley floor landscape but rather lie directly adjacent to institutional landscape at the urban edge of Lucan, which includes St Patrick's Hospital and St Andrew's National School.



Figure 1-3 St. Andrews & Hospital Built Environment

Planning decisions relating to the estate further illustrate this context. Permission was granted for the development of St Andrew's National School under South Dublin County Council Reg. Ref. SD12A/0115 and An Bord Pleanála (now An Coimisiún Pleanála) Ref. PL06S.241054. In considering that

proposal, the Board had regard to the proximity of the site to the Liffey Valley SAAO, the proposed Natural Heritage Area (pNHA), protected structures and the wider landscape sensitivity of the area. The Board concluded that, subject to appropriate safeguards and conditions, the development would not be contrary to policies relating to the Liffey Valley or the objective of a Liffey Valley Regional Park.

More recently, the continuing institutional role of the St Edmundsbury lands was reflected in the pre-application consultation process undertaken with An Coimisiún Pleanála in respect of proposed expansion at St Edmundsbury Hospital (ABP-322151-25). The Inspector's report describes the lands as an established hospital campus located north of Lucan Road within a wider setting characterised by residential neighbourhoods, schools and community facilities. The documentation also envisages the retention of public access and open space connections in the context of the longer-term objective of a Liffey Valley Park.

Taken together, these planning decisions demonstrate that the St Edmundsbury lands have historically been understood as forming part of an established and evolving institutional landscape at the edge of Lucan, where development proposals are assessed through a careful balancing of environmental sensitivity, heritage considerations and the need to support appropriate urban development.

The approach proposed through Variation No. 2, linking residential development with the delivery of parkland, ecological safeguards and a comprehensive masterplanning framework, represents a continuation of this balanced and plan-led approach.

The proposed zoning has the potential to facilitate the delivery of approximately 540 homes, representing a meaningful contribution towards addressing the ongoing housing supply challenges facing the Dublin metropolitan area. The delivery of housing in this highly accessible and serviced location is consistent with national planning policy objectives which prioritise compact urban growth and the efficient use of serviced land.

The proposed zoning for residential development is accompanied by a comprehensive masterplanning framework and park delivery strategy, which

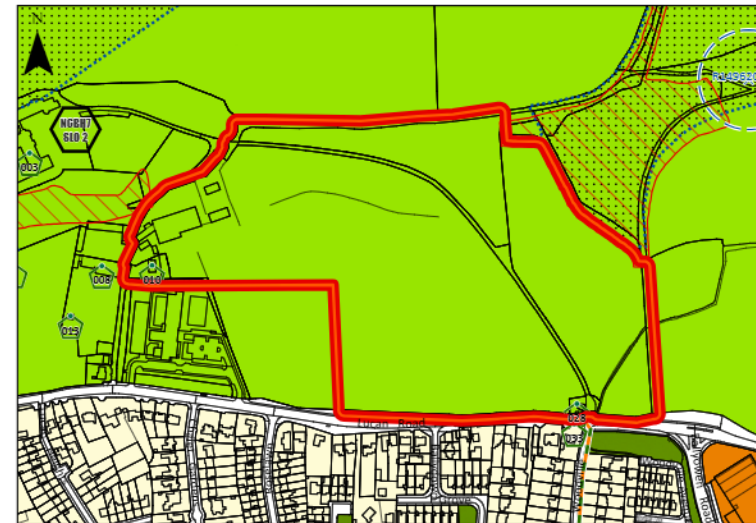
will ensure that development occurs in a coordinated manner informed by ecological, landscape and heritage assessments. This approach will support the delivery of enhanced recreational access, green infrastructure connectivity and public amenity within the Liffey Valley while safeguarding the valley's biodiversity and landscape character.

Future development of the lands will also provide opportunities to accommodate appropriate supporting social and community infrastructure, including childcare provision, local services, recreational facilities and open space, ensuring that the new neighbourhood integrates successfully with Lucan and the wider community.

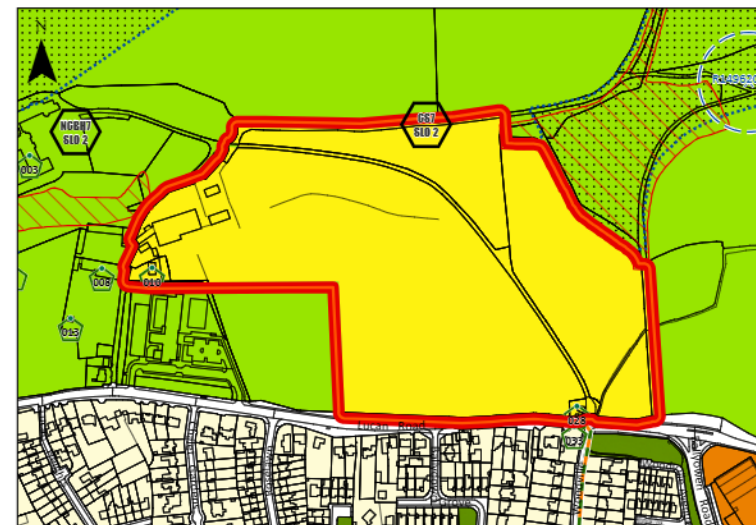
The proposed zoning is accompanied by a comprehensive masterplanning framework and park delivery strategy, which will ensure that development occurs in a coordinated manner informed by ecological, landscape and heritage assessment.

Through this integrated approach, the proposed variation can support the delivery of much-needed housing in a sustainable and serviced location while simultaneously contributing to the long-standing vision of developing the Liffey Valley as an interconnected network of parklands, ecological corridors and public amenity spaces for the benefit of Lucan and the wider Dublin region.

In bringing forward this submission, we acknowledge the careful and considered approach being undertaken by South Dublin County Council through the statutory Development Plan variation process, including Strategic Environmental Assessment, Appropriate Assessment and public consultation. Through the masterplanning framework and environmental safeguards proposed, combined with project specific studies and assessment at planning application stage, the development of the St Edmundsbury lands can achieve an appropriate and carefully managed balance between housing delivery, environmental protection and enhanced public amenity.



Existing



Proposed

1.3 Policy Context – Consolidation Areas and Policy CS7

The South Dublin County Development Plan 2022–2028 identifies Lucan as one of the key urban centres within the Dublin City and Suburbs settlement, located approximately 14 kilometres west of Dublin City along the N4 economic corridor.

Lucan is characterised by an historic village core surrounded by established residential neighbourhoods supported by a network of district and local centres. The area is served by high-frequency bus routes connecting to Dublin City and lies close to major employment centres including Grange Castle and other business parks in the wider area.

Lucan is identified within the Development Plan as part of the Dublin City and Suburbs settlement, where consolidation and sustainable intensification of development is encouraged in order to support compact growth and efficient use of existing infrastructure and services.

Within this broader spatial framework, Policy CS7 of the Development Plan promotes the consolidation and sustainable intensification of development within the Dublin City and Suburbs settlement boundary.

The policy recognises that future growth within the metropolitan area should be focused on infill, brownfield and edge-of-settlement opportunities that can support compact development patterns while making efficient use of existing infrastructure, services and public transport.

The proposed Variation No. 2 seeks to introduce a Specific Local Objective (CS7 SLO2) under Policy CS7 relating to lands at St Edmundsbury, Lucan Road.

The proposed objective establishes a clear framework for the future development of the lands, requiring:

- The delivery of a park within the Liffey Valley lands zoned HA-LV with enhanced recreational amenity and improved accessibility to the river corridor.
- The preparation of a comprehensive masterplan to be agreed with the Planning Authority prior to the submission of any planning application.

- The undertaking of key environmental and technical assessments including ecological, landscape and transport assessments.
- The retention and enhancement of important landscape features including the historic east-west hedgerow and tree line.

The objective therefore establishes a structured and plan-led framework for the future development of the St Edmundsbury lands.

It is also important to note that zoning does not in itself constitute development consent. A zoning objective indicates the types of development that may in principle be considered at a particular location, but any future development proposal must still be assessed through the statutory planning process having regard to the full range of policies and objectives contained within the Development Plan together with all environmental and heritage considerations.

In the context of the Development Plan and the wider strategic ambition for a Liffey Valley Park, it is considered that this term should be understood as providing for the progressive delivery of interconnected public open space, green infrastructure and recreational access within the valley, rather than implying the immediate delivery of a fully realised regional park as a single intervention in advance of residential development.

Given the scale of the wider Liffey Valley landscape, the fragmented pattern of land ownership and the environmentally sensitive nature of the river corridor, the delivery of a Liffey Valley Park will necessarily occur through a phased and collaborative approach involving multiple landowners and public authorities over time. The proposed masterplanning framework provides the appropriate mechanism to ensure that the development of the St Edmundsbury lands contributes meaningfully to this objective while ensuring that park delivery is carefully planned, environmentally informed and coordinated with the future development of the lands.

Importantly, it links residential development directly to the delivery of parkland, ecological protection and enhanced public access within the Liffey Valley.

In this regard, the proposed variation reflects the wider strategy of the Development Plan to support the consolidation of existing urban settlements,

while also advancing the long-standing objective of enhancing the Liffey Valley as a major recreational and green infrastructure corridor.

1.4 Masterplan Framework

A key element of the proposed Specific Local Objective is the requirement for the preparation of a comprehensive masterplan for the lands prior to the submission of any planning application.

This requirement provides an important mechanism to ensure that the future development of the St Edmundsbury lands is considered in a coordinated, planned and environmentally informed manner, having full regard to the sensitive landscape, ecological and heritage context of the Liffey Valley.

The objective requires that the masterplan be prepared by, or in consultation with, and approved by the Planning Authority. The masterplanning process will therefore provide an opportunity to fully examine the appropriate form, scale and layout of development on the lands and how this integrates with the wider Liffey Valley landscape and Lucan Village.

Importantly, the objective also requires that the masterplan be informed by a number of detailed assessments including:

- an Ecological Impact Assessment to examine the use of the site and surrounding lands by mobile species
- the retention and enhancement of the historic east–west hedgerow and tree line recorded on the First Edition Ordnance Survey mapping
- a local landscape and historical character assessment
- a transport and traffic assessment examining the impact of development and potential mitigation measures
- a design statement addressing the setting of protected structures and their curtilage

These requirements ensure that the future development of the lands will be informed by a comprehensive understanding of the environmental, heritage and infrastructural context of the site.

The masterplanning process will also provide the appropriate framework to coordinate the delivery of social and community infrastructure alongside residential development. This will include consideration of matters such as childcare provision, community facilities, recreational infrastructure and walking and cycling connections to existing services within Lucan Village and the wider area, in accordance with the standards and policies of the South Dublin County Development Plan.

In addition, the masterplan will provide the appropriate mechanism to coordinate the delivery of parkland, green infrastructure and recreational access within the Liffey Valley, ensuring that the development of the St Edmundsbury lands contributes positively to the wider objective of enhancing the Liffey Valley as a major environmental and recreational asset.

In this regard, the proposed masterplan requirement provides a robust planning framework through which residential development, park delivery, environmental protection and community infrastructure can be integrated and implemented in a coordinated and environmentally responsible manner.

This framework directly addresses a number of concerns raised in submissions, including ecology, landscape impact, traffic, heritage protection and social infrastructure capacity, by ensuring that these matters are examined in detail through a structured and evidence-based planning process prior to any planning application.

1.5 Liffey Valley Special Amenity Area Order (SAAO) – Planning Context

South Dublin County contains a significant amount of natural capital, most notably the Liffey Valley, a distinctive landscape corridor extending along both sides of the River Liffey.

The valley is recognised for its scenic, ecological and recreational value and is protected through the Liffey Valley Special Amenity Area Order (SAAO).

The Special Amenity Area Order was made in March 1990, recognising the outstanding natural beauty and special recreational value of the Liffey Valley together with the need to conserve its landscape and ecological character.

The Order establishes a framework not only for safeguarding the valley's environmental assets but also for enhancing the area for public amenity and recreational use.

The priorities attached to the Liffey Valley Special Area Amenity Order are:

- Enhancement of the area for amenity and recreational use, by way of agreements with landowners.
- Secure conservation of Anna Liffey Mills (Shackleton's Mill) and Luttrellstown Gate Lodge, Lower Road.
- Secure public control over some of the lands in the area covered by the order, with a view to the development of a Liffey Valley Park, with public access to the riverbanks.
- Provision of public rights of way and/or public footpaths along both side of the river.
- Construction of pedestrian bridges across the river in conjunction with the provision of new rights of way.
- Provision for additional car parks in the area.
- The development of facilities for anglers and canoeists.
- Making arrangements with local landowners to lower or remove walls which obscure views in order to provide viewing places. Preserve and enhance views and prospects of special amenity value or special interest, in particular views from the Lower Road and Head of the Glen (Luttrellstown)

A central objective of the Order is the long-standing ambition to establish a Liffey Valley Park, incorporating improved public access along the river corridor, pedestrian connections across the river and enhanced recreational infrastructure. The detail is set out in Strategy Document *Towards a Liffey Valley Park*.

Over the intervening decades the SAAO has played an important role in protecting the landscape and ecological integrity of the Liffey Valley.

However, many of the priorities attached to the Order remain unrealised, largely due to the fragmented pattern of land ownership within the valley.

In this context, it is important to recognise that the SAAO does not simply seek to protect the valley from change. Rather, it envisages the active enhancement of the valley for public amenity and recreational use, including the delivery of a Liffey Valley Park, improved access to the riverbanks and the creation of new pedestrian connections across the valley. The lands at St Edmundsbury and the wider associated landholding represent a rare opportunity to contribute meaningfully to these priorities.

Importantly, the wider St Edmundsbury and Woodville landholding includes approximately 53 hectares within the SAAO area, representing one of the few locations where the coordinated delivery of parkland and public access could realistically be achieved.

It is also important to recognise that the designation of a Special Amenity Area does not in itself constitute a prohibition on development either within or adjacent to the designated area. Rather, the existence of a Special Amenity Area Order is a matter to which planning authorities must have regard when preparing development plans and determining planning applications, with the objective of ensuring that any development respects and enhances the special character, landscape and recreational value of the area.

The proposed variation introduces Specific Local Objective CS7 SLO2, which requires the delivery of parkland within the Liffey Valley lands in tandem with or prior to residential development.

The objective further requires that a detailed proposal for the park be agreed with the Planning Authority in advance of any planning application.

These provisions ensure that development of the lands directly contributes to the implementation of some of the priorities for the SAAO while safeguarding the ecological and landscape integrity of the valley.

1.6 Implementation of Policy NCBH7 Objective 4

The proposed variation also aligns with and has the potential to actively implement Policy NCBH7 Objective 4 of the Development Plan, which seeks

to facilitate and support the development of the Liffey Valley as an interconnected green space and regional park.

Objective 4 explicitly recognises that the development of a Liffey Valley Park will require collaboration between local authorities, State agencies, landowners, community groups and other stakeholders, including the investigation of appropriate land uses capable of supporting the long-term development of the park and enhancing public access and recreational amenity within the valley.

The lands at St Edmundsbury represent one of the few locations within the valley where a substantial and coherent landholding exists under single ownership, creating a realistic opportunity to facilitate the coordinated delivery of parkland, public access and green infrastructure in accordance with this objective.

Through Specific Local Objective CS7 SLO2, the proposed variation directly links residential development to the delivery of parkland within the Liffey Valley and requires the preparation of a comprehensive masterplan informed by ecological, landscape, heritage and transport assessments.

This approach provides a structured mechanism through which the recreational, amenity and accessibility objectives identified under Policy NCBH7 can be advanced while ensuring that biodiversity and landscape sensitivities are appropriately protected.

In this regard, the proposed variation should be understood not as a departure from the objectives of Policy NCBH7, but as a practical opportunity to progress their implementation through collaboration between the Planning Authority, landowners and other stakeholders, consistent with the approach envisaged by the Development Plan.

The policy framework also recognises that the delivery of large-scale parkland within privately owned landscapes typically occurs through phased and coordinated development processes, whereby land assembly, design, environmental assessment and infrastructure provision are progressed alongside appropriate development. The inclusion of the masterplanning

requirement and the linkage between residential development and park delivery within CS7 SLO2 therefore provides a practical mechanism through which the long-standing objective of a Liffey Valley Park can be realised in a structured and deliverable manner.

1.7 Strategic Planning Balance

The proposed variation must be considered within the broader planning and policy framework established by the South Dublin County Development Plan 2022–2028 and by national and regional planning policy. As with all Development Plan policies and objectives, these provisions must be read and applied together as part of the overall planning framework rather than in isolation.

The Development Plan promotes the consolidation of the Dublin City and Suburbs settlement, supporting compact growth within existing urban areas while making efficient use of serviced lands and existing infrastructure. The lands at St Edmundsbury occupy a highly sustainable location at the edge of Lucan Village, within walking distance of established services, schools and public transport, and therefore represent an appropriate location to accommodate residential development in accordance with this strategy.

At the same time, the Development Plan and the Liffey Valley Special Amenity Area Order place significant emphasis on protecting and enhancing the environmental, landscape and recreational value of the Liffey Valley and progressing the long-standing ambition to develop the valley as an interconnected network of parklands and green infrastructure.

The proposed variation provides a mechanism through which these objectives can be pursued in a coordinated manner. Through the inclusion of Specific Local Objective CS7 SLO2, residential development of the St Edmundsbury lands is explicitly linked to the delivery of parkland, enhanced public access and strengthened green infrastructure within the Liffey Valley.

Importantly, the lands represent one of the few locations within the valley where the coordinated delivery of parkland and public access is realistically

achievable, given the scale of the landholding and its proximity to the existing urban area of Lucan.

In this regard, the proposed variation does not represent a departure from the objectives of the Development Plan or the priorities of the Special Amenity Area Order. Rather, it provides a practical opportunity to advance several long-standing policy objectives, including the delivery of a Liffey Valley Park, improved access to the river corridor and enhanced connectivity between Lucan Village and the wider Liffey Valley landscape.

Accordingly, the proposed variation should be understood as a balanced and plan-led approach which supports the delivery of much-needed housing in a sustainable location while simultaneously enabling the enhancement of one of the County's most important landscape and recreational assets.

The proposed variation therefore presents a rare opportunity to align the delivery of housing, public amenity and environmental protection in a manner consistent with both the Development Plan strategy and the priorities of the Liffey Valley Special Amenity Area Order.

Some submissions express concern that the proposed rezoning could set a precedent for further development within or adjacent to the Liffey Valley. However, planning decisions and development plan variations are assessed on their individual merits having regard to the specific planning, environmental and infrastructural circumstances of each site. The St Edmundsbury lands represent a unique location at the interface between the existing urban edge of Lucan and the wider Liffey Valley landscape, with a substantial landholding capable of supporting coordinated masterplanning, park delivery and enhanced public access. The circumstances that arise at this location, including the scale of the landholding and its relationship with the existing settlement structure, are therefore not readily replicable elsewhere within the valley. The proposed variation should accordingly be understood as a site-specific and plan-led response rather than as establishing a broader precedent for development within the Liffey Valley.

1.8 Contribution to Housing Delivery and Compact Growth

The proposed zoning of the St Edmundsbury lands has the potential to facilitate the delivery of approximately 540 homes within a highly accessible and serviced location at the edge of Lucan Village.

Using the national average household size recorded in Census 2022 of 2.74 persons per household, this would accommodate an estimated population of approximately 1,479 persons.

It is notable, however, that South Dublin County recorded a higher average household size of approximately 2.97 persons per household, significantly above the national average. Higher household sizes are widely recognised as an indicator of housing supply constraints, often reflecting delayed household formation and increased pressure on the existing housing stock. Applying this local household size suggests that the proposed development could accommodate approximately 1,604 residents.

Equally, as housing supply improves, household sizes may be expected to gradually converge towards lower European norms over time. Applying a more conservative household size assumption of 2.5 persons per household would indicate a population of approximately 1,350 residents.

On this basis, the proposed development would be expected to generate a population in the order of 1,350 to 1,600 people. This represents a modest and manageable level of population growth at the edge of an established settlement.

While submissions raise concerns regarding infrastructure capacity, national and regional planning policy consistently emphasises that new housing should be located within existing urban areas where infrastructure, services and public transport networks are already established and can be incrementally expanded.

Importantly, the delivery of additional population within such locations also contributes to the critical mass required to sustain and enhance local services, community facilities and public transport provision.

The scale of development proposed at St Edmundsbury would therefore not only utilise existing infrastructure but would also support the continued viability and improvement of local services in Lucan.

The masterplanning framework further provides an opportunity to integrate supporting uses within the site itself, including childcare provision, local services, recreational amenities and enhanced walking and cycling connections to Lucan Village. In this way, the development can contribute positively to the consolidation of Lucan while delivering much-needed housing supply in a sustainable and serviced location.

1.9 Proper Planning & Sustainable Development

The overarching purpose of the planning system in Ireland is to regulate the development and use of land in the interests of the common good, having regard to proper planning and sustainable development.

The Act establishes that planning authorities should seek to achieve an appropriate balance between environmental protection, economic development and social progress, while supporting sustainable patterns of development and the efficient use of land and infrastructure.

In this regard, the proposed variation relating to the lands at St Edmundsbury reflects a balanced and integrated approach.

The proposed zoning change would facilitate the delivery of approximately 540 homes (subject to zoning & planning permission) within a highly accessible and serviced location adjacent to Lucan Village, contributing to the provision of housing for approximately 1,500–1,600 people in an area where household sizes remain above the national average and where additional housing supply is required.

At the same time, the variation includes specific safeguards through Specific Local Objective CS7 SLO2, including the delivery of parkland within the Liffey Valley in tandem with, or prior to, residential development, the preparation of a comprehensive masterplan, and the undertaking of detailed ecological, landscape, heritage and transport assessments prior to the submission of any planning application.

These requirements ensure that development of the lands will proceed in a plan-led and environmentally responsible manner, safeguarding the ecological and landscape integrity of the Liffey Valley while strengthening public access and recreational amenity.

Accordingly, the proposed variation provides a clear example of the type of balanced planning outcome envisaged by the principles of proper planning and sustainable development, whereby the delivery of much-needed housing in a sustainable urban location is aligned with the protection and enhancement of environmental and recreational assets.

In this regard, the proposed zoning change represents an appropriate and proportionate response to both the housing needs of the County and the long-standing policy objective to enhance the Liffey Valley as a major environmental and recreational resource.

2. St. Edmundsbury & The Liffey Valley SAAO

The Liffey Valley is widely recognised as one of the most important landscape corridors within South Dublin and its scenic, ecological and recreational qualities are protected through the Liffey Valley Special Amenity Area Order (SAAO), the High Amenity zoning applied to the valley lands and the wider policy framework of the South Dublin County Development Plan. The proposed Variation maintains the protections applicable to the lands the subject of the SAAO and introduces an additional mechanism for their enhancement through the delivery of the Liffey Valley Park as required under Specific Local Objective CS7 SLO2. The landscape assessment presented below therefore considers how development of the St Edmundsbury lands can respond sensitively to this context while protecting the character and visual qualities of the wider valley landscape.

2.1 Role of the Liffey Valley Special Amenity Area Order

South Dublin County contains a significant amount of natural capital, most notably the Liffey Valley, a distinctive landscape corridor extending along both sides of the River Liffey through the County and beyond. The valley is recognised for its scenic, ecological and recreational value and is protected through the Liffey Valley Special Amenity Area Order (SAAO).

The Special Amenity Area Order was made in March 1990, recognising the outstanding natural beauty and special recreational value of the Liffey Valley, together with the need to conserve its landscape and ecological character. The Order establishes a framework not only for safeguarding the valley's environmental assets, but also for enhancing the area for public amenity and recreational use.

The designation of a Special Amenity Area does not in itself constitute a prohibition on development within or adjacent to the designated landscape. Rather, it provides an additional planning framework through which development proposals are assessed to ensure that the character, scenic value and recreational function of the area are protected and enhanced.

Central to the Order's priorities is the long-standing ambition to establish a Liffey Valley Park, incorporating improved public access along the river corridor, pedestrian connections across the river, recreational infrastructure and the conservation and activation of key heritage assets such as Anna Liffey Mill (Shackleton's Mill).

Over the intervening decades the SAAO has played an important role in protecting the landscape and ecological integrity of the Liffey Valley. However, many of the priorities associated with the Order remain unrealised. This reflects, in part, the complex pattern of land ownership within the valley, with much of the land remaining in private ownership.

In this context, it is important to recognise that the SAAO does not simply seek to protect the valley from change. Rather, it envisages the active enhancement of the valley for public amenity and recreational use, including the delivery of a Liffey Valley Park, improved access to the riverbanks and the creation of new pedestrian connections across the valley.

2.2 Opportunity to Deliver the SAAO's Priorities

The proposed variation presents a significant opportunity to advance the long-standing priorities of the Special Amenity Area Order.

Importantly, St Edmundsbury is in single ownership, creating a rare opportunity to facilitate the coordinated delivery of parkland, public access and recreational infrastructure within the Liffey Valley. Approximately 53 hectares

of the wider landholding fall within the SAAO area, representing a significant opportunity to contribute to the development of a future Liffey Valley Park.

The proposed variation includes Specific Local Objective CS7 SLO2, which requires that development of the residential lands at St Edmundsbury must provide for the delivery of a park within the Liffey Valley lands zoned HA-LV, with enhanced recreational amenity and accessibility while protecting biodiversity and strengthening the green infrastructure network.

The safeguard further requires that a detailed proposal for the delivery of the park be agreed with the Planning Authority in advance of the submission of any planning application, ensuring that park delivery and environmental protection are integral to the future development of the lands.

In practical terms, the proposal has the potential to contribute meaningfully to a number of the priorities identified within the SAAO, including:

- the creation of a substantial component of the envisaged Liffey Valley Park;
- improved public access to the river corridor;
- the formalisation of existing walking routes and trails within the valley;
- improved connectivity across the river corridor through future pedestrian links;
- enhanced access to key heritage assets including Shackleton's Mill; and,
- the strengthening of the green infrastructure network and ecological connectivity within the valley.

In addition to enabling improved public access along the river corridor, the proposal also presents an opportunity to strengthen connections between Lucan Village, Chapel Hill and the wider Liffey Valley landscape, creating a coherent recreational network linking existing communities to the valley.

While the SAAO has successfully protected the Liffey Valley landscape for over three decades, many of the amenity and access priorities associated with the Order have yet to be fully realised.

The proposed variation provides a practical pathway to progress the SAAO priorities through a coordinated approach involving the local authority, the public and private landowners.

By enabling the delivery of parkland, improved public access and enhanced green infrastructure within the valley, the proposal creates a realistic opportunity to advance the long-standing ambition of establishing a Liffey Valley Park, while safeguarding the ecological and landscape integrity of the valley.

2.3 Response to Submissions – Liffey Valley SAAO

Submissions received as part of the consultation process express concern that the proposed rezoning would undermine the Liffey Valley Special Amenity Area Order.

This interpretation does not fully reflect the purpose or scope of the Order.

While the SAAO places a strong emphasis on protecting the landscape and ecological value of the valley, it also explicitly seeks the enhancement of the area for amenity and recreational use, including the development of a Liffey Valley Park, the provision of riverside access and the creation of improved connectivity across the valley.

The proposed variation does not weaken the protections associated with lands the subject of the SAAO. Rather, it introduces a specific safeguard (CS7 SLO2) which requires that the delivery of parkland and enhanced recreational access within the Liffey Valley be provided in tandem with, or prior to, residential development, with detailed proposals to be agreed with the Planning Authority.

These provisions ensure that development of the lands directly contributes to the implementation of the SAAO while protecting the environmental integrity of the valley.

It is also important to note that the proposed variation does not introduce development within lands designated under the Special Amenity Area Order itself, but rather relates to lands adjoining the valley at the existing urban edge of Lucan.

Accordingly, the proposed variation should be understood not as a departure from the SAAO, but as an opportunity to advance several of its core priorities, including the creation of a Liffey Valley Park, improved public access to the river corridor and strengthened green infrastructure connections.

In that regard, the proposal represents a logical and policy-consistent mechanism to progress the long-standing vision for the Liffey Valley as a major environmental and recreational asset for the wider metropolitan area.

2.4 Landscape Character

The St Edmundsbury lands sit within the River Liffey Landscape Character Area, an area defined by its broad river valley and gently sloping sides, creating a strong linear corridor through South Dublin. It features riparian woodlands, hedgerows, and agricultural lands interspersed with parkland and historic estates, giving it high ecological and cultural value.

An important characteristic of the River Liffey Landscape Character Area is its function as a ‘borrowed landscape’ whereby the valley landscape contributes to the wider setting of the surrounding areas. This informs the defined area of visual vulnerability where the landscape is more exposed to long distance views.

The site itself is predominantly in agricultural use, defined by a gently sloping terrain and a strong network of mature hedgerows and woodland, particularly concentrated along the site edges, and the central north–south spine. These features form part of the Liffey Valley Green Infrastructure Corridor, as identified in Appendix 9 of the SDCC Development Plan 2022–2028, and contribute significantly to the site's biodiversity, amenity value, and landscape identity.

To the south, the site interfaces with Lucan Village via Lucan Road, an established residential area with schools and community facilities. These areas are valued by the local community and contribute to the site's scenic and cultural significance.

Importantly, the southern portion of the site adjoins the established built edge of Lucan and is visually contained by roadside vegetation, hedgerows and suburban development. This interface represents the least visually sensitive part of the site and therefore provides the most appropriate location for

accommodating development while maintaining the character of the wider Liffey Valley landscape.

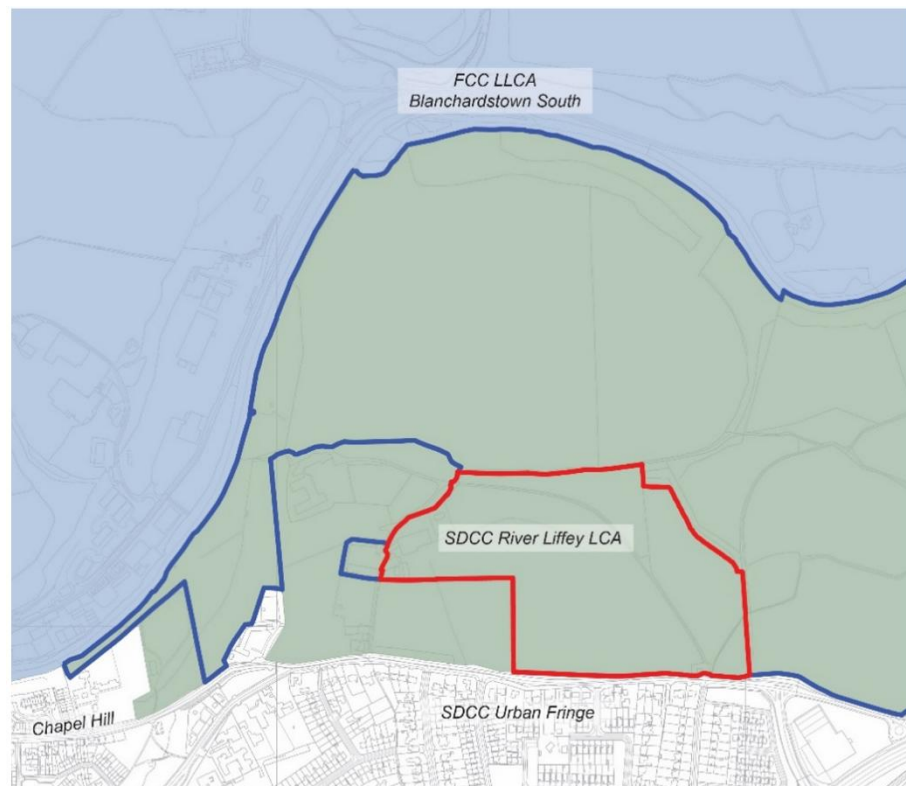


Figure 2-1 Diagram of Landscape Character areas in visual proximity of the site

2.5 Landscape Heritage and Protected Areas

The site and its surroundings contain a range of heritage features and environmental designations that collectively define its landscape character and baseline sensitivity. These elements, illustrated in Figure 2-2, contribute to the cultural, ecological and visual context in which the site is experienced and form an important part of the Landscape and Visual Impact Assessment baseline. The combined mapping of heritage features and protected areas helps identify where landscape sensitivity is elevated and where visual change requires careful consideration.

2.5.1 Landscape and Built Heritage

- **Archaeological Heritage:** Recorded monuments are found immediately east of the site. Although located outside the boundary, it forms part of a wider archaeological landscape associated with historic settlement along the valley. The presence of this feature elevates the sensitivity of the eastern edge of the site from a landscape and visual perspective, particularly in relation to setting and potential intervisibility.
- **Architectural Heritage:** A cluster of protected structures lies directly adjacent to the western boundary. These structures are an established component of the site's built heritage context, contributing to local townscape character and acting as a historic reference point within views from the surrounding area. Within the site itself, a small built structure of historic interest is also present close to this same boundary. Together, these features influence the baseline character of the western portion of the site, introducing a heritage dimension to an area otherwise defined by field boundaries and agricultural use.
- **Historic Route:** A historical route runs across the site, representing an historic access route to St Patrick's Hospital which connected listed structures of the gate house and main house, its route is recorded in historic mapping of the valley landscape. This feature reinforces the site's historic field structure and contributes to its sense of place. Its alignment remains perceptible within the current landscape pattern and informs the overall landscape character.
- **Heritage Hedgerows:** Several hedgerows recorded on the National Irish Historic Map remain present throughout the site. These long-established boundaries form part of the traditional field network and contribute to both visual enclosure and cultural landscape continuity. Their survival adds to the site's landscape sensitivity, particularly where they define historic field patterns that remain legible in the present-day landscape.

2.5.2 Protected Areas

The site lies within a landscape of notable environmental designations that influence its baseline sensitivity and contribute to the wider character of the Liffey Valley. These designations, together with identified areas of visual

vulnerability, shape how the site is perceived from key receptors and form an important part of the landscape and visual context.

- **Liffey Valley SAAO:** The Liffey Valley SAAO, is a statutory designation under the Planning and Development Act 2000 that protects the scenic, ecological, and recreational value of the Liffey Valley. It aims to conserve the natural landscape, biodiversity, and heritage features while enhancing public access and amenity. Development within the SAAO is strictly controlled to prevent adverse impacts on the valley's character, ensuring it remains a strategic green corridor for Dublin.

The Liffey Valley SAAO is situated immediately adjacent to the northern boundary of the site. No development is proposed within lands designated as part of the Liffey Valley Special Amenity Area Order.

- **Proposed Natural Heritage Area (pNHA):** A pNHA runs along the River Liffey and lies directly adjacent to the northeastern corner of the site. The pNHA is associated with riparian habitats, wetland vegetation, and the semi-natural woodland structure characteristic of the valley floor. Its presence reinforces the ecological value and environmental sensitivity of the northern and northeastern valley context, contributing to the strong natural character that influences views towards and across the site.
- **Tree and Woodland Protection Objectives:** Areas of heritage hedgerow and woodland identified in the development plan are north of the existing access road. These long-established landscape elements are part of the traditional field and woodland pattern of the valley and strengthen the natural setting that forms the backdrop to the site. Their presence adds to landscape continuity and contributes to visual enclosure along parts of the northern boundary.

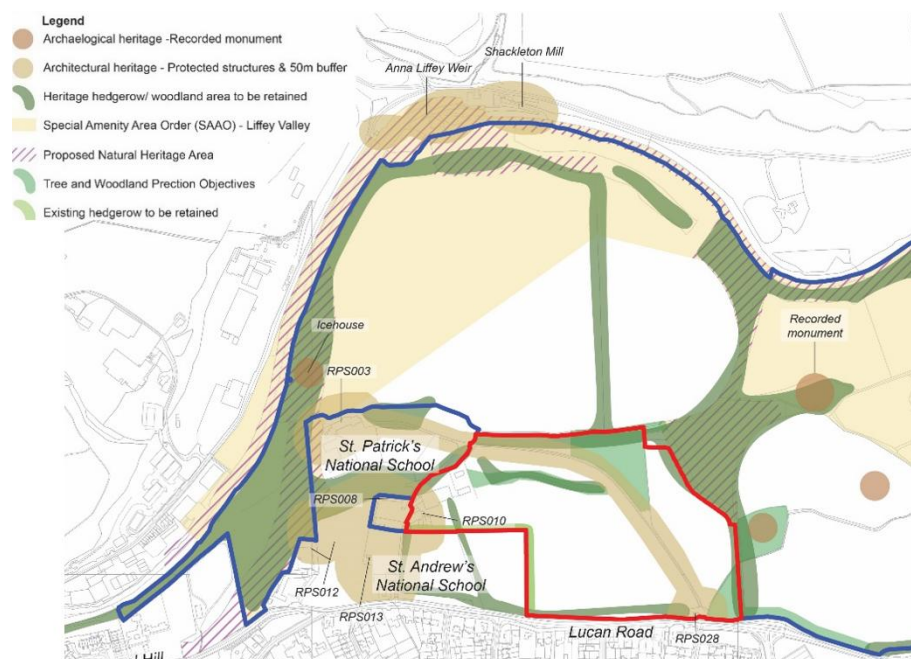


Figure 2-2 Landscape heritage (archaeological, architectural heritage, historic road and heritage hedgerow) and protected areas (SAAO, pNHA, Tree and Woodland Protection Objectives)

2.6 Landscape and Visual Sensitivity

The landscape and visual sensitivity of the site reflect the extent to which the receiving environment is susceptible to change arising from development. Sensitivity is determined by the characteristics of the landscape itself together with the nature of visual receptors who experience the site and its surroundings. The mapped areas of visual vulnerability draw on the relationship between heritage features, protected designations and landscape character established in the previous section.

Landscape sensitivity varies across the site due to its proximity to the Liffey Valley SAAO, pNHA, heritage features and established woodland structure. Areas immediately adjacent to the SAAO and pNHA represent the highest landscape sensitivity, owing to their scenic, ecological and cultural importance to the SAAO area.

Areas containing heritage hedgerows, the historic access route, and the setting of protected structures exhibit visual sensitivity as well, these features contribute to the site's experience, landscape continuity and baseline landscape character. More enclosed or visually contained parts of the site, particularly at the southern site, close to the urban edge of Lucan, generally present a lower landscape sensitivity, with reduced influence from protected landscapes or heritage assets and reduced risk of impact to those areas.

Visual sensitivity is influenced by the importance and susceptibility of visual receptors, including users of the Liffey Valley, local residents, walkers, and road users. Receptors within or overlooking protected landscapes, such as those using the SAAO pathways or viewing the valley from higher ground, have higher visual sensitivity due to the value placed on scenic quality and natural character. The areas of flat land at the top of the valley are of lower visual sensitivity due to no visual receptors in close proximity are situated on higher ground.

The areas of higher visual vulnerability correspond with open, elevated or outward-facing slopes that have scenic views of the River Liffey SAAO lands and users who walk within the lands, predominately along the northern river edge which has limited long distance views due to dense tree cover. These are areas where visual change would be most noticeable. The site has features that could provide significant mitigation measures and space to reinforce and strengthen these measures.

The southern edge of the site, adjoining the built-up area of Lucan sits on a relatively flat terrain and due to these levels, have limited views of protected or sensitive landscape and visual features. This area represents the lowest level of visual vulnerability within the study area. This part of the site is visually contained by existing hedgerows, tree belts and the suburban context along Lucan Road, resulting in limited long-distance visibility and a lower degree of landscape openness. Visual receptors in this area have a lower susceptibility to landscape change than receptors within or overlooking the site. As a result, the southern interface has a greater capacity to accommodate change without significantly altering the wider landscape character or prominent views towards the valley.

All potential landscape and visual assessments would be carried out in full and in accordance with planning processes and GLVIA3 guidance as part of the development of the masterplan.

2.7 Consistency with the Liffey SAAO

The proposed site lies immediately south of the Liffey Valley SAAO boundary. No development is proposed within the designated SAAO lands, ensuring alignment with the statutory objective to protect the scenic, ecological and recreational character of the Liffey Valley. The location of the SAAO with respect to the site boundary is pictured in Figure 2-3 below.

The proposed Development Plan variation further strengthens this relationship through Specific Local Objective CS7 SLO2, which requires the delivery of a Liffey Valley Park within the adjoining High Amenity lands in tandem with, or prior to, residential development of the site. This framework ensures that the landscape and amenity priorities of the SAAO are actively advanced as part of the overall development strategy.

The overarching principle is to ensure that development positively responds to the Liffey Valley landscape, avoids adverse effects on the SAAO, and supports the wider recreational, ecological and cultural objectives for the valley.

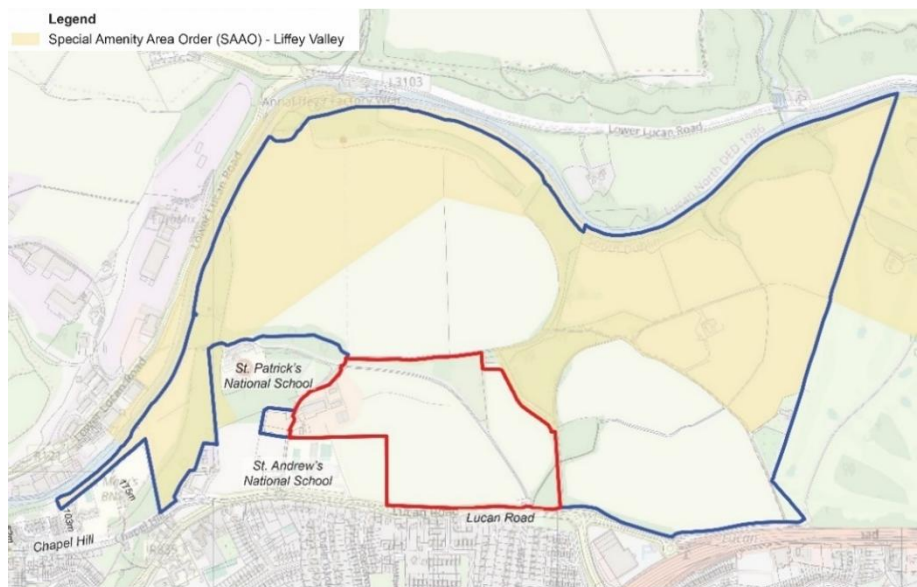


Figure 2-3 Location of Liffey Valley SAAO with respect to the site boundary

2.8 Landscape and Visual Mitigation Strategy

The mitigation strategy set out below consolidates all landscape, visual and heritage measures to demonstrate how the proposal supports the delivery of the SAAO and its priorities.

Mitigation measures have been developed to respond directly to the site and its surrounding landscape and visual sensitivities, ecological context and heritage setting, while also aligning with the SAAO's long-term priority to secure public access, amenity enhancement and conservation.

The approach ensures that development is in the lowest sensitivity parts of the site and that the relationship with the Liffey Valley is strengthened rather than diminished with focus on protecting the areas of lower sensitivities. Key mitigation and compliance measures include:

- **Retention and enhancement of existing hedgerows, woodland and field boundaries**, particularly along the northern and central parts of the site, to

maintain ecological connectivity, preserve landscape structure and support the SAAO objective of enhancing the natural character of the valley.

- **Protection of key views across the site**, ensuring that skyline relationships and scenic viewpoints associated with the SAAO are preserved and that development does not obstruct or diminish significant views identified in the Order, including those from Lower Road and Head of the Glen.
- **Integration of open space and green infrastructure as structuring elements**, creating a natural transition between the development and SAAO lands and reinforcing the long-term ambition to develop the Liffey Valley Park and associated recreational routes, as envisaged under the Liffey Valley SAAO.
- **Allowing for future public access and recreational improvements**, linear public riverbank footpaths, pedestrian or amenity routes forming part of the Liffey Valley Park vision.
- **Support for heritage conservation objectives** through the sensitive treatment of views and landscape character associated with nearby heritage assets, including Shackleton's Mill. The landscape led approach ensures that development does not compromise the wider setting required for their appreciation.
- **Provision of natural and seminatural areas** along the northern interface of the site, strengthening biodiversity and maintaining the ecological character of the valley, consistent with the SAAO's environmental protection and recreation.
- **Use of vegetated visual buffers**, hedgerows and tree belts to soften development edges and ensure new buildings do not intrude upon key visual receptors within the valley, supporting the objective of preserving and enhancing important valley views.
- **Maintaining flexibility for future SAAO initiatives**, ensuring the development does not prevent amenity and recreational enhancement of the valley, future car parking provision within SAAO lands, facilities for anglers and canoeists, or the removal or lowering of visual barriers along key viewpoints. The design intentionally avoids introducing any new barriers that could conflict with these priorities.

- **Respecting the setting of protected structures and historic features**, ensuring that cultural landscape elements remain legible and connected to the wider Liffey Valley character.

Together, these measures ensure that the proposed development responds constructively to the site's landscape constraints, protects the Liffey Valley's environmental and visual qualities, and supports delivery of the SAAO's statutory aims while enabling appropriate residential development.

The landscape-led approach outlined above demonstrates that development of the St Edmundsbury lands can be accommodated in a manner that respects the environmental sensitivities of the Liffey Valley while reinforcing the recreational, ecological and amenity values of the Special Amenity Area Order.

The assessment identifies that the southern portion of the site adjoining the existing built edge of Lucan presents the lowest landscape and visual sensitivity and therefore represents the most appropriate location for accommodating residential development while protecting the character of the wider Liffey Valley landscape.

Several submissions received as part of the public consultation process highlight concerns regarding potential visual impact on the Liffey Valley landscape and the protection of the SAAO. These concerns are acknowledged and reflect the strong local appreciation of the valley's scenic and recreational value. The assessment presented above provides an objective baseline analysis of landscape character, visual sensitivity and heritage context and demonstrates how development of the St Edmundsbury lands can be accommodated in a manner that respects the environmental and visual qualities of the wider Liffey Valley landscape. At Development Plan variation stage, the assessment focuses on the strategic suitability of lands, with detailed landscape design, visual assessment and mitigation measures addressed through the subsequent master planning and planning application stages.

2.9 Comparative Planning Context – Development in or Adjacent to Special Amenity Area Orders

It is also relevant to consider the wider planning context in which SAAOs operate in Ireland. SAAOs are intended to protect areas of outstanding natural beauty and recreational value while ensuring that development proposals are

carefully assessed and managed through the planning system. They do not automatically preclude all forms of development.

In practice, development has been permitted both within SAAO areas and within their immediate buffer or setting, if proposals are appropriately designed and assessed having regard to the landscape, ecological and heritage sensitivities of the area.

2.9.1 Howth Special Amenity Area Order

The Howth Special Amenity Area Order, confirmed in 2000, protects approximately 547 hectares of land on the Howth Peninsula, including coastal cliffs, heathland, woodland and established residential areas.

The Howth SAAO area is not entirely undeveloped. The Order itself includes existing residential neighbourhoods within the designated boundary, reflecting the fact that the peninsula has evolved over time as both a landscape and a settled community.

Recent planning decisions within the wider Howth Castle estate further illustrate how development proposals can be considered within landscapes affected by Special Amenity Area Orders. The Howth Special Amenity Area Order encompasses approximately 547 hectares and includes extensive areas of residential development within the southeastern portion of the Howth peninsula. Planning permissions granted within the Howth Castle estate have included development proposals located partly within the SAAO buffer area and adjoining lands zoned for residential use. In those cases, development was assessed through the normal planning process having regard to landscape sensitivity, environmental designations and the objectives of the SAAO. This demonstrates that the presence of a Special Amenity Area Order does not automatically preclude development within its wider setting, provided proposals are carefully designed and assessed in accordance with the relevant planning and environmental framework.

2.9.2 Bray Head Special Amenity Area Order

A similar planning context exists in relation to the Bray Head Special Amenity Area Order, which covers a prominent coastal landscape between Bray and Greystones.

Bray Head is surrounded by an established urban area, and development proposals in the wider Bray and Greystones area continue to be considered in the context of this designation. The presence of the SAAO does not sterilise land from development but instead introduces an additional framework through which planning applications are assessed having regard to landscape and environmental sensitivity.

Development proposals in areas adjoining Bray Head, including lands at Kindlestown / Kilruderry (commonly referred to as the “Foggy Fields”), have similarly been considered through the planning system with careful regard to landscape impact, ecological considerations and the visual relationship with the protected amenity landscape.

2.9.3 Relevance to St Edmundsbury

These examples demonstrate that development occurring within or adjacent to SAAO landscapes is not unusual within the Irish planning system, provided that such development is:

- appropriately located relative to existing settlements,
- carefully designed to respond to landscape and heritage sensitivities, and
- supported by robust environmental assessment and planning safeguards.

The approach proposed for the St Edmundsbury lands follows this established planning practice.

The proposed variation does not seek to weaken the protections associated with the Liffey Valley Special Amenity Area Order. Instead, it introduces a structured planning framework which:

- links residential development directly to the delivery of parkland within the Liffey Valley,
- requires the preparation of a comprehensive masterplan, and
- mandates detailed ecological, landscape and heritage assessments prior to any planning application.

The approach proposed for the St Edmundsbury lands follows the same principle, whereby development adjoining the Liffey Valley landscape would be carefully planned and assessed through the masterplanning and planning application processes to ensure that the character and environmental value of the valley are protected.

3. Environmental Considerations

The proposed variation does not remove or weaken the High Amenity designation applying to the lands within the SAAO. These lands remain protected under the existing High Amenity zoning and the Liffey Valley SAAO and will continue to be subject to the policies and objectives of the South Dublin County Development Plan which safeguard the landscape, ecological and recreational value of the valley. Rather than undermining these protections, the proposed policy framework provides a practical mechanism to enhance them through the delivery of the Liffey Valley Park within the adjoining High Amenity lands. This approach directs residential development to lands outside the valley’s most sensitive areas while facilitating the enhancement of public access, ecological connectivity and recreational amenity within the protected landscape. In this regard, the proposed variation reinforces, rather than diminishes, the objectives of the High Amenity zoning and the Liffey Valley SAAO.

Environmental considerations associated with the proposed variation are addressed at a strategic level through the Strategic Environmental Assessment (SEA) prepared by SDCC as part of the Variation No. 2 process.

The SEA evaluates the environmental implications of identifying lands for potential residential development having regard to biodiversity, landscape, water, cultural heritage and flood risk. Importantly, the SEA recognises that the purpose of a Development Plan variation is to establish a strategic planning framework, with detailed environmental design and assessment undertaken through the subsequent masterplanning and planning application stages.

The proposed variation does not remove or weaken any of the environmental protection policies contained within the South Dublin County Development

Plan 2022–2028. Existing statutory safeguards relating to biodiversity protection, landscape character, heritage conservation, green infrastructure and flood risk management continue to apply fully to the lands.

In addition, the proposed policy framework introduces further safeguards through CS7 SLO2, which requires the preparation of a comprehensive masterplan and a series of environmental and technical assessments prior to the submission of any planning application.

These measures ensure that development of the lands will proceed in a structured, transparent and environmentally responsible manner.

3.1 Flood Risk and the Liffey Valley

Flood mapping undertaken as part of the OPW National Catchment Flood Risk Assessment and Management (CFRAM) Programme confirms that the lands proposed for residential development lie outside identified flood risk zones associated with the River Liffey floodplain as shown in Figure 3-1.



Figure 3-1 Areas of site identified as at risk for flooding

The provision of parkland, open space and green infrastructure within floodplain areas is consistent with the Planning System and Flood Risk

Management Guidelines, which identify a range of water compatible development and less vulnerable development as appropriate within such areas. Water compatible uses include amenity open space, outdoor sports and recreation, and water-based recreational uses, while less vulnerable development may include certain recreational infrastructure and elements of local mobility infrastructure associated with open space.

Within the context of the proposed Liffey Valley Park, this provides an opportunity to formalise and enhance the existing network of informal trails referenced in third-party submissions as being used by local walkers. The delivery of a structured network of walking and cycling routes within the valley corridor would create an important recreational and active travel connection between the proposed residential lands, Lucan Village and the wider Liffey Valley green infrastructure network. Such routes are consistent with the Open Space use permitted in principle under the current High Amenity (HA-LV) zoning objective and represent an appropriate and policy compliant use of floodplain lands, accommodating compatible recreational infrastructure while directing built residential development to lands outside identified flood risk areas.

Chapter 4 of the Planning System and Flood Risk Management Guidelines provides that flood risk should be addressed through the planning hierarchy, with Development Plans and local area plans undertaking strategic flood risk assessment while more detailed site-specific assessment is carried out at development management stage.

Detailed flood risk assessment and hydraulic modelling will be undertaken at the masterplanning and planning application stages to ensure full compliance with the Planning System and Flood Risk Management Guidelines and the policies of the South Dublin County Development Plan.

The proposed Variation adopts this approach by ensuring that lands within the River Liffey floodplain remain within the High Amenity (HA-LV) zoning and are incorporated into the delivery of the Liffey Valley Park. The park framework provides an appropriate planning response to the environmental and hydrological characteristics of the valley by accommodating compatible recreational and landscape uses within the floodplain while directing built development to lands outside flood risk areas. Accordingly, the proposed Variation:

- Directs residential development to lands outside identified flood risk zones;
- Retains floodplain lands within the High Amenity designation and the Liffey Valley SAAO; and
- Integrates these lands into the delivery of the Liffey Valley Park, facilitating walking and cycling routes, passive recreation and landscape management consistent with both the HA-LV zoning objective and national flood risk guidance.

3.2 Relationship with the Liffey Valley SAAO

The lands to the north and west of the proposed residential zoning fall within the Liffey Valley SAAO and remain zoned High Amenity under the South Dublin County Development Plan.

The proposed variation does not alter or weaken this designation.

High Amenity zoning applies to landscapes of special character where inappropriate development could diminish landscape value. The Development Plan requires that such areas be protected from inappropriate development and that their distinctive landscape character be reinforced.

Rather than undermining these protections, the proposed policy framework provides an opportunity to advance the long-standing aim the Liffey Valley SAAO, including:

- Enhancement of the valley for recreational and amenity use;
- Improved public access to the river corridor;
- Provision of walking routes and green infrastructure connections; and,
- Protection of the valley's ecological and landscape character.

The proposed Liffey Valley Park, required under CS7 SLO2, will be delivered within the High Amenity lands adjoining the River Liffey and must be provided in tandem with, or prior to, residential development.

This requirement provides a practical mechanism to progress the long-standing ambition for a Liffey Valley Park, while ensuring the continued protection of the valley's environmental and landscape qualities.

3.3 Cultural Heritage

A number of heritage assets are located in the vicinity of the St Edmundsbury lands (refer to Figure 3-2), including two protected structures situated within the area proposed for residential development:

- St Edmundsbury Gate Lodge (NIAH Ref. 11202009)
- House (NIAH Ref. 11202004)



Figure 3-2 Protected structures in and within proximity to the site boundary (GSI, 2025)

These buildings form part of the historic landscape and represent an important component of the site's local heritage character.

The proposed policy framework requires that development respond appropriately to the setting and special interest of protected structures and their curtilage, as part of the masterplanning and design process.

Through careful planning and conservation-led design, these structures can be retained, sensitively restored and beneficially reused, potentially contributing to community or social infrastructure uses within the future development.

This approach ensures that heritage assets are protected and enhanced rather than undermined, consistent with the objectives of the South Dublin County Development Plan.

3.4 Ecology and Landscape

The St Edmundsbury lands form part of the wider landscape context of the Liffey Valley corridor, which contains a mosaic of habitats including agricultural lands, hedgerows, woodland and riparian environments.

It is recognised that species typical of river valley environments occur within the wider area. Ecological considerations will therefore form an important part of the future planning of the lands.

Environmental and ecological surveys have commenced to inform the masterplanning process, ensuring that development proceeds in a transparent and evidence-based manner.

Importantly, the proposed policy framework under CS7 SLO2 requires the preparation of a comprehensive Ecological Impact Assessment to examine usage of the site and surrounding lands by mobile species.

The policy framework also requires the retention and enhancement of the east-west hedgerow and tree line located in the northern portion of the proposed residential site, as recorded on the 1st Edition Ordnance Survey maps.

These landscape features form part of the historic landscape structure of the site and represent important elements of the local green infrastructure network.

Through the masterplanning process, ecological considerations will inform the layout and design of development, ensuring that landscape features are retained and ecological connectivity between the site and the Liffey Valley corridor is protected.

3.5 Consideration of Local Concerns

Submissions received as part of the public consultation process highlight concerns raised by local residents relating to environmental protection, biodiversity, flood risk, infrastructure and the character of the Liffey Valley.

These concerns are acknowledged and reflect the strong appreciation of the local community for the environmental qualities of the valley landscape.

However, it is important to note that the Development Plan variation establishes a strategic planning framework only. Detailed environmental design, infrastructure planning and site layout will be addressed through the subsequent masterplanning and planning application stages, where full technical assessment and environmental studies will be undertaken.

In particular, CS7 SLO2 introduces a number of safeguards which directly respond to issues raised in submissions, including:

- Preparation of a comprehensive masterplan agreed with the planning authority
- Completion of an Ecological Impact Assessment
- Retention and enhancement of historic hedgerows and landscape features
- Preparation of a local landscape and historical character assessment
- Detailed transport and infrastructure assessments
- A design statement addressing the protection of protected structures

These safeguards embedded in the proposed Variation ensure that environmental and community considerations will be fully addressed through the next stages of planning.

Taken together, the Strategic Environmental Assessment undertaken for Variation No. 2, the continued application of the Development Plan's environmental protection policies, and the additional safeguards embedded within CS7 SLO2, ensure that environmental considerations will be comprehensively addressed through the masterplanning and planning application stages.

The proposed Variation therefore establishes an appropriate strategic framework for the delivery of new homes within the existing urban area of Lucan while safeguarding the environmental and landscape qualities of the Liffey Valley. Importantly, the requirement to deliver a Liffey Valley Park within the adjoining High Amenity lands provides a significant opportunity to advance the aims and priorities of the Liffey Valley SAAO, securing public access to the valley while protecting its ecological, landscape and recreational value.

4. Infrastructure-led Development Framework

A detailed infrastructure capacity assessment for the Applicant's landholding, which includes the St Edmundsbury lands, was previously carried out as part of the response to SDCC's November 2025 Non-Statutory Public Consultation and is included in Appendix A. This section provides a summary of the findings of the infrastructure capacity assessment in the context of the St Edmundsbury lands specifically. Infrastructure delivery for the St Edmundsbury lands will be guided by a masterplan for the proposed development and will be delivered through a phased and coordinated approach.

4.1 Transport

4.1.1 Transport Context and Strategic Planning Position

The St Edmundsbury lands are located north of Lucan Village and directly adjacent to the R835 Lucan Road, an established transport corridor connecting Lucan Village with the wider national road network including the N4 and M50. The corridor currently accommodates pedestrian facilities, bus priority infrastructure and public transport services and forms an important movement corridor serving the Lucan area.

The site therefore occupies a highly accessible location within the existing urban structure of Lucan, within walking and cycling distance of Lucan Village

and a wide range of local services including retail, education, community and recreational facilities, refer to Figure 4-1.

The R835 corridor is served by a number of bus routes including the C Spine (C3 and C4) introduced as part of the BusConnects programme, as well as additional express and orbital services including X30, X31, X32, X25 and P29 (refer to Figure 4-2). These services provide frequent connections to Dublin City Centre and surrounding employment areas, offering a viable alternative to private car travel.



Figure 4-1 Location of site in relation to Lucan Village and the surrounding transport network

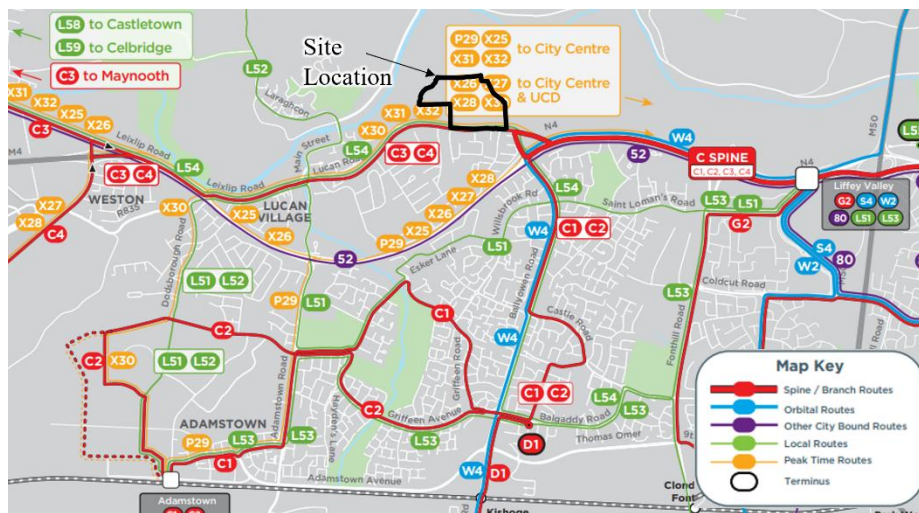


Figure 4-2 Bus services delivered as part of BusConnects in the vicinity of the site

Importantly, the corridor will benefit from further infrastructure investment through the Lucan to City Centre Core Bus Corridor Scheme, which will deliver enhanced bus priority measures as well as improved walking and cycling infrastructure along the R835. These improvements are intended to increase the reliability and attractiveness of public transport services and to support greater use of sustainable transport modes.

At a strategic level, the location of the St Edmundsbury lands adjacent to an established public transport corridor is consistent with the National Planning Framework (NPF), which promotes compact growth and the consolidation of development within existing urban areas, particularly those located along public transport corridors.

In parallel, the Greater Dublin Area Transport Strategy 2022-2042 aims to align land-use and transport planning by prioritising development in areas where public transport and active travel infrastructure can be optimally delivered.

The development of residential lands in accessible locations such as this therefore supports broader regional objectives to reduce car dependency, promote modal shift and make efficient use of existing transport infrastructure.

4.1.2 Local Connectivity and Integration with Lucan Village

In addition to its location on an established transport corridor, the St Edmundsbury lands benefit from close proximity to Lucan Village, which contains a wide range of services and facilities including schools, retail outlets, community services and recreational amenities as shown in Figure 4-3.

The relationship between the site and Lucan Village provides a strong opportunity to support active travel modes such as walking and cycling, particularly for short local journeys.



Figure 4-3 Local amenities and schools located in vicinity of the site

Importantly, the site is positioned adjacent to the Liffey Valley green infrastructure corridor, which provides opportunities to enhance pedestrian and cycling connectivity between the site, Lucan Village and the wider area through the integration of greenways, parkland routes and recreational trails.

The proposed policy requirement for the delivery of a Liffey Valley Park alongside development of the St Edmundsbury lands presents a significant opportunity to enhance active travel connectivity in the area. The creation of new parkland, greenways and trail routes within the Liffey Valley corridor would enable the delivery of high-quality pedestrian and cycling connections linking the site directly with Lucan Village, nearby schools, community facilities and the wider Liffey Valley green infrastructure network.

These routes would provide attractive, safe and traffic-free movement corridors for everyday journeys as well as recreational use, helping to reduce reliance on the private car for short local trips. In this regard, the delivery of the park and associated greenway infrastructure has the potential to function not only as a recreational amenity but also as an important element of the local active travel network, supporting the modal shift objectives set out in national, regional and local transport policy.

The future masterplanning of the lands presents an opportunity to strengthen these connections by providing high-quality pedestrian and cycling routes linking the site to Lucan Village, local schools, community facilities and the wider green infrastructure network. These routes could utilise existing and enhanced green infrastructure corridors to create attractive and safe connections for everyday journeys.

Such connections would support the 10-minute neighbourhood concept promoted in the South Dublin County Development Plan, whereby residents are able to access a wide range of daily services within a short walk or cycle of their homes.

Enhancing pedestrian and cycling connectivity through the park and green infrastructure network would therefore help to reinforce the relationship between the St Edmundsbury lands and the existing urban centre of Lucan Village while promoting healthier and more sustainable travel patterns.

4.1.3 Transport Demand and Capacity

Based on the indicative development capacity of the St Edmundsbury lands (approximately 540 residential homes), a preliminary high-level review of potential transport demand has been undertaken using standard industry methodologies including TRICS database trip rates and projected modal share targets consistent with national and local policy objectives.

This assessment indicates that the transport demand associated with development of the lands would represent a relatively modest incremental addition to the existing transport network.

The analysis indicates that development of approximately 540 residential homes may generate approximately 191 vehicular trips during the AM peak period. The majority of these trips (approximately 85% or 163 vehicles) are expected to travel eastwards towards the national road network and Dublin City Centre, reflecting established commuting patterns and the location of major employment centres.

A smaller proportion of trips (approximately 15% or 29 vehicles) are expected to travel westwards towards Lucan Village. The expected vehicular traffic trip distribution from the proposed development is shown in Figure 4-4.

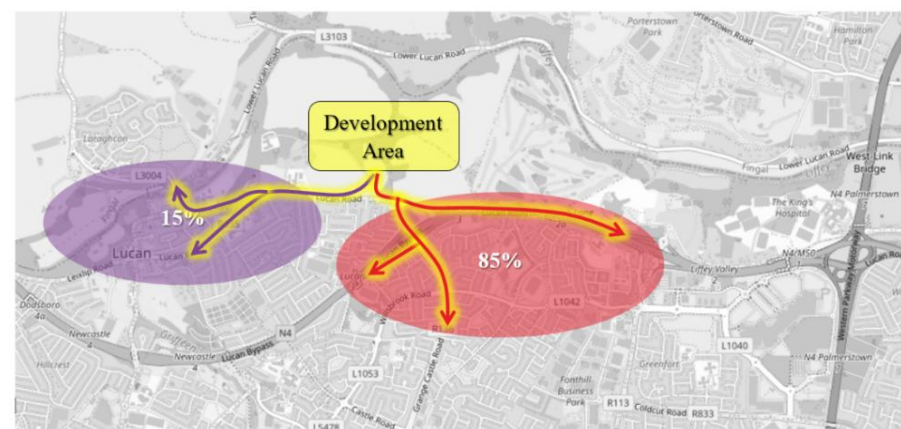


Figure 4-4 vehicular traffic trip generation from the proposed development

In practical terms this equates to approximately one additional vehicle every two minutes on the R835 corridor during the peak hour, representing a modest incremental change when considered within the context of overall traffic volumes along the corridor.

In addition to vehicular traffic, the development is expected to support increased use of sustainable transport modes. Preliminary analysis indicates that approximately 126 additional passengers may utilise public transport services during the morning peak period as a result of development of the lands.

When distributed across the range of bus services operating along the corridor, this level of demand represents a manageable increase in passenger numbers, particularly when considered alongside planned improvements to bus capacity and reliability under the BusConnects programme.

A proportion of trips associated with the development are also expected to be undertaken by walking and cycling, reflecting the close proximity of the site to Lucan Village and nearby services.

Taken together, these findings indicate that the transport demand associated with development of the St Edmundsbury lands would represent a modest and manageable increase in activity within the transport network, particularly when considered alongside planned improvements to public transport and active travel infrastructure in the area.

4.1.4 Supporting Public Transport Critical Mass

Development of the St Edmundsbury lands also presents an opportunity to strengthen the long-term viability and effectiveness of public transport services operating along the Lucan Road corridor.

Public transport systems operate most effectively where there is a sufficient concentration of population within walking distance of services, providing a critical mass of passengers which supports service frequency and reliability.

National and regional planning policy therefore emphasises the importance of locating new residential development in areas where it can reinforce existing public transport corridors and support modal shift away from private car travel.

The St Edmundsbury lands are located directly adjacent to the R835 Lucan Road public transport corridor, which is already served by multiple bus services including the BusConnects C Spine routes.

The introduction of additional residential population within walking distance of these services can therefore strengthen the passenger base for public transport, supporting the continued enhancement of service frequency and reliability.

In this regard, the estimated 126 additional public transport passengers during the morning (AM) peak period associated with development of the site represents not only an incremental increase in demand but also a positive

contribution towards the utilisation and long-term viability of sustainable transport infrastructure along the corridor.

The proposed development of the St Edmundsbury lands represents an opportunity to integrate land use with existing and planned public transport and active travel infrastructure, supporting more sustainable mobility patterns and reducing reliance on private car travel. The location of the site adjacent to an established public transport corridor, combined with the opportunity to deliver enhanced walking and cycling connections through the proposed Liffey Valley Park and wider green infrastructure network, aligns with national, regional and local policy objectives which seek to concentrate development in accessible locations capable of supporting sustainable transport.

The development of residential lands in such locations supports the efficient use of existing infrastructure while reinforcing the viability of public transport services and active travel networks.

4.1.5 Issues Raised in Third-Party Submissions

A review of submissions made during the public consultation process indicates that a number of observations raise concerns regarding traffic congestion, infrastructure pressures and public transport capacity in the Lucan area.

In particular, submissions reference existing congestion along the Lucan Road corridor, the N4 and routes through Lucan Village, as well as pressure on public transport services and concerns regarding the potential transport impacts associated with additional residential development.

These concerns are acknowledged and reflect wider transport pressures experienced across many suburban areas of the Dublin metropolitan region that have experienced significant population growth in recent decades.

However, it is important to consider that the St Edmundsbury lands are located in a position which benefits from:

- Direct access to an established public transport corridor;
- Proximity to Lucan Village and local services;
- Planned investment in sustainable transport infrastructure through BusConnects and the Greater Dublin Area Cycle Network; and,

- Opportunities to significantly enhance walking and cycling connectivity through the delivery of the Liffey Valley Park required under the proposed policy framework, which will provide new pedestrian and cycling routes linking the site with Lucan Village, local schools, community facilities and the wider Liffey Valley green infrastructure corridor.

As outlined above, preliminary analysis indicates that the transport demand associated with development of the lands would represent a modest incremental addition to the existing transport network, while also contributing to the critical mass of population necessary to support the continued enhancement of public transport services along the corridor.

4.1.6 Future Masterplanning and Detailed Transport Assessment

It is important to emphasise that the current analysis represents a high-level transport review appropriate to the Development Plan variation stage.

Should the lands be rezoned, the next stages of the planning process would involve a comprehensive masterplanning exercise and detailed transport assessment to ensure that any future development is appropriately integrated with the surrounding transport network.

These subsequent stages would include:

- The preparation of a site-wide masterplan addressing permeability, connectivity and access strategy
- Detailed Transport Impact Assessment and traffic modelling
- Junction capacity analysis and access design
- Integration with planned BusConnects and cycle network improvements
- Delivery of enhanced walking and cycling routes linking the site to Lucan Village, local schools and community facilities

The variation process therefore represents an initial strategic step, establishing the potential for development in a location with strong accessibility characteristics. Detailed design, infrastructure planning and transport assessment would follow through the subsequent masterplanning and planning application stages.

4.1.7 Transportation Conclusion

The St Edmundsbury lands are located in a highly accessible position within the existing urban structure of Lucan and adjacent to a strategic public transport corridor. Preliminary transport analysis indicates that development of the lands would generate a modest and manageable level of additional travel demand, while also contributing to the critical mass necessary to support enhanced public transport services and sustainable mobility patterns along the Lucan Road corridor. The proposed policy requirement for the delivery of a Liffey Valley Park presents a further opportunity to enhance walking and cycling connectivity between the site, Lucan Village and the wider Liffey Valley corridor, supporting the modal shift objectives of national, regional and local transport policy.

It is important to note that the current analysis represents a high-level strategic review appropriate to the Development Plan variation stage. Should the lands be rezoned, detailed transport modelling, infrastructure assessment and access design will be undertaken through the subsequent masterplanning and planning application processes to ensure that development is appropriately integrated with the surrounding transport network.

The location of the lands within an established urban area and adjacent to a strategic public transport corridor therefore represents an appropriate and sustainable location for future residential development, subject to the detailed assessment and masterplanning processes outlined above.

4.2 Water Supply and Wastewater Infrastructure

The St Edmundsbury lands are located within the established water services catchment for the Dublin metropolitan area and can connect to the existing regional water supply and wastewater infrastructure network operated by Uisce Éireann.

The delivery of new homes in accessible urban locations forms a central objective of the NPF and associated national housing policy, which seeks to accelerate housing delivery within existing urban settlements supported by available infrastructure. The location of the St Edmundsbury lands within the built-up area of Lucan allows development to connect efficiently to the existing water services infrastructure network serving the wider Dublin region.

In terms of potable water supply, the site is well positioned to connect to the existing water network serving the Lucan area. The long-term resilience of water supply for the Dublin metropolitan area will be further strengthened through strategic infrastructure initiatives including the Barrow Water Supply Scheme Area Extension Project and the Eastern and Midlands Region Water Supply Project, both of which form part of the national strategy for securing water supply to support future population growth within the Greater Dublin Area.

With regard to wastewater infrastructure, the site will ultimately discharge to the Ringsend Wastewater Treatment Plant, which serves the majority of the Greater Dublin Area. The Ringsend facility is currently undergoing a significant upgrade programme designed to increase treatment capacity to approximately 2.4 million population equivalent, supporting continued population growth across the metropolitan region.

In parallel, wastewater infrastructure serving the Dublin region is being further expanded through the Greater Dublin Drainage Project at Clonshaugh, which received planning permission in September 2025. This plant will provide additional wastewater treatment capacity for up to 500,000 population equivalent, together with associated regional sewer infrastructure.

These strategic infrastructure investments form part of Uisce Éireann's Capital Investment Programme 2025–2029 and demonstrate that wastewater infrastructure serving the Dublin metropolitan area is actively being expanded to service projected population growth.

A Pre-Connection Enquiry was submitted to Uisce Éireann in respect of the St Edmundsbury lands. Uisce Éireann confirmed that connection to potable water and wastewater infrastructure is feasible, subject to upgrades to elements of the local network within the immediate area. This confirmation demonstrates that the lands can be serviced by the existing and planned water services infrastructure network.

It is important to recognise that water services infrastructure across the Dublin metropolitan area operates within a dynamic and evolving network, where infrastructure upgrades and network expansion occur alongside population growth. Major metropolitan infrastructure such as wastewater treatment plants

and trunk sewer networks is continually upgraded and expanded as part of the normal evolution of urban infrastructure systems.

The ability to deliver development ahead of major regional infrastructure upgrades through phased connection arrangements and local network upgrades is a well-established and accepted approach.

The scale of the St Edmundsbury landholding allows for a phased development strategy, whereby early phases of housing delivery can align with confirmed available network capacity while subsequent phases can be delivered alongside planned infrastructure upgrades.

This approach aligns with the proposed policy framework set out in the Variation's Specific Local Objective CS7 SLO2, which requires the preparation of a comprehensive masterplan for the lands in advance of the submission of any planning application for residential development. The masterplanning process will provide the appropriate mechanism to coordinate the phasing of development with the provision of supporting infrastructure, including water services.

Through this process, detailed engineering design, infrastructure capacity assessments and connection agreements with Uisce Éireann will be progressed to ensure that development proceeds in a coordinated and sustainable manner consistent with the capacity of the water services network.

Accordingly, the proposed policy framework already provides a clear mechanism to ensure that the detailed planning and delivery of water services infrastructure will be addressed through the masterplanning and subsequent planning application stages in consultation with Uisce Éireann and therefore does not present a constraint to the identification of the lands for residential development at this stage.

In addition, any future development will incorporate a range of water demand reduction and sustainability measures, including greywater reuse, rainwater harvesting and smart water management systems. These measures will reduce overall water consumption and limit peak wastewater loading on the receiving network.

4.2.1 Issues Raised in Third-Party Submissions

Submissions received during the public consultation process raise concerns regarding infrastructure capacity and suggest that development of the lands would be premature pending further infrastructure upgrades. However, such arguments do not reflect the role of the Development Plan variation process.

The purpose of the variation process is to identify appropriate lands for residential development in sustainable urban locations, having regard to the strategic infrastructure context and the capacity of existing networks to evolve and expand in line with growth. Detailed infrastructure design, modelling and connection agreements are appropriately addressed at the planning application stage in consultation with Uisce Éireann.

The confirmation of connection feasibility by Uisce Éireann, together with the ongoing expansion of wastewater infrastructure across the Dublin metropolitan area, demonstrates that the St Edmundsbury lands represent a serviceable and deliverable location for residential development contiguous with the existing urban area of Lucan, consistent with national policy objectives for the timely delivery of new homes.

These considerations demonstrate that infrastructure availability for water supply and wastewater management does not present a constraint to the identification of the lands for residential development at this Development Plan variation stage.

4.3 Drainage and Surface Water Management

The St Edmundsbury lands are located adjacent to existing surface water drainage infrastructure along the R835 Lucan Road, where a 300mm public surface water sewer is present. The proximity of this infrastructure provides an appropriate connection point for the management of surface water arising from future development of the lands.

As with any new development, appropriate management of surface water runoff will be required to ensure that post-development flows do not exceed existing greenfield runoff conditions. Surface water management for the development will therefore be designed in accordance with the Greater Dublin Strategic Drainage Study (GSDS) Volume 2 – New Development and the

relevant policies embedded in the South Dublin County Development Plan 2022–2028.

The drainage strategy for the site will incorporate a combination of stormwater attenuation and Sustainable Drainage Systems (SuDS) designed to replicate natural drainage processes and ensure that runoff from the development is effectively controlled and treated prior to discharge.

Key drainage principles guiding development of the site will include:

- Stormwater attenuation systems designed to limit post-development runoff rates to existing greenfield conditions.
- The incorporation of SuDS to reduce runoff volumes and improve water quality through measures such as bioretention systems, rain gardens, filter drains, permeable paving, swales, green roofs and attenuation ponds.
- Compliance with Policy GI4 of the South Dublin County Development Plan, which requires SuDS infrastructure to maximise both ecological and amenity value.

The application of SuDS techniques ensures that surface water is managed at source, attenuated on site and treated through natural filtration processes prior to discharge. This approach protects downstream watercourses and supports water quality objectives within the Liffey catchment.

It is also important to note that the implementation of SuDS within new developments typically represents an improvement over unmanaged runoff conditions, where surface water runoff occurs without attenuation or treatment.

Importantly, the proposed policy requirement for the delivery of a Liffey Valley Park alongside development of the lands presents a significant opportunity to integrate surface water management within the wider green infrastructure framework. SuDS features can therefore be incorporated into the parkland landscape as multifunctional elements that support drainage management, biodiversity enhancement and recreational amenity.

This integrated approach to drainage design aligns with the objectives of the Greater Dublin Strategic Drainage Study, which promotes the incorporation of SuDS within landscape and green infrastructure networks as part of sustainable urban development.

A detailed site-specific SuDS Strategy will be prepared as part of the masterplanning process required under SLO2, ensuring that surface water management is fully integrated with the overall design and layout of the development.

As with other infrastructure considerations, the current assessment represents a strategic overview appropriate to the Development Plan variation stage. Detailed hydraulic modelling, flood risk assessment and drainage design will be undertaken through the subsequent masterplanning and planning application stages to ensure that development proceeds in a coordinated and sustainable manner consistent with the requirements of the Greater Dublin Strategic Drainage Study and the South Dublin County Development Plan.

Therefore, surface water management does not present a constraint to the identification of the lands for residential development at Development Plan variation stage.

4.3.1 Issues Raised in Third-Party Submissions

Submissions raise concerns regarding potential flood risk, surface water runoff and possible impacts on water quality within the River Liffey corridor. These concerns are acknowledged. However, the detailed design of surface water management systems is appropriately addressed at the planning application stage, where site-specific hydraulic modelling and drainage design are undertaken.

As outlined above, any future development of the St Edmundsbury lands will incorporate a comprehensive Sustainable Drainage Systems (SuDS) strategy, ensuring that surface water runoff is attenuated to greenfield rates and treated prior to discharge. The application of SuDS measures represents best practice in modern urban development and typically results in improved management of surface water compared to unmanaged runoff from existing agricultural lands.

Detailed drainage design and flood risk assessment will therefore form part of the masterplanning and planning application stages, ensuring that development proceeds in accordance with the requirements of the Greater Dublin Strategic Drainage Study and the South Dublin County Development Plan.

4.4 Social infrastructure

A Social Infrastructure Audit (SIA) was prepared and submitted as part of the earlier Call for Sites process and is appended to this submission. The purpose of that audit was to review the availability of existing social and community facilities in the surrounding area and to consider how future population growth may be supported through appropriate infrastructure provision.

The proposed Variation relates to approximately 540 homes (subject to zoning & planning permission) at St Edmundsbury. It is recognised that development of this scale will generate additional demand for social and community infrastructure. However, the purpose of the Development Plan variation process is to establish an appropriate strategic planning framework for residential development in a sustainable urban location rather than to determine the detailed provision and delivery of facilities at this stage. Importantly, the proposed Variation does not remove or weaken the policy framework governing social infrastructure provision within the South Dublin County Development Plan 2022–2028. All existing policies, objectives and standards relating to community infrastructure will continue to apply fully to any future development of the lands.

Submissions received as part of the public consultation process raise concerns regarding the capacity of existing schools, childcare facilities, healthcare services and other community infrastructure in the Lucan area. These concerns are acknowledged. However, the South Dublin County Development Plan already provides a clear policy framework and established standards for the delivery of social and community infrastructure in tandem with residential growth. The detailed assessment of infrastructure requirements arising from the proposed development, including childcare provision and other community facilities, will be undertaken during the masterplanning and planning application stages, in consultation with relevant service providers and statutory agencies.

The Development Plan sets out clear standards for the provision of social and community infrastructure in tandem with residential growth, including:

- Childcare facilities at a standard of approximately one facility providing 20 places per 75 dwellings, in accordance with the Childcare Facilities Guidelines for Planning Authorities.

- School provision, based on Department of Education standards, indicates that approximately 11.5% of the population will require primary school places and 7.5% post-primary places.
- Community centres, typically at a benchmark of one multi-functional centre per 8,000 population, or smaller local facilities where appropriate.
- Public open space and parks, at a standard of 2.4 hectares per 1,000 population.

These standards, together with the policies of the Development Plan under Policy COS2 (Social / Community Infrastructure), require that social, community, cultural and recreational facilities are provided in tandem with housing development and located close to the communities they serve.

The proposed Variation introduces an additional safeguard by requiring a comprehensive masterplan under CS7 SLO2 prior to the submission of any planning application. That process will enable the detailed assessment of social infrastructure needs arising from the proposed development, including:

- Childcare provision;
- Community and cultural facilities;
- Open space and recreational infrastructure;
- Walking and cycling connectivity; and
- The integration of appropriate supporting mixed-use or community floorspace.

The masterplanning process will also enable consideration of the beneficial reuse of existing protected structures within the lands for appropriate community, social or local service uses where feasible. Such an approach would support the conservation of heritage assets while contributing to the social infrastructure needs of the future community. Therefore, the proposed development should be understood within the context of a phased, masterplanned approach, through which social infrastructure provision will be assessed and delivered in tandem with residential growth, consistent with the standards and policy framework of the South Dublin County Development Plan.

The proposed residential zoning, therefore, operates within a clear and established policy framework that already requires social and community infrastructure to be planned and delivered alongside housing growth.

4.5 Green infrastructure

The St Edmundsbury lands sit within a well-established green infrastructure network associated with the Liffey Valley. The existing green infrastructure resource forms a strong natural framework which shapes the site's landscape character and informs opportunities for biodiversity protection, ecological connectivity, movement, recreation and open space integration.

This is consistent with the approach set out in Chapter 4 of the South Dublin County Development Plan 2022–2028, which defines green infrastructure as a strategically planned network of natural and semi-natural areas and environmental features designed and managed to deliver a wide range of ecosystem services, including biodiversity, water management, climate resilience, recreation, amenity and landscape protection.

Importantly, the proposed Variation does not remove or weaken the Green Infrastructure Strategy of the Development Plan. The policies and objectives of the Plan relating to biodiversity, sustainable water management, climate resilience, recreation and amenity, and landscape, natural, cultural and built heritage will continue to apply fully to the lands.

4.5.1 Existing Green Infrastructure

A significant portion of the existing green infrastructure follows the River Liffey and its associated riparian woodland. This corridor represents the primary green and blue infrastructure spine in the area, extending east-west through the Liffey Valley SAAO and forming the ecological and landscape backdrop to the site. It supports biodiversity, provides visual containment, contributes to flood management and reinforces the valley's natural identity.

To the south, along the Lucan Road interface, a further strip of established vegetation forms an additional green corridor. Although narrower, this boundary vegetation contributes to visual buffering, urban-rural transition and local biodiversity.

A north-south green infrastructure link exists along the eastern boundary of the site, providing a natural connection from the southern urban edge up to the Liffey riparian corridor. This feature forms part of a broader landscape connection and represents an important ecological route and potential active travel link between Lucan, the site and the river valley.

The site proposed to be rezoned for residential development therefore occupies a position between the established urban edge of Lucan and a strategic green infrastructure corridor, giving it a particular capacity to contribute to the strengthening and extension of the wider GI network.

4.5.2 Policy Context

The Green Infrastructure chapter of the Development Plan identifies the Liffey Valley Corridor as a strategic GI corridor of regional importance and seeks to protect and enhance its ecological, landscape, recreational and amenity value. Among the objectives of the Plan are:

- Protection and enhancement of a multifunctional GI network;
- Strengthening ecological links and reducing fragmentation;
- Protection and enhancement of riparian corridors and associated biodiversity;
- Integration of SuDS and multifunctional open space into new development;
- Support for accessible, attractive and safe routes linking settlements to the GI network; and
- protection and enhancement of the outstanding character and amenity of the Liffey Valley Corridor.

The proposed Variation aligns with these objectives. Rather than diminishing the GI function of the Liffey Valley, it provides an opportunity to secure a more coherent relationship between the existing urban area of Lucan and the adjoining valley lands through the delivery of a Liffey Valley Park, required under CS7 SLO2, in tandem with or prior to residential development.

In this regard, the Variation creates the basis for a more structured and publicly accessible green infrastructure framework, including enhanced links between

Lucan Village, the proposed residential lands, the SAAO designated lands, and the wider river corridor.

4.5.3 Opportunities for Strengthened Green Infrastructure

A notable green infrastructure opportunity is the existing east-west route across the site proposed to be rezoned in this Variation. This corridor has the potential to function as an internal green infrastructure link by integrating hedgerows, woodland planting, open space and a walking and cycling route. Its reuse would reinforce historic landscape patterns while improving connectivity from the interior of the site towards both the eastern GI link and the riparian corridor.

There is also scope to create a central green infrastructure connection informed by the alignment of existing heritage hedgerows and tree lines. Strengthening this corridor would help structure the layout of future development and enhance permeability, habitat continuity and landscape legibility.

The proposed policy framework under CS7 SLO2 is particularly important in this regard, as it requires:

- A Liffey Valley Park to be delivered within the adjoining High Amenity lands;
- An Ecological Impact Assessment to assess the use of the site and surrounding lands by mobile species;
- The retention and enhancement of the east-west hedgerow and tree line in the northern part of the site;
- A local landscape and historical character assessment; and
- A masterplan to be agreed with the planning authority in advance of any planning application.

These requirements provide a clear statutory mechanism to ensure that green infrastructure is treated as a structuring element of the future development, rather than as an afterthought.

4.5.4 Submissions Received

Submissions received during the public consultation process raise concerns regarding the protection of biodiversity, the character of the Liffey Valley, the retention of green space and the need to improve public access and connections within the valley.

These concerns are acknowledged and reflect the strong local appreciation for the environmental and amenity value of the Liffey Valley. Importantly, the Green Infrastructure Strategy of the Development Plan already provides a robust policy framework for addressing these issues, and the proposed Variation adds a further layer of site-specific safeguards through CS7 SLO2.

In particular, the proposed requirement to deliver a Liffey Valley Park, together with the retention and enhancement of important hedgerow and tree features and the preparation of a masterplan informed by ecological and landscape assessment, provides a clear mechanism to respond positively to the principal GI related issues raised in submissions.

The opportunity to formalise and enhance existing informal walking routes referenced in submissions, and to provide improved pedestrian and cycle connectivity between the site, Lucan Village, Chapel Hill and the wider Liffey Valley corridor, is also consistent with the recreational and amenity objectives of the Development Plan's GI Strategy.

4.5.5 Delivery through Masterplanning

At Development Plan variation stage, the role of the assessment is to establish that the lands can form part of an appropriate strategic GI framework. The detailed design, configuration and delivery of green infrastructure elements will be progressed through the masterplanning and planning application stages. That process will allow for the detailed integration of:

- Biodiversity and habitat protection measures;
- Riparian and ecological buffer design;
- SuDS and multifunctional open space;
- Walking and cycling links;
- Tree, hedgerow and woodland retention and enhancement;

- Landscape transition between built form and the valley corridor; and
- Recreation and amenity infrastructure associated with the proposed Liffey Valley Park.

Accordingly, the proposed Variation should be understood as providing the strategic basis for the protection, enhancement and better public integration of the Liffey Valley green infrastructure network, while detailed design and implementation will follow through the statutory masterplanning and development management process.

4.5.6 Green Infrastructure Conclusion

Taken together, the existing GI assets of the site and surrounding area, the continued application of the Development Plan's Green Infrastructure Strategy, and the additional safeguards embedded within CS7 SLO2 ensure that green infrastructure considerations will be fully addressed through the next stages of planning. The proposed Variation therefore provides an opportunity not only to accommodate residential development in an accessible urban location, but also to strengthen the ecological, recreational and landscape function of the Liffey Valley corridor through the delivery of the Liffey Valley Park and associated green infrastructure connections.

5. Park Delivery Framework

This section provides a high-level overview of how the delivery of a park within the Liffey Valley could be progressed in response to the Proposed Specific Local Objective for the St Edmundsbury lands contained in SDCC's Proposed Variation No. 2 to the Development Plan.

The proposed Specific Local Objective establishes an important ambition to enhance recreational access to the Liffey Valley while protecting the environmental qualities of the river corridor. It is recognised that the delivery of a Liffey Valley Park within the HA-LV lands will form an integral part of the overall development framework for the area. However, given the scale of the wider valley landscape, the environmental sensitivities of the corridor and the number of landholdings involved, the implementation of a park framework

is likely to occur through a coordinated and phased process informed by detailed ecological, landscape and access assessments. In this regard, the St Edmundsbury lands represent an important opportunity to contribute to the wider park vision while enabling the preparation of a comprehensive masterplan that establishes how recreational access, biodiversity protection and landscape character can be appropriately balanced.

The delivery of such a park will require ongoing collaboration with SDCC and a range of stakeholders including the public, and we welcome the opportunity to work collaboratively with the Planning Authority and relevant stakeholders to deliver a high-quality public amenity.

As outlined in the draft objective, several important considerations must be addressed in establishing an appropriate framework for the park. In order to respond constructively to the proposed Specific Local Objective, the following sections outline how each of the key elements of the draft objective may be addressed.

5.1 Enhanced recreational amenity

The lands are currently used informally by members of the local community and play an important role in providing access to nature and opportunities for both passive and active recreation.

There is also potential to consider the provision of additional formal recreational facilities, including sports pitches, which could provide a valuable amenity for local schools and the wider community.

The identification of appropriate recreational facilities will require engagement with SDCC and relevant stakeholders to determine:

- The most suitable mix of recreational uses;
- How such facilities can be appropriately accessed and integrated within the wider landscape; and
- Appropriate long-term management and maintenance arrangements.

5.2 Protecting biodiversity and strengthening the green infrastructure (GI) network

As outlined in Section 4.5 Green Infrastructure, the lands contain a number of important landscape and ecological features including mature hedgerows, woodland areas and green corridors which form part of the wider Liffey Valley green infrastructure network.

Studies will be required to fully understand the ecological characteristics of the site and surrounding lands. This will allow for the careful design of recreational infrastructure in a manner that:

- Protects and enhances biodiversity;
- Avoids fragmentation of habitats;
- Strengthens ecological connectivity; and
- Contributes positively to the wider South Dublin County green infrastructure network.

This approach aligns with the Green Infrastructure Strategy of the South Dublin County Development Plan and ensures that biodiversity protection is embedded as a core principle of the park design.

5.3 Extending to the River Liffey & Lands within the HA-LV zoning objective

The proposed strategy seeks to enhance and formalise access to the River Liffey and the lands within the High Amenity - Liffey Valley (HA-LV) zoning. At present, informal paths provide access to the river corridor. The park framework presents an opportunity to improve this access in accordance with best practice guidance, including:

- The provision of accessible routes through level or ramped paths;
- Appropriate surfacing suitable for a range of users; and
- Careful integration with the existing landscape.

The area contains dense vegetation and features of historical interest, including the former ice-house, which contribute to the ecological and heritage

complexity of the site. The design of the park will therefore require a sensitive approach that balances improved public access with the protection of ecological and landscape features.

Safety and appropriate management of public access will also be important considerations as part of the detailed design process.

5.4 Relationship with Lands Proposed for Zoning Designation RES-N

The strategy for delivering parkland within the HA-LV zoning sits alongside the proposed residential development of the lands zoned RES-N.

This approach aligns with the principles of compact urban development promoted in national and regional planning policy; whereby residential development occurs within the existing urban footprint while sensitive landscapes such as the Liffey Valley are protected and enhanced as recreational and ecological assets.

5.5 Lands north and west of St. Patrick's Hospital grounds

Any proposals for increased public access or recreational use in areas north and west of the St Patrick's Hospital lands will need to carefully consider the environmental sensitivities of the wider Liffey Valley, including the SAAO.

As such, any increase in public access within these areas will require appropriate environmental assessment and a sensitive design approach to ensure that recreational uses are accommodated without adversely affecting the receiving environment.

5.6 Connections westwards to Lucan Village and Chapel Hill

An important opportunity exists to strengthen connections between the Liffey Valley and Lucan Village.

By linking the river corridor with Lucan Village and the surrounding neighbourhoods, the park could form part of a coherent network of pedestrian

and cycling routes which connect into existing and emerging projects being progressed by SDCC.

The precise form of these connections will require further collaboration with the Planning Authority in order to identify appropriate design solutions and to address local topographical and access constraints.

5.7 Future Connections

The site also presents an opportunity to act as a catalyst for the longer-term development of a linear river park along the Liffey Valley.

Such an approach would support the priorities of the Liffey Valley SAAO, Towards a Liffey Valley Park and the broader green infrastructure ambitions of SDCC and neighbouring authorities.

Potential future initiatives could include:

- Enhanced walking and cycling routes along the river corridor;
- Improved access to heritage assets such as Shackleton's Mill;
- Sensitive boardwalk or riverside paths where appropriate; and
- Potential river crossings that enhance connectivity between both sides of the valley.

The delivery of such infrastructure would require careful consideration of land ownership, landscape sensitivity and environmental constraints, and would be progressed in collaboration with the relevant stakeholders.

In this regard, it is also noted that Kildare County Council is currently progressing a feasibility study for a potential recreational corridor along the River Liffey between Celbridge Bridge and St. Catherine's Park, Leixlip. While this project remains at an early stage, the study reflects a wider ambition to enhance recreational access along the River Liffey corridor while protecting its biodiversity and landscape character. The proposed park framework at St Edmundsbury would complement these wider initiatives by strengthening connections within the Liffey Valley and supporting the long-term vision for an interconnected network of river corridor amenities across local authority boundaries.

This approach allows for the early provision of recreational access and landscape enhancement measures while ensuring that the longer-term delivery of a wider Liffey Valley Park can evolve in a coordinated manner across the river corridor.

5.7.1 Vision

The vision for the park is to create a landscape that integrates seamlessly with the wider Lucan village environment and Liffey Valley landscape, delivering an ecological, cultural and recreational asset for the local community and the wider region.

A key feature of the proposal is the opportunity to strengthen connections between Lucan and the River Liffey, improving access to the valley landscape and creating new opportunities for recreation and nature engagement.

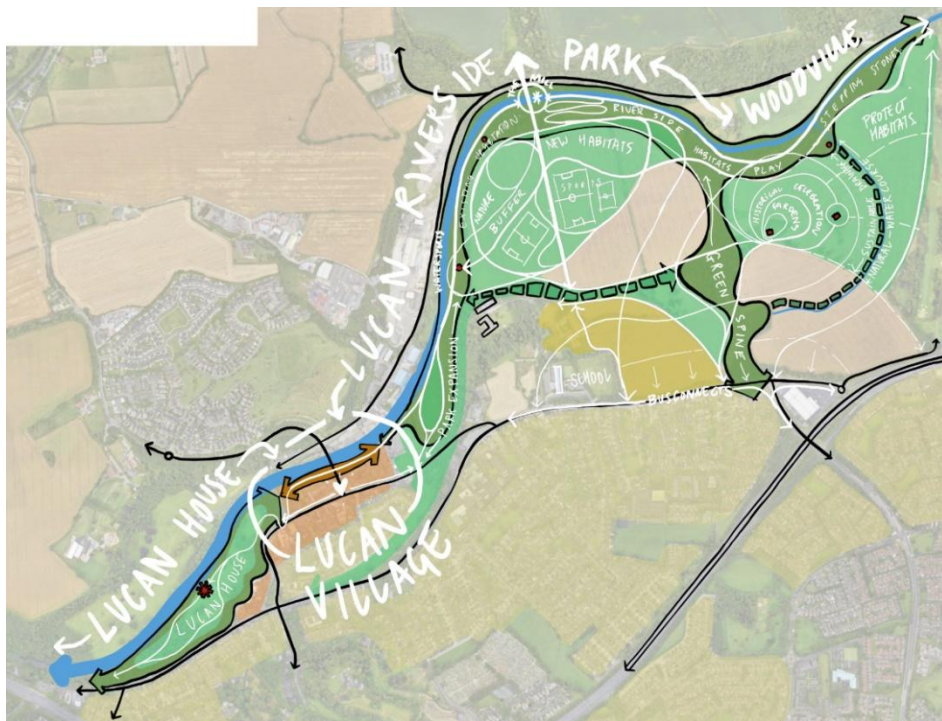


Figure 5-1 Vision for future connections to the river corridor

The delivery of such a park will require a collaborative design process involving the Planning Authority and other stakeholders to ensure that ecological sensitivities are carefully managed while delivering meaningful recreational and amenity benefits.

A phased approach to delivery will allow time for the completion of the necessary environmental assessments and design development while enabling early amenity improvements to be considered.

The applicant welcomes the opportunity to work with the Planning Authority in developing a detailed framework for the park in advance of any residential planning application and looks forward to engaging constructively with South Dublin County Council and other stakeholders to agree an appropriate and deliverable vision for the Liffey Valley Park.

A preliminary concept sketch has been prepared to explore the potential of the site and to illustrate the opportunity presented by the lands. This sketch highlights the significant potential for the site to contribute to the creation of an attractive and well-connected public park within the Liffey Valley.

To conclude, the St Edmundsbury lands present an opportunity to contribute meaningfully to the wider vision for enhanced recreational access and landscape connectivity within the Liffey Valley. The preparation of the masterplan required under CS7 SLO2 will provide the appropriate framework to coordinate park delivery, ecological protection and residential development in an integrated manner. Through this process, elements of the park framework can be delivered alongside development while ensuring that the longer-term vision for a wider Liffey Valley Park evolves in a coordinated and environmentally sensitive manner in collaboration with the Planning Authority and relevant stakeholders.

6. Conclusion

The proposed Variation No. 2 relating to lands at St Edmundsbury must ultimately be considered in the context of the statutory objective of the planning system to secure the proper planning and sustainable development of the area.

The South Dublin County Development Plan 2022–2028 establishes a clear strategy to support the consolidation of existing settlements within the Dublin City and Suburbs area while protecting and enhancing key environmental assets, including the Liffey Valley landscape. The lands at St Edmundsbury occupy a unique position at the interface between the established urban area of Lucan and the wider Liffey Valley corridor, presenting a rare opportunity to support compact residential growth in a highly accessible and serviced location while simultaneously advancing the long-standing ambition to enhance the Liffey Valley as a regional parkland resource.

The proposed variation introduces Specific Local Objective CS7 SLO2, which provides a clear and robust framework for the future development of the lands. This objective explicitly links residential development with the delivery of parkland, enhanced recreational access and strengthened green infrastructure within the Liffey Valley. Importantly, the objective requires that a comprehensive masterplan be prepared and agreed with the Planning Authority prior to the submission of any planning application, informed by ecological, landscape, heritage and transport assessments. These requirements ensure that development will proceed in a coordinated, plan-led and environmentally informed manner.

Submissions received as part of the statutory consultation process highlight the strong public appreciation of the Liffey Valley landscape and raise concerns regarding landscape protection, ecological sensitivity, infrastructure capacity and the potential implications for the Special Amenity Area Order. These concerns are acknowledged and reflect the importance of the valley as a valued environmental and recreational asset. However, the analysis presented in this submission demonstrates that the proposed variation does not weaken the protections afforded to the Liffey Valley. Rather, it introduces an additional mechanism through which the recreational, ecological and amenity objectives of the valley can be actively advanced.

In particular, the requirement to provide for the delivery of a Liffey Valley Park within the adjoining HA-LV lands ensures that the enhancement of public access, recreational amenity and green infrastructure will occur in tandem with the development of the residential lands. Given the scale and fragmented ownership of lands within the valley, the development of a regional park will

necessarily occur through a phased and collaborative approach involving multiple stakeholders over time. The St Edmundsbury lands represent one of the few locations where a substantial and coherent landholding exists capable of facilitating meaningful progress towards this long-standing objective.

The proposed development of approximately 540 homes (subject to zoning & planning permission) represents a modest and sustainable level of growth at the edge of an established settlement. The site benefits from proximity to Lucan Village, schools, community facilities and public transport services, making it well suited to support compact, transport-oriented development in accordance with national planning policy. The delivery of additional population within this location will also contribute to the critical mass required to sustain and enhance local services, community infrastructure and public transport provision within Lucan.

Importantly, the proposed rezoning does not confer development consent. Any future development proposal will remain subject to the full statutory planning process, including detailed environmental assessment, ecological studies and compliance with all relevant policies and objectives of the Development Plan. The masterplanning requirement introduced under CS7 SLO2 further ensures that landscape protection, biodiversity, heritage assets and the setting of the Liffey Valley will be carefully considered and integrated into the design and layout of any future development.

Having regard to the strategic planning context, the environmental safeguards provided, the masterplanning framework proposed and the opportunity to deliver enhanced public access and parkland within the Liffey Valley, the proposed variation represents an appropriate and balanced planning response.

The proposed rezoning of the St Edmundsbury lands can therefore be considered consistent with the principles of proper planning and sustainable development. The variation provides a plan-led mechanism to support the delivery of much-needed housing in a sustainable location while simultaneously contributing to the protection, enhancement and long-term accessibility of one of South Dublin's most important landscape and recreational assets.

Appendix A

Submission to SDCC's November 2025 Call for Sites



Response to South Dublin County Council's 'Call for Sites'

St. Edmundsbury & Woodville: A Landscape-Led Proposal for Housing, Parkland and Transport-Oriented Growth.



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Executive Summary

St. Edmundsbury & Woodville: A Landscape-Led Proposal for Housing, Parkland and Transport-Oriented Growth.

This submission relates to the St. Edmundsbury and Woodville lands, Lucan, Co. Dublin, comprising approximately 110 hectares (271 acres) immediately south of the River Liffey and directly adjoining the core of Lucan Village. Of this, approximately 61 hectares (150 acres) fall within the Liffey Valley Special Amenity Area Order (SAAO). No residential development is proposed within the SAAO, ensuring the objectives of the Order are fully respected, safeguarding the ecological, landscape, and recreational value of the valley, and contributing to the wider vision of the Liffey Valley Park.

The SAAO-designated lands will be retained and enhanced as public parkland, forming part of the proposed Liffey Valley Park, delivering:

- Accessible recreational amenity, walking and cycling trails, and biodiversity corridors;
- Connections to heritage assets, including Shackleton's Mill, Lucan Middle Icehouse, and Lucan House supporting heritage-led placemaking and tourism;
- Enhanced river access, with approximately 2.5 km of previously inaccessible riverside opened to the public; and
- Opportunities for north-south connectivity, including pedestrian bridges linking to Fingal County Council lands.

This approach builds on the objectives of the SAAO, aligns with the park proposals supported by this project proponent during the preparation of the current South Dublin Development Plan and *Towards a Liffey Valley Park*, and complements the Lucan House Masterplan, delivering integrated, high-quality open space within the wider Liffey Valley context.

Strategic Context and Housing Opportunity – Lucan Neighbourhood

The Lucan–Palmerstown–Adamstown neighbourhood is largely built out in terms of Tier 1 lands, with almost no meaningful Tier 2 landbank remaining (just 1 hectare).

Lucan is an established suburban village within the metropolitan area, with strategic transport connectivity via the N4, R835, and M50, supporting its role as a well-served, compact settlement.

The neighbourhood is now constrained in terms of sequentially appropriate, uncommitted land. Virtually all zoned land is Tier 1, with the remaining Tier 2 parcel minor in scale and not significant for housing supply. Adamstown SDZ is nearing full delivery, leaving limited opportunities to sustain housing growth in the post-Adamstown period. This represents a strategic challenge for South Dublin in meeting NPF-aligned housing growth targets for 2025 and beyond.

Residential Development at Edmundsbury & Lucan

A multidisciplinary assessment has identified three distinct developable areas, collectively comprising approximately 40 hectares, or 36% of the overall landholding:

- St. Edmundsbury Tier 1: 10.43 ha
- St. Edmundsbury Tier 2: 14.01 ha
- Woodville Tier 1: 15.61 ha

The proposed development adopts a phased approach, with density carefully aligned with environmental sensitivities, ensuring that areas of higher ecological or landscape value are preserved and integrated into green and blue infrastructure networks. Residential density is also structured to support Transport-Oriented Development (TOD) principles, maximising proximity to high-quality public transport along the BusConnects C-Spine corridor, and

reinforcing compact, sequential growth in accordance with National Planning Framework objectives.

This approach ensures that the lands are deliverable, serviceable, and capable of contributing significantly to South Dublin County Council's housing supply, while safeguarding the ecological, landscape, and amenity qualities of the Liffey Valley.

The analysis demonstrates that the St. Edmundsbury and Woodville lands have the potential to provide approximately 26 hectares of Tier 1 development land, capable of accommodating around 1,306 homes, alongside a further 14 hectares of Tier 2 land, with capacity for an additional approximately 420 homes.

These lands, located outside the SAAO, are strategically positioned adjacent to Lucan Village and accessible via existing roads and transport links. A Strategic Environmental Assessment undertaken in 2007 by a third-party consultant on behalf of South Dublin County Council, as part of the proposed variation of the 2004–2010 Development Plan, confirmed that the site has capacity to accommodate residential development while retaining its landscape, ecological, and amenity qualities. This provides a verified foundation for this proposal, demonstrating that the identified developable areas are suitable for compact, sequential growth in line with 10-minute settlement principles and Transport-Oriented Development (TOD).

Key considerations for residential development include:

- **Efficient land use and compact growth:** Although greenfield, the lands function as strategic infill, optimising underutilised land within the Dublin City and Suburbs area and consolidating the built environment.
- **Social and community infrastructure:** The site is well-serviced by schools, healthcare, recreation, and local amenities. Potential facilities include local shops, cafés/community hubs, micro-offices, childcare, and health services, integrated with the parkland and residential framework;

- **Transport-Oriented Development:** The lands are served by existing and planned high-capacity public transport, supporting sustainable commuting and reducing car dependency.
- **Landscape-led design:** Housing is directed to least visually sensitive areas, with a strong transition to parkland and the Liffey Valley corridor, and opportunities for terraced or multi-storey forms that support compact, energy-efficient urban development.
- **Integration with the Lucan House Masterplan:** The proposal complements this vision, enhancing community amenity, through extending the riverside walk by 2.5 kilometres, heritage-led placemaking, and high-quality open space in Lucan.

Infrastructure Capacity and Deliverability

This submission for St. Edmundsbury and Woodville, Lucan, Co. Dublin, is supported by a comprehensive Infrastructure Report prepared by Arup and a Social Infrastructure Audit prepared by McCutcheon Halley, providing a detailed assessment of the site's capacity to accommodate residential and community development. The analysis demonstrates that the lands are strategically positioned, serviceable, and capable of supporting sustainable growth in line with South Dublin County Council's Development Plan objectives, National Planning Framework policies, and TOD and 10-minute settlement principles. Key Infrastructure Findings:

Transport:

The site is directly accessible from the R835 Lucan Road, with connectivity to the N4, R136, and wider regional networks. Transport modelling indicates a moderate increase in traffic, with the majority of trips directed east towards the N4, limiting local impact on Lucan Village. The development presents an opportunity to enhance the R835 corridor through pedestrian crossings, traffic calming, and safer cycling infrastructure. Internal streets will prioritise active travel, shared space, and human-scale design, linking to the Liffey Valley Park, greenways, and Lucan Village, supporting Transit-Oriented Development principles. Public transport accessibility is strong, with the BusConnects C-Spine corridor providing high-frequency service directly adjacent to the site.

Water Infrastructure:

Potable water supply can be accessed from existing mains along the R835 and N4, with connections supported by ongoing regional projects, including the Barrow Water Supply Scheme Area Extension and the Eastern and Midlands Region Water Supply Project, ensuring sufficient capacity for proposed development.

Wastewater Infrastructure:

The site falls within the Ringsend catchment, with flows conveyed via the 9B trunk sewer. While upgrades to the network are planned, short-term deliverability is achievable through phased connections, local pumping, and demand management measures, ensuring early housing delivery without waiting for full catchment upgrades. The Greater Dublin Drainage Scheme (2025) provides additional regional capacity and long-term resilience.

Drainage and Flood Risk:

Surface water runoff will be managed through Sustainable Drainage Systems (SuDS) integrated with recreational and green infrastructure, maintaining flows at pre-development rates. Flood-prone areas along the riverbank are excluded from residential development, ensuring safety and ecological protection.

Energy and Telecommunications:

Electricity and gas infrastructure are present locally, with upgrades including a potential new substation developed in parallel within the holding to support development. The energy strategy prioritises fossil-fuel-free solutions, including all-electric systems. Telecommunications infrastructure is available and will be coordinated with providers to ensure adequate service.

Social Infrastructure:

The Social Infrastructure Audit confirms strong access to schools, healthcare, and recreational amenities in Lucan. Opportunities exist to adapt existing heritage buildings on site for community use, complementing new facilities at Lucan House and providing a dedicated creche within the site. Social infrastructure is phased alongside housing delivery to ensure coordinated, sustainable community growth.

Integration with Lucan House Masterplan

St. Edmundsbury and Woodville are conceptually and spatially linked to the Lucan House Masterplan, providing a complementary extension that delivers residential, community, and recreational functions. Shared green and blue infrastructure, heritage activation, and pedestrian/cycle connections create a cohesive Liffey Valley Heritage Quarter, reinforcing sustainable mobility, community cohesion, and placemaking.

Green Infrastructure:

The site sits within the Liffey Valley, supporting biodiversity, landscape connectivity, and public access. The strategy integrates SuDS, riparian and woodland protection, and greenway linkages to ensure ecological continuity while supporting amenity and recreation. Development zones are landscaped, concentrating higher-density housing where capacity is strongest and preserving sensitive areas.

Strategic Opportunity

The St. Edmundsbury and Woodville lands represent a rare, high-quality, and deliverable proposal.

This submission demonstrates that the site is ready to deliver residential development, parkland, and community infrastructure in a manner that is sustainable, sequential, and fully aligned with SDCC's housing and open space objectives, while safeguarding the ecological, landscape, and recreational value of the Liffey Valley.

Accordingly, the St. Edmundsbury and Woodville lands are suitable and capable of supporting residential development in accordance with the South Dublin County Development Plan and relevant National Planning Framework (NPF) objectives, including NPO 4 (directing 50% of future population and employment growth to Dublin City and Suburbs), NPO 10 (delivering TOD at scale at well-serviced locations), and NPO 97 (facilitating large-scale TOD and sustainable communities). The lands form part of the built-up footprint of Dublin City and Suburbs, immediately adjoining Lucan Village, enabling compact, sequential growth that optimises access to existing services, infrastructure, and public transport.

The proposal incorporates a major parkland element within the SAAO-designated area along the more sensitive parts of the site adjoining the Liffey Valley, ensuring that development enhances the recreational, ecological, and visual value of the valley corridor. This approach provides accessible public parkland for the community while safeguarding the valley's natural and amenity features, and aligns with the objectives of the Lucan House Masterplan, reinforcing the vision for integrated, high-quality open space within the wider Liffey Valley context.

Key aspects of the proposal include:

- **Residential Lands:** Located on lands outside the SAAO and proposed Natural Heritage Area, these areas are strategically positioned for residential development with appropriate landscape carrying capacity, phased densities, and proximity to existing road frontages, services, and public transport. Thoughtful design ensures a strong landscape transition between the built environment and the open valley, delivering sustainable, compact housing without compromising ecological or amenity values.
- **Parkland and Green Infrastructure:** Remaining areas extending toward the river corridor are retained and enhanced as public parkland, delivering biodiversity corridors, walking and cycling trails, and recreational opportunities. This approach maximises public benefit, complements Liffey Valley conservation objectives, and provides active travel connections to Lucan Village, Shackleton's Mill, and the wider greenway network.
- **Transport-Oriented Development (TOD):** The site's proximity to the BusConnects C-Spine corridor and regional transport network supports TOD principles, enabling sustainable commuting, reduced car dependency, and alignment with national and regional policy objectives. Development density is structured according to transport accessibility to maximise uptake of public transport.
- **Integration with Lucan House Masterplan:** St. Edmundsbury and Woodville complement the Lucan House Masterplan, forming a coherent urban extension that strengthens community, social, and recreational infrastructure while preserving heritage, landscape, and

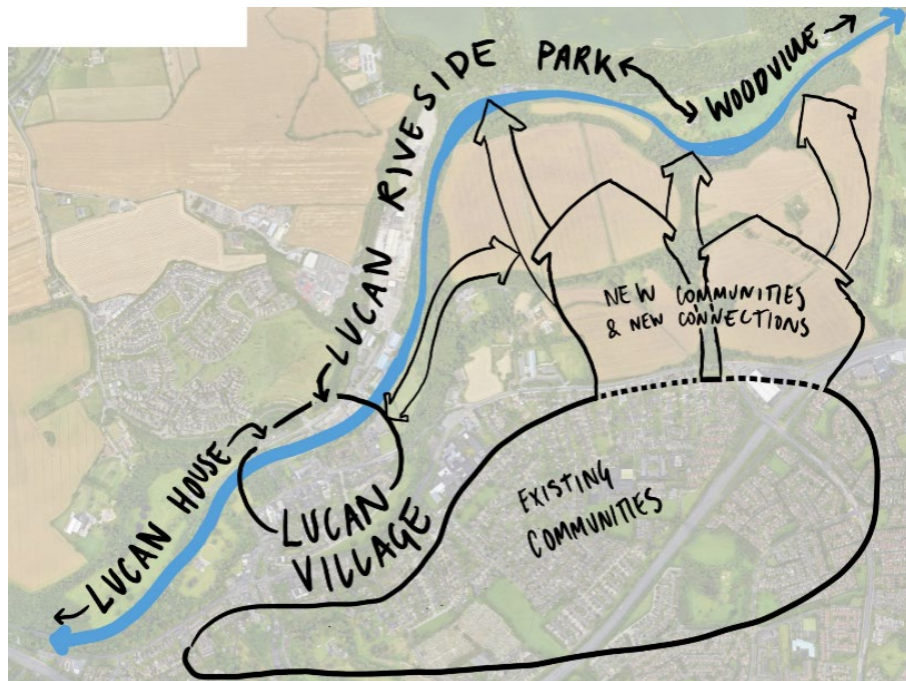
ecological assets. Shared green and blue infrastructure, heritage-led placemaking, and linked active travel routes provide a joined-up approach to sustainable urban growth.

- **Infrastructure Readiness:** Technical analysis, including the Infrastructure Capacity Assessment Report (Arup) and Social Infrastructure Audit (McCutcheon Halley), confirms the site is serviceable and deliverable. Phased infrastructure upgrades in transport, water, wastewater, energy, and social facilities ensure that early residential phases can proceed while accommodating long-term growth.
- **Environmental Sensitivity and Policy Compliance:** Development is directed to areas of appropriate carrying capacity, avoiding the SAAO and proposed natural heritage areas. Strategic phasing and landscaped zoning ensure housing, green infrastructure, and social facilities integrate with the existing environment, maintaining the ecological, recreational, and heritage value of the Liffey Valley.

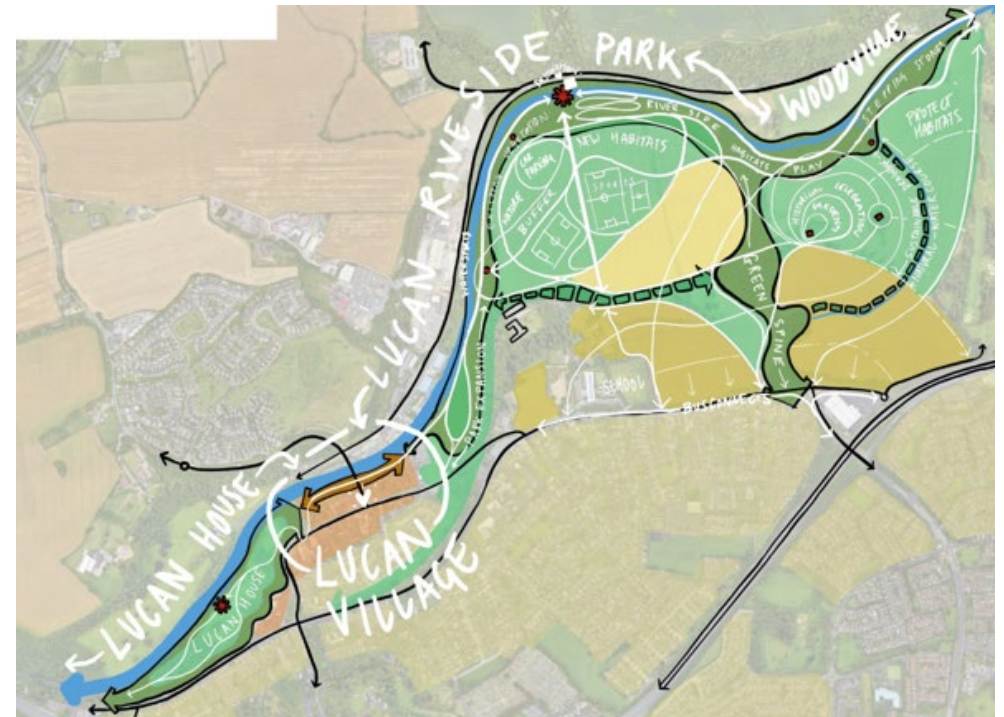
This integrated approach delivers on the principles of compact, sequential, and sustainable growth, supporting Transport-Oriented Development, high-quality public realm, and long-term landscape protection. The proposed development maximises regional and local connectivity, enhances the 10-minute settlement objectives of South Dublin, and contributes significantly to housing delivery in the Dublin City and Suburbs region, while protecting the unique character and ecological integrity of the Liffey Valley.

St. Edmundsbury and Woodville are well-positioned to deliver a highly sustainable, serviced, and connected residential development. Strategic phasing, robust infrastructure planning, and integration with Liffey Valley Park and the Lucan House Masterplan ensure that housing, social, transport, and green infrastructure are delivered in a coordinated, community-focused manner. The site is fully deliverable, serviceable, and capable of supporting compact, sequential growth, enhancing Lucan Village's vitality, and safeguarding the heritage, ecological, and amenity value of the Liffey Valley corridor.

A vision of new connections for Lucan and the River Liffey



Conceptual Exploration of a new world class linear park



1. Introduction

1.1 Introduction & Context

This report has been prepared in response to the *National Planning Framework Implementation: Housing Growth Requirements Guidelines for Planning Authorities* (July 2025) and the accompanying Non-Statutory Public Consultation initiated by South Dublin County Council (SDCC).

The consultation seeks proposals for potential lands that may contribute to meeting revised housing growth requirements arising from the implementation of the updated National Planning Framework (NPF) to 2040. In particular, SDCC invites submissions identifying lands suitable for residential development that can support compact growth, transport-oriented development, and the efficient use of serviced or serviceable lands within the County.

The Guidelines establish new annual housing growth requirements for each local authority and permit “additional provision” up to 50% above the baseline housing growth requirement to ensure sufficient flexibility in achieving national targets. SDCC’s consultation therefore provides an opportunity to identify strategic, well-located, and deliverable residential lands consistent with the principles of sustainable urban development.

In line with the consultation notice, the following criteria have guided the preparation of this submission as only lands that sufficiently meet these criteria may ultimately be considered as part of any formal variation to the South Dublin County Development Plan (SDCDP) 2022–2028.

- Contribution to Compact Growth within the built-up footprint of Dublin City, suburbs, and established towns.
- Support for Transport-Oriented Development (TOD) through proximity and access to high-capacity public transport.
- Availability of servicing or serviceability within the next five-year period.

- Presence of or potential to provide social and community infrastructure, including schools, childcare, parks, and healthcare facilities.
- Contribution to infill, brownfield regeneration, or the re-use of underutilised lands to address vacancy and dereliction.
- Absence of significant legal, environmental, or topographical constraints that would impede development.

This proposal is led by the **O’Flynn Group (OFG)**, one of Ireland’s leading home builders with an established reputation for delivering high-quality, sustainable communities across the country. As Master Developer, OFG bring extensive experience in coordinating large-scale, multi-phased residential and mixed-use projects, ensuring that development is delivered in a comprehensive, design-led, and infrastructure-first manner.

The O’Flynn Group prioritise placemaking, community integration, and long-term stewardship of development lands. The company has consistently demonstrated its ability to deliver housing alongside essential amenities such as parks, childcare facilities, and community infrastructure, creating vibrant and enduring neighbourhoods.

This multidisciplinary team brings together planners, architects, engineers, designers, and financial specialists committed to delivering sustainable, contextually responsive development.

- **McCutcheon Halley Planning Consultants** – Lead planning advisors, guiding the project’s alignment with policies on compact growth, and urban consolidation within the Dublin metropolitan area.
- **Denis Byrne Architecture** – Architectural lead, ensuring a design-led approach that supports Transport-Oriented Development (TOD) and enhances the quality of the built environment.
- **Arup** – Engineering and environmental consultants, providing expertise in infrastructure servicing, mobility, and sustainable systems design, ensuring serviceability and environmental resilience within a five-year horizon.
- **Sherwood & Associates** – Specialists in strategic planning and placemaking, creating plans for places and strategies for place-makers.

1.2 Edmundsbury & Woodville

This submission relates to lands at St. Edmundsbury and Woodville, Lucan, Co. Dublin, comprising approximately 110 hectares (271 acres) situated immediately south of the River Liffey and directly adjoining the core of Lucan Village to the west. Approximately 61 hectares (150 acres) of the overall landholding are located within the Liffey Valley Special Area Amenity Order (SAAO).

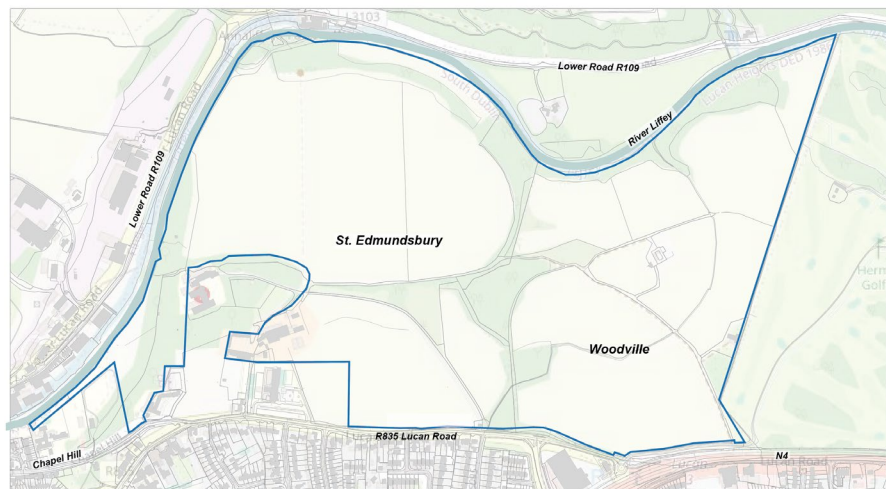


Figure 1-1 Extent of Landholding

The extent of the landholding is delineated by the red line on the following figure, while the SAAO is indicated by the green hatched area.



Figure 1-2 Extent of Landholding & SAAO Area

The SAAO area is not proposed as an opportunity site for residential development. Instead, it is integrated into this submission as a designated public amenity area, contributing to the overall quality and accessibility of the proposal.

The lands are currently in agricultural use, primarily for tillage. In addition to farming activities, the site is used informally for passive recreation, with walkers frequently accessing the lands, despite their private ownership.

The established pattern of informal recreational use underscores the site's existing amenity potential, indicating clear opportunities for the integration of community-focused open space within future development. Should the site be advanced through this "Call for Sites" process, a Masterplan would provide the framework through which this informal use could be regularised and enhanced, delivering well-designed, accessible recreational facilities that complement the site's landscape and ecological qualities.

The balance of the lands, located outside the SAAO, form the focus of this submission. These areas present a realistic sequential opportunity for compact,

serviceable, and sustainable residential-led development that can integrate effectively with the existing settlement of Lucan.

Analysis undertaken by the multidisciplinary team has identified three distinct “developable” areas within the overall landholding, collectively comprising approximately 40 hectares or 36 per cent of the overall holding. They are:

- St. Edmundsbury Tier 1: 10.43 ha
 - St. Edmundsbury Tier 2: 14.01 ha
- Woodville Tier 1: 15.61 ha

These lands are well located in relation to existing infrastructure, community amenities, and transport networks, providing a strong basis for phased, masterplanned development consistent with the principles of compact growth and the objectives of the SDCDP.

The St. Edmundsbury and Woodville lands benefit from excellent accessibility and connectivity at both local and regional levels.

Along the riverbank, the site’s ownership extends towards Lucan Village, reaching St. Mary’s National School. An informal footpath currently runs along the river, providing pedestrian access into the site and demonstrating the potential to formalise and enhance active travel connections as part of future development proposals.

The site is accessible via the N4 National Primary Road (R136 / R835 interchange), located approximately 2.8 kilometres from the M50, which provides direct connections to all strategic routes serving Dublin and the wider metropolitan area.

The R835 Lucan Road, which forms the southern boundary of the site, offers a direct link between Lucan Village and the N4, facilitating efficient vehicular, public transport, and active travel connections.

In addition, the existing eastbound bus and cycle corridor on Lucan Road provides frequent public transport services, with over ten buses during peak hours to Dublin City Centre, further enhancing the site’s transport-oriented

development (TOD) potential. Together, these features position the St. Edmundsbury and Woodville lands as a well-connected and strategically located opportunity site within the Dublin City & Suburbs area.

The site is served by existing foul and surface water infrastructure along Lucan Road. Potable water is supplied via the Leixlip Water Treatment Plant, with regional capacity being supported by the Barrow Water Supply Scheme and planned future enhancements through the Parteen Basin Project. Locally, infrastructure is readily available to service development on the St. Edmundsbury and Woodville lands, ensuring that future residential development can be effectively accommodated in line with existing utilities.

St. Edmundsbury and Woodville therefore represent a strategically located, well-connected, and serviced opportunity site, offering direct integration with the established urban core of Lucan Village while supporting the delivery of compact and sustainable growth in line with national and local policy.

1.2.1 Boundaries & Surrounding Context

The lands are bounded to the north, east, and west by the River Liffey, which provides a natural edge and forms part of the Liffey Valley Special Amenity Area. Immediately north of the river within Fingal is Shackleton Mill, a public asset which suffers from access constraints

To the south, the site is enclosed by the R835 Lucan Road and the N4 National Primary Road, both of which provide direct vehicular access and strategic connections to Lucan Village and Dublin City.

To the east, the lands adjoin the Hermitage Golf Club and established green infrastructure corridors, reinforcing the site’s landscape character and offering opportunities for visual integration and biodiversity enhancement.

To the west, the site directly abuts Lucan Village, ensuring immediate connection to its amenities, services, and community facilities. Notably, there is a strong connection to the existing greenspaces and pedestrian network of Lucan Village via access along the River Liffey. The site has the opportunity

to support the growth and success of Lucan Village by extending the built form in a sensitive manner.

Located 12 km west of Dublin City Centre, the site is well-positioned to benefit from proximity to employment hubs, services, and transport connections, while remaining within the built-up suburban corridor of the city.



Figure 1-3 Site location with respect to Dublin City Centre



Anna Liffey Wier



The River Liffey and woodlands



Shackleton's Mill



Woodville and Edmunsbury



Gate Lodge (source: NIAH)



Barn and Coach House in Woodville

2. Planning Policy Context

This section summarises the relevant national, regional and local policy and guidance. Although the “*Call for Sites*” does not facilitate a zoning change, a successful submission could lead to a future variation of the land use zoning in parts of the site to enable housing development and supporting social infrastructure.

2.1 National Planning Framework – 1st Revision (April 2025)

The National Planning Framework (NPF) is the Government’s plan to cater for Ireland’s projected population increase to approximately 6.1 million by 2040, with a high migration scenario projecting up to 6.3 million.

The First Revision of the NPF (April 2025) provides updated objectives focused on compact growth, climate resilience, sustainable mobility, and integrated infrastructure planning. It updates national housing targets, clarifies the operation of the compact growth model, and emphasises a performance-based approach to zoning and delivery. Key policy relevant to this submission include:

- **Compact Growth:** Local authorities must actively prioritise serviced, connected, and contiguous urban lands for residential use, particularly those within or immediately adjoining existing urban footprints.
- **Sequential and Infrastructure-Led Development:** The Revised NPF directs that land-use zoning must follow a clear hierarchy: (i) infill/brownfield, (ii) contiguous greenfield serviced lands, and only thereafter (iii) strategic expansion areas.
- **Serviced Land and Performance Testing:** Zoning is to be demonstrably tied to infrastructure readiness and deliverability ensuring that lands designated as Tier 1 genuinely facilitate near-term delivery.
- **Flexibility to Respond to Housing Shortfalls:** The 2025 revision explicitly states that where delivery or capacity shortfalls arise, local

authorities may review and extend residential zoning to secure the national delivery trajectory, provided such lands are sequential and infrastructure aligned.

- **No Implied Cap on Growth:** Unlike earlier interpretations, the Revised NPF clarifies that policy does not impose ceilings on local growth where justified by serviced land availability and strategic need. Settlements adjacent to the city and suburbs, particularly those with transport connectivity, are not precluded from future growth.

The Revised NPF sets new housing targets and updated population projections following recent demographic trends. Key National Policy Objective’s (NPO) relevant to housing delivery under the NPF include:

- **NPO 8:** Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.
- **NPO 42:** To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.
- **NPO 43:** Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

The proposal aligns with NPO 16 by contributing to the targeted population growth of Dublin City and Suburbs. The location of the site within Dublin City and Suburbs ensures that new development can efficiently integrate with existing transport, services, and employment hubs, supporting compact growth and reducing pressure for unsustainable expansion into more remote areas. By facilitating well-designed, masterplanned residential development, the proposal directly contributes to achieving the city’s growth targets while maintaining environmental, landscape, and heritage considerations within the Liffey Valley.

The following policy themes are relevant to the site.

- **Compact and sequential growth:** The proposed developable areas are identified in line with the principles of compact and sequential growth. In this context, development is prioritised immediately adjoining the existing built-up footprint of Lucan, ensuring that growth occurs in a sequential manner from the existing urban area outward, utilising available infrastructure and services before the development of peripheral or unserviced lands. By adhering to the sequential development principle, the proposed plots respond directly to national, regional, and local policy priorities, supporting the creation of a sustainable, connected, and climate-resilient community that contributes positively to the long-term consolidation of the Lucan area.
- **Transport-oriented development and sustainable mobility:** The NPF promotes development in locations served by high-capacity public transport, with a strong emphasis on walking and cycling infrastructure to support modal shift and reduce car dependency (as highlighted in National Planning Objective 10, 27 and 37).
- **Placemaking and urban quality:** The framework supports the creation of attractive, liveable, and well-designed urban environments that foster community integration and high quality of life (as highlighted in National Planning Objective 12).
- **Flood risk and nature-based solutions:** Planning must incorporate flood risk management and nature-based solutions, including Sustainable Urban Drainage Systems (SuDS), to ensure climate resilience and environmental protection. (As highlighted in National Planning Objective 77, 78 and 79)
- **Green and blue infrastructure and biodiversity:** The NPF encourages the integration of green and blue infrastructure into statutory land use plans and supports biodiversity conservation through planning and design. (As highlighted in National Planning Objective 82, 83, 84 and 85)

The proposal acknowledges the objectives of NPO 82 and NPO 83, recognising the strategic importance of green and blue infrastructure, ecosystem services, and biodiversity across the Liffey Valley. While a portion of undeveloped greenfield land is identified as suitable for sensitive,

managed housing development, the strategy ensures that this is carefully targeted, informed by a comprehensive assessment of landscape, ecological, and settlement considerations.

By combining well considered development with strategic environmental and amenity enhancement, the proposal balances the long-term need for housing with the conservation and enhancement of biodiversity, ecosystem services, and green/blue infrastructure, consistent with the intent of NPO 82 and NPO 83.

2.2 NPF Implementation Guidance – Housing Growth Requirements (July 2025)

In July 2025, the Minister for Housing, Local Government and Heritage published the Section 28 Guidelines ‘NPF Implementation: Housing Growth Requirements’ to facilitate the review and variation of city and county development plans. This document replaces the Housing Supply Target Methodology for Development Planning, Guidelines for Planning Authorities, published in December 2020 following the publication of the Revised NPF in April 2025. It provides updated ‘housing growth requirements’ to local authorities, setting out the housing demand scenario to 2040 for each local authority, based on ESRI modelling of population growth and structural housing demand and assumptions relating to unmet demand.

The housing growth targets now include:

- Unmet demand/need considerations
- Larger short-term targets to 2034
- A policy-led “*up to 50% additional provision*” to account for un-activated zoned land and delivery risk

Policy and Objective 1 of the Guidelines state that:

“It is a policy and objective of these Guidelines that the housing growth requirements for each planning authority set out in Appendix 1 are reflected in the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.”

Appendix 1 of the Guidelines provides new annual housing growth requirement figures for each Local Authority, which are provided in the form of an annualized estimated housing figure for two time periods (2025 to 2034 and 2034 to 2040). The new housing growth requirement for South Dublin County Council is outlined in the following Table.

Table 2-1 New housing growth requirements for South Dublin County Council

Existing Annual 2020 Housing Requirement (Housing Supply Target)	Adopted Development Plan - Annual Housing Requirement (Housing Supply Target)	New Annual New Housing Growth Requirement 2025 to 2034	New Annual New Housing Growth Requirement 2035 to 2040
1,932	2,596	3,270	2,414

The Guidelines state that planning authorities should address the scope for additional provision of up to 50% in excess of the baseline housing growth requirement, in light of the urgent need to increase housing delivery and to optimise the ability to deliver on the housing requirements of the Revised NPF. The Guidelines state that *“additional provision recognises the fact that, for a variety of reasons, a relatively significant proportion of zoned lands are not activated over the period of a development plan.”*

Policy and Objective 2 of the Guidelines state that:

“It is a policy and objective of these Guidelines that ‘additional provision’ of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 is reflected within the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.”

Table 2-2 Adopted and new annual housing growth requirements

Adopted Development Plan - Annual Housing Requirement (Housing Supply Target)	New Annual New Housing Growth Requirement 2025 to 2034 with 50% Headroom
2,596	4,905

The Guidelines, in accordance with National Policy Objective 101, require that Tier 1 and Tier 2 lands be identified and allocated based on their servicing status, with Tier 1 lands being serviced and Tier 2 lands serviceable within the lifetime of the plan.

To allocate land in this manner, it is necessary to undertake a Settlement Capacity Audit to assess the availability and capacity of enabling infrastructure, including wastewater, water supply, energy, transport, schools, and community facilities.

This submission, together with the **Infrastructure Audit** prepared by Arup and the **Social Infrastructure Audit** (SIA) prepared by McCutcheon Halley Planning, responds comprehensively to each of these considerations. The analysis provided by these audits has directly informed the assessment of the three parcels proposed for consideration, resulting in the conclusion that two parcels meet Tier 1 criteria and one parcel meets Tier 2 criteria, reflecting their suitability and capacity to support future residential development.

The SIA demonstrates that there is a diverse range of existing community assets in the Lucan area and highlights the potential for this proposal to support and enhance their long-term viability. Where required, the proposed master planning framework will provide opportunities for the delivery of new social infrastructure, ensuring that future development promotes balanced, inclusive, and sustainable community growth.

The environmental carrying capacity of settlements must be a central consideration in the assessment of potential development lands. Accordingly, this submission includes an evaluation of environmental sensitivities across the St. Edmundsbury and Woodville landholding. This strategic examination of the environmental baseline has been undertaken to develop a composite understanding of the site’s ecological, landscape, visual, heritage, and hydrological sensitivities. This analysis has enabled the identification of areas with capacity to accommodate development and those where environmental constraints necessitate protection.

Notably, all lands designated under the Liffey Valley Special Area Amenity Order (SAAO) have been immediately excluded from consideration for development, ensuring full compliance with statutory environmental protections and the preservation of the valley’s intrinsic ecological and amenity value.

Notably, the Tier 1 lands coincide with areas that were previously assessed by a third party working on behalf of the Council as appropriate for development during a proposed variation to the Development Plan 2004–2010. It is understandable that the outcomes are similar, given that no substantial development or change has occurred on the lands in the intervening period, and the environmental context remains largely consistent.

2.3 NPF Implementation: South Dublin (October 2025)

South Dublin County Council (SDCC) published a report *NPF Implementation: Housing Growth Requirements* (October 2025). This review examines whether existing zoned lands in South Dublin can meet national housing targets to 2040.

SDCC’s current Development Plan (2022–2028) provides for 15,576 homes (2,613 per year). The Guidelines raise South Dublin’s annual housing requirement to 3,270 per year (2025–2034), then 2,414 per year (2035–2040).

These are baseline figures only; they do not include the 50% “headroom” allowed.

The following is an extract from Table 4 in the report (Section 3.1.3).

Period	Baseline Annual Target	Period Total
2025–2034	3,270 homes/year	32,700
2035–2040	2,414 homes/year	14,484
2025–2040 Total Homes	—	47,184

Under the Guidelines (Section 2.4) *“Planning authorities may provide for up to 50% additional land capacity above the baseline housing requirement.”* In Table 7 of the report, SDCC converts this allowance into equivalent land and dwelling numbers.

Period	Baseline Target	+50% Headroom	Total with Headroom
2025–2034	32,700	+16,350	49,050 homes
2035–2040	14,484	+7,242	21,726 homes
2025–2040 Total Homes	47,184	+23,592	70,776 homes

After auditing all existing zoned land, SDCC found that:

- Forecast delivery from current zoned land = 35,480 dwellings to 2040.
- Baseline housing requirement = 45,803 dwellings to 2040. Estimated shortfall: 10,323 units (equivalent to 26–52 hectares).

In Section 6.2 (“Additional Provision”), SDCC estimates as follows.

Basis	Equivalent Land Requirement
Baseline shortfall only	26–52 ha
Baseline + 50% headroom	99–199 ha

To achieve this, it is proposed to vary the Development Plan to **zone between 99 and 199 hectares of additional land** (equating to approximately 7,936 dwellings).

This provision would meet the identified baseline shortfall to 2028 while incorporating a large proportion of the maximum 50% “Additional Provision” permitted under national guidance.

The recommendation further directs that South Dublin County Council (SDCC) will:

“Commence a non-statutory consultation to invite submissions from landowners and developers proposing lands suitable for residential zoning to address the identified shortfall and provide for the additional provision permitted under national guidance.”

Both the NPF Housing Growth Requirements Guidelines (2025) and the Development Plan Guidelines (2022) require that such lands fall within the Tier 1 or Tier 2 classification.

- Tier 1 – Serviced Lands: immediately available for development, fully serviced and accessible, capable of commencing within 0–2 years.
- Tier 2 – Serviceable Lands: capable of being serviced within the life of the plan, typically within five years, where required infrastructure is committed or feasible in that timeframe.

In interpreting these definitions, SDCC has confirmed that it is targeting “ready-to-go” sites—those that are either:

- already serviced and capable of early delivery (Tier 1), or
- demonstrably serviceable within five years (Tier 2) with realistic delivery programmes and confirmed infrastructure commitments.

South Dublin is seeking immediately deliverable residential lands Tier 1 or Tier 2 that can bring new homes forward within approximately five years of adoption, by 2031 at the latest.

The analysis presented in this submission demonstrates that the St. Edmundsbury and Woodville lands have the potential to contribute approximately 26 hectares of Tier 1 development land, capable of accommodating approximately 1,306 homes, together with a further 14 hectares that meet the Tier 2 criteria, with capacity for an additional approximately 420 homes.

2.4 Sustainable Residential Development & Compact Settlements Guidelines for Planning Authorities (January 2024)

The “Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities” was published in January 2024. These Guidelines built on and updated the previous policy recommendations that were published in 2009, “Sustainable Residential Development in Urban Areas (Cities, Towns & Villages)”.

The Guidelines promote the use of densities that reflect the size of the settlement and its specific context, acknowledging the distinct characteristics of cities, large and medium-sized towns, and smaller towns and villages. The guidelines allow for greater flexibility in residential design standards, setting national standards for the first time that support innovation in housing design and a greater range of house types. The flexibility provided for within the guidelines are to assist in addressing viability constraints within the construction sector, while also adhering to national obligations imposed by European Directives and international agreements relating to the management and protection of the environment and biodiversity and the transition towards net zero by 2050.

With regards to Cities and Metropolitan Areas, the Guidelines set out that the NPF sets ambitious growth targets for cities and metropolitan areas to 2040.

To meet the targets set out in the National Sustainable Mobility Policy 2022, local authorities are required to design settlements that facilitate ease of movement for pedestrians, cyclists, and public transport users. This involves the creation of highly permeable and legible street networks that optimise route choice and connectivity, particularly between homes, employment centres, public transport nodes, and local amenities. The guidelines advocate for:

- Integration with existing transport networks, ensuring new developments enhance connections between communities and key destinations.
- Traffic calming and street design in accordance with DMURS, to support safe and comfortable movement for vulnerable road users.
- Minimisation of car parking provision, in line with SPPR4, to reduce travel demand and avoid the dominance of vehicles in the public realm.
- Universal Design principles, ensuring accessibility for all users, including those with mobility impairments.

The application of DMURS is considered essential to achieving these objectives, particularly in ensuring that strategic movements are accommodated along desired lines and that walking and cycling routes are safe, attractive, and direct.

This policy approach aligns with the overarching goal of creating compact, inclusive, and low-carbon settlements, where sustainable transport is embedded into the urban structure and daily life.

2.4.1 St. Edmundsbury & Woodville: Density & Compact Settlement Approach

In accordance with Section 3 of the Compact Settlement Guidelines (2024) this submission adopts a structured, policy-led approach to determining appropriate residential densities across the St. Edmundsbury and Woodville lands. The evaluation process follows the methodology illustrated in Figure 3.3 of the Guidelines, encompassing three key stages:

1. **Establishing Density Ranges** – Density parameters were first defined having regard to the site’s context within Dublin City and Suburbs and its **Area Type** as a **Suburban / Urban Extension** located on the edge of the existing built footprint.

2. **Refining Density** – Densities were refined using (a) **Accessibility criteria**, assessing walkable proximity to high-capacity and frequent public transport services, and (b) **Local Context criteria**, considering landscape setting, heritage, amenity, and environmental sensitivities.
3. **Outcome** – This iterative process produced a contextually responsive density framework aligned with compact growth and design quality objectives.

Based on the settlement and area typology, and in line with the accessibility framework in Table 3.8 of the Guidelines, the following emerging density ranges are identified.

Context	Recommended Density (units per ha)	Basis for Application
High Accessibility Areas	50–100	Close to transport corridors, BusConnects and Lucan Village core. Potentially ‘Luas to Lucan’ – alignment not yet published.
Standard Suburban Edge	35–50	Accessible but less central locations within the built-up footprint.
Environmental Interface / SAAO Transition Zone	20–35	Areas adjoining SAAO or other environmentally sensitive edges.

The density framework also reflects strategic policy considerations central to achieving compact, sustainable growth:

- **Long-Term Growth Enablement:** The implementation of BusConnects and the proposed Luas extension to Lucan will further enhance accessibility, support long-term higher density potential and justify compact urban expansion at St. Edmundsbury and Woodville.

- **Integration of Green and Blue Infrastructure:** The Liffey Valley corridor is treated as a defining landscape feature. Development will respect SAAO objectives through landscaped buffers, lower-density transitions, and the enhancement of recreational and public access opportunities.
- **Proximity to Employment Hubs:** The lands benefit from strategic access to regional employment centres, including Grange Castle, Intel Leixlip, and the wider Dublin Metropolitan employment corridor, supporting sustainable commuting and balanced live–work patterns.
- **Reinforcing Lucan:** By enabling population growth within walking and cycling distance of Lucan’s town centre, the proposal strengthens its role as a Level 3 Town Centre and underpins the viability of local retail, education, and community services.

Three residential development scenarios were prepared to test policy alignment, infrastructure capacity, and design response:

1. **Transport-Oriented Intensification:** Focused on higher-density clusters near existing and proposed high-capacity public transport corridors (BusConnects), with supporting mixed-use nodes.
2. **Balanced Residential–Environmental Strategy:** Moderate densities that optimise land use while respecting environmental constraints and integrating green infrastructure.
3. **Landscape-Led Housing:** Lower densities along sensitive edges and viewsheds, with stepped transitions and strong emphasis on biodiversity and visual integration.

Each scenario was shaped by consistent criteria relating to transport accessibility, ecological and landscape sensitivities, green infrastructure integration, topographical suitability, and local service provision.

This density evaluation process ensures that residential development across the St. Edmundsbury and Woodville lands is policy-aligned, environmentally responsible, and locally responsive. It provides South Dublin County Council with a transparent, evidence-based framework to assess how varying density configurations can optimise housing delivery, protect environmental assets,

and contribute to the creation of a sustainable, compact, and connected urban edge for Lucan.

2.5 Design Manual for Urban Roads & Streets (DMURS)

The Design Manual for Urban Roads and Streets (DMURS) provide a national framework for the design of urban streets in Ireland, promoting sustainable mobility and high-quality public realm. It sets out four key design principles that underpin contemporary street design listed below, these principles relate to how the proposed variation can improve the existing condition of Lucan Road.

- **Connected Networks:** DMURS challenges the traditional cul-de-sac model, which restricts permeability for active travel users. Instead, it encourages street layouts where all streets connect to others, enhancing network legibility and supporting direct movement. This approach increases the number of walkable and cyclable routes between destinations, improving accessibility and reducing reliance on private vehicles.
- **Multi-Functional Streets:** Streets are viewed as more than transport corridors; they are multi-functional spaces that support connectivity, active frontages, and optimal block sizing. This principle promotes streets that contribute to urban liveability, accommodating movement while also serving social, economic, and environmental roles.
- **Pedestrian and Cyclist Focus:** DMURS establishes a user hierarchy that places pedestrians and cyclists at the forefront, followed by public transport users and, lastly, private vehicles. This prioritisation informs design decisions that enhance safety, comfort, and accessibility for vulnerable road users.
- **Multi-Disciplinary Approach:** The manual advocates for a collaborative design process involving planners, engineers, architects, and landscape designers from the outset. This integrated approach ensures that streets are not only functional but also context-sensitive and visually coherent.

Together, these principles support the creation of inclusive, resilient, and well-connected urban environments, aligning with broader policy goals such as modal shift, compact growth, and the 10-minute settlement concept.

2.6 Eastern & Midlands Regional Spatial & Economic Strategy 2019-2031

Under the original National Planning Framework:

- NPO 3a required that at least 50% of all new housing in cities and their suburbs occur within or contiguous to the existing built-up footprint, supporting compact, efficient, and infrastructure-led development.
- NPO 11 promoted a sequential, infrastructure-first approach prioritising development of lands that are serviced and proximate to existing urban areas.
- NPO 68 allowed up to 20% of metropolitan growth to be reallocated to other serviced metropolitan settlements, where development is compact, accessible to high-capacity public transport, and consistent with sustainable urban growth.

These principles underpin the Eastern and Midland Regional Spatial and Economic Strategy (RSES), including the Dublin Metropolitan Area Strategic Plan (MASP), which designates compact, sequential, and transport-oriented expansion along major public transport corridors as the preferred growth model.

The RSES states that **growth enablers** for Dublin City and Metropolitan Area include:

- *To realise ambitious compact growth targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built-up area of Dublin city and suburbs and a target of at least 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life.*

The St. Edmundsbury and Woodville lands are located within the Dublin City and Suburbs boundary, as illustrated in the following figure. Accordingly, their

development directly supports the achievement of national and regional compact growth objectives, offering a strategically positioned, serviceable, and well-connected opportunity to deliver new housing within the existing metropolitan footprint of Lucan.

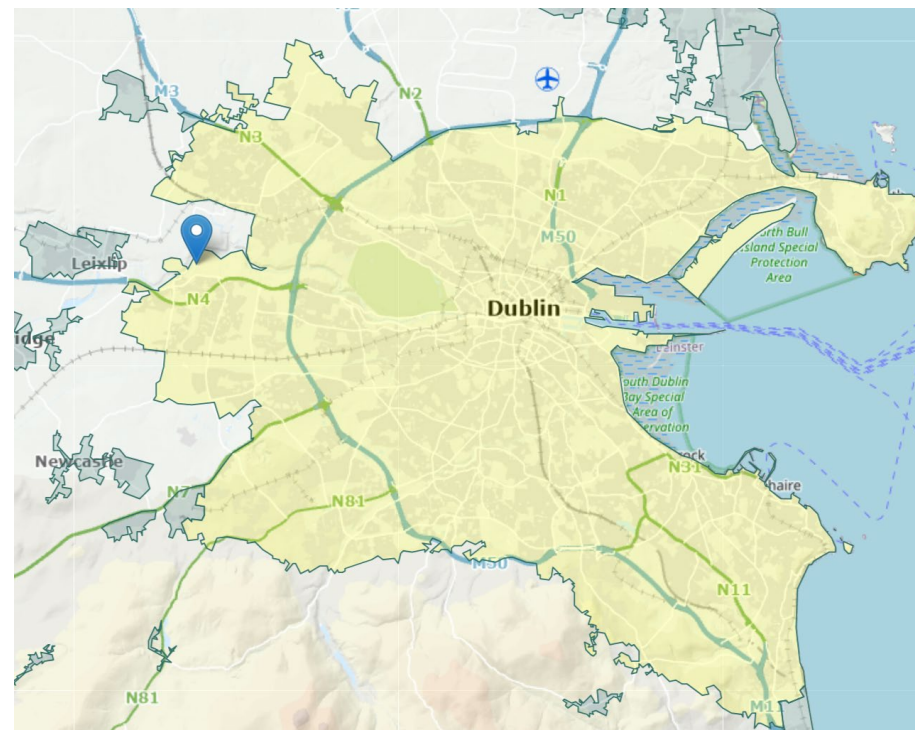


Figure 2-1 Landholding within Dublin City and Suburbs (Source: CSO)

2.7 South Dublin County Development Plan 2022-2028

2.7.1 Tier 1 Landbanks

Following is a breakdown of the existing Tier 1 (serviced) zoned land in South Dublin. It is noted that this includes residential, mixed use and employment land.

Area	Total Land (ha)	Tier 1 Land (ha)	% Tier 1
Naas Road (City Edge)	294	2	1%
Tallaght (Cookstown & Broomhill)	158	45	28%
Templeogue / Walkinstown / Rathfarnham / Firhouse	120	27	23%
Clondalkin / Clonburris / Grange Castle	732	597	82%
Lucan / Palmerstown / Adamstown	154	153	99%
Citywest / Saggart / Newcastle / Rathcoole	290	153	52%

South Dublin was on target to deliver the number of units set out in their core strategy before the introduction of the new targets. Existing Tier 1 lands are confirmed as delivering this target, with the majority understood to come from Adamstown and Clonburris.

SDCC's Housing Growth Requirements report states that:

“The majority of existing residentially zoned lands within the County are Tier 1 – serviced and available for development. These lands account for the bulk of active permissions and construction activity contributing to current housing delivery.”

2.7.2 Tier 2 Landbanks

Following is a breakdown of all areas with Tier 2 (serviceable) land and the key associated issues/constraints for each neighbourhood.

Area	Total Land (ha)	Tier 2 (ha)	% Tier 2	Main Issues
Naas Road (City Edge)	294	292	99%	Brownfield regeneration; new infrastructure framework needed.
Tallaght (Cookstown & Broomhill)	158	113	72%	Roads & transport links; wastewater upgrades; drainage; groundwater.
Templeogue / Walkinstown / Rathfarnham / Firhouse	120	93	78%	Road links; Dodder Valley drainage plan; low water capacity.
Clondalkin / Clonburris / Grange Castle	732	135	18%	Drainage/flood risk; road access; sewer capacity issues.
Lucan / Palmerstown / Adamstown	154	1	1%	Minor drainage and access constraints.
Citywest / Saggart / Newcastle / Rathcoole	290	137	47%	Drainage risk (Grange Castle, Greenogue); road and pumping issues.

The data shows that Lucan/Palmerstown/Adamstown is essentially built out in Tier 1 lands and has no meaningful Tier 2 landbank (just 1 hectare). That means the capacity pipeline for Lucan is almost exhausted beyond Adamstown SDZ, which has already been planned and is nearing full delivery.

2.7.3 South Dublin Infrastructure Capacity Assessment

The Infrastructure Capacity Assessment undertaken by South Dublin County Council provides an evidence-based overview of the servicing status of all residential and mixed-use lands across the county.

It identifies that across South Dublin's development landbanks, the most critical constraints are consistent and interlinked chiefly relating to wastewater capacity, water supply resilience, and strategic road connectivity.

Countywide Constraints

- **Wastewater Infrastructure:** The 9B Strategic Sewer is operating near capacity, with upgrades and stormwater separation required. Constraint affects Tallaght, City Edge, and Clonburris.
- **Water Supply:** Current reliance on the Ballymore Eustace Water Treatment Plant and Saggart Reservoir limits resilience; long-term augmentation is tied to the Eastern and Midlands Water Supply Project.
- **Roads & Access:** Several key link roads and junction improvements remain outstanding in Tallaght, Citywest, and Templeogue.
- **Surface Water & Flood Risk:** Localised groundwater vulnerability and the need for SuDS infrastructure constrain development in multiple settlements.

2.7.4 Lucan/Palmerstown/Adamstown Neighbourhood

For the Lucan, Palmerstown and Adamstown neighbourhood, the assessment examined approximately 154 hectares of zoned lands, encompassing 11 residential sites, 12 mixed-use sites and the Adamstown SDZ block. The analysis confirms that this neighbourhood is one of the most infrastructure-

ready areas in the county, reflecting significant past and ongoing investment in water, wastewater, road and social infrastructure.

Lucan is described as an established suburban village within the metropolitan area, benefitting from strategic transport corridors including the N4 and M50.

From a servicing perspective, the assessment highlights that 99% of all land in this neighbourhood is Tier 1 (serviced), with only 1 hectare identified as Tier 2 (serviceable). The remaining Tier 2 parcel, an infill mixed-use site within Lucan village, is considered minor in scale and not significant for housing supply.

Key infrastructure items for the area are confined to localised road and drainage upgrades, such as footpath and cycleway improvements and completion of the Celbridge Link Road, all of which are developer or SDCC-led and deliverable within the plan period.

Water supply to the neighbourhood is provided through the Ballymore Eustace and Leixlip Water Treatment Plants and associated reservoirs at Saggart, Belgard and Peamount. The assessment records no strategic constraints in this network, with only local distribution upgrades required as development progresses.

Wastewater is managed via the 9B Strategic Sewer, which is nearing capacity but already programmed for upgrade under the Irish Water Investment Plan, ensuring continuity of connection on a first-come, first-served basis. Surface water is to be managed through standard Sustainable Drainage Systems (SuDS) measures on a site-by-site basis.

The assessment demonstrates that the Lucan, Palmerstown and Adamstown neighbourhood is fully integrated within the metropolitan network, with no major infrastructural impediments to continued development.

Instead, the findings point to a shortfall in remaining land supply not servicing capacity as the primary constraint on future housing delivery once Adamstown reaches full build-out.

2.7.5 Lucan – Strategic Growth Context and Need for Additional Sequential Capacity

The Core Strategy identifies Lucan as part of the Lucan–Palmerstown–Adamstown neighbourhood, a key established settlement and growth area within South Dublin’s metropolitan framework. Development ambitions focus on consolidating existing communities, completing Adamstown, and enhancing local infrastructure and services rather than pursuing large-scale new zoning. Lucan is a traditional suburban village with a distinct character, forming part of the Dublin City and Suburbs boundary, in line with compact growth objectives.

As shown on the following plan, new development is concentrated south of the N4, with a notable absence of growth to the north and around Lucan village. This presents a clear opportunity to redress spatial imbalance, supporting compact, sequential growth in areas already served by infrastructure while maintaining village character and enhancing local services, transport, and community facilities.

Analysis of Tier 1 and Tier 2 lands highlights that virtually all zoned land in the area is Tier 1 (serviced) and already committed, almost entirely within the Adamstown SDZ. Of the 154 hectares of zoned land, 99% is Tier 1, leaving only 1 hectare of Tier 2 (serviceable) land uncommitted. With Adamstown now substantially developed and delivering at scale, there is a limited supply of sequentially appropriate land to sustain housing delivery and balanced community growth in the post-Adamstown period. This represents a strategic challenge for South Dublin in meeting its new NPF-aligned housing growth targets under the 2025 Guidelines.

In this context, the Edmondsbury and Woodville lands offer a policy-consistent opportunity to extend Lucan’s housing delivery in a measured, sequential, and infrastructure-led manner. These lands are contiguous with the established village core, benefit from existing transport, road, and services infrastructure, and are situated within the Dublin City and Suburbs boundary, meeting the definition of compact growth. Their inclusion would ensure continuity of housing supply, optimise existing investment in social and physical infrastructure, and reinforce Lucan’s role as a sustainable, well-served metropolitan settlement.

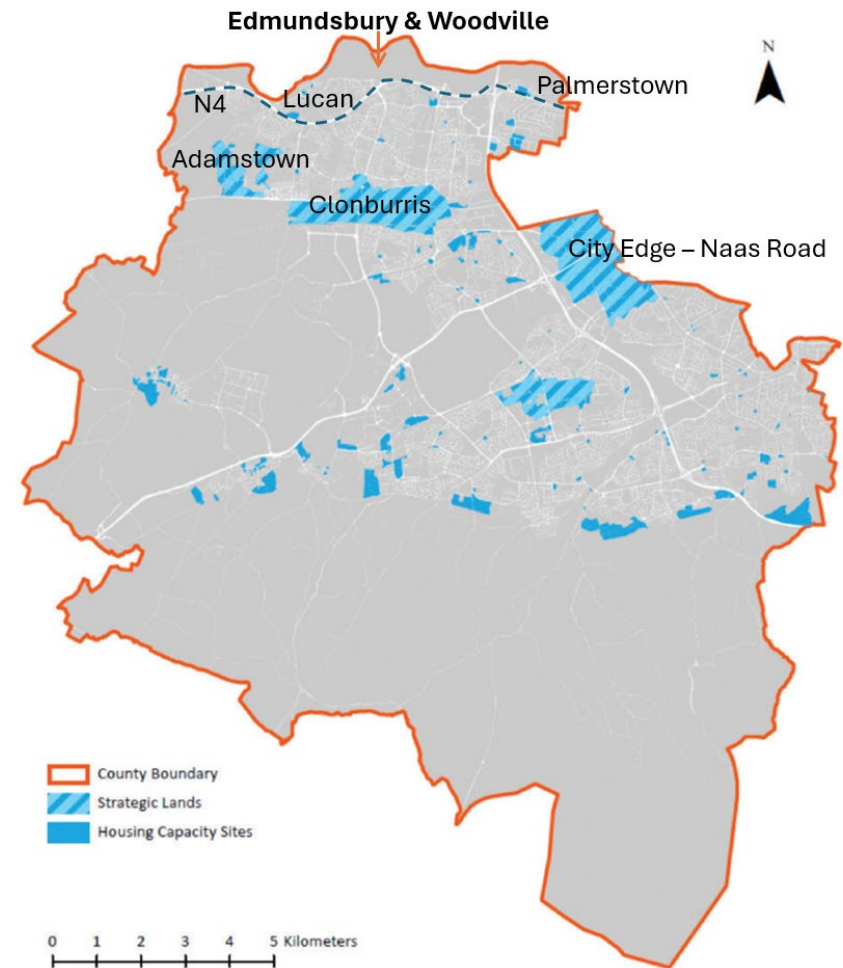


Figure 2-2 Existing Zoned Residential Sites

2.7.6 Landuse Zoning

The lands at Edmundsbury and Woodville are currently zoned Objective HA-LV – “To protect and enhance the outstanding character and amenity of the Liffey Valley.” This objective recognises the exceptional environmental, recreational, and landscape qualities of the Liffey Valley, while allowing for compatible uses that respect and enhance these attributes. Under the current zoning, Open Space is Permitted in Principle, and certain other uses are Open for Consideration where they can be demonstrated to protect the character and amenity of the area.

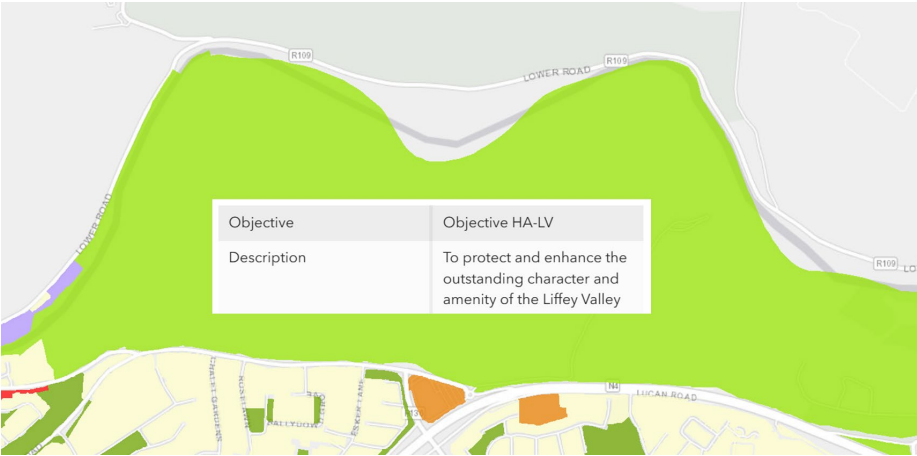


Figure 2-3 Existing Landuse Zoning ‘HA-LV’

This objective underpins the approach presented in this submission for the proposed site. The principles adopted require that

- i. development reinforces the valley’s landscape identity,
- ii. enhances ecological connectivity,
- iii. provides appropriate public access and open space, and
- iv. respects the setting of protected structures and natural features.

The Edmundsbury and Woodville lands are uniquely positioned to deliver on these objectives, offering areas of Tier 1 land adjacent to the existing road network that are of lowest sensitivity and highly suitable for residential development.

The remainder of the site, particularly lands adjoining the river corridor, is retained and enhanced as public parkland and open space. This approach ensures that development not only supports housing delivery but also provides significant ecological, recreational, and landscape benefits, fully consistent with the HA-LV zoning objectives.

In this way, the proposal demonstrates that it is possible to deliver substantial residential development in a sustainable, design-led manner, while protecting and enhancing the overall character and amenity of the Liffey Valley.

2.7.7 Specific Planning Objectives

In addition to zoning and landscape protection, the Development Plan sets out a number of specific local objectives. The following outlines how this proposed development responds to each of these objectives.

NCBH7 Objective 1: To restrict development within areas designated with Zoning Objective ‘HA-LV’ (To protect and enhance the outstanding character and amenity of the Liffey Valley) and to ensure that new development: à does not significantly impact on built or cultural heritage assets, on sensitive habitats, species, or ecosystem services; à is related to the area’s amenity potential; à is designed and sited to minimise environmental and visual impacts; and à enhances the County’s green infrastructure network.

Response:

The proposal demonstrates how the site can deliver on this Objective by protecting and enhancing the outstanding character and amenity of the Liffey Valley. Through a comprehensive analysis of heritage, ecology, and landscape, the strategy identifies areas suitable for sensitive development while ensuring that key cultural, ecological, and visual assets are safeguarded. Proposed interventions, including managed public access, open space, and connectivity enhancements, will be guided through a masterplan framework to minimise environmental and visual impacts and strengthen the green infrastructure network. Certain portions of the site are identified as appropriate for rezoning and managed residential development, enabling sustainable use while remaining consistent with the overall objective.

NCBH7 Objective 2: *Within areas designated ‘High Amenity – Liffey Valley’ (‘HA-LV’), non-residential development will only be permitted where it: à relates to the area’s amenity potential or to its use for agriculture or recreational purposes, including recreational buildings; or à comprises the redevelopment of or extensions to existing commercial or civic uses or development of new commercial or civic uses within an existing established area of commercial or civic activity; and à preserves the amenity value of the river valley including its biodiversity value, its landscape value, and views or vistas of the river valley.*

Response:

The proposal demonstrates how non-residential development within the HA-LV zoning can be appropriately facilitated. Based on a comprehensive analysis of the site’s heritage, ecological, and landscape assets, the strategy identifies opportunities for development that relate directly to the area’s amenity potential. This includes managed public access and recreational routes, supporting the Liffey Valley as a valued community and tourism resource.

The proposal also seeks to support the sensitive reuse of existing assets, including Shackleton’s Mill and other heritage structures.

All interventions are designed to preserve the river valley’s amenity value, maintaining biodiversity, landscape character, and key views and vistas along the Liffey. Through a masterplan framework, future detailed design will ensure that any development is carefully sited and integrated with the natural and cultural environment. Certain portions of the site have been identified as suitable for rezoning, enabling sustainable and compatible uses while remaining fully aligned with the long-term objectives of NCBH7.

NCBH7 Objective 4: *To facilitate and support the development of the Liffey Valley (Zoning Objective ‘HA-LV’) as an interconnected green space and park in collaboration with Dublin City Council, Fingal County Council, Kildare County Council, the OPW and other State agencies, existing landowners, community groups and sectoral and commercial interests in accordance with the Ministerial Order for the Liffey Valley SAAO by: à Carrying out a study of the lands that comprise Liffey Valley inclusive of the Special Amenity Area Order (SAAO) and adjacent lands; à Investigating and determining, as part of the study, viable and appropriate uses to support and*

facilitate the development of a Regional Park (Liffey Valley Park), with particular emphasis on enhancing the recreation, amenity value and accessibility of the area while protecting the valley’s biodiversity and enhancing the green infrastructure network; à Identifying and designating, as part of the study, possible future new pedestrian routes and footbridge locations in accordance with ‘Towards a Liffey Valley Park’ (2007) or any superseding plan, including potential permissive access routes. Universal accessibility for all should be balanced with ensuring that environmental and built heritage sensitivities are not negatively impacted upon.

Response:

It is acknowledged that this Objective seeks to facilitate and support the long-term development of the Liffey Valley as an interconnected green space and regional park, underpinned by a collaborative study process involving relevant local authorities, state agencies, and stakeholders, including landowners. The study has yet to commence, and there is currently no clear timeline for its progression or completion.

This submission fully supports the intent of the objective and the preparation of the proposed study. Indeed, a submission on behalf of the owners of the land during the making of the current development plan promoted this objective.

However, it is important to note that the requirement to undertake a study should not be interpreted as a moratorium on all development activity within or adjacent to the Liffey Valley. Rather, the study is intended to inform and guide the appropriate management, enhancement, and integration of future land uses objectives that are entirely consistent with the approach outlined in this submission.

The St. Edmundsbury and Woodville lands, particularly the identified Tier 1 and Tier 2 areas outside the SAAO, represent viable, serviceable, and policy-aligned development lands that can actively facilitate the objectives of NCBH7. The proposed masterplanned approach provides for the delivery of new housing, local amenities, and extensive green infrastructure, alongside the protection and enhancement of the Liffey Valley’s ecological and recreational functions. This integrated framework will contribute to the realisation of the Liffey Valley Park concept by improving accessibility, strengthening green

linkages, and delivering complementary public open space within a controlled, design-led environment.

On this basis, it is submitted that the advancement of a well-considered, phased development strategy for these lands would not prejudice or pre-empt the outcomes of the Liffey Valley study. Instead, it would serve as an enabling and complementary measure, demonstrating how viable development and landscape protection can proceed in parallel. Deferral of the site's consideration on grounds of prematurity would be inconsistent with national and regional policy imperatives to deliver compact and sequential growth, optimise serviced lands, and accelerate housing supply in accordance with the NPF Implementation: Housing Growth Requirements Guidelines (2025).

Accordingly, the proposed masterplanned approach for the St. Edmundsbury and Woodville lands directly supports the implementation of NCBH7 Objective 4 through the delivery of accessible green infrastructure, enhanced amenity provision, and the long-term stewardship of the Liffey Valley landscape in tandem with sustainable residential development.

NCBH7 Objective 5: To ensure that development proposals within the Liffey Valley, including local and regional networks of walking and cycling routes à avoid impacts on the Valley's sensitive landscape character and ecological network; à maximise opportunities for enhancement of existing features; à protect and incorporate natural and built heritage features as part of the County's Green Infrastructure network; à do not prejudice the future creation and development of interconnected public parklands.

Response:

The proposal demonstrates a strategic approach to development within the Liffey Valley that aligns with NCBH7 Objective 5. Through a comprehensive site analysis, the strategy identifies opportunities to provide local and regional walking and cycling connections while ensuring that the valley's sensitive landscape character and ecological networks are avoided and preserved.

The proposal seeks to enhance existing natural and cultural features, integrating them into an accessible public realm that strengthens the County's Green Infrastructure network. Heritage assets, including Lucan House and Shackleton's Mill, and ecological corridors are protected and incorporated into

the design, ensuring that both natural and built heritage contribute to recreational, cultural, and ecological value.

Future detailed delivery will be guided through a masterplan framework, ensuring that all interventions are carefully sited, visually sensitive, and environmentally responsible. The strategy also safeguards the potential for interconnected public parklands, providing a coordinated approach to long-term access, amenity, and biodiversity enhancement across the Liffey Valley.

NCBH7 Objective 6: To actively pursue the extension of publicly owned lands, either by direct purchase or land swap within and adjacent to the Liffey Valley Special Amenity Area to create a linked series of park land and open spaces.

Response:

The proposal strategically identifies opportunities for public benefit, providing a framework to deliver accessible and interconnected parkland. Detailed delivery, including integration with surrounding lands and ecological considerations, will be guided through a masterplan framework, ensuring that any interventions are sensitive, sustainable, and consistent with the long-term objectives of the Liffey Valley Special Amenity Area.

NCBH7 Objective 7: To work in collaboration with the owners of lands along the length of the river to seek to provide appropriate public access.

Response:

The landowner is actively offering this site to facilitate the provision of appropriate public access along the River Liffey. The proposal identifies opportunities for managed pedestrian and cycling routes, riverside trails, and public open spaces that connect key heritage and recreational assets while safeguarding the valley's ecological and landscape character.

The detailed design and delivery of these connections will be developed through a masterplan framework, ensuring that access is implemented in a safe, sustainable, and carefully managed manner. This landowner-led initiative provides a strategic contribution to the long-term vision of interconnected parklands and amenity routes within the Liffey Valley, enhancing public use and appreciation of this important landscape.

NCBH7 SLO 1: *To investigate the potential of collaborating with Fingal County Council for the re-use of Shackleton’s Mill as a tourism destination, given its proximity to Lucan Village.*

Response:

This proposal directly supports the objectives of NCBH7 by strategically facilitating the re-use and conservation of Shackleton’s Mill as a viable tourism and cultural destination. The proposed strategy provides the framework and guidance to establish safe and practical access routes to the Mill from the south. The detail of this would be developed in the Masterplan. This approach enables collaboration between Fingal County Council and South Dublin County Council in realising the Mill as a key heritage asset. By establishing a public park and integrated connections, the proposal strengthens the tourism potential of the wider Liffey Valley and lays the foundation for the Mill’s long-term reactivation and public use.

EDE20: *To work in collaboration with the owners of lands at St. Edmundsbury, Lucan to seek to provide appropriate public access to these lands in the Liffey Valley .*

Response:

This proposal represents a strategic and practical framework for the implementation of EDE20. Promoted by the landowners, it provides a comprehensive strategy for managed public access, including greenway routes, riverside trails, and potential pedestrian bridges linking both sides of the Liffey. While the detailed design and delivery of these connections will be established through a subsequent masterplan phase, the proposal secures new public open space and parkland while maintaining environmental protection and landscape integrity. In doing so, it establishes the framework to achieve the long-standing objective of providing appropriate and sustainable public access to privately held lands within the Liffey Valley, consistent with the intent of the SAAO and the Development Plan.

2.7.8 Liffey Valley Special Area Amenity Order (SAAO) & proposed Natural Heritage Area

Approximately 61hectares (150 acres) of St Edmundsbury and Woodville are covered by the Order and the Tier 1 and Tier 2 sites identified in this submission sit outside this area.



Figure 2-4 SAAO Designation

Development within the SAAO is subject to stringent environmental and design criteria to ensure compatibility with the valley’s natural character and ecological sensitivity.

The site is identified as part of a Proposed Natural Heritage Area, recognised for its importance to wildlife and habitats. The SAAO aims to preserve and enhance the character of the Liffey Valley and regulate development within the area, with a particular focus on protecting its landscape, nature, and outstanding natural beauty.

The SAAO was made for 3 reasons.



More than 30-years since the making of the Order, optimising the recreational value of the Liffey Valley SAAO has proven difficult. There are many reasons for this, most notably the fact that most of the land is in private ownership. This is a significant barrier to securing the implementation of the Order.

The benefit of active land management for land benefitting from a SAAO is most clearly demonstrated in Howth. The Howth Order was made over 20 years ago and is actively managed by multiple stakeholders including landowners who work in partnership with Fingal County Council and other stakeholders to oversee the implementation of the Order.

The result of this active management approach to the Order is a valuable recreational amenity area for the people of Howth, the wider Dublin area and tourists. Residents and approximately 750,000 visitors/tourists (120,000 paying) use/visit the area annually.

Schedule 1 of the SAAO sets out a series of priorities for the Liffey Valley. This proposal directly assists in the implementation of these goals, as outlined below:

- **Enhancement of the area for amenity and recreation**
While progress has been achieved by the Local Authority on publicly controlled lands, engagement with private landowners has been challenging. This proposal offers a viable partnership model to deliver meaningful public access, amenity, and landscape enhancement across both public and private lands.
- **Conservation of Anna Liffey (Shackleton's) Mill**
Shackleton's Mill was identified over a decade ago as a flagship project under Towards a Liffey Valley Park. However, poor access and declining condition have constrained progress. This proposal would facilitate a new pedestrian bridge, establishing the only practical and safe route to the Mill, and enabling its adaptive reuse and conservation.
- **Securing public control to deliver a Liffey Valley Park**
This proposal presents a credible opportunity to deliver the vision by providing continuous public access and managed open space along both riverbanks.
- **Provision of public rights of way and Greenway trails**
Public riverside access remains fragmented. The proposal includes approximately 3.5km of public rights of way and greenway trails.
- **Pedestrian bridges and connectivity**
Two new pedestrian bridges can be facilitated east and west of St. Edmundsbury, providing direct and safe connections to Shackleton's Mill and linking communities from north to south across the valley corridor.
- **Facilities for anglers and canoeists**
Reports associated with the SAAO highlight ongoing habitat damage due to a lack of controlled access. The proposal would facilitate managed river access points to support water-based recreation while protecting riparian habitats.

- **Enhancement of scenic views and viewpoints**

There are no defined locations of scenic views and/or viewpoints that directly affect the site, refer to section 3.13.2. for more information. The proposal has taken steps to reduce the magnitude of visual change to areas of visual vulnerability as defined in draft environmental report for the proposed variation of the south Dublin county development plan 2004-2010.

- **Preservation of views from key vantage points**

There is no defined locations of vantage points, however it is understood from the sites contours that new high value vantage points towards the river Liffey could be established as part of the proposal.



Schedule 2 of the SAAO restricts new residential, commercial, or industrial development within the designated area in order to preserve the open, rural character and protect the natural beauty of the Liffey Valley.

While outside the designated SAAO boundary, the areas identified for development have been carefully selected based on their carrying capacity, accessibility, and lower landscape sensitivity. The lands represent locations that can accommodate development without adverse visual, ecological, or amenity impact on the Liffey Valley or its protected features.

Their identification reflects a detailed understanding of the SAAO's objectives, ensuring that proposed development is cognisant of and complementary to the intent of the Order. The layout, form, and scale of development will be guided by the need to preserve the open character of the valley, maintain key view corridors, and enhance public access and ecological connectivity along the Liffey corridor.

Accordingly, appropriately located, design-led development outside the SAAO can proceed in harmony with its protective aims, while supporting the identified need to deliver housing.

3. Site Suitability Assessment – Environmental Analysis

This section assesses the spatial and environmental suitability of the lands at St Edmundsbury and Woodville for development. It evaluates how the site's location, accessibility, and physical characteristics align with national, regional, and local planning objectives for compact, sustainable growth. The assessment draws on historic and contemporary evidence, including the Strategic Environmental Assessment (SEA) prepared for the proposed variation to the South Dublin County Development Plan 2004–2010.

The analysis demonstrates that the lands identified as Tier 1 development areas occupy the least environmentally sensitive and most accessible parts of the holding, lying outside the Liffey Valley Special Amenity Area Order (SAAO). From both a strategic spatial planning and environmental perspective, these lands represent a logical and low-impact location for future development, capable of supporting housing and community uses while safeguarding the Liffey Valley's ecological, visual, and recreational value.

3.1 Methodology

This desktop study involved the collection and review of relevant published information. This desktop environmental and spatial assessment was undertaken to identify the key environmental constraints and opportunities associated with the lands at St Edmundsbury and Woodville. The study involved the collection, collation, and review of published datasets and existing baseline information relating to the site and its surrounding context.

The following environmental parameters were assessed:

- **Biodiversity:** Designated sites, habitats, species, and invasive species.
- **Land, Soils, and Geology:** Soils, subsoils, bedrock, and aquifers.
- **Hydrology and Hydrogeology:** Surface and groundwater bodies.
- **Flooding:** River, rainfall, groundwater, and historical flood events.
- **Well-being:** Air quality, noise, and radon risk.
- **Archaeological and Cultural Heritage:** Features listed on the National Inventory of Architectural Heritage (NIAH) and the Sites and Monuments Record (SMR).
- **Landscape and Visual:** Protected views and key visual receptors.
- The following publicly available sources were consulted as part of this desktop review:
 - **Aerial imagery:** Google Maps and Google Earth.
 - **Planning Policy:** South Dublin County Development Plan 2022–2028 (Adopted).
 - **Biodiversity:** National Biodiversity Data Centre (NBDC) – *Biodiversity Maps*.
 - **Environmental Baseline:** Environmental Protection Agency (EPA) SEA Maps.
 - **Noise:** EPA Strategic Noise Mapping (Round 4, 2022) – agglomeration road noise contours (L_{den} period).
 - **Cultural Heritage:** Geological Survey Ireland (GSI) *Historic Environment Viewer*.
 - **Flood Risk:** Office of Public Works (OPW) *Floodinfo.ie* Maps.

3.2 General Site Context

The lands at St Edmundsbury and Woodville are located on the eastern approach to Lucan Village. The proposed tier 1 developable areas lie approximately 200 metres south of the River Liffey, at the closest point and tier 2 developable areas lying approximately 100m offset from the River Liffey.

The identified developable areas within the site are bounded by agricultural land and the Liffey Valley to the north, golf grounds to the east, education and health care uses to the immediate west and beyond that Lucan village. The R835 route forms the southern boundary and south of that is established low-density residential development.

This land-use pattern provides a defined and contained development edge, with the R835 corridor acting as a clear southern boundary and existing open space and tree belts offering a natural buffer to the north.

Overall, the site presents a balanced setting offering strong connections to Lucan Village and major transport routes, while retaining an inherent landscape and ecological structure capable of supporting a sustainable, landscape-led development approach.

From an environmental sensitivity perspective, the lands display various levels of sensitivity, these were mainly driven by the following :

- The Tier 1 lands are generally flat and comparatively low in visual and sensitivity, with direct access to existing roads and services. These lands are therefore appropriate for residential development of a suitable scale.
- The northern portion of the site, closer to the Liffey Valley SAAO, is of higher environmental sensitivity and is best suited for open space, parkland, and ecological enhancement, contributing to the broader Liffey Valley network.
- Existing vegetation, hedgerows, and topographic variation provide effective landscape screening and opportunities to integrate green infrastructure and habitat corridors into the design framework.

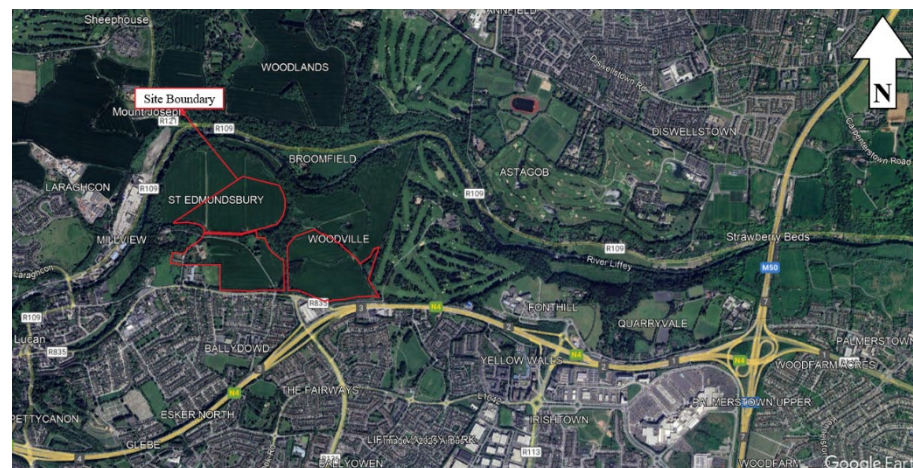


Figure 3-1 Site boundary and surrounding context

3.3 European Designated Sites

Special Areas of Conservation (SACs) are designated sites that are recognised for their ecological value at a European level under the EU Habitats Directive (1992/43/EEC). Special Protection Areas (SPAs) are designated areas of habitat for the protection of endangered species of wild birds and Ireland is obliged under the EU Birds Directive (2009/147/EC) to designate such habitats. Both EU Directives were transposed into Irish law by the European Communities (Birds and Natural Habitats) Regulations (S.I. No. 477 of 2011). SPA and SAC sites are referred to as 'Natura 2000' sites.

There are no SACs or SPAs situated within the site boundary or within 2 kilometres of the site. The nearest designated European site is the Rye Water Valley SAC, 3.5 kilometres to the west and there is no known direct connection with this Natura 2000 site.

The River Liffey discharges to Dublin Bay approximately 15 kilometres to the east, where the South Dublin Bay SAC and South Dublin Bay & River Tolka Estuary are present.

Under the South County Dublin Development Plan, Policy **NCBH3** requires that all planning applications are screened for the need for Appropriate Assessment to ensure there are no adverse effects on the integrity of Natura 2000 sites.

Response:

Given the absence of any SAC or SPA within or adjacent to the site, it is anticipated that the proposed development will have no direct impacts on European sites.

Tier 1 development areas are set back from the river corridor, minimising hydrological and ecological impacts on the Liffey.

Parkland and green infrastructure along the river corridor enhance riparian buffers, support biodiversity and contribute to water quality protection.

The proposed residential and park development will be designed in a manner that avoids indirect impacts on distant European sites, including through sustainable drainage systems (SuDS) to manage surface water runoff and ensure no deterioration of downstream water quality.

By combining strategic site layout, ecological buffers and SuDS, developing this site can be done in a manner that ensure no adverse effect on downstream European sites in Dublin Bay.

3.4 Local Designated Sites

Proposed Natural Heritage Areas (pNHA) are sites which have been designated by the Irish Government on a non-statutory basis and are subject to limited protection and their ecological value is recognised by Planning and Licensing Authorities.

The Liffey Valley pNHA (site code: 000128) is within the overall landholding. This area overlaps with the SAAO. Development is not proposed within this zone.

No published information is available from the authorities on the biodiversity interest of the pNHA at the site. Mapping of the boundaries of the pNHA suggests the importance of the river and woodlands.

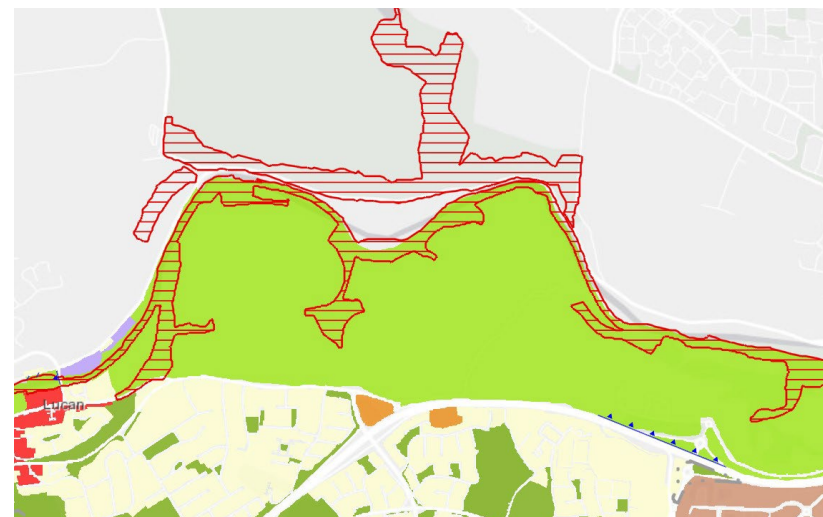


Figure 3-2 Extent of proposed Natural Heritage Area

South Dublin County Council's Development Plan 2022-2028 sets out the relevant policy framework:

- **Policy NCBH4** requires the protection of the ecological, visual, recreational, environmental, and amenity value of pNHAs.
- **NCBH4 Objective 1** states that any development within or adjacent to a pNHA must be designed and sited to minimise impacts on biodiversity, ecological value, geological features, and landscape.
- **NCBH4 Objective 2** restricts development within or adjacent to pNHAs to uses directly related to the area's amenity potential, provided biodiversity, natural heritage, and visual amenity are protected and enhanced.

Response:

The proposed developable areas within Edmundsbury & Woodville have been selected with full cognisance of the location of the pNHA.

Tier 1 development areas are located away from sensitive ecological zones and the river corridor, ensuring that development does not undermine the ecological, landscape, or recreational value of the Liffey Valley. The parkland

and green infrastructure network is positioned along the more sensitive parts of the site to enhance biodiversity, provide habitat corridors, and support public access, thereby aligning fully with the intent of NCBH4 and its associated objectives.



Figure 3-3 Designated sites of ecological importance in proximity to the site boundary (EPA, 2025)

Refer to Table 3-1 below for the complete list of designated sites within 15km of the site boundary. The plots defined within this proposal sit outside any designated areas.

Table 3-1 Designated sites within 15 km of the site boundary

Name & ID	Site Type	Distance (km)
Liffey Valley (000128)	pNHA	Within land holding [not within developable plots proposed]
Royal Canal (002103)	pNHA	1.5 (north)
Grand Canal (002104)	pNHA	3.2 (south)
Rye Water Valley/Carlton (001398)	pNHA & SAC	3.5 (west)
Dodder Valley (000991)	pNHA	9.5 (southeast)
Lugmore Glen (001212)	pNHA	9.8 (south)
Glenasmole Valley (001209)	pNHA & SAC	11.6 (south)
Kilteel Wood (001394)	pNHA	15 (south)
Slade Of Saggart And Crooksling Glen (000211)	pNHA	10.7 (south)
South Dublin Bay (000210)	pNHA & SAC	13.8 (east)
North Dublin Bay (000206)	pNHA	12.2 (east)
Santry Demesne (000178)	pNHA	11.7 (northeast)
Wicklow Mountains (002122)	SAC	13.8 (southeast)
South Dublin Bay and River Tolka Estuary (004024)	SPA	12.6 (east)

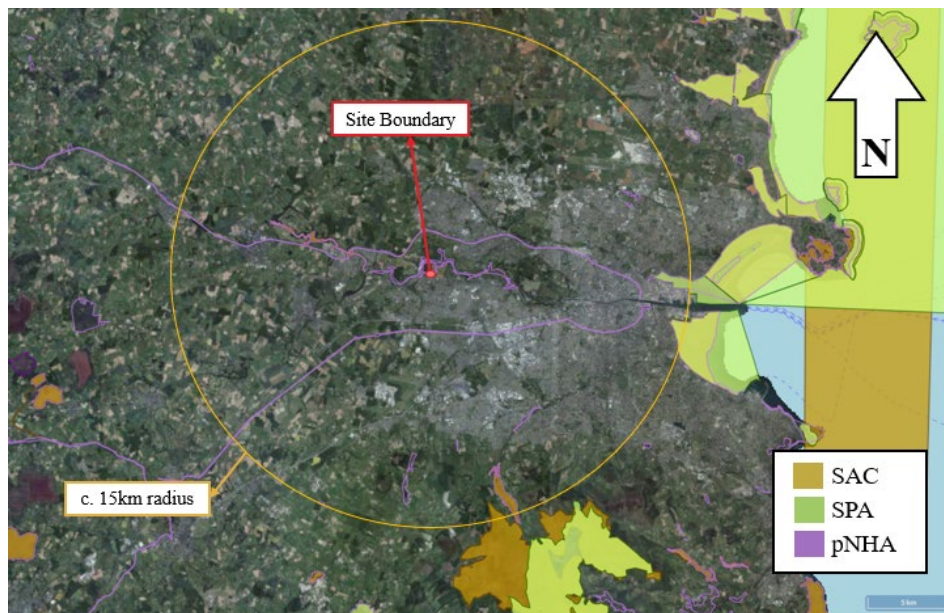


Figure 3-4 Designated sites within 15 km of the site boundary (EPA, 2025)

3.5 Habitats

The National Biodiversity Data Centre (NBDC) uses a standardised 2km national grid square mapping system that divides Ireland into a grid of 2km x 2km square, allowing for the georeferencing of habitats and species. The site is partially situated within 2 national grids: O03N and O03M.

The Fossitt habitats are a classification system to categorise different types of natural and semi-natural habitats based on vegetation, land use, and ecological characteristics. There are no Fossitt habitats situated within the site boundary.

Refer to Figure 3-5 below for the Fossitt Habitats in proximity to the site boundary.

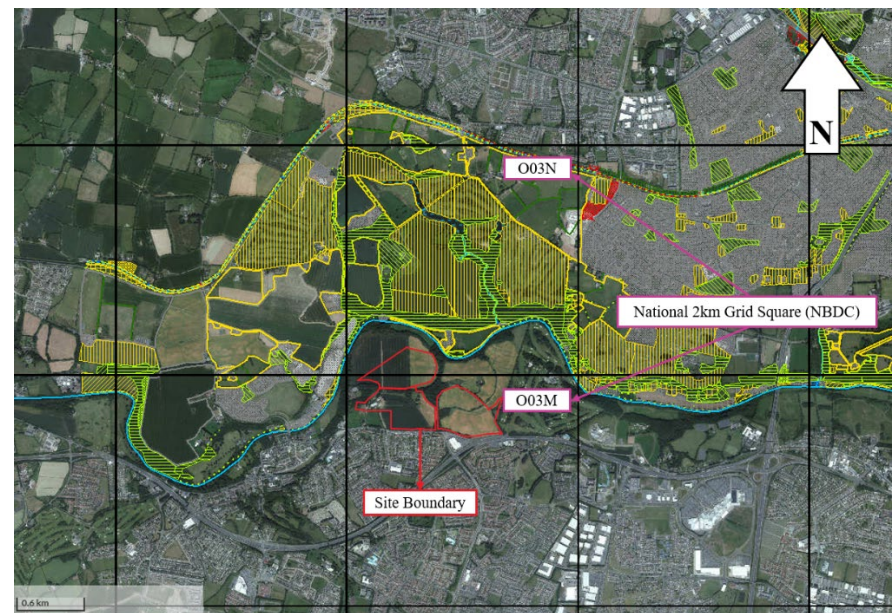


Figure 3-5 Fossitt habitats surrounding the site boundary (NBDC, 2025)

3.6 Species

Legally protected, threatened and invasive species situated in within national 2km grid squares O03M and O03N were reviewed using the NBDC database.

Grey Squirrels were the only invasive species sighted near and / or in proximity to the site boundary. Refer to Figure 3-6 below for a map of grey squirrel sightings in proximity to the site boundary.



Figure 3-6 Grey squirrel sightings in proximity to the site boundary (NBDC, 2025)

The NBDC Biodiversity Maps were also reviewed with respect to bats. The NBDC's Bat Suitability Index ranges from 0 to 100 with 100 being most suitable for bats. As per the NBDC Maps, the site is situated in an area that is suitable to bats with an index ranging from 28.1 to 36.4. Refer to Figure 3-7 below.



Figure 3-7 Bat suitability index within and in proximity to the site boundary (NBDC, 2025)

3.7 Land, Soils and Geology

Soils and Subsoils

According to the EPA's 2018 Corine Land Cover assessment of soils, the soils underlying the site are primarily categorised as 'non-irrigated arable land'. Refer to Figure 3-8 below.

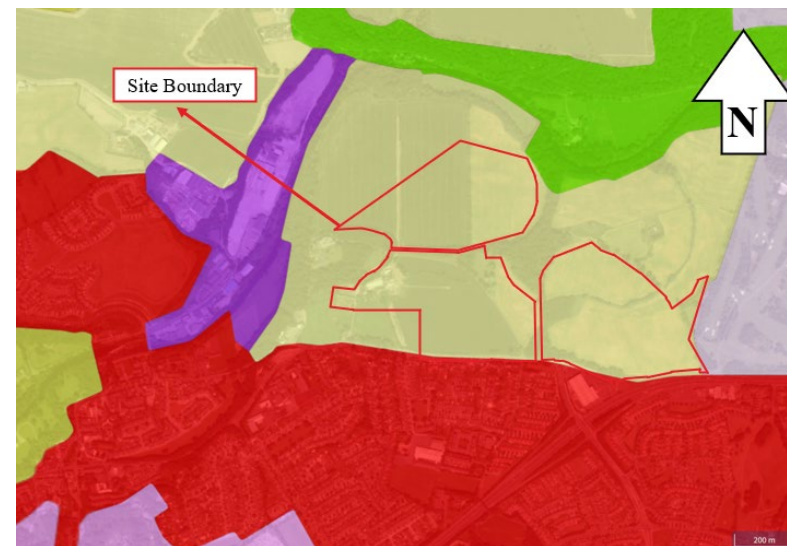


Figure 3-8 Land Corine Cover soils underlying the site and its surroundings (EPA, 2025)

According to the EPA's national soils database, the subsoils underlying the site comprise of 'Bedrock at surface', 'limestone sands and gravels (carboniferous)' and 'limestone till (carboniferous)'. Refer to Figure 3-9 below.

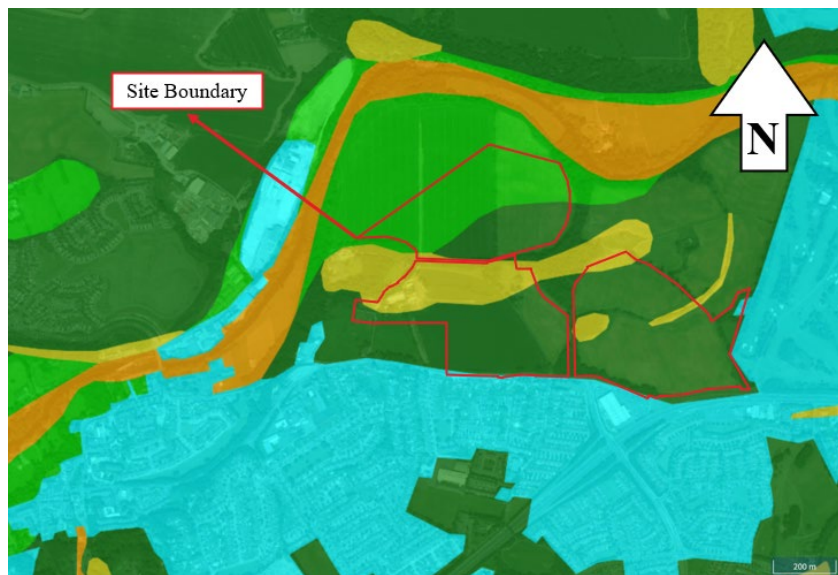


Figure 3-9 Subsoils underlying the site and its surroundings (EPA, 2025)

Aquifer

The aquifer underlying the western portion of the site is a poor aquifer consisting of *'bedrock is generally unproductive except for local zones.'* However, the aquifer underlying the eastern portion of the site is a locally important aquifer consisting of *'bedrock which is moderately productive only in local zones.'* Generally both aquifers range from High vulnerability to Extreme Vulnerability. Refer to Figure 3-10 and Figure 3-11.

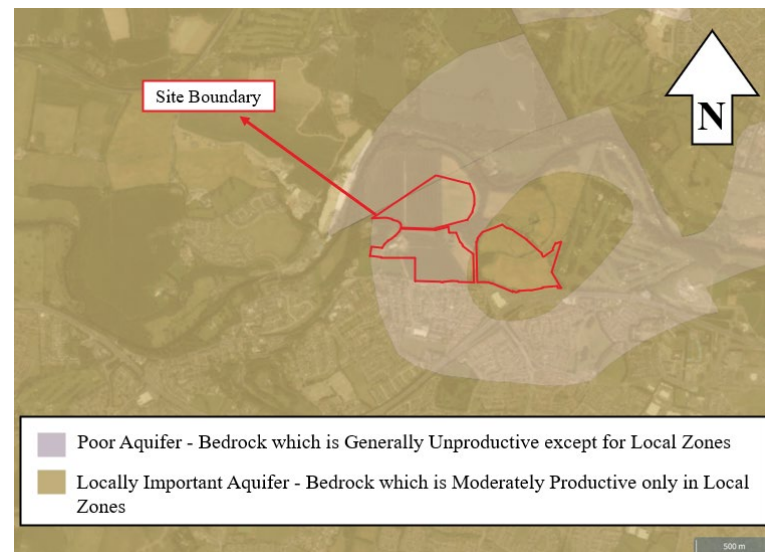


Figure 3-10 Bedrock / aquifer classification underlying the site (EPA, 2025)

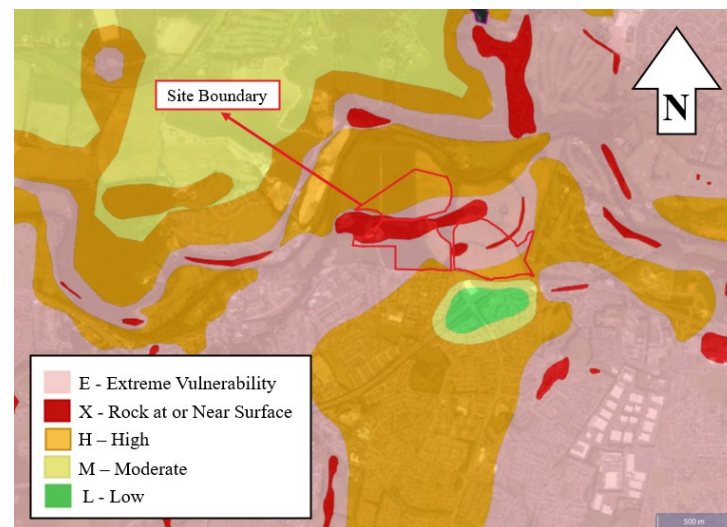


Figure 3-11 Aquifer vulnerability underlying the site (EPA, 2025)

3.8 Hydrology and Hydrogeology

3.8.1 Water Quality

This section describes the quality of waterbody features within or in proximity to the site, in the context of European standards i.e. European Water Framework Directive (WFD). The Water Framework Directive was agreed by all individual EU member states in 2000. On its inception the aim of WFD was to achieve “good status” for all waters by 2027. The WFD runs in 6-year cycles, the first cycle ran from 2009 – 2015, the second cycle ran from 2016 – 2021, and the third cycle runs from 2022 – 2027.

The Environmental Protection Agency (EPA) is responsible for water quality monitoring of Ireland’s lakes, rivers, canals, groundwaters, estuaries and coastal waters and evaluating the results against the standards and objectives set out in the EU WFD and National River Basin Management Plan 2022-2027.

This natural resource assessment looks at a number of aspects of water quality reported by the EPA: surface water and groundwater.

3.8.2 Waterbody WFD Status

Under the WFD, the status of waterbodies (rivers, lakes, groundwater, and transitional waterbodies) is classified under one of five status classes: high, good, moderate, poor, and bad.

‘High status’ is defined as the biological, chemical and hydromorphological conditions associated with no or very low human pressure. This is also called the ‘reference condition’ as it is the best status achievable - the benchmark. Assessment of water quality is based on the extent of deviation from these reference conditions, following the definitions in the WFD.

‘Good status’ means ‘slight’ deviation, ‘moderate status’ means ‘moderate’ deviation, and so on. The overall status is determined by the poorer of the ecological and chemical status. ‘Good surface water status’ is determined by the lower of ecological and chemical status.

Groundwater quality status is classed as either “Good” or “Poor”. The assigned groundwater quality status related to the natural chemical composition of the water and to these same substances as well as to the quantitative status (i.e. extent to which annual recharge to aquifers is depleted by abstractions). Refer

to figure 3-12 on the following page which demonstrates how the waterbody WFD status is determined.

3.8.3 Waterbody Risk Status

The ‘Risk’ in the WFD context means the risk of not meeting the WFD objectives due to damage caused by significant pressures, i.e. achieving Good Status, no deterioration of status (for all water bodies) and reversing upward trends (groundwater bodies only).

The main significant pressures impacting water quality in Ireland include agriculture, wastewater discharges, impacts to the physical habitat conditions including excess fine sediment (hydromorphology), and pressures from forestry activities.

Water body risk status is based on the characterisation of the waterbody which considers its physical characteristics (including typologies, reference conditions, the geology and hydrogeology of groundwater bodies including the nature of the overlying strata, linked groundwater, and surface water systems, etc.), a review of the impact of human activity on the status of surface waters and groundwater, and an economic analysis of water use.

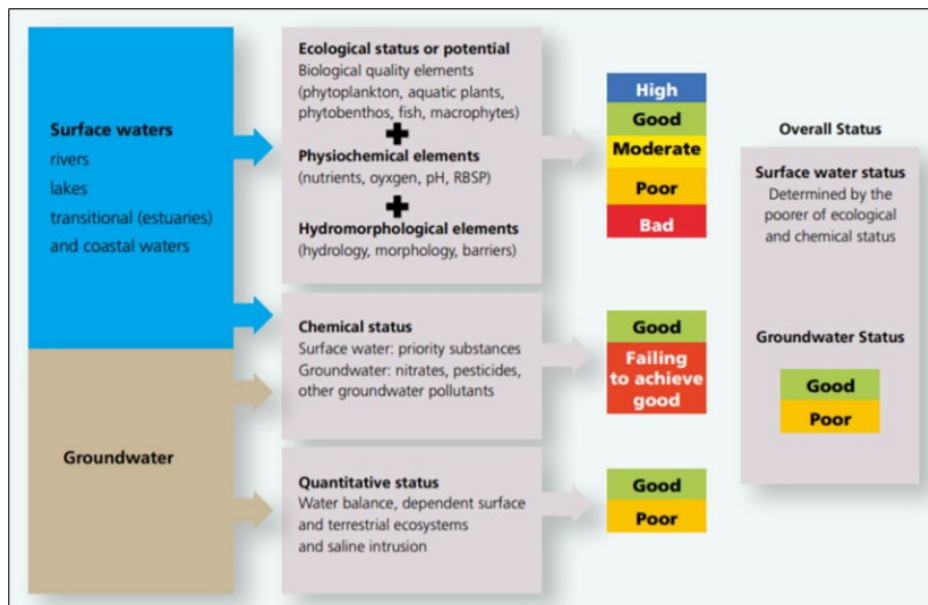


Figure 3-12 Classification of status of surface water and groundwater according to the WFD (EPA, 2013)¹

3.8.4 Surface Water

This section describes the surface water features and the quality of these features in the context of European standards i.e., WFD.

One water feature was identified within the developable areas, the Hermitage 09 (segment code: 09_1136) stream, a tributary of River Liffey is within the Tier 1 Woodville site. The EPA River network mapping was used to identify surface water features in proximity to the site and their direction of flow, refer to Figure 3-13 below.

The proposal provides the opportunity to explore a shift in the land management to reduce the use of herbicides and pesticides by changing the use

of the land away from agricultural uses and towards a more sustainable uses such as public parkland, nature reserve or water management.



Figure 3-13 Water features and flow direction within the site and in proximity to the site (EPA, 2025)

The primary water feature in proximity to the site is the River Liffey. According to the WFD waterbody assessment the River Liffey has a WFD status of 'Poor' and is classified 'At Risk'. Refer to Figure 3-14 and Figure 3-15 below.

¹ EPA (2013). *Water Quality in Ireland 2013-2018*. Available at: [Water-Quality-in-Ireland-2013-2018-\(web\).pdf](https://www.epa.ie/publications/reports/water/water_quality_in_ireland_2013_2018.pdf).



Figure 3-14 WFD status of the surface waterbodies in and surrounding the site (EPA, 2025)



Figure 3-15 WFD risk of the surface waterbodies in and surrounding the site (EPA, 2025)

3.8.5 Groundwater

The Dublin groundwater body underlies the entirety of the site. According to the WFD waterbody assessment the Dublin ground waterbody has a WFD status of 'Good' and its risk status is currently classified as 'Under Review'. Refer to Figure 3-16 and Figure 3-17 below.



Figure 3-16 WFD status of the ground waterbodies in and surrounding the site (EPA, 2025)

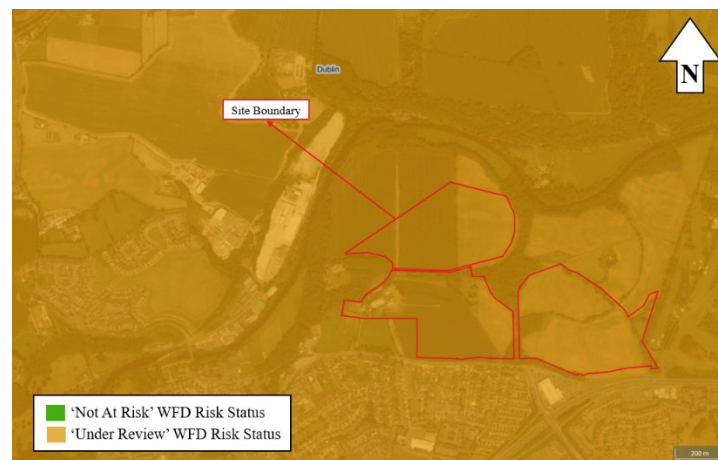


Figure 3-17 WFD status of the ground waterbodies in and surrounding the site (EPA, 2025)

3.8.6 Response to Policy IE3: Surface Water and Groundwater

The proposed site will be designed and developed in a manner that safeguards both surface water and groundwater quality, aligns with the EU Water Framework Directive, and implements the principles of Sustainable Drainage Systems (SuDS). The approach will ensure that water resources are protected, hydrological processes are maintained, and downstream impacts are minimised.

Surface water and groundwater systems will be considered holistically in the site layout and landscape design.

Measures will be incorporated to prevent pollutants and sediments entering surface waters during construction and operation phases.

A SuDS strategy will be prepared to manage surface water at source through attenuation and treatment. Techniques such as swales, permeable paving, green roofs, rain gardens, and constructed wetlands will be integrated where feasible.

The development will seek to mimic natural hydrology and manage runoff within the site boundary.

No direct discharges to groundwater will occur; all infiltration systems will be designed with adequate treatment capacity.

The River Liffey is a receiving watercourse that supports salmonid populations, and it will be protected through strict control of surface water discharge quality.

All new connections to foul and surface water networks will be designed in accordance with Irish Water and South Dublin County Council standards to avoid misconnections. The development will facilitate monitoring points or inspection chambers to ensure compliance during operation.

At this strategic stage, the proposed site demonstrates suitability in relation to Policy IE3 by incorporating sustainable drainage, pollution prevention, and groundwater protection into its conceptual design. Future detailed design stages will include a Surface Water Management Plan and Hydrogeological Assessment, ensuring the development enhances local water quality and hydrological resilience in accordance with the South Dublin County Development Plan 2022–2028.

3.9 Flood Risk

This desktop study considered the South Dublin County Council Strategic Flood Risk Assessment prepared as part of the South Dublin County Development Plan 2022-2028 (SDCC, 2022).

The Strategic Flood Risk Assessment outlines two flooding zones as follows:

- Zone A - High probability of flooding: this zone defines areas with the highest risk of flooding from rivers (i.e. more than 1% probability or more than 1 in 100) and the coast (i.e. more than 0.5% probability or more than 1 in 200); and
- Zone B – Moderate probability of flooding: This zone defines areas with a moderate risk of flooding from rivers (i.e. 0.1% to 1% probability or between 1 in 100 and 1 in 1000) and the coast (i.e. 0.1% to 0.5% probability or between 1 in 200 and 1 in 1000).

The site developable plot boundaries lie outside of flooding zones B, and only minor areas of Zone A are present along existing agricultural field drainage ditches which form a tributary of the River Liffey which dissects the eastern portion of the Woodville site. Refer to Figure 3-18. This area of flood risk would be integrated into any development to ensure adequate space for flood mitigation measures are provided.



Figure 3-18 Flood zones within and surrounding the site boundary (SDCC, 2022)

Additionally, the OPW flood maps were reviewed historical flooding events. The image below illustrates the location of single and recurring historical flooding events occurring in proximity to the site boundary. As part of the scheme, it would be envisaged that flood mitigation measures could be successfully integrated if not addressed fully by the permitted BusConnects scheme.



Figure 3-19 Historical flooding event in proximity to the site boundary (OPW, 2025)

3.9.1 Response to Policy IE4: Flood Risk

The proposed site will be planned and designed in accordance with the principles of sustainable flood risk management and climate resilience. A precautionary, risk-based approach will guide all future stages of design, ensuring that flood risk to people, property, and the environment is avoided.

The proposal has considered areas at risk of flooding and areas of historical flooding events and allowed space to adequately manage the risk, the site has the capacity to mitigate any flood risks through bio-attentions ponds, street SuDs schemes and other SuDs approaches to water management.

The proposal will fully align with the EU Floods Directive, EU Water Framework Directive, and The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009).

The development will adopt the Precautionary Principle, recognising the uncertainties in flood modelling and the potential for climate change impacts.

- Flood-compatible land uses, such as public open space or parkland, will be preferentially located in lower-lying or higher-risk areas, contributing to wider flood storage and biodiversity benefits.
- The project will take account of the Eastern CFRAM Flood Risk Management Plan and will not impede or conflict with any OPW or South Dublin County Council flood management measures.
- Opportunities for multi-functional SuDS and blue-green infrastructure will be explored to integrate flood management, amenity, and ecological enhancement and manage exceedance flows;
- Avoidance of inappropriate development in flood-prone areas;
- Compliance with national and EU directives; and
- Delivery of a climate-resilient, multifunctional landscape that enhances both housing and parkland value.

3.10 Public Transport

Proximity to public transport are key factors in determining appropriate zoning and development density across the site. These considerations ensure that the proposed masterplan responds sensitively to the site's traffic and transport constraints while maximising its potential for compact, sustainable growth.

The Infrastructure Capacity Assessment Report goes into further detail and with particular emphasis on Lucan Road (R835) along the southern boundary. This corridor serves as the primary vehicular and pedestrian access route, connecting the site to Ballydowd to the west and Lucan Village to the east, where a concentration of educational and healthcare facilities supports community integration.

From the analysis defined within the ICA Report, and in line with the Sustainable Residential Development Guidelines and DMURS, there is sufficient existing and permitted public transport infrastructure to support the proposed developable areas. The site would encourage sustainable transport through ;

- **Established public transport infrastructure**, including multiple BusConnects routes and proximity to the proposed Luas Lucan line, supporting a TOD approach.
- **Pedestrian infrastructure**, with footpaths and crossings that link the site to nearby schools, healthcare services, and community amenities.
- **Cycle infrastructure**, adequate space for dedicated cycle lanes and on-site parking opportunities.

This approach supports modal shift, walkability, and integration with Lucan Village, aligning with the 10-minute settlement concept promoted in the South Dublin County Council Development Plan 2022–2029.

3.11 Well-Being

3.11.1 Air Quality

According to the EPA maps, the site is situated within Ireland's Air Quality Zone A 'Dublin Conurbation'.

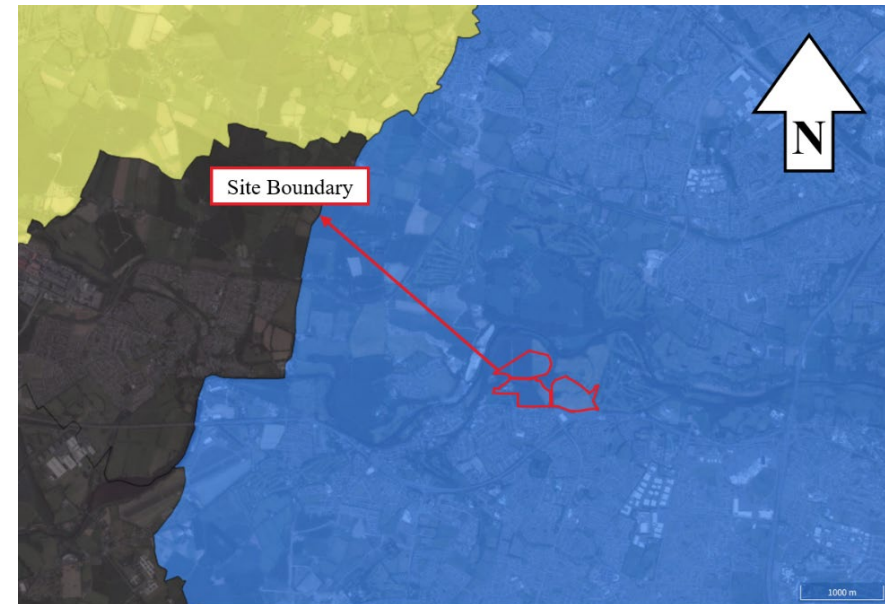


Figure 3-20 Air quality zone within and surrounding the site boundary (EPA, 2025)

3.11.2 Radon

The site is primarily located in an area where approximately 1 in 10 homes are likely to have high radon levels, according to available radon risk mapping. However, portions of the eastern area of the site fall within a zone of higher radon risk, where up to 1 in 5 homes are estimated to be affected. Refer to Figure 3-21 below.

While sections of the site fall within a moderate to high radon risk area, the issue is readily manageable through standard construction practices and established regulatory measures. With appropriate design and implementation

of radon protection systems, the site remains suitable for residential and parkland development from a radiological safety perspective.

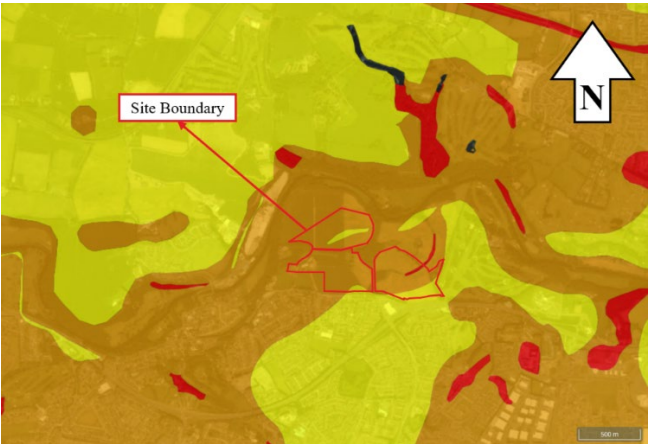


Figure 3-21 Radon levels within and in proximity to the site boundary (EPA, 2025)

3.12 Noise

A review of EPA noise maps indicates that the site is not located within an area significantly impacted by airport or industrial noise. However, the site is susceptible to road traffic noise, primarily originating from the N4 roadway situated to the south of the site. Refer to Figure 3-22 and Figure 3-23 below.

While the site is influenced by road traffic noise , it is considered strategically suitable for development, provided that a noise-sensitive masterplanning approach and appropriate mitigation measures are implemented. The site’s layout, landscaping, and building design will be guided by acoustic principles to deliver a comfortable, healthy, and policy-compliant residential and recreational environment.

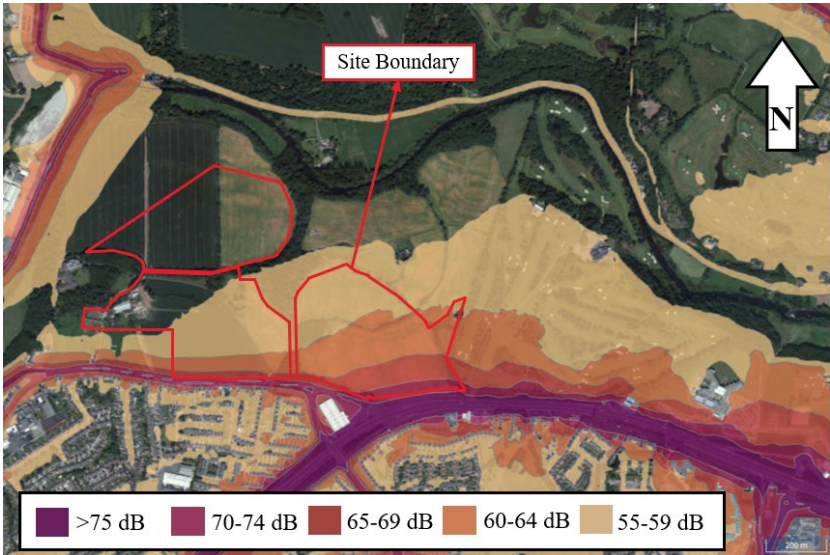


Figure 3-22 Noise round 4 road agglomeration day levels in and within proximity to the site (EPA, 2025)

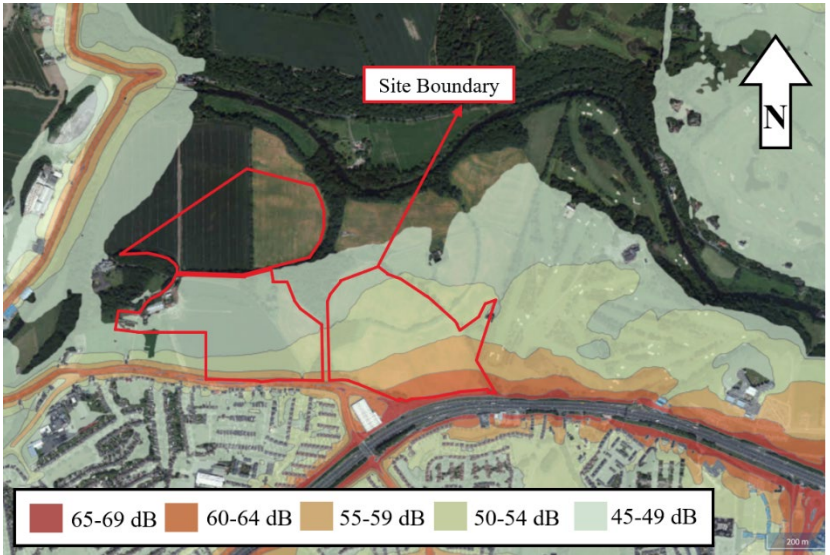


Figure 3-23 Noise round 4 road agglomeration night levels in and within proximity to the site (EPA, 2025)

3.13 Archaeological and Cultural Heritage

This section provides an overview of the historic environment in and around the site. It considers both architectural and archaeological heritage features that may present environmental constraints to future development.

3.13.1 Protected Structures

The GSI Historic Environment Viewer was reviewed and no. 5 protected structures were identified on site. These structures are classified as part of the National Inventory of Architectural Heritage (NIAH) and / or the Sites and Monuments Record (SMR). Refer to the table below for a complete list of the protected structures within the site boundary.

Table 3-2 Protected structures situated within the site boundary (GSI, 2025)

Item	Record & ID
St Edmondsbury Gate Lodge : gate lodge	11202009 (NIAH)
House	11202004 (NIAH)
Barn	11202007 (NIAH)
Enclosure : Woodville	DU017-097 (SMR)
Gates / railings / walls	11202005 (NIAH)

The following Figure shows the location of protected structures within the site boundary as well as additional structures within proximity of the site boundary.

The presence of heritage and archaeological features within the site is considered an opportunity rather than a constraint. Through sensitive design, conservation-led reuse, and integration into the overall masterplan, the development can celebrate local history, enhance cultural identity, and secure

the long-term preservation and active use of heritage assets. This approach will deliver both heritage and placemaking benefits, consistent with the objectives of the South Dublin County Development Plan 2022–2028.

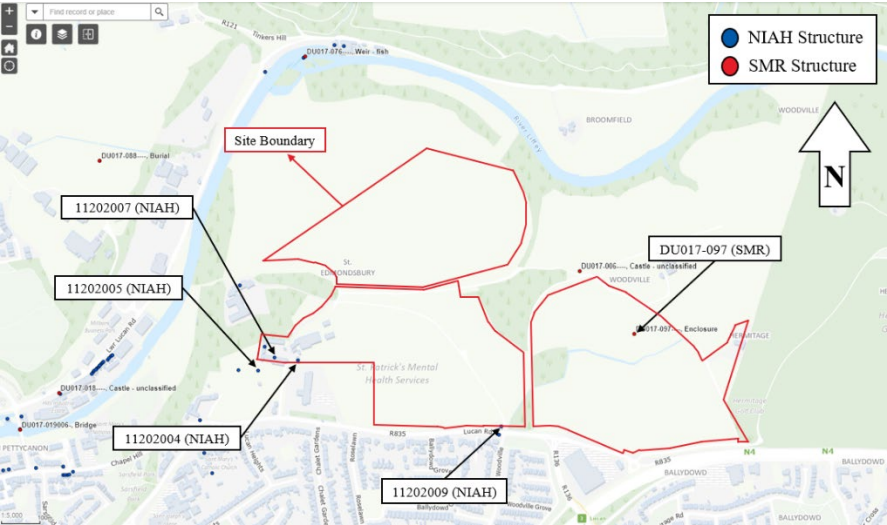


Figure 3-24 Protected structures in and within proximity to the site boundary (GSI, 2025)

3.14 Landscape and Visual

This section provides an overview of the scenic environment in and around the site. It considers both landscape and visual features that may present environmental constraints to future development in relation to the existing landscapes as set out within Appendix 9 of the South Dublin County Council CDP.

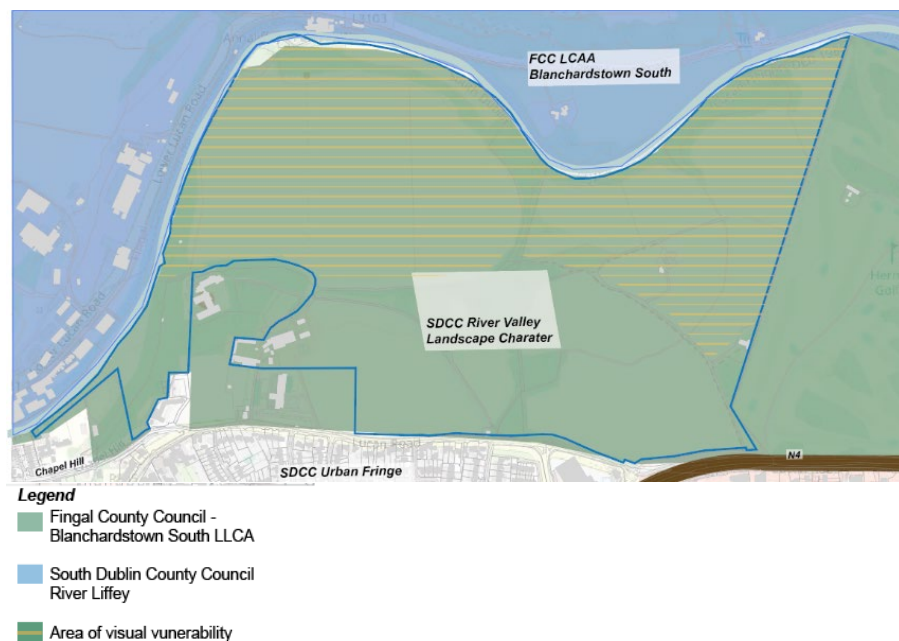
3.14.1 Landscape Character

The site sits within The River Liffey Landscape Character area. The River Liffey Landscape Character Area is defined by its broad river valley and gently sloping sides, creating a strong linear corridor through South Dublin. It features riparian woodlands, hedgerows, and agricultural lands interspersed with parkland and historic estates, giving it high ecological and cultural value.

An aspect of the River Liffey character area is that the land serves a wider catchment area as a ‘borrowed landscape, this informs the defined area of visual vulnerability which is more exposed to long distance views.

The site itself is currently dominant by agricultural use, defined by a gently sloping terrain and a strong network of mature hedgerows and woodland, particularly concentrated along the site edges, and the central north–south spine. These features form part of the Liffey Valley Green Infrastructure Corridor, as identified in appendix 9 of the SDCC Development Plan 2022–2028, and contribute significantly to the site's biodiversity, amenity value, and landscape identity.

To the south, the site interfaces with Lucan Village via Lucan Road, an established residential area with schools and community facilities. These areas are valued by the local community and contribute to the site's scenic and cultural significance.



3-25 Diagram of Landscape Character areas and local landscape character areas in visual proximity of the site.

3.14.2 Key Views, Prospects and Tree Preservation Orders

There are no key views, prospects and / or tree preservation orders in or within immediate proximity to the site. There are two protected views situated approximately 650m to the east and west of the site boundary. Additionally, there is one tree protection order situated approximately 1.3km to the east of the site boundary. Figure 4-52 shows the location of these landscape and visual features.

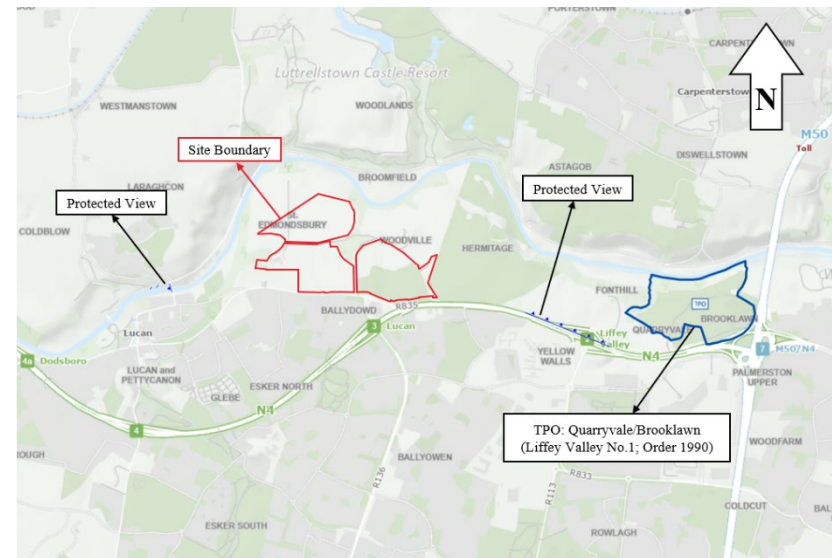


Figure 3-26 Key views, prospects and tree preservation orders within proximity to the site boundary (SDCC, 2022)

3.14.3 Special Amenity Area Order (SAAO)

The Liffey Valley Special Amenity Area Order (SAAO), as defined by South Dublin County Council, is a statutory designation under the Planning and Development Act 2000 that protects the scenic, ecological, and recreational value of the Liffey Valley. It aims to conserve the natural landscape, biodiversity, and heritage features while enhancing public access and amenity. Development within the SAAO is strictly controlled to prevent adverse impacts on the valley’s character, ensuring it remains a strategic green corridor for Dublin.

The Liffey Valley SAAO is situated immediately adjacent to the northern boundary of the site. The proposal will not define any development within the defined area to align to the objectives of SDCC. The location of the SAAO with respect to the site boundary is picture in Figure 3-26 below.

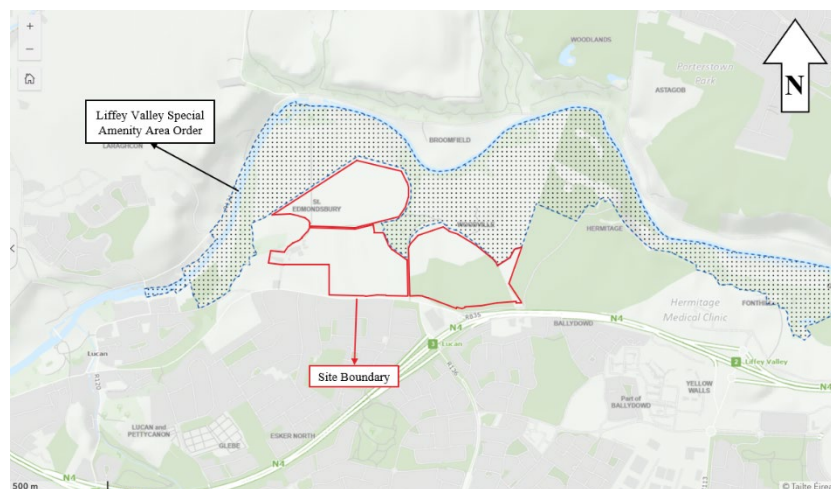


Figure 3-27 Location of Liffey Valley SAAO with respect to the site boundary

From the analysis the development approach should seek to introduce a range of measures to protect the existing value of the site and its surrounding, this could measure such as the ones listed below and future in the mitigation section that follows. .

- **Retention of existing hedgerows and woodland**, particularly along the central spine and boundaries, to preserve ecological corridors and visual buffers.
- **Protection of key views** towards Ballydowd, Lucan Village and the River Liffey, ensuring that new development respects the site's scenic qualities and avoids visual intrusion.
- **Integration of open space and green infrastructure**, reinforcing the site's natural character and supporting biodiversity.

- **Community-responsive zoning**, where development intensity reflects stakeholder feedback and aligns with the site's amenity zoning under the Liffey Valley Special Amenity Area Order (SAAO).
- **Creation of habitat areas**, integrating space for nature within the site to be left to thrive if its current condition is good.
- **Introduction of visual buffers**, the use of planted hedgerows, tree lined streets and other elements to help mitigate any visual impact from built infrastructure

This approach supports the delivery of housing in a way that is sensitive to the site's natural assets and cultural context, ensuring that landscape protection and community integration are embedded in the approach

4. Infrastructure Capacity Assessment

An **Infrastructure Report** has been prepared for the site, with the technical report prepared by Arup appended in full for reference. A **Social Infrastructure Audit**, prepared by McCutcheon Halley, is also appended. This chapter presents a summary of the key strategic findings across the full range of infrastructure considerations, including:

- Transport infrastructure
- Water infrastructure
- Wastewater infrastructure
- Energy and Telecommunications
- Social Infrastructure
- Green infrastructure

The summary highlights opportunities and measures that would support safe, sustainable, and well-connected development, ensuring integration with Lucan village, the wider regional network, and the surrounding natural and built environment.

4.1 Transport Infrastructure (Access, Connectivity & Public Transport)

The site is primarily accessed from its southern boundary via the R835 Lucan Road, which provides direct connectivity to the N4, R136, and the wider regional and motorway road network. The R835 currently functions as both a strategic corridor and a local access road. Traffic modelling indicates a moderate increase in vehicle trips, with the majority directed eastwards towards the N4 and only a small proportion expected to travel west into Lucan village, minimising impacts on local streets.

The R835 is characterised by wide lanes and limited pedestrian crossing points, presenting a barrier to safe movement from south to north, particularly for

families accessing schools and local amenities. The proposed development offers a strategic opportunity to transform this corridor, creating a safer, more permeable, and community-friendly streetscape. Key measures would include the introduction of well-designed pedestrian crossings at regular intervals, traffic calming interventions, and potential lane reconfiguration to reduce vehicle speeds and the dominance of motorised traffic. New connections from the site to the R835 will be carefully designed to prioritise pedestrian and cyclist safety, with crossings integrated into the public realm and designed to maximise visibility and natural surveillance.

Internally, pedestrian routes will link seamlessly with greenways, amenity trails, and the Liffey Valley park network, while streets within the site will be designed to human scale, incorporating active frontages, landscaping, street furniture, and recreational spaces. Informal trails currently offer some connectivity to Lucan village, and these will be formalised and enhanced, creating direct, safe, and legible routes to the village core, extending to Lucan House in line with the masterplan vision. Together, these measures will create a permeable, attractive, and sustainable movement network, improving connectivity to Lucan village, enhancing active travel, and supporting placemaking objectives.

While cycling infrastructure is currently absent along the site frontage, nearby east-west and north-south routes on the R136 and N4 provide connections. The development will integrate with the planned GDA cycle route network and BusConnects improvements, providing internal cycle lanes, shared streets with cyclist priority, secure cycle parking, and opportunities for bike-sharing and mobility hubs to promote sustainable travel modes.

Public transport in the vicinity is focused on bus services, including existing stops on the R835 and the BusConnects corridor, serving routes X30, X31, X32, X25, P29, and the C Spine, which runs directly in front of the proposed site. Residential density will be structured according to proximity to bus stops to support Transit-Oriented Development (TOD) principles, ensuring efficient use of public transport and minimising reliance on private vehicles. Anticipated increases in bus demand from the development are expected to be accommodated by planned improvements under BusConnects, with minimal impact on overall network capacity.

Connectivity with Lucan village will be strengthened through new pedestrian and cycle links, integrated green infrastructure, and local amenities within the site. These measures will support short trips by active modes, reduce car dependency, and enhance safety. Opportunities also exist to activate the R835 street frontage through high-quality urban design, landscaping, and traffic calming, balancing the strategic function of the road with local placemaking objectives.

The site is strategically positioned to function as a seamless extension of Lucan village, offering substantial opportunities to integrate pedestrian, cycling, public transport, and road infrastructure in a manner that supports sustainable mobility and placemaking. Vehicle traffic generated by the development is expected to have a moderate impact on the local road network, with the majority of trips directed eastwards toward the N4, and only a limited proportion travelling west into Lucan village. Internal roads will provide essential vehicular access for services, deliveries, and emergency vehicles while prioritising shared space and filtered permeability to reduce car dependency and encourage active travel.

The strategic transport approach demonstrates that the site can be well-integrated with Lucan village and the wider regional network, supporting sustainable mobility, safe and attractive active travel, and limited vehicle impact. The proposals balance connectivity, accessibility, and placemaking, providing a robust framework to support residential and mixed-use regeneration while enhancing the public realm and local community experience.

In conclusion, the site has strong potential to deliver a highly sustainable, well-connected development. Pedestrian, cycling, and public transport infrastructure can be effectively integrated, while vehicle traffic impacts are expected to be moderate. Carefully designed streets, active frontages, and traffic management will minimise disruption to the public road network and the village environment. The strategic transport approach aligns fully with South Dublin County Council's Development Plan objectives, promoting sustainable mobility, local accessibility, and connectivity, and confirming the site's suitability for residential and mixed-use regeneration.

4.2 Water Infrastructure

The site is well-positioned to connect to existing water infrastructure. South of the River Liffey, multiple watermain runs along the R835 Lucan Road and adjacent to the N4, offering technically feasible connection points for the proposed development. These include a 200mm PVC watermain and a three-inch cast iron watermain, which could potentially serve the site subject to confirmation of supply capacity from Uisce Éireann.

Potable water is currently supplied from both the Ballymore-Eustace and Leixlip Water Treatment Plants (WTPs), with Lucan primarily served by the Leixlip plant. The Barrow Water Supply Scheme Area Extension project, currently being commissioned, is expected to increase supply to the Greater Dublin Area by 18 million litres per day once complete in 2025, further enhancing regional water supply capacity.

Approximately 2km north of the site, a 685mm diameter steel watermain forms part of the wider ring main network and could provide a potential connection, subject to feasibility and alignment with Uisce Éireann's overall water supply strategy.

Looking forward, the Eastern and Midlands Region Water Supply Project, which plans to collect potable water from the River Shannon and pipe it to the Greater Dublin Area, will further ensure adequate water supply for future development and population growth in the region.

A Pre-Connection Enquiry was submitted to Uisce Éireann on 17th September 2025 to confirm connection feasibility and capacity. A response is anticipated by mid-January 2026. The development team will submit full details of water infrastructure connections once correspondence is received.

In summary, the site is well-positioned to connect to existing and planned water infrastructure, and current initiatives provide a positive outlook for securing sufficient potable water supply to support the proposed residential and mixed-use development.

4.3 Wastewater Infrastructure

The site would connect to the existing Ringsend Wastewater Treatment Plant (WwTP) network. Trunk sewer 9B originates in Lucan and conveys flows via the Grand Canal to Ringsend, consistent with South Dublin County Council's Development Plan objectives. While the Leixlip WwTP has undergone recent upgrades, the development will form part of the Ringsend catchment, supported by planned infrastructure enhancements.

An existing foul sewer runs along the R835 Lucan Road. Properties such as St. Andrew's National School are connected to this sewer. Given the topography of the site, pumping will likely be required to convey wastewater from the development to the Lucan Road sewer connection, necessitating at least one pumping station.

A Pre-Connection Enquiry was submitted to Uisce Éireann on 17th September 2025, with a response expected by mid-January 2026. This will confirm capacity availability and determine whether any upgrades are required. Any upgrades and new sewer systems will comply with the Uisce Éireann Code of Practice for Wastewater Infrastructure (July 2020, Rev. 2).

The South Dublin County Council Development Plan highlights the need to expand Ringsend WwTP capacity in line with the Greater Dublin Strategic Drainage Study (GSDS). Policy IE2 Objective 2 supports Uisce Éireann in upgrading trunk sewer 9B, increasing capacity for Lucan, while Objective 4 commits to supporting Uisce Éireann's strategic and capital investment plans, ensuring long-term infrastructure resilience. Uisce Éireann's Water Services Strategic Plan confirms that headroom in strategic infrastructure will be regularly reassessed, with new treatment plants, pumping stations, and pipelines designed to accommodate future growth.

Together, these measures demonstrate that the site can be effectively serviced by existing and planned wastewater infrastructure, with capacity to accommodate the proposed residential and mixed-use development.

It is acknowledged that a significant portion of Tier 2 land in the sub-region (including some Naas Road / Citywest allocations) is reliant on the 9B trunk sewer upgrade, and that the 9B constraint is cited in SDCC appendices. St Edmundsbury and Woodville are located within the same broader drainage catchment and therefore need to address sewer capacity risk in a transparent

manner. However, reliance on a catchment-level upgrade does not by itself preclude near-term delivery where (a) strategic upgrades are committed, (b) site-level mitigation and phasing can bridge short-term capacity gaps, and (c) the promoter is proactive in funding and coordinating required infrastructure.

4.3.1 St. Edmundsbury and Woodville Tier 1 Deliverability Commitments to Works

It is understood that existing wastewater infrastructure in the Dublin region is approaching full capacity, especially at the Ringsend treatment plant, which currently handles 40% of Ireland's wastewater.

Population and economic growth in the Greater Dublin Area are driving a projected 50% increase in wastewater volumes by 2050, making new treatment capacity essential to avoid service limitation. The proposed Greater Dublin Drainage scheme which was permitted in September 2025 will enable sustainable housing development, protect public health, and support economic growth by providing wastewater treatment for up to 500,000 people across Dublin the Dublin region. According to the GDD website the GDD releases "critical treatment and network capacity in other parts of the Ringsend catchment" which includes the subject site, see image extracted from the GDD website with the subject site overlaid in the following figure.



Response to South Dublin County Council's 'Call for Sites'

St. Edmundsbury & Woodville: A Landscape-Led Proposal for Housing, Parkland and Transport-Oriented Growth

In addition to the GDD scheme, as outlined already, the Uisce Eireann Investment Programme and Objective IE2 the development plan identify sewer 9B in the Lucan area for reinforcement thus further enhancing the foul sewer resilience in the area.

Alternative and interim local solutions

The site can be made serviceable in the short term through local engineering measures where required: on-site pumping (local pumping station(s)) to route flows to available sewers, flow management and temporary staged connection agreements. These are standard, deliverable civil engineering responses that can be implemented quickly and efficiently.

Phased, plan-led approach

The landbank's scale allows an early first phase to be sized to match confirmed available capacity. Early phases can therefore proceed while longer-term network upgrades (9B/Ringsend) are progressed to accommodate subsequent phases. This is a commonly accepted approach for major regeneration sites and meets the "deliverable" test by ensuring that some housing can be occupied without waiting for full catchment upgrades.

Demand management and flow-reduction measures

The development will incorporate measures to reduce water usage demand including water efficiency measures, greywater reuse, rainwater harvesting, smart controls, holding tanks and temporary package treatment plants. Combining these measures materially reduces peak wastewater loading and the immediate capacity requirement on off-site infrastructure.

4.4 Drainage Infrastructure

The site drains predominantly from south to north, towards the River Liffey, which flows west to east. Along the site boundary, an open drainage channel or stream conveys stormwater flows into the Liffey. The upper reaches of this watercourse originate outside the Special Amenity Area (SAA) and carry flows from the wider Lucan area. Due to the predominantly greenfield nature of the site, natural overland drainage currently predominates.

South Dublin County Council records indicate no public surface water infrastructure within the site itself, with the nearest public surface water sewer being a 300mm gravity sewer along the R835 Lucan Road, which discharges into the drainage channel on the site. The location of the existing stormwater infrastructure is illustrated in Figure 4.15.

Future development of the site will increase both the volume and rate of surface water runoff. To mitigate potential impacts, the drainage system for the development will be designed in accordance with the Greater Dublin Strategic Drainage Study (GSDSDS) Volume 2 – New Development and relevant South Dublin County Council policies. Key requirements include:

- Stormwater Attenuation Systems: Limit post-development flows to existing greenfield runoff rates.
- Sustainable Drainage Systems (SuDS): Reduce runoff volumes and improve water quality through measures such as bioretention systems, rain gardens, filter drains, permeable paving, green roofs, swales, and attenuation/treatment ponds.
- Policy GI4 Compliance: SuDS must maximise amenity and biodiversity value, consistent with the South Dublin County Development Plan 2022-2028.

A site-specific SuDS Strategy will be prepared as part of the masterplan to ensure compliance with these requirements and to integrate drainage management within the broader landscape and amenity framework. SuDS is envisioned as a key element of the masterplan, delivering both functional and ecological benefits.

4.5 Flood Risk

The Office of Public Works (OPW) CFRAM flood maps indicate that certain areas along the River Liffey, are at risk of 1 in 100-year fluvial flooding. These areas are primarily along the riverbank, which is not proposed for residential development.

Given the site's highly permeable soils (Type 2), incorporating attenuation and SuDS measures will effectively manage stormwater, reduce flood risk, and improve water quality.

4.6 Energy and Telecommunications

Gas Networks Ireland (GNI) infrastructure includes a medium-pressure (4 bar) gas main along the R835 Lucan Road to the south of the site, with branches serving St Andrew's National School and St Patrick's Hospital.

Electricity Supply Board Networks (ESBN) infrastructure in the vicinity includes a 38kV substation west of St Andrew's National School, along with a mix of overhead and underground MV/LV cables serving adjacent properties. A number of overhead lines traverse the development lands, serving individual houses or farm buildings. Existing infrastructure on-site will need to be rationalised, undergrounded, and integrated into the proposed new power network.

Telecommunications infrastructure is present in the area but requires coordination with providers to ensure adequate service for the new development.

4.6.1 Energy – Electricity

European, national, and local policies are driving a transition away from fossil fuels. Accordingly, the St Edmundsbury development will adopt a fossil fuel-free energy strategy, with no gas, oil, or solid fuel-fired plant installed on site. Two main options are proposed:

1. All-electric solutions with on-site renewable energy generation (e.g., photovoltaics and battery storage) to meet both power and thermal needs.
2. Electric solutions supplemented by a district heating system to meet thermal energy demands.

The development of approximately 1,000 dwellings is estimated to require 5–6 MVA peak electrical demand. On-site renewable generation and storage will reduce peak demand, while building-integrated or distributed substations will service individual areas.

Based on discussions with ESBN a new 38kV or 110kV ESBN substation will likely be required on the site to serve the overall development and provide resilience to the wider area. It will likely take 5 years for delivery of the substation. Such a substation would be circa 50mx50m in size and would be

incorporated into the masterplan for the site. Given the 5-year timeline for delivery of the substation a phased approach to the development will be taken.

All cabling will be underground, and substations will be located outside flood-prone areas.

4.6.2 Energy – Thermal

Thermal energy will be supplied using one or a combination of the following:

- Individual heat pumps for each dwelling or apartment unit.
- Centralised heat pump systems for apartment buildings, providing lower combined capacity and improved resilience.

District heating was considered and potentially presents a long-term opportunity to reduce peak electrical demand for the development and could utilise waste heat from nearby data centres (e.g., Meta Data Clonée, Intel Leixlip, Grange Castle), although these would require feasibility assessments, significant investment, and coordination with local authorities and private operators.

This approach aligns with decarbonisation trajectories of the national grid, SEAI projections, and EU policy, supporting a sustainable, low-carbon energy strategy for the site.

4.7 Social infrastructure

The Social Infrastructure Audit, prepared by McCutcheon Halley and appended to this submission, demonstrates that the Lucan area benefits from a strong and diverse provision of social and community facilities, including schools, healthcare services and recreational amenities. While opportunities for enhancement remain, the audit confirms that the site is well positioned relative to established infrastructure and services.

The masterplan will explore opportunities to adapt and repurpose existing on-site buildings, several of which are of heritage value, to accommodate new community functions. This adaptive reuse approach will both support the emerging residential community and strengthen the role of the adjacent Liffey Valley Park.

Provision will also be made for a crèche within the development to serve the future population, with detailed requirements to be confirmed through subsequent planning applications.

Given the scale, coherence, and strategic location of the landholding, the site presents a significant opportunity for phased, plan-led delivery of social, recreational, and green infrastructure alongside new housing. The masterplan phase will refine these relationships to ensure that social, green, and physical infrastructure evolve in a coordinated and sustainable manner, supporting long-term community wellbeing and resilience.

The proposed recreation and social infrastructure strategy aims to foster an inclusive, accessible, and sustainable community, building on the site's proximity to existing amenities and enhancing public access to natural, cultural, and recreational assets.

Key components include:

- **Recreation zone:** A dedicated area adjacent to the river corridor that integrates SuDS features, scenic walkways, and high-quality open spaces. This zone will accommodate both passive and active recreation, biodiversity enhancement, and community wellbeing.
- **Public realm and greenway integration:** The masterplan delivers a network of high-quality public realm spaces along greenway corridors, linking residential clusters with Lucan Village, Shackleton's Mills, and the Liffey Valley Park. These routes will provide safe, attractive connections for walking and cycling while encouraging social interaction and outdoor activity.
- **Access to existing amenities:** The site's proximity to schools, healthcare, and community facilities in Lucan provides a strong foundation for sustainable development. The strategy reinforces these connections and identifies opportunities for future infrastructure provision in response to projected demand.
- **Cultural heritage activation:** Enhanced access to nearby heritage assets such as Shackleton's Mills and the Lucan Middle Icehouse will support tourism, education, and placemaking, contributing to the cultural identity of the area.

- **Inclusive design principles:** All social and recreational infrastructure will be designed to be fully accessible, safe, and inclusive, supporting diverse user needs and fostering a strong, connected community.

Collectively, these measures ensure that the proposed development contributes meaningfully to the social, cultural, and recreational fabric of Lucan, while enhancing the ecological and heritage value of the wider Liffey Valley corridor.

4.7.1 Relationship to the Lucan House Masterplan

This proposal is intrinsically linked with the Lucan House Masterplan, both spatially and conceptually. Together, these initiatives represent a coordinated vision for the Liffey Valley, integrating new housing, community uses, and parkland into a coherent and accessible landscape framework.

The Lucan House Masterplan provides a natural and cultural anchor for the wider area, enhancing access to the River Liffey corridor, promoting heritage conservation, and creating a destination for recreation, education and tourism.

St. Edmundsbury and Woodville, located immediately to the east, will act as a complementary extension to this vision providing the residential and community fabric that will help sustain and activate the wider masterplan area.

The relationship between the two sites offers a unique opportunity to deliver a joined-up approach to public realm, access, and social infrastructure.

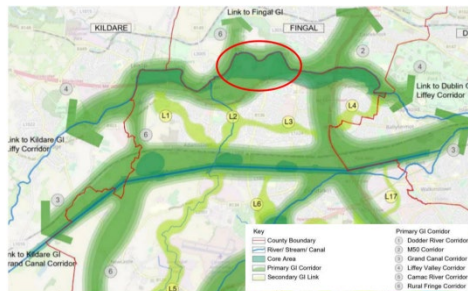
Key synergies include:

- **Green and Blue Infrastructure Integration:** The shared river corridor and parkland setting provide opportunities for linked walking and cycling routes, biodiversity networks, and a continuous public realm spine connecting Lucan Village, Lucan House and the St Edmundsbury lands.
- **Cultural and Heritage Assets:** Both areas contain buildings and landscapes of heritage value. The reuse of existing structures within St Edmundsbury for community and recreational purposes complements the conservation-led strategy at Lucan House, ensuring that historic assets are celebrated and given new civic functions.

- **Social Infrastructure and Community Activation:** The proposed crèche, potential community facilities and open spaces at St Edmundsbury & Woodville will directly support the wider catchment, while Lucan House provides the cultural and institutional counterpart. Together, they will deliver a balanced mix of community-serving and cultural uses.
- **Access and Movement:** The two masterplans will be united by a shared focus on sustainable mobility enhancing pedestrian and cycle connectivity between Lucan Village, the Liffey Valley Park, and new neighbourhoods. This supports the wider SDCC objective of promoting active travel and reducing car dependency.
- **Shared Identity and Placemaking:** The integration of these lands creates a distinctive and legible urban edge to Lucan, one that is rooted in its landscape setting and historic estates. Together they can form a “Liffey Valley Heritage Quarter” a place that combines living, leisure, and landscape in a manner that is both sustainable and distinctive.

As such, this proposal should be viewed not as a standalone project but as a complementary extension to the Lucan House Masterplan, reinforcing its objectives and accelerating delivery of SDCC’s strategic vision for a connected, well-served, and vibrant western gateway to the Liffey Valley.

4.8 Green infrastructure



The proposed site is embedded within the SDCC Green Infrastructure Strategy, as outlined in the Development Plan and shown above. It falls within the Primary Green Infrastructure Corridor (Liffey Valley Corridor) and is identified as a core area of green infrastructure. This designation reflects the site's strategic ecological value, linking riparian habitats, mature woodland, and adjacent open spaces. The corridor supports biodiversity, landscape connectivity, and recreational potential, and is central to the vision for an expanded Liffey Valley Park.

The site's location within this corridor imposes a strong policy imperative to protect and enhance its natural assets, particularly in relation to water quality, habitat integrity, and public access.

This strategy supports the long-term vision for an expanded and connected Liffey Valley Park, reinforcing its role as a regional ecological and recreational asset. The strategy for green and blue infrastructure is designed to protect and enhance the site's ecological value, reinforce landscape connectivity, and support sustainable water management. Key elements of the strategy include:

Riparian protection and woodland reinforcement: The northern boundary of the site interfaces directly with mature woodland and riparian habitats. These areas are preserved and enhanced through buffer planting, habitat corridors, and view protection, ensuring continuity with the wider Liffey Valley landscape.

SuDS integration: Sustainable Drainage Systems (SuDS) are embedded throughout the site, particularly within the recreation infrastructure zone. Bio-retention ponds, swales, and permeable surfaces are used to manage surface water, support biodiversity, and contribute to the site's amenity value.

Greenway connectivity: The strategy includes greenway spines that connect the site to Lucan Village, Shackleton’s Mills, and adjacent open spaces. These corridors support active travel, ecological movement, and public access to natural assets.

Landscape-led zoning: Development zones are shaped around ecological constraints, with low-density housing positioned near sensitive areas and higher densities concentrated where infrastructure capacity is strongest. This ensures that green infrastructure is not fragmented but integrated into the urban form.

Amenity zoning compliance: All interventions align with the site's Amenity Zoning designation under the SDCC Development Plan 2022–2028, ensuring compatibility with landscape character, ecological sensitivity, and policy objectives.

5. Landscape-led Development Strategy

5.1 Introduction

This submission functions as a strategic concept, to be further refined through collaboration with SDCC in subsequent design stages if the site is selected under the *Call for Sites* initiative.

Should the site progress, a future Strategy Masterplan would guide the detailed design and delivery of development, ensuring it is cohesive, contextually responsive, and aligned with local objectives.

The proposal has been guided by a landscape-led approach, placing the site's natural, cultural, and environmental assets at the centre of the design process to ensure the emerging plots respond to the sensitivity of the site and ensure the existing characteristics and value is protected and enhanced as part of any development.

This approach treats environmental management, biodiversity, and heritage conservation not as constraints but as structuring elements shaping the layout, character, and identity of the new neighbourhood and parkland. Successful placemaking depends on understanding the site's landscape character, topography, ecology, water systems, and built heritage.

The site's combination of heritage buildings, mature trees and boundaries, proximity to watercourses, and its relationship with the surrounding road and green infrastructure network provides a unique opportunity to create a resilient, attractive, and context-sensitive environment. Key components of the approach include:

- Integrating sustainable drainage (SuDS) and flood management;
- Responding sensitively to heritage assets, supporting adaptive reuse;
- Mitigating noise and radon through design and landscape structure;

- Enhancing biodiversity and ecological connectivity via native planting, habitat creation, and open spaces; and
- Delivering a cohesive, climate-resilient, and healthy community aligned with the South Dublin County Development Plan 2022–2028.

The following sections outline the site analysis and emerging design strategy, covering transport and infrastructure, landscape character, ecological sensitivity, and proposed zoning and plot layout.

5.2 Strategic Context

The site occupies a strategic location within Dublin City for a variety of reasons. Its proximity to Lucan Road positions it as a key location for transport-oriented development. Situated within the River Liffey Valley corridor, the site offers a significant opportunity to restore and enhance the valley's ecological complexity. In addition, its close proximity to Lucan Village presents the potential to establish green link connections that would improve local walkability and accessibility. The site also benefits from its relationship with the historic Shackleton Mills, strengthening its cultural and heritage value within the wider landscape.

The site is also bounded by important ecological and heritage assets that can add significant value if they are carefully protected and celebrated through a sensitive, restorative approach to development.

The proposal explores how the development of residential plots, aligned with national, regional, and local planning policy, can unlock the site's full potential.

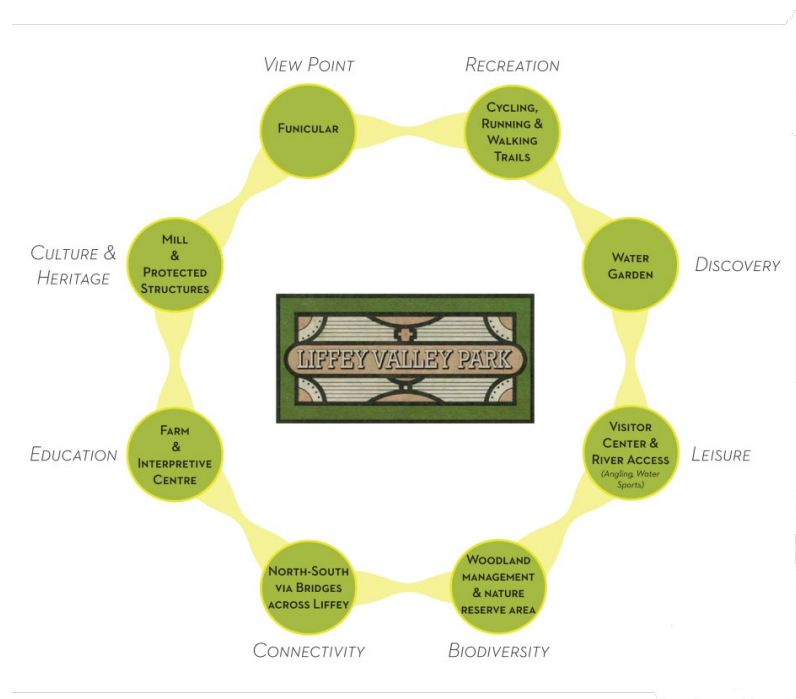
The Strategy:

- Promotes compact and sustainable housing;
- Enhances integration with Lucan Village;
- Supports the creation of the Liffey Valley Park while protecting and strengthening green and blue infrastructure;
- Contributes to achieving the priorities of the Liffey Valley SAAO;

- Responds to site-specific constraints and opportunities; and
- Promotes the adaptive re-use of historical structures on the site.

The proposal has explored how the potential development of this land can act as a catalyst for the development of Liffey Valley Park, a new public amenity that would give access to the river to the wider existing communities, provide improved access to recreational facilities and how the project can support the ecological complexity of the River Liffey valley.

To explore how best the site can achieve these aims, the proposal outlines a concept for the River Liffey Valley Park, illustrating its potential components and how it could be developed in coordination with other projects in the area.



5-1 Liffey Valley Park Concept

5.3 Emerging Site-Specific Principles

This proposal is guided by eight site-specific principles addressing the site's landscape character, planning context, ecological sensitivity, and infrastructure potential. These principles are derived from:

- Policies in the Revised National Planning Framework, the Eastern & Midlands Regional Spatial Strategy and the South Dublin County Development Plan 2022–2028.
- Objectives of the Liffey Valley Special Amenity Area Order (SAAO) and *Towards a Liffey Valley Park*.
- The Design Manual for Urban Roads and Streets (DMURS).
- The Sustainable Residential Development & Compact Settlements Guidelines for Planning Authorities.
- Site specific conditions as per analysis presented in the preceding chapters of this report and the accompanying Infrastructure Report and Social Infrastructure Assessment.

Together, they have guided a policy-aligned, landscape-led, and community-responsive framework to support the protection, connection, and activation of the site.

5.3.1 Principle 1: Promote the Delivery of Housing

In response to South Dublin County Council's *Call for Sites* for Residential Development, this proposal establishes its first guiding principle: to examine how housing can be provided on the site in a manner that avoids negative environmental or social impacts. National and local policies advocate for compact and well-serviced housing in sustainable urban locations such as this. Accordingly, the Strategy proposes that the site should deliver contextually responsive residential densities and a diverse range of housing typologies that respect site conditions and connect cohesively with adjacent neighbourhoods.



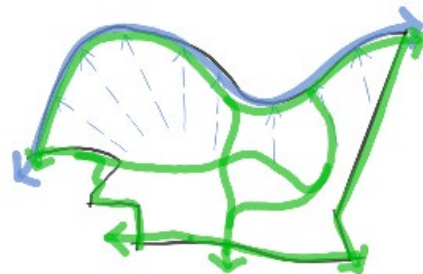
5.3.2 Principle 2: Connect & Activate Liffey Valley Park (including Shackleton's Mills)

The site lies within the Liffey Valley Green Infrastructure Corridor and is informed by Development Objectives **EDE20** (*Greenways, Trails and Loops*) and **NCBH7** (*Liffey River Valley and Special Amenity Area Order*). These objectives advocate for collaboration with landowners to facilitate public access and the adaptive reuse of heritage assets such as Shackleton's Mills. Accordingly, the strategy proposes enhanced greenway connections and public realm interventions to integrate the site with the broader Liffey Valley Park, promoting accessibility, ecological continuity, and tourism-led regeneration.



5.3.3 Principle 3: Protect and Strengthen Green-and-Blue Infrastructure

The site lies within the core area of the Liffey Valley Corridor, with its northern boundary overlapping a proposed Natural Heritage Area and surrounded by dense woodland. These features create a strong ecological context and policy imperative for protection. Key measures under this principle include reinforcing the riparian corridor, integrating walking and cycling routes, and applying SuDS strategies to support biodiversity and water-sensitive design.



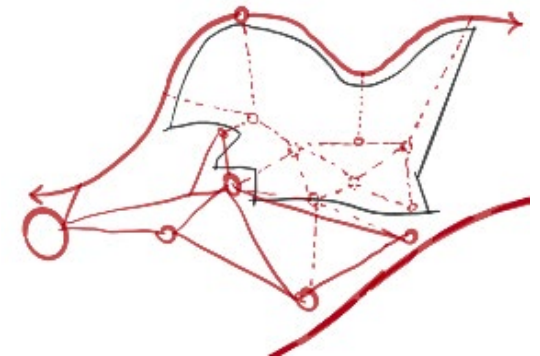
5.3.4 Principle 4: Protect & Strengthen Natural & Built Heritage

The site contains important natural and cultural assets such as the Lucan Middle Ice House, scenic walkways, alongside mature woodland and riparian habitats and is adjacent to Shackleton's Mills. These elements are protected under the Liffey Valley Special Amenity Area Order (SAAO) and referenced in NCBH7. The Masterplan should consider sensitive integration of these features through protected view corridors, adaptive reuse of heritage structures, and landscaped design that respects both natural and built character.



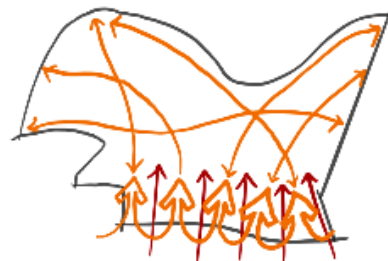
5.3.5 Principle 5: Urban Integration

The western and southern boundary of the site adjoins the R835 and Lucan Road and is close to social infrastructure assets such as schools, healthcare, businesses and community spaces, offering opportunities for seamless integration with the urban fabric. This aligns with compact development strategies in the SDCC Development Plan and principles in DMURS. The masterplan should extend existing street networks and block structures into the site, ensuring permeability, contextual fit, and continuity of movement and form.



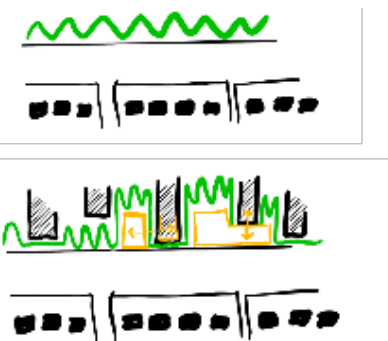
5.3.6 Principle 6: Encourage Walking, Cycling & Integration with Bus Services

The site is located along the Lucan to City Centre BusConnects corridor, hence providing initiatives to promote active travel and reduce car dependency. The Masterplan should introduce and strengthen internal pedestrian and cycle networks that connect to existing transport networks and regional greenways, supporting modal shift and sustainable mobility.



5.3.7 Principle 7: Activate the R835 Lucan Road

The R835 forms a key frontage and access point for the site, with potential for placemaking and improved connectivity. This is supported by DMURS principles for active frontages and multi-functional streets. The Masterplan should introduce mixed-use nodes to enhance public realm and improve quality of open space, and active edges along Lucan Road to create a vibrant and accessible interface.



5.3.8 Principle 8: Promote Sustainable Energy Use

The development will aim to adopt best-practice, low-carbon construction methods to deliver A-rated, near zero-energy homes. Our strategy will align with national decarbonisation targets through the use of solar PV systems and all-electric building services, and exploration of district heating options using



5.4 Developable Areas

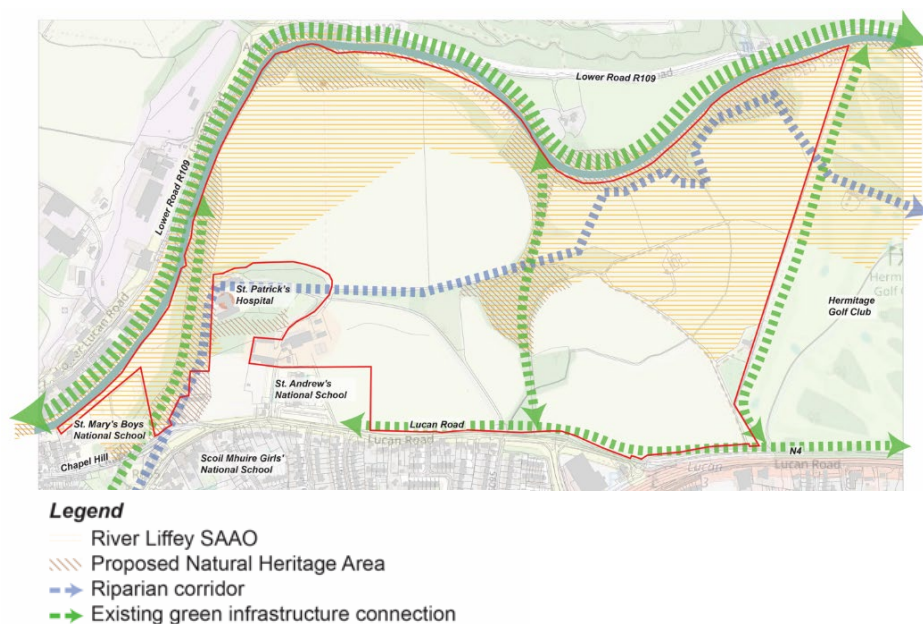
The identification of potential development areas arises directly from the landscape-led approach outlined in the preceding sections. This approach has combined spatial analysis, policy context, environmental assessment, and site-responsive design principles to determine where development can occur sustainably while safeguarding the site's ecological, hydrological, and cultural assets.

The SAAO and pNHA areas within the northern and central portion of the site are to be protected. These zones are excluded from residential development and will be integrated into the Masterplan as part of the site's green and blue infrastructure strategy, supporting biodiversity, landscape connectivity, and community access to nature.

Through this integrated process, all strands of analysis converge to identify three principal areas with development potential. These three developable plots represent locations where new residential neighbourhoods could be sensitively accommodated, informed by:

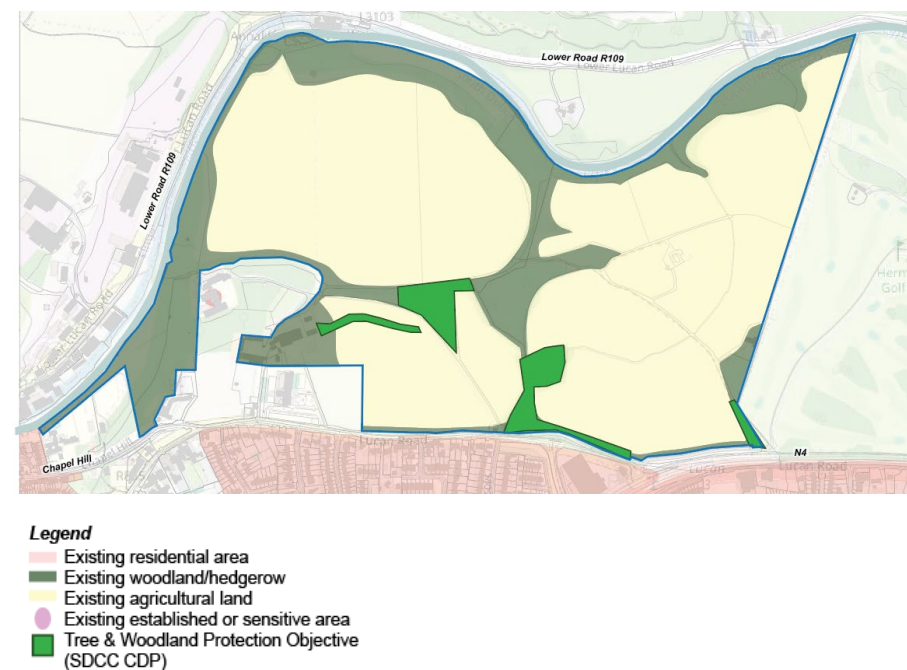
- Proximity to existing transport and service infrastructure, and
- Landscape capacity and visual containment,
- Ecological and heritage sensitivities, and
- Opportunities for green-blue infrastructure integration.

Environmental sensitivity and interface with protected zones are key factors in determining appropriate zoning and development density across the site. These considerations ensure that the proposed masterplan protects the site's ecological integrity, reinforces landscape connectivity, and supports sustainable growth aligned with national and local policy.



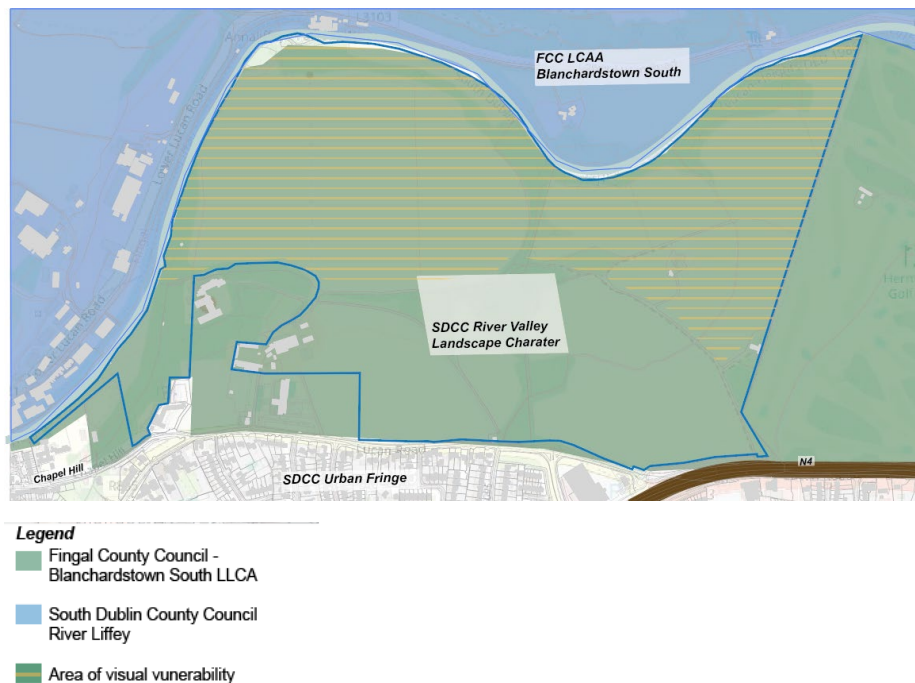
5-2 Ecological Sensitivity Diagram

The drawing above illustrates the site's green infrastructure network and ecological constraints. The northern portion of the site falls within the Liffey Valley SAAO and overlaps with a Proposed Natural Heritage Area (pNHA), as designated in the SDCC Development Plan 2022–2028. These areas are ecologically sensitive and require careful protection from development pressure. The site also forms part of the Primary Green Infrastructure Corridor identified in SDCC's Green Infrastructure Strategy, linking riparian habitats, mature woodland, and open spaces across the Liffey Valley.



5-3 Site Landcover Diagram

The drawing above highlights a network of existing hedgerows, woodland and green infrastructure networks that define the site's boundaries and internal structure, including a dense hedgerow runs along Lucan Road on the southern boundary, additional hedgerows and woodland corridors run north–south along the western edge, central spine, and eastern boundary, and a riparian corridor traverses the site from the south-western boundary to the north-eastern edge, connecting to the River Liffey.



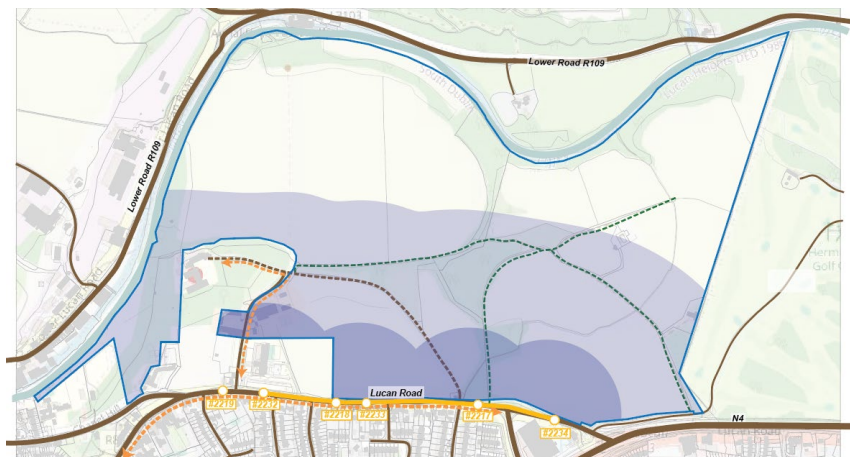
5-4 Landscape Character Diagram

Another key consideration, as shown above is the defined landscape character areas both within the site boundary but also the adjacent sites which will use the site as ‘borrowed landscape’ or have theoretical visibility of the site and any potential change. We have worked to ensure that any development would aim to reduce this change. The River Valley is a significant landscape character that have value to the wider communities and areas, and it is critical that any development within this area respects this character and aims to improve it as part of any development.

From the above analysis, and in line with the Sustainable Residential Development Guidelines and Design Manual for Urban Roads and Streets (DMURS), development should be avoided or significantly moderated in areas of high ecological value. The Masterplan should prioritise:

- **Low-density development** (20–35 dph) near the River Liffey and woodland edges to minimise ecological disturbance and preserve natural habitats.
- **Landscape buffers and open space corridors** where the site interfaces with SAAO and heritage zones, maintaining visual and spatial integrity.
- **Retention and enhancement of green infrastructure**, including hedgerows, woodland, and riparian corridors, to support biodiversity and ecological connectivity.
- **Integration of SuDS features** (e.g. bio-retention ponds, swales, permeable surfaces) to manage surface water and support water-sensitive design.
- **Creation of greenway links and public open spaces** that connect ecological assets and provide recreational value, supporting the vision for an expanded and connected Liffey Valley Park.

This strategy offers recommendations for housing density allocation and amenity zoning, ensuring the protection and enhancement of the site’s unique ecological and landscape values.



Legend

- <500m walking catchment
- <200m walking catchment
- Existing bus lane
- Existing bus stop

5-5 Walking Catchment Diagram

Lastly, public transport and infrastructure were assessed, including the permitted bus connect scheme, which will improve the existing bus corridor to a high-capacity transport corridor along Lucan Road. This serves as a key driver in defining best-practice residential development in accordance with national policy guidance.

We have identified two walking catchment zones from Lucan Road (R835), the primary movement corridor along the southern boundary of the site:

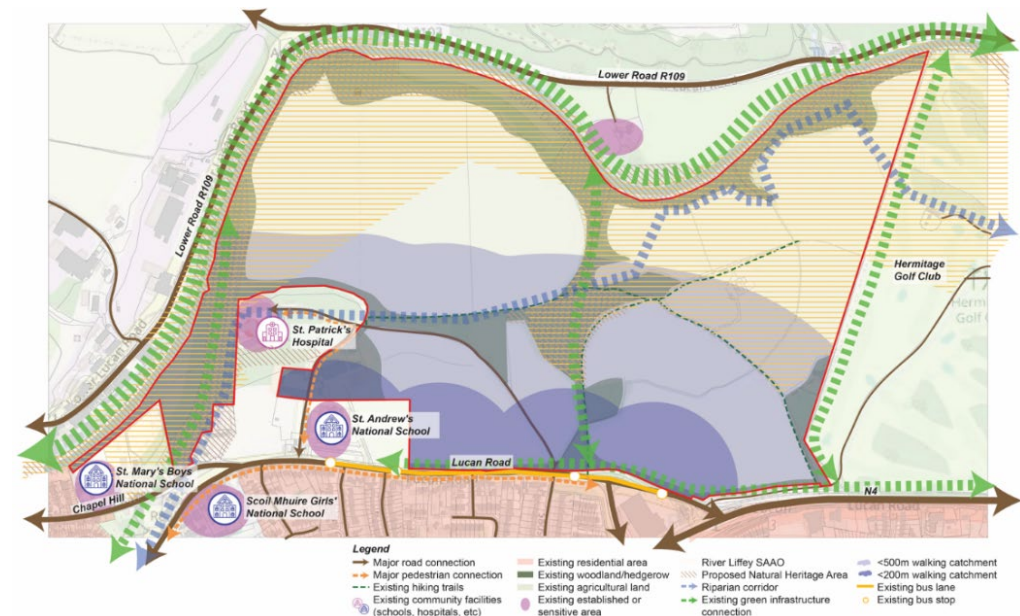
- 200m catchment:** Represents the immediate walking zone with the highest accessibility to public transport and local amenities.
- 500m catchment:** Represents the extended walking zone with moderate accessibility.

Based on the Sustainable Residential Development Guidelines and Design Manual for Urban Roads and Streets (DMURS), areas within the 200m catchment are most suitable for higher-density residential development, due to their proximity to:

- Established public transport infrastructure (BusConnects and proposed Luas Lucan line),
- Pedestrian connections to schools, healthcare, and community services,
- Existing infrastructure capacity.

This supports a Transport-Oriented Development (TOD) approach and aligns with the 10-minute settlement concept promoted in the South Dublin County Council Development Plan 2022–2028, encouraging compact, walkable, and sustainable growth near Lucan Village.

The landscape-led approach has taken all these layers of consideration and compiled a diagram that explores what capacity the land has for development that aligns with national and local policy while ensuring that areas of sensitivity are protected.



5-6 Overlapping layer diagram highlighting the areas of potential development and their proximity to high-capacity public transport network.

5.4.1 Site Strategy and Development Framework

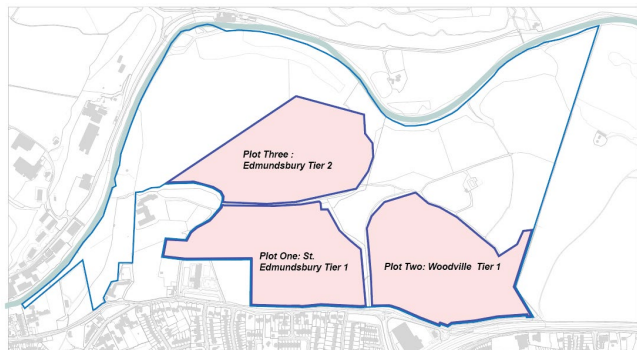
Through this approach, a series of development plots is proposed, establishing a framework that balances compact, sustainable growth with the protection of ecological and heritage assets, while creating opportunities to enhance the wider landscape and cultural context of the site.

While these proposals are submitted as part of the *Call for Sites* process, it is anticipated that the identified developable areas could, in due course, inform a future variation to the South Dublin County Development Plan. This, in turn, would facilitate the preparation of a comprehensive Masterplan, guided by the principles, strategies, and framework outlined in this submission.

This plot area layout takes reference to various policies and guidance, as well as site specific opportunities and constraints, ensuring that development responds to site conditions, policy objectives, and community needs while protecting and enhancing the site's landscape and ecological assets .

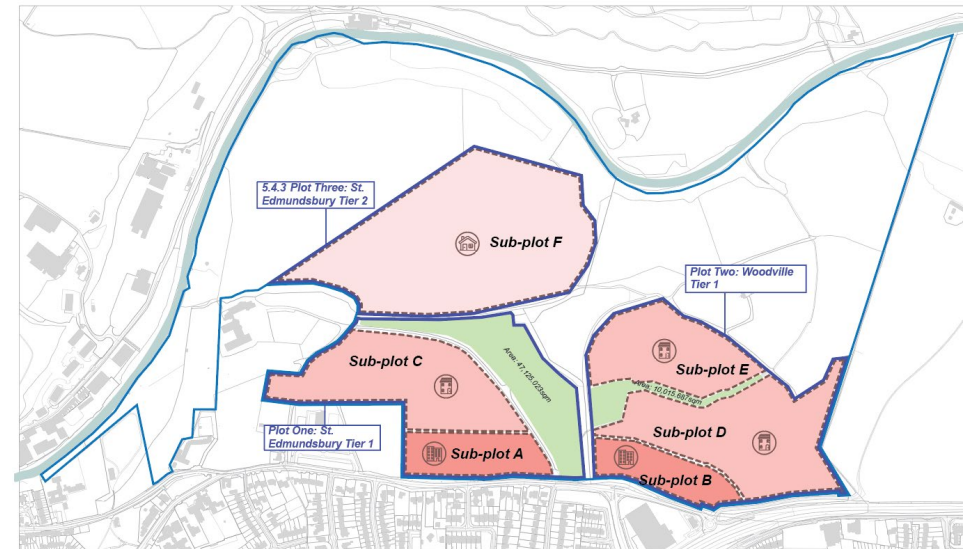
The proposal identifies three primary development plots, each with indicative sub-plots reflecting appropriate densities and designated green spaces for amenity and ecological value. These allocations are presented as a strategic framework, intended to guide future detailed Masterplan preparation rather than representing a fixed layout.

The three primary development plots are defined as shown below ;

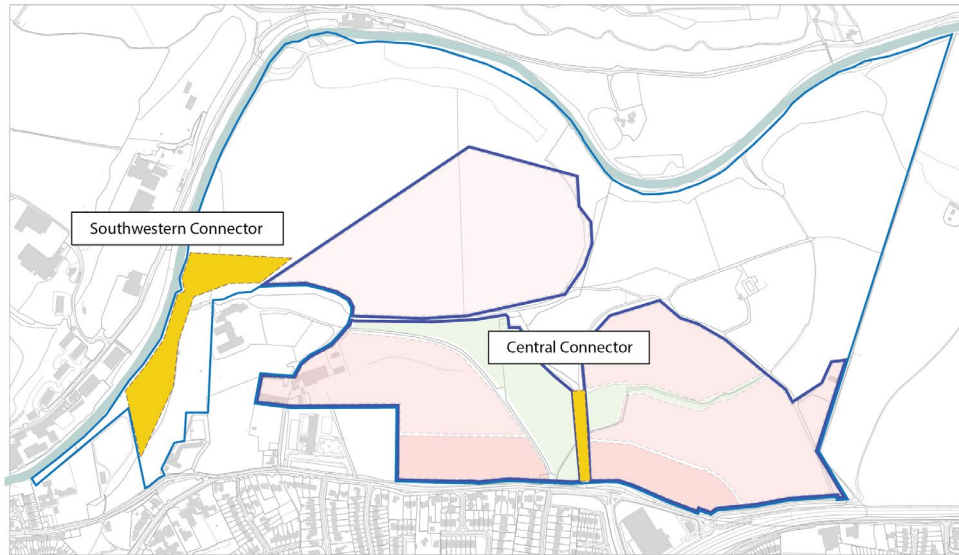


5-7 Plot Areas

The three primary plots are driven by the sub-plots which take into account the sites sensitivities and define the green open space, developable areas by density as per national guidance. These sub-plot areas are defined as a strategic framework, intended to guide a future detailed Masterplan that would be developed in collaboration with SDCC rather than representing a fixed layout. See the following page for the sub-plot area table to be read in conjunction with the below diagram.



5-8 Developable Plot Areas



5-9 Public Infrastructure Offer

In addition to the residential plots, two public infrastructure offers, the ‘central connector’ to provide an area dedicated to SDCC green infrastructure and ‘southwestern connector’ as a potential phase 1 site for public park enhancement schemes that link to the ongoing public realm enhancements in Lucan Village, see diagram below showing the potential locations:

Central Connector (4,000 sqm): Located in the central area of the site, this pedestrian and cycle route links Plot 1 and Plot 2, enhancing permeability and connecting to Ballydowd to the south and wider site context.

Southwestern Connector (24,810 sqm): Positioned along the southwestern boundary, this green corridor links Plot 3 to the River Liffey and Lucan Village, providing safe and high-quality access across the site.

Plot / Tier	Area (HA)	Location/Notes	Sub-Plot / Green Space	Sub-Plot Hectares	Density / Typology / Purpose
Plot One: St Edmundsbury Tier 1	15.5	Southeastern boundary, fronting Lucan Road (R835); close to BusConnects corridor, Lucan Village, and local services and amenities. Suitable for compact, transport-oriented development	Sub-plot A	3	High-density (50–80 dph); compact own-door houses or duplexes; closest to Lucan Road; strong public transport and walkable links to Lucan Village and opportunity to improve Lucan Road through street activation with active facades.
			Sub-plot C	7.5	Medium-density (35–40 dph); terraced housing, duplexes, low-rise apartments; north of Sub-plot A, forming transition to internal green infrastructure.
			Green Space	4.7	Dedicated open green space to ecological and social value
Plot Two: Woodville Tier 1	16.7	Southwestern boundary, adjacent to Lucan Road (R835); strong service capacity and proximity to planned transport upgrades.	Sub-plot B	3.2	High-density (50–80 dph); closest to Lucan Road and key access points.
			Sub-plot D	7.8	Medium-density (35–40 dph); north of Sub-plot B; transition towards central green spine.
			Sub-plot E	4.6	Medium-density (35–40 dph); north of Sub-plot B; transition towards central green spine.
			Linear Green Space	1	Dedicated open green space to ecological and social value
Plot Three: St Edmundsbury Tier 2	14	Western portion; adjacent to River Liffey, enclosed by mature woodland; sensitive due to proximity to SAAO, pNHA, and riparian habitats	Sub-plot F	14	Low-density (20–40 dph); semi-detached or terraced housing; supports visual protection and minimises ecological disturbance.
Public Infrastructure	-		Central Connector	0.4	Pedestrian and cycle route linking Plot 1 and Plot 2; enhances permeability and connections to Ballydowd and wider site context
			Southwestern Connector	2.5	Green corridor linking Plot 3 to River Liffey and Lucan Village; provides safe, high-quality access across site

5.5 A Future Vision of New Connections.

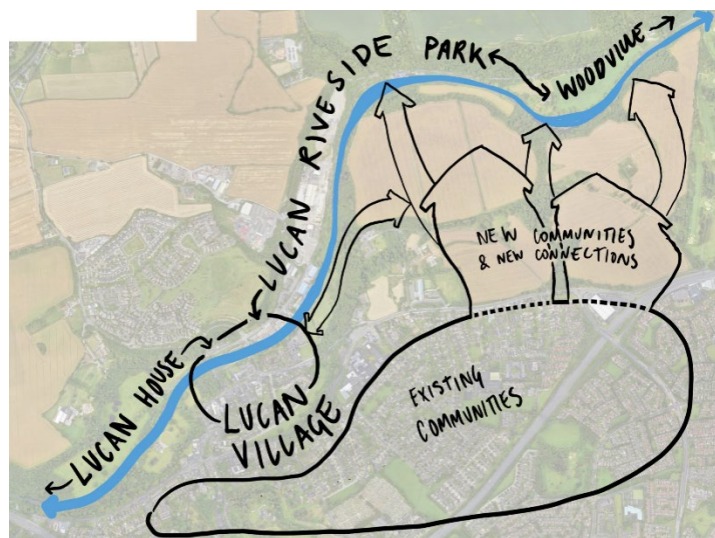
To the River- Along the River- Across the River

This proposal represents a rare and transformative opportunity for Lucan. By linking the River Liffey with Lucan Village, it enables a cohesive and accessible community space that celebrates the area's natural heritage, rich history, and distinctive landscape character.

The defining element of the proposal is the extraordinary level of new riverine connections it provides for the town of Lucan and its hinterland.

These connections will facilitate new access to the river along a length of 2.5 km, hitherto inaccessible to the public, at locations where the river valley is at its most beautiful. A new riverside link will connect Lucan House to the proposed Liffey Valley park, thus providing the town with ready access to an unrivalled new natural amenity of river walks, waterside activities and sporting facilities.

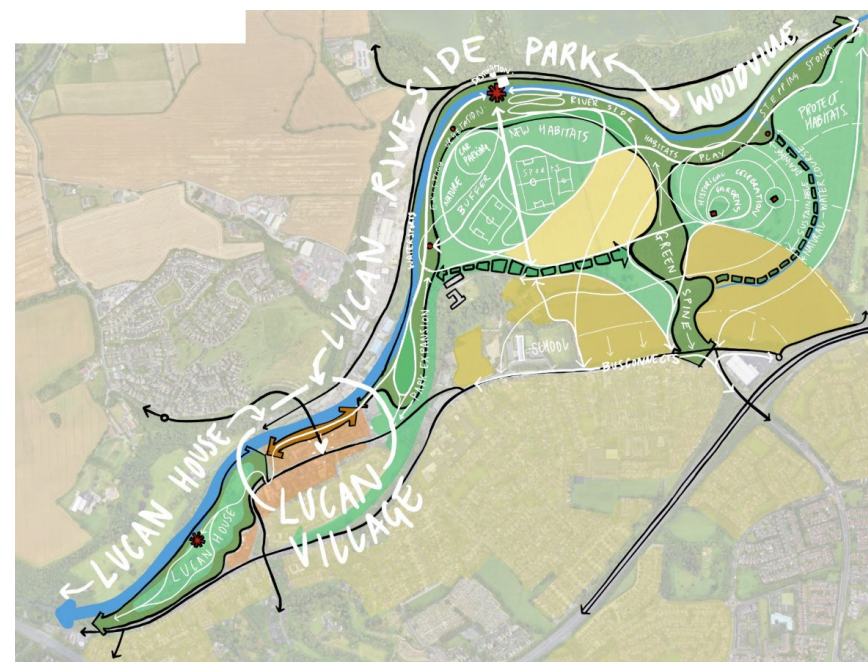
New river crossings will enhance the range of public realm possibilities. Allowances have been made within the proposal for a bridge connection to the important heritage buildings of Shackleton's Mill and the north side of the river valley.



This vision sketch below demonstrates how Lucan House and the village enhancement initiatives can be seamlessly integrated into the site, delivering an extraordinary cultural and recreational asset that will enrich the lives of the local community for generations to come.

The unique form of the site enables opportunities to strengthen Lucan as a village through providing a network of spaces that connect the Lucan House Demesne through Lucan Village and along into the site, this string of social infrastructure assets could significantly improve the overall experience of Lucan village, contributing to improved footfall and lingering time in the village, which can be benefit to the wider business community in Lucan.

Existing features on site provide opportunities to integrate sustainable urban drainage systems to sustainably manage surface water on site and reduce pressure on the existing network, with potential to provide flood storage to reduce pressure on the wider network or areas further downstream the River Liffey.



Response to South Dublin County Council's 'Call for Sites'

St. Edmundsbury & Woodville: A Landscape-Led Proposal for Housing, Parkland and Transport-Oriented Growth

6. Compliance with South Dublin County Council's Submission criteria

The analysis presented in this submission provides a comprehensive justification for the site's inclusion as a suitable and deliverable location for housing and associated open space development, while maintaining full cognisance of the Liffey Valley's landscape, visual, heritage and ecological sensitivities.

The site is suitable to progress as Tier 1 and Tier 2 land, aligned with SDCC's new growth requirements and supported by existing and planned infrastructure, enabling the timely and sustainable delivery of housing and associated facilities.

If activated under this process, the site would achieve the following outcomes in alignment with SDCC's Call for Sites criteria:

- Contributes to the achievement of Compact Growth, supporting sustainable urban consolidation.
- Lies within or immediately adjoining the built-up footprint of Dublin City and Suburbs, ensuring consistency with the metropolitan growth framework.
- Supports Transport-Oriented Development (TOD) through proximity to high-capacity public transport.
- Is serviced or capable of being serviced within the next five years, ensuring near-term deliverability.
- Benefits from strong existing social infrastructure, with capacity to accommodate future community facilities as required.
- Promotes infill housing and efficient land use, enabling the activation of underutilised lands.
- Presents no significant impediments to development, including legal, environmental, topographical, or servicing constraints.

6.1 Compact Growth

The proposal aligns with the Revised National Planning Framework and its National Strategic Outcome 1 (NSO 1): Compact Growth, which seeks to carefully manage the sustainable growth of cities, towns, and villages. The NPF emphasises that compact growth adds long-term value, enhances urban quality, and creates more attractive, resilient, and inclusive places in which people can live, work, and invest.

Ireland's cities and towns contain many centrally located that are suitable and capable of re-use to deliver new housing, employment opportunities, and supporting amenities. To unlock their potential, the NPF calls for a co-ordinated and streamlined approach to their development, supported by targeted investment in enabling infrastructure and social facilities.

Activating such strategic, well-located lands rather than continuing outward sprawl is identified as a top national priority. This approach delivers effective density, regeneration, and urban consolidation, consistent with National Policy Objective (NPO) 4, which sets a target that at least 50% of future population and employment growth will occur within and adjacent to the existing built-up footprints of Ireland's five cities and their suburbs, including Dublin.

In parallel, the South Dublin County Development Plan 2022–2028 promotes the creation of a “10-Minute Settlement”, compact, connected, and complete communities where daily needs can be met within a 10-minute walk or cycle from people's homes. This concept underpins the County's growth strategy and complements the national compact growth agenda by linking housing delivery, transport accessibility, and local amenity provision.

Within this policy framework, the site advanced through this *Call for Sites* submission directly supports the achievement of compact growth and the 10-Minute Settlement vision by:

- Being located within the Dublin City and Suburbs area as defined by the CSO;
- Offering a strategic opportunity for housing and associated social infrastructure within or adjoining the existing urban footprint;
- Leveraging existing and planned transport and service infrastructure to enable sustainable, walkable neighbourhoods;
- Optimising lands to deliver mixed-use, well-serviced communities; and
- Contributing to the consolidation and strengthening of Lucan in line with Metropolitan Area Strategic Plan.

6.2 Dublin City & Suburbs

The lands are directly adjacent to Lucan, within Dublin City's existing suburban footprint. Development here would provide a natural extension to the built-up area, supporting compact growth, utilising existing infrastructure, and minimising the need for peripheral greenfield expansion.

6.3 Transport-Oriented Development

Transport-Oriented Development (TOD) is a key principle of sustainable urban form, promoting the location of new housing close to high-quality, high-capacity public transport services. The site benefits from its proximity to the BusConnects C-Spine corridor, which provides frequent, reliable connections to Dublin City Centre. This connectivity positions the site as a strategically suitable location for TOD, enabling future residents to access employment, education, and community amenities via sustainable modes of travel.

This proposal aligns with National Policy Objective (NPO) 10, which supports the delivery of TOD at scale in locations that are:

- ✓ Serviced by high-capacity public transport, and

- ✓ Within or immediately adjacent to the built-up footprints of Ireland's five cities, ensuring compact and sequential growth patterns.

It also reflects the provisions of NPO 97, which requires the delivery of strategic large-scale TOD opportunities in Ireland's metropolitan areas. Specifically, NPO 97 requires that:

- A proportion of planned metropolitan growth is directed to TOD locations, ensuring that new housing, employment, and community infrastructure are delivered in well-connected, sustainable urban areas;
- The creation of new sustainable communities is facilitated at greenfield or underutilised sites where appropriate, providing a coordinated approach to residential development, public amenities, and transport infrastructure; and
- Development is focused along existing and planned high-capacity transport corridors, maximising investment in public transport and promoting compact, sequential, and sustainable urban growth.

This site represents a key opportunity to fulfil the requirements of NPO 10 and 97, by delivering a TOD-led development that:

- ✓ Integrates seamlessly with the BusConnects C-Spine corridor;
- ✓ Supports compact growth within the Dublin City and Suburbs footprint;
- ✓ Provides high-quality housing, social infrastructure, and community amenities; and
- ✓ Enables future residents to access employment, education, and services sustainably, reducing reliance on private vehicles.

In doing so, the site exemplifies the type of strategic, well-serviced, and sustainable urban extension envisaged by NPO 97.

By aligning with these national policy objectives, the site demonstrates the potential to support sustainable, compact growth, optimise public transport investment, and contribute to the creation of well-connected, resilient communities. Further detail on transport accessibility and infrastructure provision is provided in the Infrastructure Report.



Figure 6-1 BusConnects corridors in proximity to site

6.4 Serviceability within the Next Five Years

The site is either already serviced or serviceable within the next five-year period, ensuring that development can be delivered efficiently and in a phased manner. Detailed analysis of infrastructure capacity and social infrastructure provision is provided in the Infrastructure Report and the Social Infrastructure Audit, submitted under separate cover.

Development can be phased through a Masterplan, allowing the delivery of housing, community facilities, and amenities in a coordinated and sustainable way, while optimising infrastructure investment and site functionality.

6.5 Social Infrastructure

The lands benefit from strong access to existing social and community infrastructure, concentrated around Lucan Village and the surrounding suburban areas, as detailed in the Social Infrastructure Audit. These include:

- Educational facilities at primary and secondary level;
- Healthcare facilities, including the Hermitage Medical Clinic;
- Recreation and leisure amenities, such as Hermitage Golf Club, GAA pitches, and local parks; and
- Retail, civic, and community services within Lucan Village and Lucan Retail Park, supporting the 10-minute settlement concept.

While childcare demand is currently supported by several creches, future development will require additional childcare infrastructure to meet growing demand. Importantly, this can be delivered within the proposed land alongside housing.

The proposal recognises the opportunity to adapt existing buildings, including those of historic value, to provide local social infrastructure and community services, complementing the residential and parkland development. Potential uses include:

- Local Shop: Conversion of a historic or existing building to provide daily essentials for residents.
- Community Services / Health Clinic: Small-scale adaptation to provide local health or community support services.
- Childcare / Early Learning Facility: Delivered as a standalone building, providing essential services for families and integrating with the residential community.

The site also contains cultural and heritage assets, including a scenic walkway and proximity to Shackleton's Mill and the Lucan Middle Icehouse, offering opportunities for heritage-led placemaking.

The Lucan House Masterplan provides a coordinated framework for the development of that site, integrating social, recreational, and heritage-led initiatives. This proposal is designed to integrate with and complement the Lucan House offering, enhancing its amenity, cultural, and recreational value, while supporting the creation of a well-connected, sustainable, and vibrant community.

6.6 Support for Infill Housing

While the Edmundsbury and Woodville lands are currently greenfield, their location and context mean they function as strategic infill within the Dublin City and Suburbs footprint, in line with the National Planning Framework (NPF). The NPF highlights that underutilised urban lands, including infill and previously undeveloped sites within existing settlements, can make a transformational contribution to housing delivery and the vitality of communities.

The site is immediately adjacent to Lucan Village, well-connected to schools, services, recreational facilities, and transport networks. This ensures that development will form a logical extension of the built-up area, delivering new housing in a compact, sequential manner rather than promoting urban sprawl.

Key policy-aligned benefits of development on this site include:

- **Sequential, compact growth:** The lands enable residential expansion within or immediately adjacent to the urban footprint, consolidating the existing settlement.
- **Efficient land use:** The site represents underutilised land in a highly accessible location, optimising its value without compromising the Liffey Valley's landscape and amenity.
- **Support for services and public transport:** New development will bring footfall and activity that supports shops, community services, and existing public transport, reinforcing sustainable settlement patterns.
- **Sustainable mobility:** Proximity to the village, schools, and greenway networks encourages walking, cycling, and reduced car reliance, consistent with NPF objectives.

Although greenfield in technical terms, the site is strategically located, well-connected, and low sensitivity, making it a highly suitable opportunity for residential development that:

- Delivers compact, policy-aligned growth,
- Integrates seamlessly with Lucan Village, and
- Provides sustainable, well-serviced housing while respecting the landscape, heritage, and recreational function of the Liffey Valley.

6.7 No Significant Challenges or Impediments to Development

The Infrastructure Report and Social Infrastructure Audit, submitted alongside this report, confirms that the site faces no significant legal, environmental, topographical, or servicing constraints that would impede its development. Any required infrastructure upgrades are proportionate, feasible, and achievable within standard development timelines.

The site's singular ownership provides a clear pathway for delivery and enables a coordinated, comprehensive approach to development. Collectively, the identified developable areas have the potential to make a substantial contribution to South Dublin's housing supply, while supporting the vitality and viability of Lucan Village without undermining the current functioning of local services or amenities.

Accordingly, the site is suitable, available, and serviceable, capable of delivering well-planned, sustainable residential development within the current plan period, and contributing meaningfully to the achievement of SDCC's new housing and compact growth objectives.

O'Flynn Group

Response to South Dublin County Council's 'Call for Sites'

Infrastructure Capacity Assessment

Reference:

Issue | 13 November 2025

This report takes into account the particular instructions and requirements of our client.
It is not intended for and should not be relied upon by any third party and no
responsibility is undertaken to any third party.

Job number 309534-00

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1. Introduction

This report provides an assessment of the infrastructure capacity of the sites at Edmunsbury and Woodville, Lucan. Co. Dublin identified as suitable for development in response to South Dublin County Council's (SDCC) non statutory 'Call for Sites' in response to the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities 2025. The following infrastructure has been assessed as described in the following subsections:

- Transport infrastructure
- Water infrastructure
- Wastewater infrastructure
- Surface Water Drainage infrastructure
- Energy infrastructure

2. Transportation infrastructure

This section provides an overview of the existing transport environment and the proposed transportation infrastructure in the vicinity of the site.

2.1 Review of existing transport context

The subject land is located to the north of Lucan along the Liffey Valley Green Infrastructure Corridor as shown in Figure 2-1. This corridor is of a high strategic ecological value with the function to protect and enhance its natural assets. It is an area of high biodiversity with potential to be further developed for recreational purposes. Therefore, from a transportation point of view, proposed transportation infrastructure should be carefully considered to limit any impact on the Green Corridor and its assets.

The northern and western boundary of the site is the River Liffey and is currently served by an informal pedestrian route. The only opportunities for accessing the northern and western boundaries of the site along the River Liffey is from the south of the site via informal pedestrian paths.

The eastern boundary to the subject lands is the Hermitage Golf Club, which has an access route that is used to provide access to the golf course. This access route could be improved to provide public access to the site.

Access to the subject lands is currently limited to its southern border. Lucan village and the subject lands are currently connected to one another by the R835 Lucan Road which runs in an east west direction for most of the length of the southern border. This road provides access to other strategic road infrastructure including the N4 which in turn connects to the M50 approximately 2.5 kilometres to the east of Woodville. The R136 road, runs north south and connects established residential estates including The Fairways, Ballyowen, Griffen Valley and Balgaddy to the south of the R835.

Lucan village is a well-established town with a wide range of existing community facilities, retail and local amenities. From a transportation point of view, the development of the subject lands is viewed as an extension of Lucan village and not to function as a separate urban entity. Therefore, it

would be critical to create connectivity between the existing village and any new development on the subject lands.

There is a critical opportunity to provide a range of low impact socially beneficial land uses which is compatible to the objectives of the SAAO and broader green infrastructure strategies. Therefore, it can be expected that there would not only be an opportunity for new residents on the subject land to make short trips to Lucan village but also the opposite, where existing residents from Lucan village would have reason to access the subject lands due the social beneficial land uses to be provided on this land.



Figure 2-1 Existing transport context in the vicinity of the site

2.1.1 Pedestrian access and infrastructure

Pedestrian access is currently only available from the south as shown in Figure 2-2. Access is limited to three locations along the southern boundary of the site. Otherwise, access is either deterred by the presence of walls or by land uses that do not allow access through to the lands such as the St Andrew's National School, on the southwestern boundary and the Hermitage Golf Course to the east.

To the west of the site, there is a stepped access off Chapel Hill Road that provides access to the site and along the River Liffey. An informal walking trail links to the northern field of the site; there are steep gradients at certain locations along this trail.

The remaining pedestrian access points are at the two vehicular entrances to St Patrick's Hospital. Pedestrians are able to walk along the vehicular routes to access the site.

There is no formal pedestrian infrastructure internally within the site, however, there are unpaved paths traversing the lands. Local residents utilise these routes for amenity walks.

There are footpaths provided along the R835 Lucan Road which are between 1.5 and 2.0m in width. There are three pedestrian crossings of the R835 Lucan Road in the vicinity of the site, two at the R835 / R136 junction and another at the St Andrew's National School access, in the proximity of Roselawn Road.

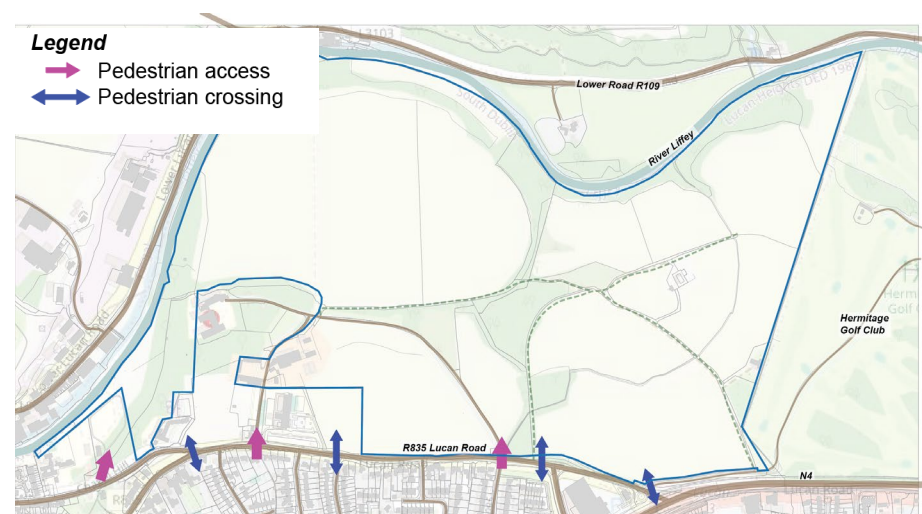


Figure 2-2 Pedestrian crossings and access in the vicinity of the site

2.1.2 Cycle infrastructure

2.1.2.1 Existing cycle infrastructure

There are no cycle lanes currently on the R835 Lucan Road, however a bus lane exists along most of the R835 adjacent to the lands which provides cyclists with some protection. The nearest formal cycle lanes are available along the R136 and cycle crossing infrastructure and cycle protection areas are available at the R136 / R835 junction.

2.1.2.2 Planned cycle infrastructure

There is significant planned cycle infrastructure planned in the medium to long term within the vicinity of Lucan, including the GDA cycle network strategy and proposed BusConnects scheme.

The GDA cycle network strategy within the vicinity of the site is shown in Figure 2-3. The figure shows that a secondary cycle lane is proposed to be provided along the R835 Lucan Road. This infrastructure links to the heart of Lucan village towards the west and links also to a proposed north south greenway on Laraghcon Road to the north of the Liffey River and Sarsfield Park / Beech Park West to the south. Two feeder routes are proposed along Esker Lane North and Beech Park East, which provides north south connections through Lucan Village. A primary orbital route is proposed on the N4 which follows a route to the south of Lucan.

Cycle infrastructure within the vicinity of the site will also be improved by the BusConnects Lucan to City Centre Core Bus Corridor Scheme. The BusConnects Scheme involves bus, cycle and walking infrastructure enhancements along the R835 Lucan Road between the R136/R835 junction and the N4/R835 junction. It also includes a reconfiguration of the R835 / R136 junction proposes junction which will improve the cycle facilities at this junction by reducing its size and by providing more cycle protection.

The BusConnects design is included in the following section (public transport infrastructure). It is expected that this Scheme will be completed in the next five years, by 2030¹.

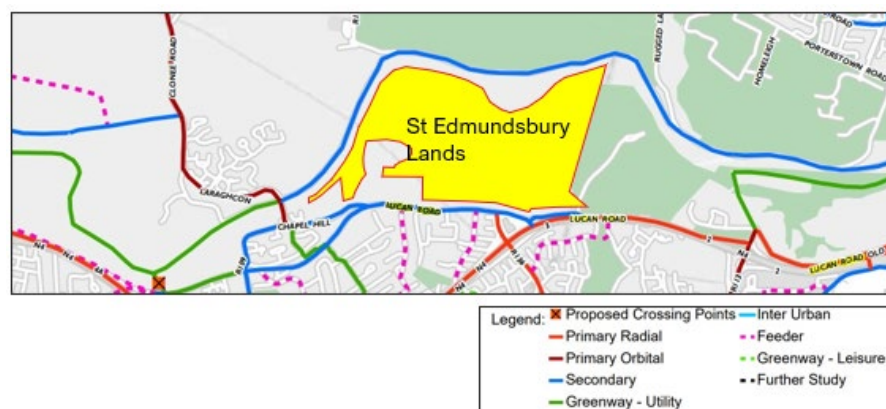


Figure 2-3 GDA Cycle Strategy within the vicinity of the site

2.1.3 Public transport infrastructure

Figure 2-4 shows the existing public transport infrastructure within the vicinity of the site. There is a bus lane provided on the eastbound lane of the R835 Lucan Road which starts in the proximity of St. Andrews National School and ends to the west of the R136 junction. There are also bus lanes on the R136 on both sides of the road which follows all the way south along the length of the road. Bus stops are available at intervals on the R835 Lucan Road serving bus routes along this route. Figure 2-4 also shows the 200m and 500m zones within the site from the existing bus stops.

Figure 2-5 shows the BusConnects planning within the vicinity of the site. The Lucan to City Centre scheme commences at the N4 Junction 3 and is routed along the R835 Lucan Road from its junction with the R136 Ballyowen Road to the roundabout serving the Lucan Retail Park and the N4 Lucan Road eastbound on-slip.

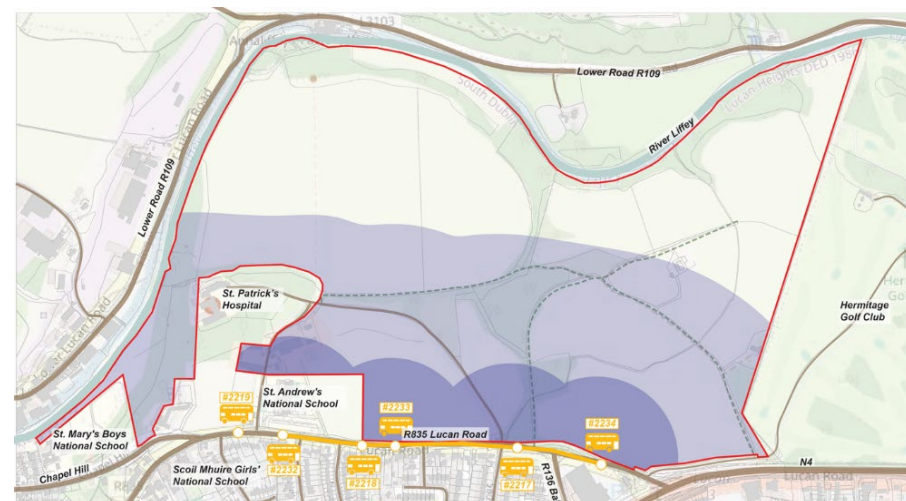


Figure 2-4 Existing public transport infrastructure

The Core Bus Corridor is then routed via the N4 (passing the Liffey Valley Shopping Centre) as far as Junction 7 (M50) and via the R148 along Palmerstown bypass, Chapelizod bypass, Con Colbert Road, St John's Road West, ending at Frank Sherwin Bridge, where it will join the prevailing traffic management regime on the South Quays.

The bus routes located in the vicinity of the site are shown in Figure 2-6 and Figure 2-7. The closest bus stops are located on the R835 Lucan Road and the N4 Lucan Road and are served by the routes X30, X31, X32 X25, P29 and the C Spine which runs directly in front of the proposed site.

¹ <https://busconnects.ie/12-core-bus-corridor-statutory-applications/lucan-to-city-centre-core-bus-corridor-scheme/>

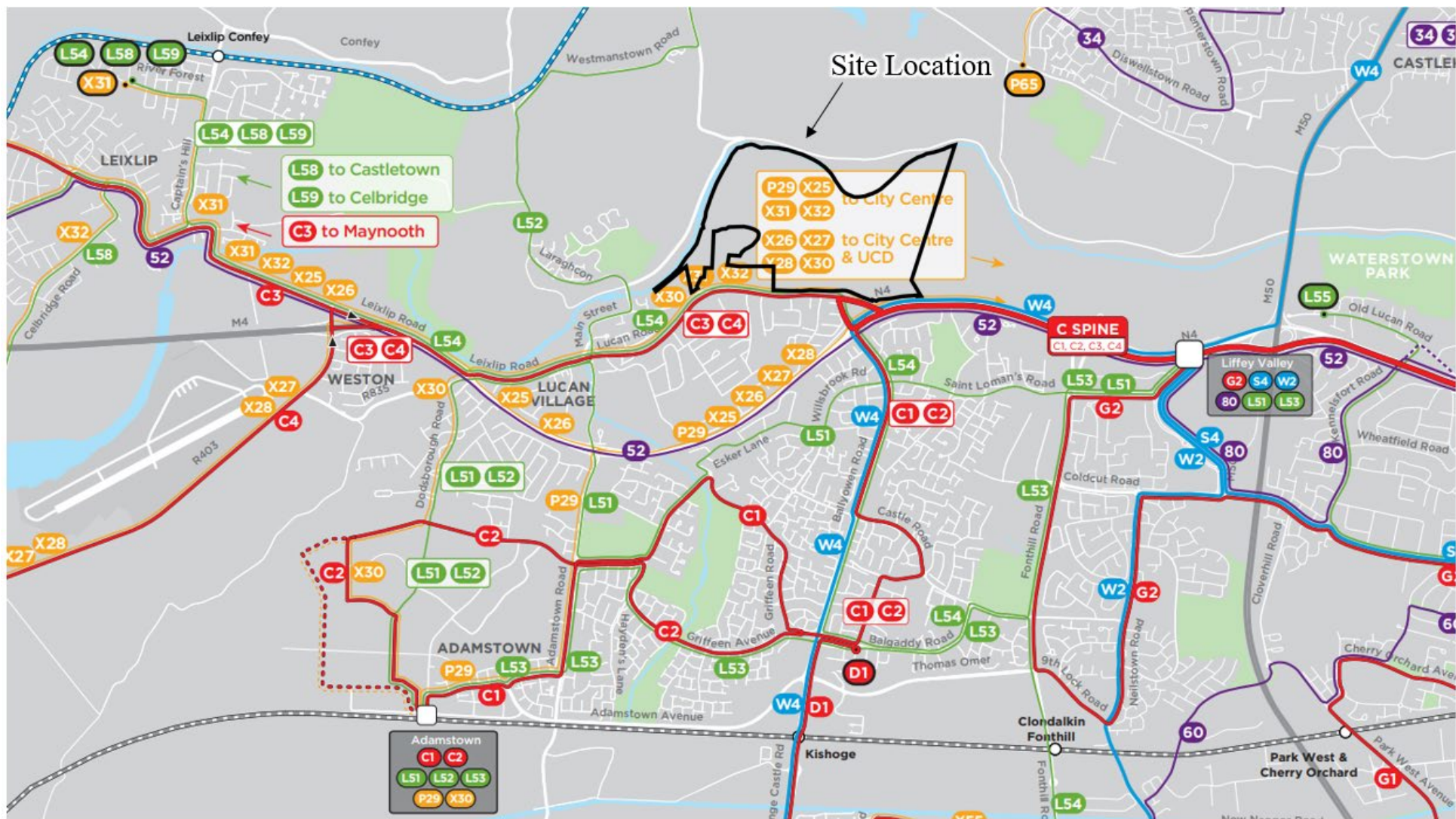


Figure 2-5 BusConnects planning within the vicinity of the site

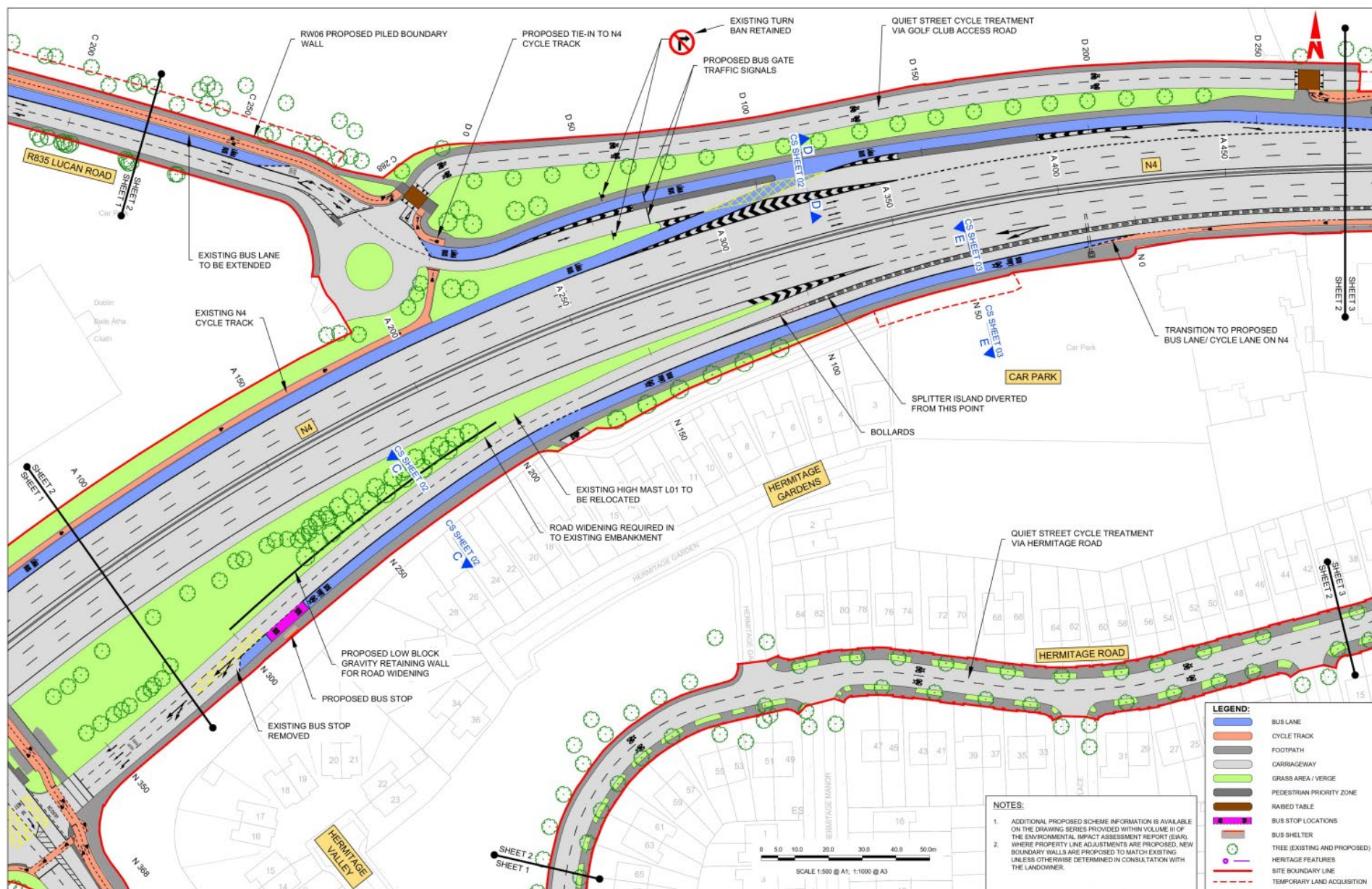


Figure 2-7 BusConnects concept design on the N4 in the vicinity of the site

Luas Lucan is a proposed east-west mass transit corridor running approximately from the areas of Lucan / Adamstown to southern areas of Dublin City Centre, which may connect to the Luas Green Line.

TII tendered for the Engineering Designer (ED) Contract for Phase 1 and 2 which includes the planning and design services up to and including the selection of an Emerging Preferred Route (EPR) and first non-statutory Public Consultation on the EPR. The EPR is expected to be ready in 2026 and will be published as part of the non-statutory public consultation process soon afterwards.

According to the 2021 Luas Lucan Feasibility Study published by TII the proposed Luas line runs a substantial distance to the south of the site as shown in Figure 2-8. The most direct route from the site would be to follow R136 and it is measured that from the edge of the site to the approximate location of the Luas is 1.8km.

Edmundsbury and Woodville therefore fall outside of the effective catchment area of the 2021 alignment of Luas to Lucan. However, as stated above the EPR for the alignment is not published.



Figure 2-8 Proposed Luas Lucan route

2.1.4 Road network

The R835 Lucan Road forms the southern boundary of the subject land. It is a strategic road with two functions (1) connecting Lucan to the wider road network including the N4 and in turn the M50, the R136 and the R120, and

(2) providing access to local residential estates, primarily situated to the south of the R835.

Lucan Road has a posted speed limit of 50kph; however the traffic lanes are generous, and vehicle speeds are often higher than the posted speed limit. A bus lane is provided on the eastbound direction. There are several junctions on the road that provides access to the residential estates to the south, while the accesses to the north are limited to a few individual land uses including the St. Patrick Hospital and St. Andrews National School.

The southern side of the road furthermore provides access to the individual residential properties. Some of these properties has been converted into business uses such as a veterinary clinic, solicitors office, car sales site and small retail sites. The southern side of the road is therefore activated to some extent as these activities draw both pedestrian and vehicular trips during the course of the day. The northern side of the road is currently mostly lined by walls and hedges and therefore there is little interaction between the northern side and the road, except for the school and the hospital.

2.2 Transport strategy

The South Dublin County Development Plan outlines a strategic framework aimed at fostering sustainable mobility across the county. Chapter 7 of the Development Plan, titled Sustainable Movement, sets forth policy objectives that seek to reduce car dependency and promote active and public transport modes.

A key objective is to enable modal shift from private car use towards walking, cycling, and public transport. This aligns with national and regional sustainability targets and supports the transition to a low-carbon transport system. The plan advocates for infrastructure investment and behavioural change initiatives to facilitate this shift.

Additionally, the plan endorses the 10-minute settlement concept, which promotes local accessibility by ensuring that essential services and amenities are reachable within a 10-minute walk or cycle from residential areas. This approach is intended to enhance liveability, reduce travel demand, and support compact urban development. These policy objectives provide a

foundational context for transport planning interventions within South Dublin, guiding both strategic assessments and scheme-level design.

Since the enactment of the Development Plan, the National Planning Framework (NPF) Revision was published in April 2025. The revised NPF places an emphasis on the delivery of transport-oriented development (TOD) and compact growth within existing urban areas.

National Planning Objective (NPO) 10 specifically seeks to:

“Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high-capacity public transport and located within or adjacent to the built-up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.”

The land at Edmundsbury and Woodville clearly satisfy this locational requirement, being situated adjacent to and contiguous with the existing built-up footprint of Lucan. The site’s proximity to established residential areas, local services, and public transport infrastructure ensures that development can occur in a compact, sequential, and sustainable manner, consistent with the intent of NPO 10.

Accordingly, there is an explicit onus on public bodies and planning authorities to ‘deliver’ on the objectives of the revised NPF by facilitating such appropriately located, transport-oriented growth. The Edmundsbury and Woodville lands therefore represent a strategic and policy-compliant location for future development in alignment with national and regional policy objectives for compact urban growth.

This section outlines a transport strategy in support of the site being zoned to facilitate residential led development subject to a development framework (masterplan or similar). The proposed strategy is in line with transport planning policy outlined earlier in this report.

It is the objective of SDCC to expand active travel within the county including cycle infrastructure, greenways and pedestrian networks and to increase public transport usage in an effort to reduce private car usage from the current 62% to 50% (Figure 2-9).

The transport strategy for the site will be guided by this ambition and built on achieving this objective. The transport strategy takes existing opportunities

and constraints into account in its development and identifies additional infrastructure requirements to ensure an integrated transport network is planned for. This strategy is only presented in concept, and more detail will be provided in further planning and development stages. Each of the modes of transport is discussed in the following sections.

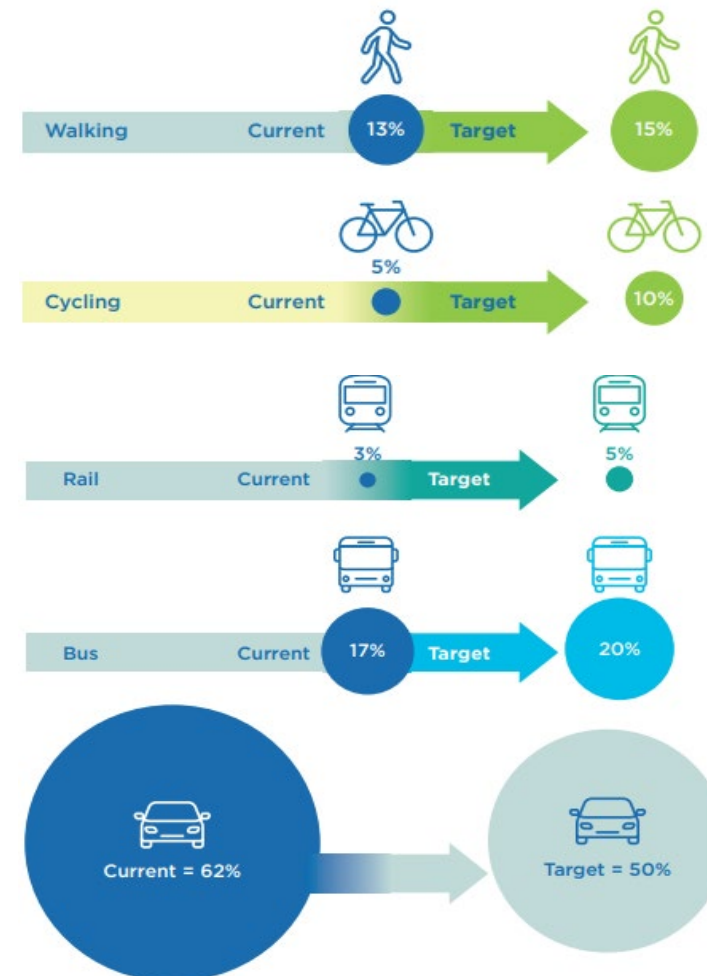


Figure 2-9 Mode shift targets set out in SDCC's Development Plan

2.2.1 Walking

2.2.1.1 Connectivity to Lucan

It is envisaged that the site will function as an extension of Lucan rather than a separate urban entity. Therefore, future residents living on the site will be dependent on the community, social, amenity, shopping and administration services provided within Lucan. The Edmundsbury site is located within walking distance of Lucan and the facilities and services it offers and is in support of the 10-minute town concept for local accessibility. The Woodville site is within walking distance of Lucan Retail Park. There is therefore an opportunity to take advantage of the close proximity of the site and Lucan by connecting the two areas together.

The site has potential to provide riverside pedestrian connectivity, a route that would improve the walkability of Lucan and provide an amenity asset for the wider community.

A pedestrian network within the site would adhere to the following principles:

- Optimising route choice options for pedestrians in order to find the shortest route to chosen destinations, including potential connections along the river.
- Providing a permeable frontage toward Lucan village which promotes the integration of the two urban areas to one another.
- Provide a pedestrian network to serve the proposed residential land use and other land uses, which provides pedestrian priority and restricts vehicular access where appropriate.
- To encourage walking through urban public realm enhancement, active street frontages, street furniture, high quality finishes and attractive landscaping.
- Create a future framework for the connection over the river and access to historical assets.

2.2.1.2 Creation of Amenity areas within subject land

As outlined earlier in this report, the Liffey Valley is an amenity area with outstanding character which needs to be protected but also to be enhanced in terms of its accessibility. There is a variety of active and passive trails that can be provided within the subject site. These may include walking trails, cycle routes and fitness trails integrated with green infrastructure corridors.

These routes will both serve the proposed development to create a high residential quality and access to the Liffey Valley, but also to open up these nature areas and cultural heritage sites to the population of Lucan and beyond.

2.2.1.3 Crossing the River Liffey

Pedestrian bridges across the River Liffey needs to be considered to connect the proposed active travel and greenway routes in the south to potential routes to the north, which would also facilitate the following objective:

NCBH7 SLO 1: To investigate the potential of collaborating with Fingal County Council for the re-use of Shackleton's Mill as a tourism destination given its location in proximity to Lucan Village.

The location of these bridges should be carefully considered to limit any environmental impacts that may occur.

2.2.1.4 Placemaking

Place making will play a key role in the successful development of the site. Placemaking and the promotion of active streets is proposed to make walking attractive and the preferred mode of transportation for short trips. Placemaking includes roads designed to human scale with attractive landscaping, rest and pause areas supported by street furniture, play areas, pocket parks and art and culture exhibition space. Room should be made for wide boulevards where appropriate, town squares, landmarks and characteristic features so that these elements provide define and offer legibility to the area.

The placement of land uses along pedestrian routes are an important factor that will promote walking. Active edges on street corridors, street enclosures,

permeability and pedestrian priority are elements to be added to the place making within the area.

To promote the use of active routes within green areas low intensity uses such as nature centres, community hubs and educational pods should be incorporated along walking trails, cycle routes and green infrastructure corridors.

2.2.1.5 Activating the R835 Lucan Road

There is a need to reconfigure the R835 Lucan Road street frontage. This road is currently a predominant vehicular corridor accommodating high volumes of traffic during peak hour periods and is associated with high noise levels. There are few opportunities for pedestrians to cross the road safely and the traffic lanes are wide without refuges.

To activate the road, it is proposed that the northern side of the road is reconfigured to allow a high level of permeability. This means that a series of new routes should be connected to the R835 Lucan Road, including vehicular routes, exclusive active travel routes and amenity routes.

It is recognised that the provision of these routes will have to take biodiversity and cultural heritage constraints into account which may limit the permeability of the southern edge of the site, however the northern edge of the site is not as constrained and offers opportunities to activate the street front through public realm space and landscaping.

Footpaths should be provided along all vehicular roads and vehicles should not be permitted to go everywhere but only along designated corridors.

Safe road crossings should be introduced at regular intervals in an effort to integrate Lucan and the site and for the convenience of pedestrians. This may include a series of tight junctions with short crossing distances and without wide slip lanes and multiple stages of road crossing. The speed limit along the R835 Lucan Road should be reconsidered in the possibility of lowering it to 30kph.

2.2.1.6 Local community, social and economic facilities

Although walking to existing facilities in Lucan is promoted, it is also imperative that some social infrastructure serving residents daily needs

should also be located within the site. This will lessen the need to travel long distances and may avoid external trips. This is in line with the national and regional transportation principles of avoid making trips if possible and to keep trips short to avoid needing to use motorised transport.

2.2.2 Cycling

2.2.2.1 Expansion of cycle infrastructure

There is an opportunity to expand the Lucan cycle route network into the site, by providing cycle lanes adjacent to key access roads or by providing segregated cycle lanes where appropriate. There is a need for cycle crossing facilities on the R835 at regular intervals to ensure that the site is permeable to cyclists and that inconvenient long travel distances is avoided.

Internally to the site, cycle lanes may be provided along key access routes where vehicle traffic volumes are high. However, it is envisaged that the majority of roads internally are shared space where vehicles and cyclists both use the same space, and cyclists have priority.

In addition to the above, secure cycle parking should be provided at strategic locations within the site to provide convenient facilities for cyclists visiting amenity, social, community or economic opportunities.

2.2.2.2 Bike sharing and mobility hubs

Bike sharing can be brought into the proposed development. Bike share stations should be provided in strategic hubs within the site and at public transport stops along the R835. Eventually bike sharing schemes can be joined with mobility hubs which offer a variety of personal mobility modes and potentially car sharing.

2.2.3 Public transport

As stated earlier a bus lane is already available along the R835 Lucan Road and the BusConnects scheme propose more bus infrastructure along the N4. This bus priority scheme starts at the N3 / R136 interchange, located to the south east of the proposed development.

2.2.3.1 Land Use Density Structuring and Transportation Oriented Development (TOD)

The focussing of development towards public transport services is critical. TOD promotes the idea that the level of accessibility afforded by public transport infrastructure and services should structure the intensity of developments, in other words, the higher the accessibility the higher the density of development.

The strategy for public transport is for the residential density on the site to be structured so that the highest density is located as close to the existing and proposed bus stops on the R835. Figure 2-4 indicates the extent of the land falling within the <200m and <500m zones from the bus stops.

These zones should be used as a guide to structure the density with the highest land use density located within the < 200m zone, followed by the 2nd highest density within the <500m zone and lower densities thereafter.

2.2.3.2 Public Transport within site

It is unlikely that public transport routes can feasibly be provided within the site as this would impact on the efficiency of the route. It is therefore proposed that public transport should remain on the R835 with land use density responding to proximity of the bus route and with a highly permeable pedestrian network that provides pedestrians route choice and the shortest walking distances.

2.2.4 Road network and parking

There is a limited road network currently serving the site. This road network only services the St. Patrick Hospital. Although car dependency should be limited and sustainable transport promoted as much as possible, it is inevitable that there will be residents that make use of car-based transport for various purposes and needs every day. Furthermore, a road network is required on site to provide vehicle access to all buildings on site for the purposes of services, deliveries, and emergencies.

2.2.4.1 Vehicular Access

The proposed road network should provide for access from more than one access off the R835. The entrances to the site will be the busiest parts of the

road network and therefore should be the widest routes, however the road network deeper in the development can become narrower. Preferably the access points to the proposed development should be interconnected within the site to ensure that services and deliveries to multiple homes can be dealt with by one entry and exit to the development and not multiple entries and exists.

2.2.4.2 Shared Road Space and filtered permeability

As noted, roads within the development should be shared with cyclists where cyclists have priority. Parking should be provided off street and underneath buildings to avoid excessive space requirements. On street parking may be made for accessible car parking and for loading and deliveries. Surface parking may be provided to serve visitors to the cultural heritage, points of interest and the proposed Green Infrastructure areas for the site. The concept of filtered mobility, whereby pedestrians and cyclists can travel through areas and motorised traffic cannot use should be introduced to provide an advantage on these modes of transport, making them safer and more attractive than the car for short trips to local services.

2.2.4.3 Services, Deliveries and emergencies

All buildings within the subject land will need to have vehicular access to ensure that they can be serviced, deliveries can be made and that emergency vehicles can reach them.

The road design of roads should therefore make provision for the swept path of these vehicles. Since these types of vehicles only visit occasionally, it is acceptable for some of these vehicles such as emergency vehicles to make use of the oncoming lane to perform turning movements and thereby to limit lane width.

2.3 Transport impact review

2.3.1 Trip Generation

The trip generation for the Tier 1 lands in St Edmundsbury is approximately 1,307 units. Arup interrogated the TRICS® database to derive an appropriate trip generation rate that can be applied to the proposed residential units. The

TRICS database includes over 9,500 transport surveys. In addition to inbound and outbound traffic and multi-modal counts, it includes comprehensive descriptive detail on a site's surroundings, size, composition, function and details of on-site and off-site parking facilities. Large annual regional data collection programmes across all parts of the UK and Ireland ensure that new transport surveys are continuously added.

Several sites were selected in the TRICS database with similar features to the study area in terms of development scale, location, land use, availability of public transport etc. to derive a person trip rate for the morning peak period. A rate of 1.167 trips departing per household was obtained from the database. Therefore, considering the number of units in the Tier 1 lands, the total number of person trips generated by the Tier 1 development in the peak AM peak is 1,525 departing trips. There will also be arrival trips in the morning peak which will comprise of around 10% to 15 % of arriving trips to the development. This trip patterns will be the reverse during the PM trip peak period.

2.3.2 Modal Split

The starting point for arriving at an appropriate modal split for the proposed development was by considering the Ireland Census 2022 data and extracting the results for the Lucan area on modal split. Prevailing transport policy in Ireland promotes a shift from car-based travel to more sustainable moves of transport.

The South Dublin County Council Development Plan 2022 – 2028 proposes a reduction of 12% in car-based trips for the entire County (*as per Table 7 of the Development Plan*). Applying a similar reduction on the 2022 Lucan and environs modal split, the resulting modal split for the subject lands is outlined in Table 2-1.

Table 2-1 Existing and estimated modal split for St Edmundsbury lands, based on Census 2022 data

Mode	Travel to Work		Travel to School / College / Childcare		Total		Adjusted Modal Split for St Edmundsbury
	Number	Percentage	Number	Percentage	Number	Percentage	
On Foot	752	3%	5,700	34%	6,452	15%	15%
Bicycle	627	2%	867	5%	1,494	3%	5%
Bus, minibus or coach	3,928	14%	2,745	16%	6,673	15%	20%
Train, DART or LUAS	585	2%	86	1%	671	2%	2%
Motorcycle or scooter	176	1%	6	0%	182	0%	1%
Car Driver	14,538	53%	365	2%	14,903	34%	30%
Car passenger	899	3%	5,808	34%	6,707	15%	12%
Van	1,065	4%	16	0%	1,081	2%	2%
Work mainly at or from home	3,049	11%	79	0%	3,128	7%	7%
Not stated	1,578	6%	1,242	7%	2,820	6%	6%
Total	27,235	100%	16,936	100%	44,171	100%	

2.3.3 Impact on different modes of transport

2.3.3.1 *Active Travel*

The table shows the expected number of trips by each mode of transport. Active travel trips will be accommodated by proposed walking and cycling infrastructure proposed to connect the site internally and externally to Lucan. It is expected that 20% active travel trips will be generated by the proposed development.

2.3.3.2 *Public Transport*

According to the modal split calculations, 22% of trips will be made during the morning peak by public transport. The available public transport within the vicinity is by bus which also includes the BusConnects route on Lucan Road.

Table 2-2 shows the bus routes currently serving bus stops in the vicinity of the site and the capacity of the current bus services. The current capacity of the bus services was used to distribute the expected number of bus trips on the public transport network. The bus services were grouped by direction in which they travel according to Figure 2-10

Assuming that the existing bus services are running at capacity, the table also shows the number of additional passengers expected to use the bus services if they remain as they currently are. Table 2-3 shows that an additional 305 passengers will be required for the Tier 1 lands. These trips were distributed to the bus routes.

Table 2-2 Current bus services and trip distribution according to capacity

Orientation				W		*	SW	NE	SE		E		
Route No.	Route	AM Peak Service (bus/hr)	AM Peak Capacity (passenger/hr)	Maynooth	Leixlip	Lucan	Adamstown	Blanchardstown	Red Cow Luas	Tallaght	Dublin City Centre	UCD	
X30	Doddsboro - UCD	2	120			2	2					2	
X31	River Forest - Earlsfort Terrace - UCD	3	180	3	3	3						3	
X32	Leixlip - Earlsfort Terrace - UCD	2	120		2	2						2	
C1	Adamstown Stn - Sandymount	10	600				10				10		
C2	Adamstown Stn - Sandymount	10	600				10				10		
C3	Maynooth - Ringsend	4	240	4	4	4					4		
C4	Maynooth - Ringsend	4	240	4		4					4		
L54	River Forest - Red Cow Luas	2	120		2	2			2				
W4	The Square - Blanchardstown SC	4	240					4		4			
Hourly total bus service to destination (region)				11	11	-	22	4	2	4	28	7	89
Hourly bus service percentage				12%	12%	-	25%	5%	2%	5%	31%	8%	100%

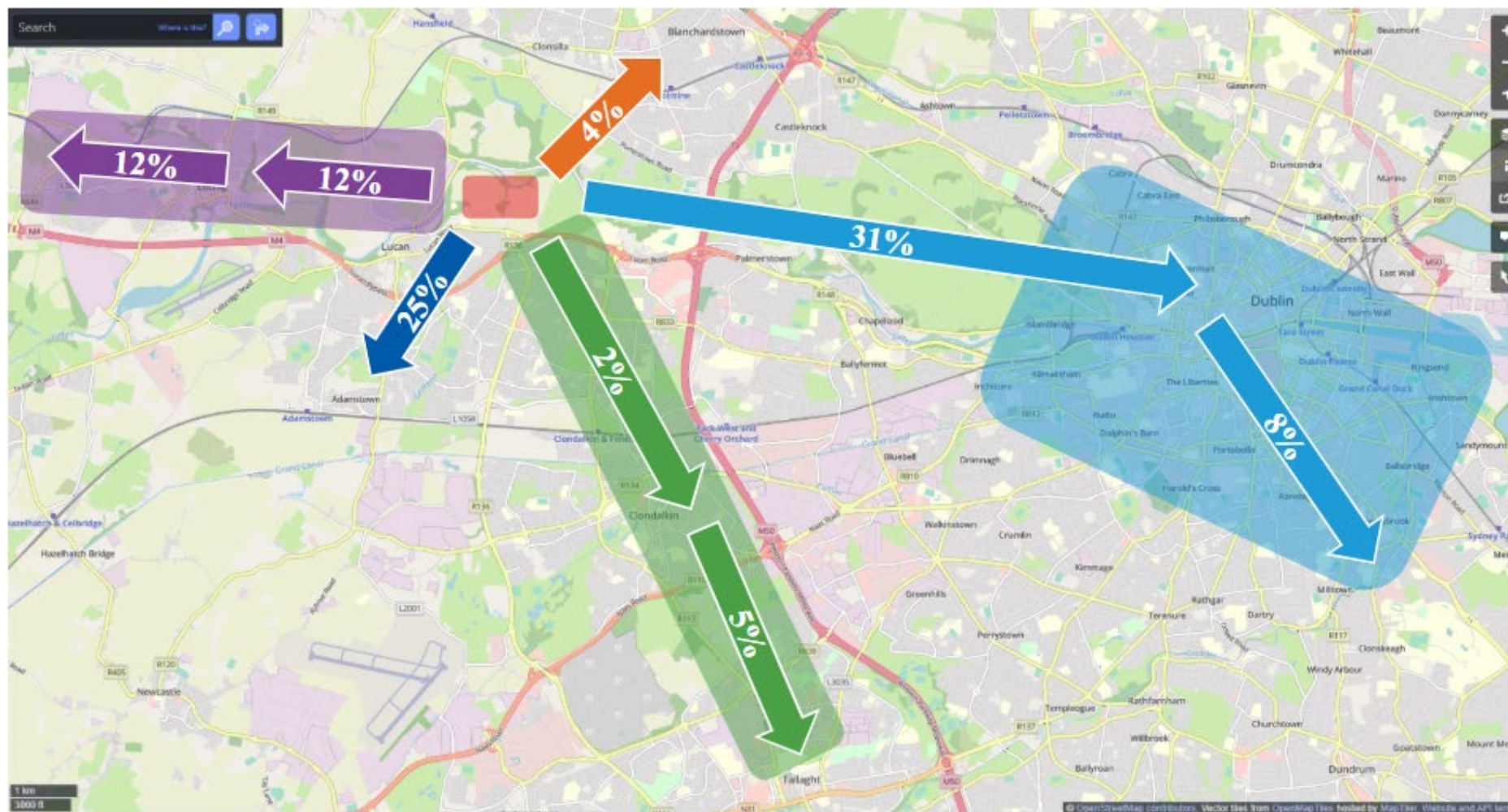


Figure 2-10 Bus transport trip distribution

Table 2-3 Bus requirements for St Edmundsbury site

Orientation				W		*	SW	NE	SE		E	
Route No.	Route	AM Peak Service (bus/hr)	AM Peak Capacity (passenger/hr)	Maynooth	Leixlip	Lucan	Adamstown	Blanchardstown	Red Cow Luas	Tallaght	Dublin City Centre	UCD
X30	Doddsboro - UCD	2	120			2	2					2
X31	River Forest - Earlsfort Terrace - UCD	3	180	3	3	3						3
X32	Leixlip - Earlsfort Terrace - UCD	2	120		2	2						2
C1	Adamstown Stn - Sandymount	10	600				10				10	
C2	Adamstown Stn - Sandymount	10	600				10				10	
C3	Maynooth - Ringsend	4	240	4	4	4					4	
C4	Maynooth - Ringsend	4	240	4		4					4	
L54	River Forest - Red Cow Luas	2	120		2	2			2			
W4	The Square - Blanchardstown SC	4	240					4		4		
Hourly total bus service to destination (region)				11	11	-	22	4	2	4	28	7
Hourly bus service percentage				12.36%	12.36%	-	24.72%	4.49%	2.25%	4.49%	31.46%	7.87%
Bus Public Transport trip distribution - Tier 1A				38	38	-	75	14	7	14	96	24
Bus Public Transport trip distribution - Tier 2				12	12	-	24	4	2	4	31	8
Bus Public Transport trip distribution - Total				50	50	-	100	18	9	18	127	32
Hourly bus service capacity				660	660	-	1320	240	120	240	1680	420

For purposes of clarity, Table 2-4 is an extraction from the table above which shows the number of additional passengers per direction due to the development of the St Edmundsbury and Woodville Tier 1 lands.

Table 2-4 Bus capacity requirements

Direction	Service	Additional Passengers	Additional bus capacity requirement
West	Maynooth	38	1 bus
	Leixlip	38	1 bus
South West	Adamstown	75	1 and ½ buses
North East	Blanchardstown	14	¼ bus
South East	Red Cow Luas	7	No add bus
	Tallaght	14	¼ bus
East	Dublin City Centre	96	2 buses
	UCD	24	½ bus

The table above shows that the largest demand is expected to be towards Dublin City Centre (2 no. buses), followed by Adamstown (1 and a ½ no. buses). Less than 1 no. bus each is required to Maynooth and Leixlip and the remainder of the directions might be absorbed by existing bus services not currently fully occupied.

Since BusConnects route to Dublin City Centre will be provided in the near future, this additional demand should be easily absorbed by the improved bus services. Dublin Bus is expected to monitor demand increases along routes and to adjust the availability of bus services accordingly. This analysis shows that the impact of the proposed development on public transport services is expected to be minimal.

2.3.3.3 Vehicle Demand

The estimated car driver modal split for the Tier 1 lands is expected to be 30%, which represents 463 no. vehicles. Figure 2-11 shows the expected trip distribution for vehicles departing from the Tier 1 sites during the morning peak. Based on existing land use and employment centres, the majority of the Tier 1 trips (85% or 394 no. trips) are expected to travel eastward on Lucan Road towards the national road network (N4 and M50) and Dublin City Centre. Significantly less Tier 1 trips (15% or 70 no. vehicles, equating to circa 1 additional vehicle per minute over the peak hour) are expected to travel westwards on Lucan Road towards Lucan village. As noted above, Lucan village and the local schools and amenities are within walking distance of the Tier 1 sites and therefore the majority of trips to the village are expected to be via active travel.

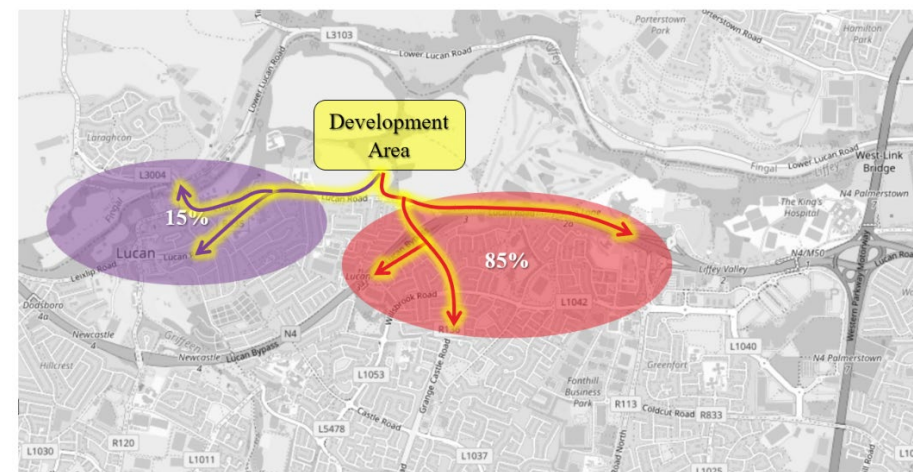


Figure 2-11 Vehicular traffic trip distribution during the AM peak

Arup carried out traffic counts at the R835 Lucan Road / R136 Grange Castle Road junction in March 2025. The counts showed that in the AM peak there are approximately 750 vehicles travelling eastbound on Lucan Road and 703 vehicles travelling westbound. As indicated above, the majority of traffic generated from the Tier 1 lands is expected to travel eastbound on Lucan Road and limited traffic is expected to travel westbound. As such, the expected impact of the Tier 1 lands in the AM peak is to increase the

eastbound traffic by 394 vehicles to 1,146 and increase the westbound traffic by 70 vehicles to 773, as shown in Figure 2-12.



Figure 2-12 Traffic impact on R835 Lucan Road

3. Water infrastructure

South of the River Liffey, multiple watermains are present along the Lucan Road and adjacent to the N4. Watermains present include a 200mm PVC watermain and a three-inch cast iron watermain.

Figure 3-1 shows an indicative map of the main watermains present in the area. The connection of any new developments will be subject to confirmation of feasibility from Uisce Éireann and preparation of a strategy for development of the future water network in the area.

A Pre-Connection Enquiry was submitted to Uisce Éireann on 17th September 2025. There is typically a 16-week turnaround on Pre-Connection Enquiries so a response is expected by mid-January 2026.

A watermain connection for St. Edmundsbury and Woodville would be technically feasible from this existing infrastructure. Supply Potable water is received in the area from both Ballymore-Eustace and Leixlip water treatment plants (WTPs). The Lucan area being the main recipient from the Leixlip plant. The Leixlip plant is currently undergoing a Phase 3 upgrade programme which will add 63 million litres/day to the network and improve resilience for future demand. The Phase 3 upgrade is scheduled for completion 2027.

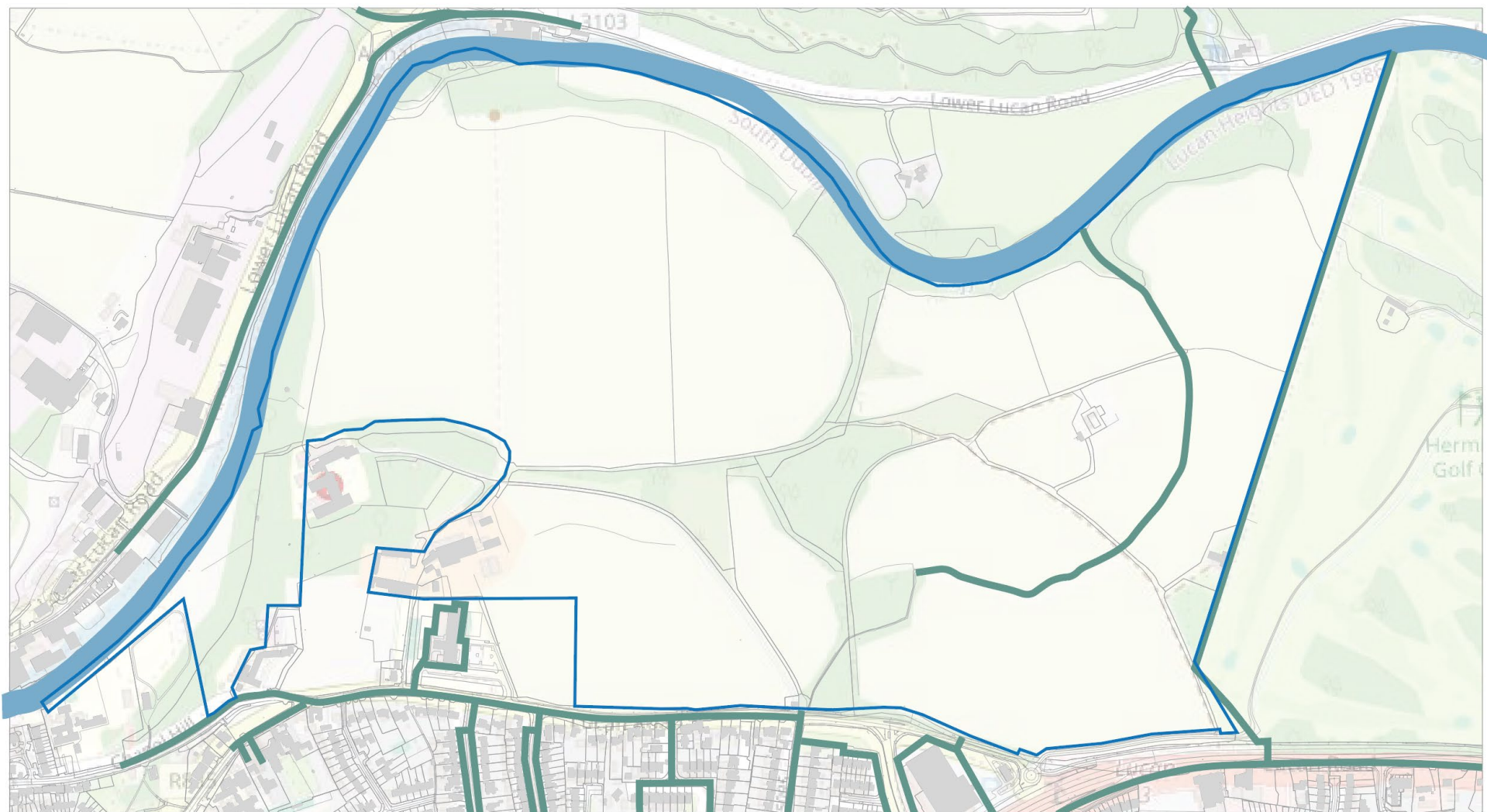
In addition, the Barrow Water Supply Scheme Area Extension project has been undertaken by Uisce Éireann to boost drinking water supply to the GDA, through additional works around the Ballymore-Eustace WTP. It is predicted that this will increase supply to the GDA by 18 million litres per day once the series of works are complete in 2025. Commissioning works are also currently underway.

East of the proposed development, a short section of three-inch diameter uPVC watermain services properties along the R109 Lower Road but does not cross the River Liffey into the proposed development's site boundary. It is unlikely that this watermain would be suitable for use as it is unlikely to have sufficient supply capacity available to serve the future development of the lands. This is based on Uisce Éireann's Code of Practice for Water

Infrastructure states that a mains water pipe diameter of 225mm is typical for between 300 to 700 dwellings.

Approximately 2km north of the proposed development lands, a 685mm diameter steel watermain is present which is believed to form part of a ring main for the wider area. A connection from the watermain could also be technically feasible subject to confirmation of feasibility from Uisce Éireann with regard to capacity availability and compatibility with their wider strategy for providing water supply in the area.

Uisce Éireann's Water Supply Project for the Eastern and Midlands Region, proposes for potable water to be collected from the River Shannon and piped to the GDA. If completed this project would ensure adequate supply to the region to facilitate further development and population growth.



Legend
 Potable Water Network

Figure 3-1 Indicative watermain network

An indicative wastewater location map is shown in Figure 4-1 below.

4. Wastewater Infrastructure

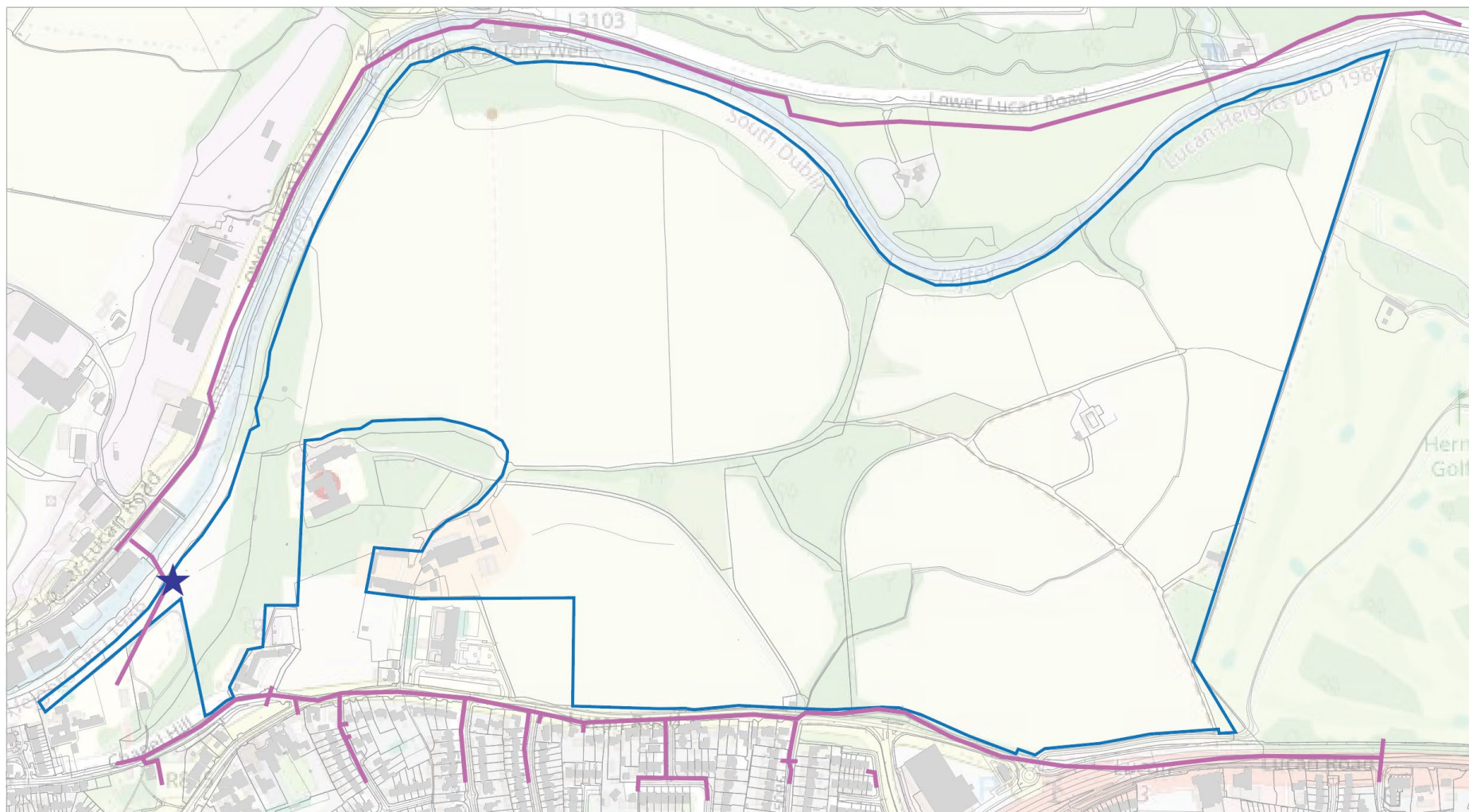
4.1 Existing conditions and wastewater infrastructure

Currently wastewater from Lucan is processed in the Ringsend Wastewater Treatment Plant. Infrastructure record maps produced as part of the Greater Dublin Strategic Drainage Study (GDSDS) show that a trunk sewer, 9B, originates in Lucan and connects to the Ringsend wastewater treatment plant through Dublin via the Grand Canal. While the nearby Leixlip Wastewater Treatment Plant (WwTP) has recently completed multimillion-euro capacity upgrade works, it is likely that any development would form an additional part of the Ringsend Catchment Area. This is signalled by the objectives set out in South Dublin County Council's Development Plan, which seek to strengthen the infrastructure leading to the plant as opposed to developing connections elsewhere.

An existing foul sewer is present along the Lucan Road to the south of the development. While St. Andrew's National School, immediately to the west of the proposed development site, is connected to this sewer, confirmation from Uisce Éireann would be required to determine the feasibility of connecting any new developments. Wastewater from Lucan passes through the sewer, which falls from east to west. It then passes through a pumping station west of the Edmundsbury land, underneath the River Liffey and along the R109 Lower Road.

Based on the topography of the Edmundsbury land, pumping would likely be required to bring any development's wastewater back to the Lucan Road. This would require the construction and future maintenance of at least one pumping station.

The connection of any new developments will be subject to confirmation of feasibility from Uisce Éireann and preparation of a strategy for development of the future wastewater network in the area. A Pre-Connection Enquiry was submitted to Uisce Éireann on 17th September 2025. There is typically a 16 week turnaround on Pre-Connection Enquiries so a response is anticipated by mid January 2026.



Legend
 — Wastewater Network
 ★ Wastewater Pump Station

Figure 4-1 Indicative wastewater network

5. Surface water drainage infrastructure

5.1 Existing conditions and stormwater infrastructure

The topography of the local area indicates the lands drain from south to north, towards the River Liffey which flows from the west to the east.

Along the site, there is an open drainage channel or stream draining into the River Liffey as can be seen from the map in Figure A1-1. The upper sections of this stream form outside of the land currently forming the Special Amenity Area (SAA) and carry stormwater flows from the Lucan area. Due to the predominantly greenfield nature of the site, natural drainage occurs from south to north.

A review of South Dublin County Council records confirms that there is no public surface water infrastructure present on the site. A 300mm diameter gravity surface water sewer is located along Lucan Road. This outfalls into the aforementioned drainage channel in the site.

The existing stormwater infrastructure for the proposed development lands are shown in Figure 5-1 overleaf.

5.2 Proposed development requirements

Any future development on the lands will result in an increase in surface water runoff volume, and rate of discharge to the River Liffey. Soil in the proposed development site is classified as Type 2 (as per HR Wallingford mapping tools), which is indicative of a relatively high permeability. Control mechanisms for the prevention of surface water entering and contaminating these areas would likely be a key requirement for site development. The level of untreated surface water infiltration would likely need to be minimised.

To mitigate against these risks, the drainage system would be required to be designed in accordance with the Regional Drainage Policies of the Greater Dublin Strategic Drainage Study Volume 2 New Development. Some of the requirements include:

- Provision of Stormwater Attenuation systems to limit stormwater flows from new developments to the current greenfield runoff rates.
- Provision of Sustainable Drainage Systems (SuDS) to reduce the volume, and improve the quality, of surface water runoff to the River Liffey. SuDS features for any development include but are not limited to bioretention systems, rain gardens, filter drains, permeable paving, green roofs, swales, attenuation ponds, treatment ponds.

Policy GI4 of the South Dublin County Development Plan 2022-2028 requires the provision of SuDS in the region and to maximise the amenity and biodiversity value of these systems. It also outlines a series of objectives and criteria for implementing SuDS which are required for all new developments.

A SuDS Strategy shall be prepared for the lands. This will outline the strategy for managing stormwater within the lands and adhering to the various policy requirements. A full masterplan of the proposed development will be required to fully detail this strategy, though it is envisioned that SuDS shall form a key element in the overall masterplan to meet these objectives.

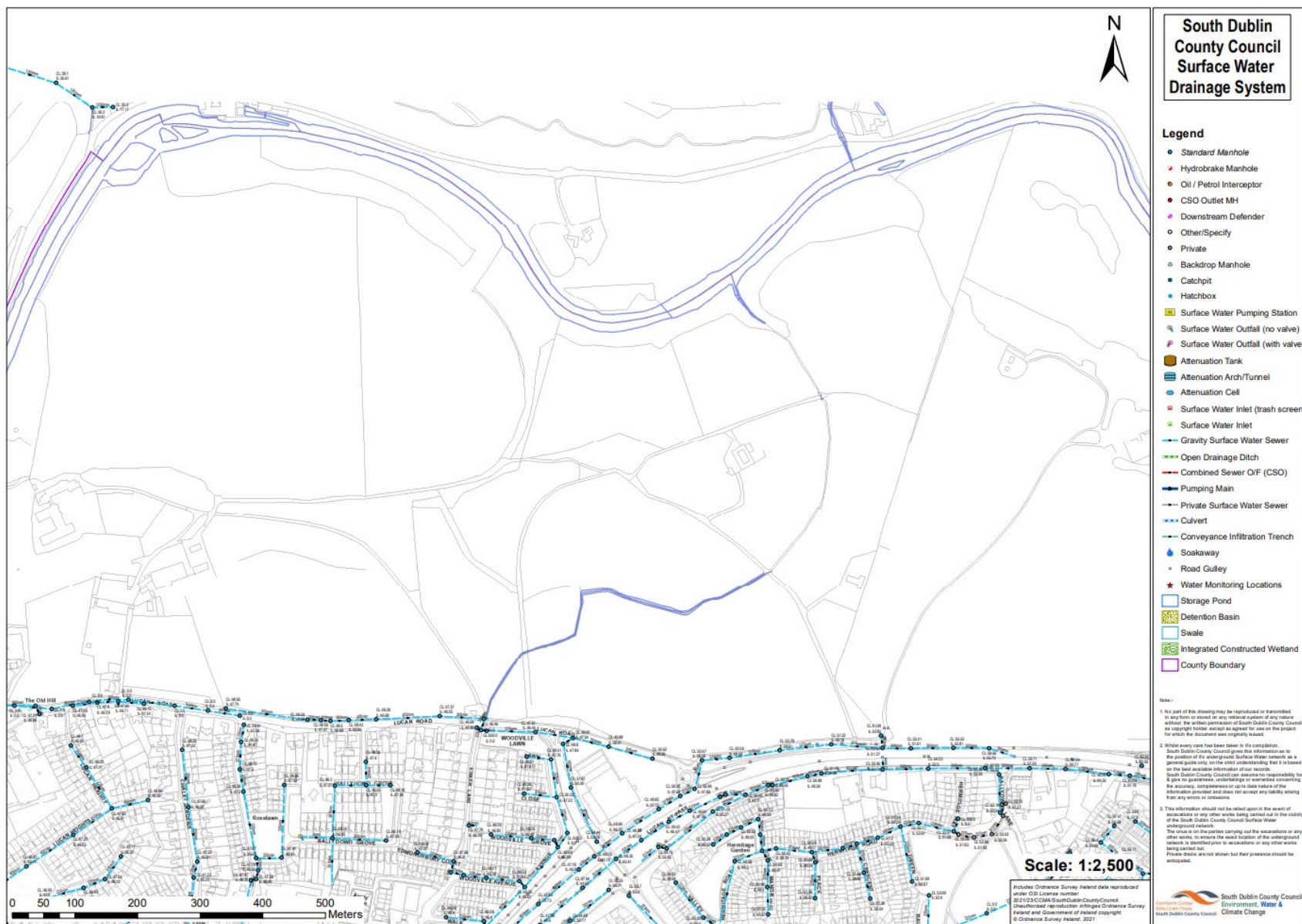


Figure 5-1 Existing stormwater infrastructure in the vicinity of the site

5.3 Flood Risk

The section of the River Liffey running north of the site was analysed as part of the Office of Public Works' (OPW) National Catchment Flood Risk Assessment and Management Programme (CFRAM).

The flood maps produced show that there are areas adjacent to the river at risk of flooding under a 1 in 100-year fluvial flood extent. These are primarily located along the banks of the river and include a large section at the site of a private residence located between the River Liffey and the R109 Lower Road. Residential development is not proposed at these locations.

Other than this drainage ditch, the flood risk under the 1 in 100-year fluvial flood appears to be limited to areas currently designated as being within the SAA.

Soil in the proposed development site is classified as Type 2 (as per HR Wallingford mapping tools), which is indicative of a relatively high permeability.

The areas of the site identified as at risk of flooding are shown in Figure 5-2. There is potential for some limited flooding within the development lands but existing features on site provide opportunities to integrate sustainable urban drainage systems to sustainability manage surface water on site and reduce pressure on the existing network, with potential to provide flood storage to reduce pressure on the wider network or areas further downstream the River Liffey.



Figure 5-2 Areas of site identified as at risk for flooding

6. Energy infrastructure

6.1 Existing energy infrastructure

6.1.1 Gas Networks Ireland (GNI)

GNI drawings (see Figure 6-1) indicate a medium pressure (4 bar) gas main running along the Lucan Road R835 to the south of the site. A branch from this main serves St Andrews National School and on to St Patrick's Hospital.



Figure 6-1 Extract from GNI infrastructure drawing

6.1.2 Electricity Supply Board Networks (ESBN)

ESBN drawings (see Figure 6-2) indicate the existence of the ESBN 38kV substation outside the site boundary, to the west of St Andrews National School. The drawings also indicate a mix of both underground and overhead MV and LV cables adjacent to the St Andrew National School and St Patricks Hospital.

There is a 10kV MV overhead lines running from St Andrews National school northeast through the development lands, to a pole mounted transformer, before crossing the Liffey at 400/230V LV to serve a single house/farm.

A 400/230V LV overhead line runs adjacent to part of the access road to the St Patricks Hospital. A 400/230V overhead line runs along the eastern boundary of the development lands.

It is likely that wayleaves exist for the above infrastructure. The existing infrastructure on the development lands will need to be rationalised, undergrounded and transferred to the new power infrastructure proposed for the development lands.

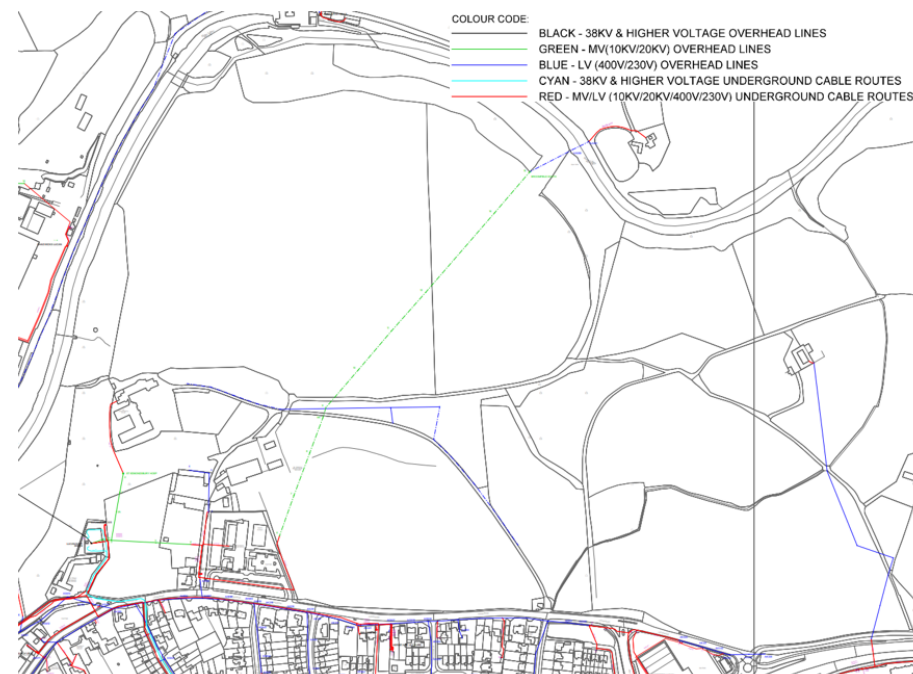


Figure 6-2 Extract from ESBN infrastructure drawing

There are several substations located in proximity to the site, as shown in Figure 6-3, however, a review of the ESBN availability capacity heatmap (<https://www.esbnetworks.ie/services/get-connected/renewable-connection/network-capacity-heatmap>).

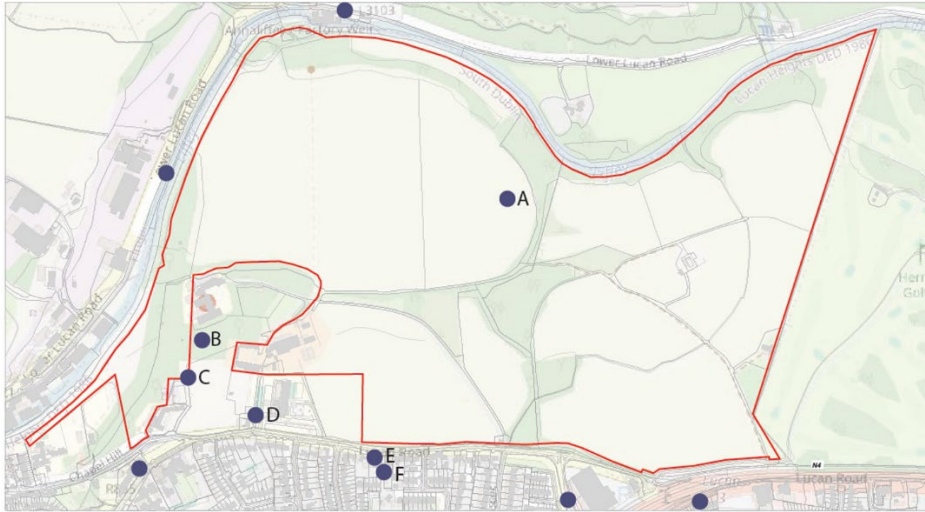


Figure 6-3 Extract from ESNB availability capacity heatmap

Details of the six substations closest to the site are included in Table 6-1 below. It should be noted that substation A, Lucan East 38kV station, is geographically located adjacent to substations B and C and not adjacent to the Liffey.

Table 6-1 ESNB substation available power capacity

Location	ESNB Substation	Spare Capacity
A	Lucan East 38kV Station	None
B	MV/LV ST***425X	None
C	MV/LV LU***4350	None
D	MV/LV ST***400X	None
E	MV/LV ST***224	None
F	MV/LV ST***4211	None

6.2 Energy strategy

European, National and Local Authority policies are driving a transition away from the use of fossil fuels to meet the energy demands of new and existing building stock. It is proposed therefore that a Fossil Fuel Free strategy be adopted. Two possible energy solutions are therefore anticipated:

- All-electric solutions with the suitable integration of on-site sustainable power generation to meet both power and thermal energy needs.
- Electric solutions with the suitable integration of on-site sustainable power generation to meet power needs, combined with possible district heating system to meet the thermal energy needs.

As indicated in Figure 6-4, SEAI have predicted that the national electrical grid will continue on its current trajectory, towards decarbonisation over the coming decades and thus the electrical energy use of buildings will continue to decarbonise over the coming decades.

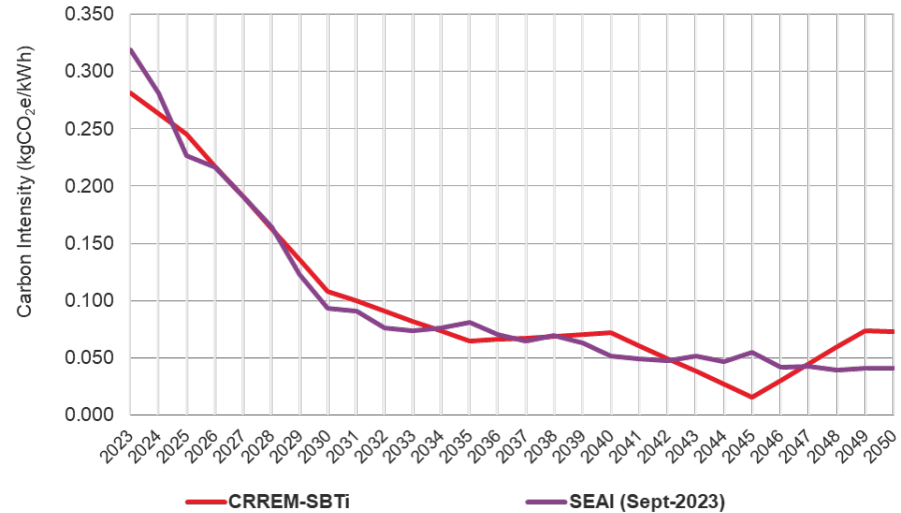


Figure 6-4 SEAI National Electric Grid Decarbonisation Trajectory

6.2.1 Power

It is anticipated that the proposed development of circa 1,000 dwellings will have a total peak energy requirement of approximately 5-6MVA. It will be possible to lower this peak demand through the integration of on-site power generation (photovoltaics) and/or on-site batteries to balance out the load.

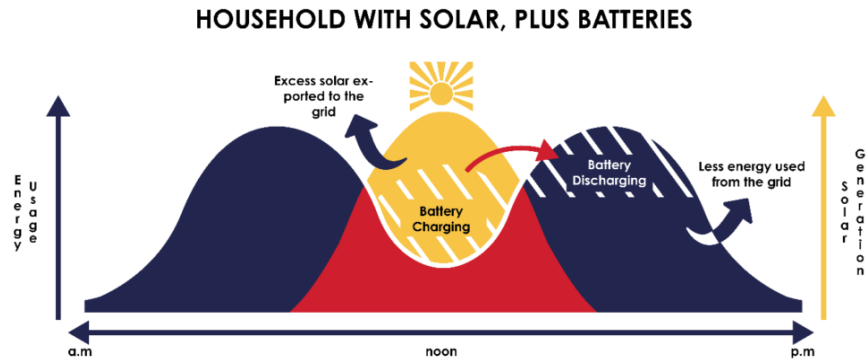


Figure 6-5 Balancing peak power usage with solar PV and batteries © nea.org.uk

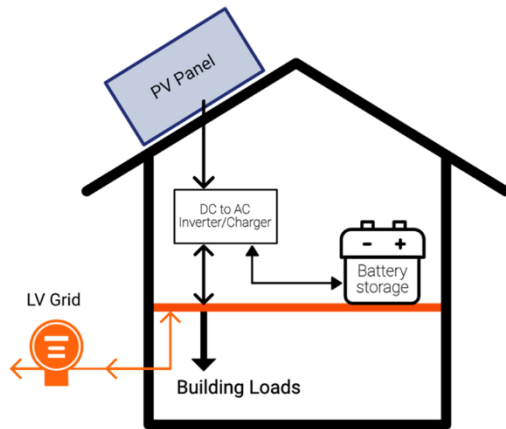


Figure 6-6 Electrical schematic with local PV and batteries © researchgate.net

Based on initial discussions with ESBN regarding the site, it was determined that in addition to approximately to 8-12 No. 10kV/400V MV/LV ESBN unit subs or building integrated substations located throughout the development lands, ESBN will likely ultimately require a new 38kV or 110kV substation

to serve the overall site needs, which will also likely back feed the existing ESBN grid in the adjoining area..

ESBN will likely require a 50m x 50m freehold site to be allocated for the 38 or 110kV substation. Based on initial discussions with ESBN, it can take 5 years for a 38kV or 110kV substation to be developed by ESBN through design, planning, procurement, testing and commissioning processes, so development would be phased accordingly. The substations will require to be located at grade and not prone to flood risk. Cabling infrastructure will be located underground.

Figure 6-7 below indicates a potential distribution of ESBN infrastructure throughout the proposed development lands.

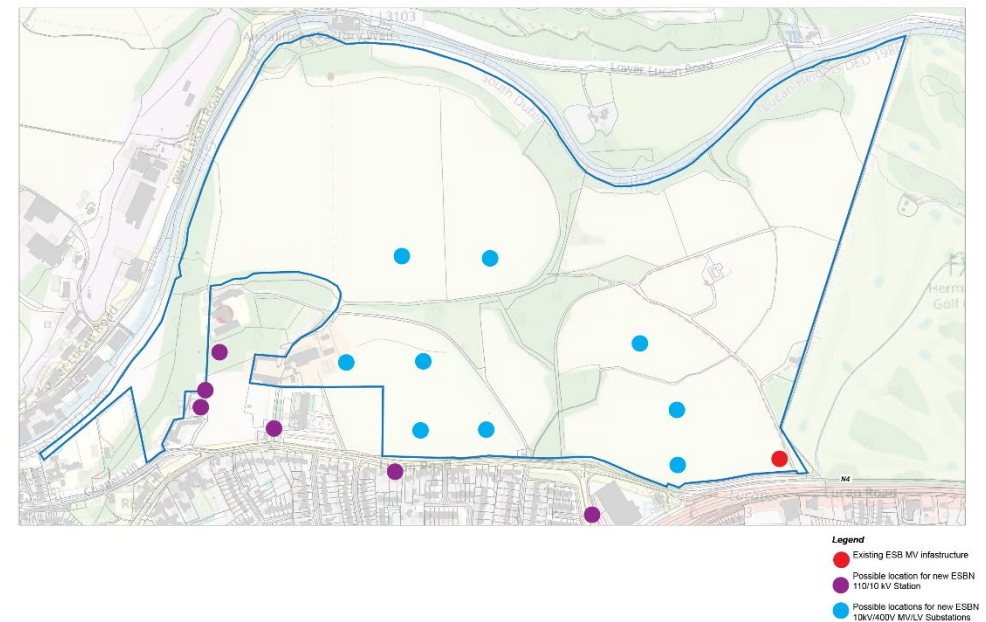


Figure 6-7 Potential location and distribution of ESBN infrastructure

6.2.2 Thermal energy

Thermal energy will be needed to heat the proposed new dwellings and buildings and to meet their domestic hot water requirements. Sustainable

options are listed below and further expanded upon in the following subsections:

- Individual heat pumps for each unit
- Centralised heat pump system per apartment building
- District heating Scheme

6.2.2.1 *Individual heat pumps*

Each unit is provided with their own individual heat pump, fed from their electrical meter (see example in Figure 6-8). The tenant or owner is responsible for the maintenance and upkeep of their heat pump unit.

Overall, the total combined installed capacity of the heat pumps is high and there is no inherent resiliency for each unit. This option is suitable for single dwellings or smaller apartment buildings.

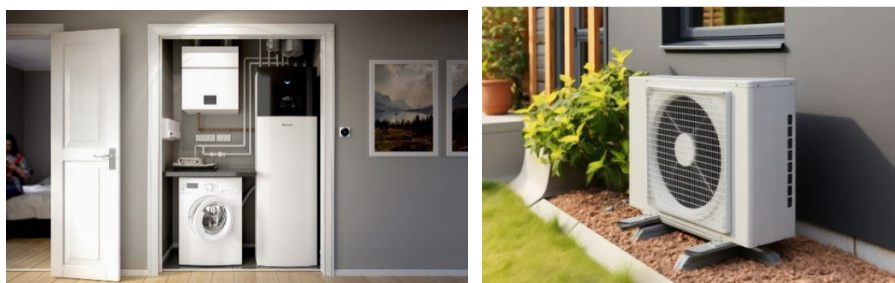


Figure 6-8 Individual heat pump unit, indoor and outdoor unit

6.2.2.2 *Centralised heat pump system*

This option provides a centralised heat pump system serving each unit in an apartment block. An example is shown in Figure 6-9. The total combined installed capacity of the centralised system is lower than a scenario where each unit is provided with their own heat pump and resiliency is improved. Space take is usually lower too. Typically, the landlord would be responsible for the operation and maintenance of the heat pumps and for the metering and billing of the heat used.

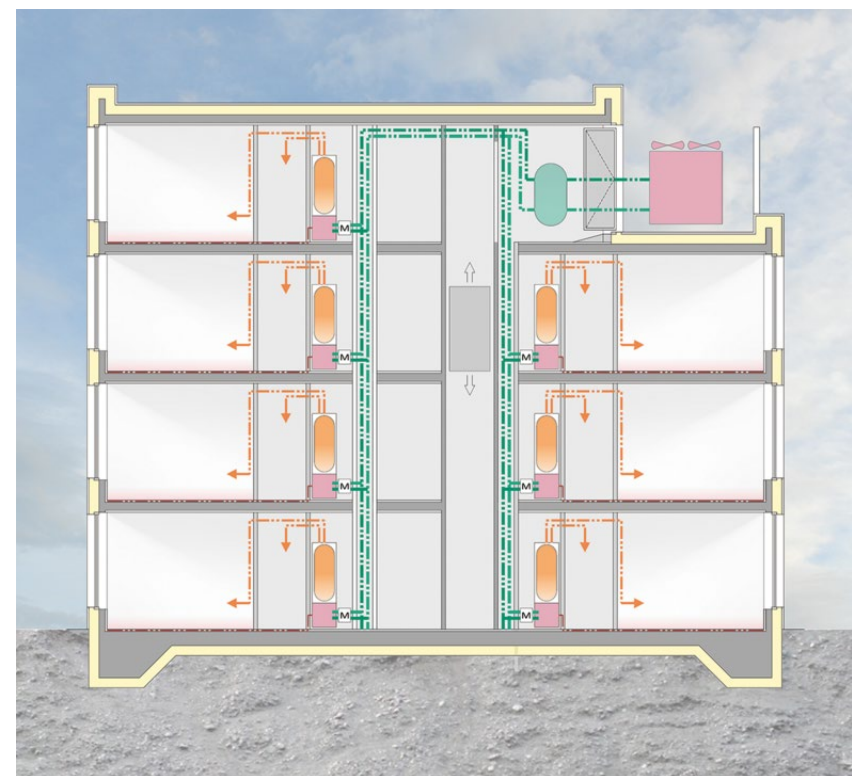


Figure 6-9 Centralised heat pump schematic for an apartment block

6.2.2.3 *District heating system*

District heating schemes in Europe are experiencing a significant resurgence as part of the continent's broader push toward energy efficiency and decarbonisation. With over 19,000 networks supplying heat to more than 77 million people, these systems are particularly prevalent in northern countries like Finland, Denmark, and Estonia, where they meet a substantial share of residential and commercial heating needs. The appeal lies in their ability to centralise heat generation—often using renewable sources, waste heat, or cogeneration—which makes them easier to decarbonise than individual heating systems. Refer to Figure 6-10 for a district heating schematic.

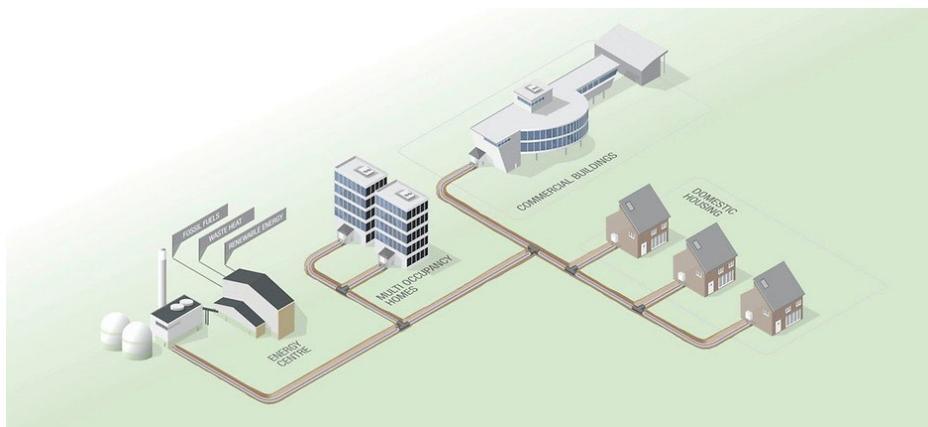


Figure 6-10 District heating system schematic © multipipe.co.uk

Recent EU policy updates, such as the Energy Performance of Buildings Directive and the anticipated Heat Pump Action Plan, are accelerating this transition by phasing out fossil fuel boilers and promoting low-carbon alternatives. Studies show district heating can be up to 30% more cost-effective than individual heat pumps, especially in urban areas where economies of scale and grid relief are critical. However, challenges remain, including high upfront investment costs and the need for coordinated funding mechanisms, which the EU is addressing through instruments like Horizon Europe and the Just Transition Mechanism.

District heating schemes in Ireland have in the past been restricted to university campuses. However, traction is gathering on the wider introduction of district heating systems that capture waste heat, that would normally be discharged to atmosphere, from Waste to Energy (W2E) plant or from data centres and distribute to customers.

A district heating system, operated under a JV arrangement with SDCC in Tallaght to take waste heat from the Amazon Data Centre to provide heat to the Technical University Dublin (TUD), Tallaght campus, SDCC Library and an apartment building. It will expand to other buildings including Tallaght Hospital in due course.

Dublin City Council hope to get their Dublin District Heating System (DDHS) operation in the next year or two, that will transport heat from the W2E plant in Poolbeg to serve buildings on the North and South Docks.

Fingal County Council are investigating opportunities to install a district heating system in Blanchardstown that will serve TUD, Blanchardstown campus, Sport Ireland campus, Connolly Hospital campus and social housing. It will take heat from at least one of the data centres located in Blanchardstown.

A similar DH system serving the St Edmundsbury site might have the potential to lower the peak electrical demand for the new development.

Potential sources of waste heat are identified in Figure 6-11 and may include:

- Meta Data, Clonee
- Intel Campus, Leixlip
- Data Centres, Grange Castle

Each of these sources of heat are a minimum of 4kms from the St Edmundsbury site, would need to be assessed for suitability and would need significant investment from the local authority and central government, and/or possibly from Data Centre operators who are looking for opportunities to demonstrate how they can positively impact local communities. The DH scheme would have the possibility to serve other buildings along the chosen route.

While district heating aligns with decarbonisation objectives, it may not be realistic for near to medium-term delivery, given the costs, infrastructure lead-in times, and dependency on third-party heat sources (e.g., data centres). For Tier 1 deliverability individual or centralised heat pump systems would be the primary solution, with district heating noted as being considered as a longer-term possible solution.

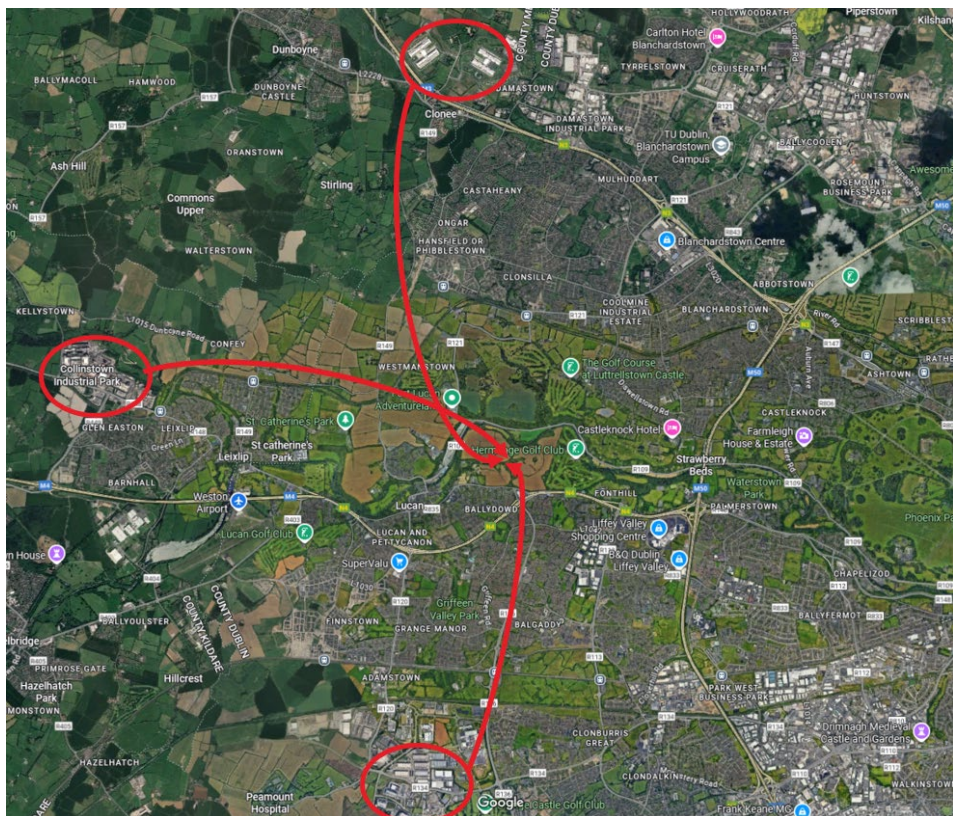


Figure 6-11 Potential sources of waste heat for a district heating scheme

Social Infrastructure Audit

Edmundsbury & Woodville, Lucan, Co. Dublin.

on behalf of O' Flynn Group

November 2025



McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

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1. Introduction

This Social Infrastructure Audit (SIA) has been prepared in response to South Dublin County Council's (SDCC) invitation for proposals for lands and sites within its administrative area that may be suitable for residential uses to contribute to meeting revised housing requirements.

A stated criteria is that the land or sites:

"Are in areas with good social infrastructure and capacity in schools and community facilities or that can provide for the development of necessary social infrastructure."

The purpose of this report is to provide supporting information in respect of the subject lands at Edmondsbury and Woodville, Lucan, Co. Dublin, demonstrating their suitability for residential use. Specifically, the report outlines the scale and phasing of potential residential development, associated population generation, and the capacity and delivery framework for social and community infrastructure.

The existing zoning is Objective HA-LV, to protect and enhance the outstanding character and amenity of the Liffey Valley.

The analysis prepared in support of this submission identifies approximately 40 hectares of developable land within an overall holding of 110 hectares, offering significant potential to meet new housing growth requirements.

These lands are well located, benefit from proximity to existing infrastructure, and can be brought forward in a phased and deliverable manner.

The delivery of these lands for residential-led development would require rezoning and the establishment of an appropriate planning framework (Masterplan or similar) to guide coordinated and sustainable implementation.

1.1 Purpose and Scope of the Social Infrastructure Assessment (SIA)

In response to South Dublin County Council's criteria for identifying lands suitable for future development namely those *"in areas with good social infrastructure and capacity in schools and community facilities, or that can provide for the development of necessary social infrastructure"* this report provides a comprehensive Social Infrastructure Assessment (SIA) in support of the proposed rezoning.

Ensuring that new residential developments have access to a range of community facilities and services is fundamental to fostering sustainable, inclusive, and well-balanced communities. The purpose of this SIA is to audit existing community and social infrastructure within the local area, identify any gaps or deficits, and make recommendations to support the sustainable delivery of new residential development.

The existing social and community facilities have been assessed under the following categories:

- Demographic Profile
- Transport
- Childcare and Education
- Sports and Recreation
- Open Space
- Community Centres and Societies
- Healthcare
- Retail
- Faith-based Facilities
- Employment

This SIA outlines the context of the subject lands, provides a high-level demographic analysis of both existing and projected populations, and assesses the availability and capacity of existing community and social infrastructure. The analysis determines whether current provision is sufficient to meet the needs arising from the proposed development and identifies where additional or enhanced facilities may be required as part of a coordinated and phased master planning framework.

1.2 Developable Areas

The analysis in this submission to SDCC has identified three 'developable' areas within the overall 110-hectare landholding, collectively comprising approximately 40 hectares:

- St. Edmundsbury Tier 1: 10.43 hectares
- Woodville Tier 1: 15.61 hectares
- St. Edmundsbury Tier 2: 14.01 hectares

Together, these areas have the potential to deliver approximately 1,727 new homes, based on an indicative unit mix of:

- 10% 1-bedroom units
- 30% 2-bedroom units
- 50% 3-bedroom units
- 10% 4-bedroom units

Population generation has been calculated using an average household size (headship) of 1 person for 1-bedroom units and 2.5 persons for 2-bedroom and larger units. Applying these assumptions, the cumulative population resulting from full development across all three areas is estimated to be approximately 4,235 people.

When considering only the Tier 1 sites (St. Edmundsbury and Woodville), the associated population would be approximately 3,200 people.

While this level of growth will place additional demand on social and community infrastructure, it is essential to note that housing delivery will be phased in line with a planning framework. Development across the identified areas would occur progressively, enabling supporting social infrastructure to be planned in tandem with each phase of residential growth.

2. Site Context

The subject lands are located contiguous with Lucan Village, occupying a strategic position on its edge where established urban fabric meets the open landscape of the River Liffey corridor. The site comprises approximately 110 hectares of predominantly open and undeveloped land, forming part of a wider natural amenity area that contributes to Lucan's valued green infrastructure network.

The lands are currently used for agriculture and informally for walking and passive recreation, benefitting from the scenic setting of the adjoining river and open space.

The location provides direct and convenient connections into Lucan Village, ensuring immediate access to local services, schools, retail, and community facilities, as well as strong public transport links.

Given its contiguous relationship with the existing settlement, excellent accessibility, and high-quality natural setting, the site represents a logical sequential and sustainable location for residential-led development.

Future development has the potential to strengthen the connection between the village and the river corridor, enhance public access to amenity lands, and integrate new green infrastructure in a manner consistent with the principles of compact growth and transport orientated development (TOD).



Figure 1: Site Location

3. Methodology

The methodology adopted in this SIA is directly informed by the policy framework of the South Dublin County Development Plan, in particular the objectives relating to compact growth, connected neighbourhoods, and the 10-minute settlement concept.

In line with the Plan's Core Strategy, the assessment places emphasis on achieving a consolidated and sustainable urban form, where new housing is integrated with existing and planned social and physical infrastructure. This approach supports the creation of walkable, accessible neighbourhoods where day-to-day services and community facilities can be reached within a 10-minute walk or cycle from the home or are readily accessible by public transport. Accordingly, this SIA:

- Evaluates the existing provision and accessibility of key social and community infrastructure within a 10-minute walk/cycle catchment of the site, reflecting the Development Plan's spatial accessibility objectives;
- Considers the capacity of existing facilities to accommodate additional population arising from the proposed development;
- Identifies any infrastructure gaps or deficits and makes recommendations for improvements or new provision in line with a compact growth strategy; and
- Aligns the assessment with the principles of sustainable movement, active travel, and climate-responsive development.

This methodology ensures that the assessment not only audits existing community infrastructure but also demonstrates how the proposed development can contribute to the creation of a connected, sustainable neighbourhood consistent with SDCC's long-term spatial vision.

The area is assessed using Central Statistics Office (CSO) data for electoral divisions (ED's). The land is in the Lucan Heights ED. There are 10 no. EDs within the Study Area (c. 10-Minute Cycle Catchment Area).

An examination of existing infrastructure within the Study Area was undertaken using information sources including:

- Census Boundaries and Statistics as per Census SAPMAPs
- Census 2022
- South Dublin Development Plan 2022 – 2028
- Department of Education (Find a School)
- An Coimisiún Pleanála
- Google Earth
- Google Maps
- Pobal Maps
- Tusla Reports
- Open Street Map
- Transport for Ireland

Any shortfall in the area regarding community and social infrastructure has been identified and should be used to inform the land uses within the proposed subject lands identified for rezoning and substantial development, where possible.

3.1 Accessibility Mapping of Social Infrastructure

In line with the principles of compact, sustainable development set out in the South Dublin County Development Plan 2022–2028, including the strategic goal of achieving a 10-minute city model, a spatial accessibility analysis was undertaken to assess the existing social and community infrastructure provision.

3.1.2 Approach & Tools

The analysis was conducted in QGIS using the OpenRouteService (ORS) Tools plugin, which leverages real-world routing data to model access via the local transport network. This approach allows for a realistic estimation of accessibility compared to simple distance buffers.

To model accessibility from the subject land, four access points were identified along the southern boundary of the site, reflecting logical pedestrian and cyclist entry routes based on the existing street and path network.

From each access point, a 10-minute isochrone was generated for both walking and cycling using the OpenRouteService (ORS) Tools plugin in QGIS. This tool calculates travel time using real-world routing data and local network conditions, producing a more accurate representation of accessibility than simple distance buffers.

The isochrones were configured using time as the defining metric (rather than distance), in alignment with the South Dublin County Development Plan's compact city objectives.

Following their creation, the individual isochrones were dissolved to form a single unified area for each travel mode representing the combined 10-minute walk and 10-minute cycle catchments from the site.

These dissolved catchments were then overlaid with mapped datasets of existing social and community infrastructure, including services such as schools, childcare, healthcare, open space, and retail, to assess the quantity and distribution of amenities accessible within a 10-minute journey from the site.

3.1.3 Policy Alignment & Validity

This methodology aligns with the core principles of the South Dublin County Development Plan 2022–2028, particularly its emphasis on the development of a compact, walkable urban form that prioritises sustainable travel modes. The plan encourages accessibility to key social and community infrastructure within a 10-minute walking or cycling distance, promoting inclusive, healthy, and connected neighbourhoods.

By selecting multiple access points along the southern boundary of the Edmundsbury lands and using real-world routing data to create time-based isochrones, the approach reflects best practice in urban accessibility analysis.

Dissolving the individual catchments into a single area for walking and cycling further reinforces the Plan's aim of delivering coherent, well-served communities. This method ensures the assessment accurately represents the extent of social infrastructure available to future residents of the site and validates the site's strategic suitability for sustainable residential development.

4. Policy Context

4.1 Project Ireland 2040: National Planning Framework First Revision – April 2025

The First Revision of the National Planning Framework (NPF), approved by both houses of the Oireachtas on April 8, 2025, serves as Ireland's long-term strategy for strategic planning and sustainable development up to 2040. As part of Project Ireland 2040, provides a comprehensive framework for the social, economic, and cultural development of urban and rural areas. Social infrastructure—encompassing housing, education, health, community facilities, public transport, and heritage conservation—is a cornerstone of the NPF, ensuring that communities are vibrant, inclusive, and well-served as Ireland's population is projected to grow to 6.1–6.3 million by 2040.

Education and skills development are highlighted as essential for supporting economic and population growth. The NPF underscores the need for accessible educational facilities to ensure communities can thrive.

Health and well-being are prioritised through the development of healthcare infrastructure. The NPF supports the expansion of healthcare services to meet the needs of populations, ensuring access to hospitals, clinics, and other facilities.

Community facilities and heritage conservation are also integral to the NPF's vision. The framework promotes initiatives such as walking and cycling routes, public realm improvements, and heritage access to enhance quality of life.

4.2 Regional Spatial Economic Strategy 2019 - 2031 (EMRA RSES)

The Regional Spatial & Economic Strategy (Eastern & Midland Regional Assembly) (RSES) came into effect in July 2019. This document aims to bring together spatial planning and economic policy. The EMRA RSES includes reference to social infrastructure within the following Regional Policy Objectives and statements:

Chapter 9 (Quality of Life) emphasises the impact of the environment on quality of life. It includes the physical, natural and social environment and community.

Section 9.4 (Healthy Placemaking) emphasises the improvement of both physical and social infrastructure, create healthy and attractive places to live, work, visit and invest in.

Section 9.6 (Access to Childcare, Education and Health Services) states, *"successful places also support a wide range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. These include facilities in relation to health, education, libraries, childcare, community centres, play, youth, recreation, sports, cultural facilities, policing, places of worship, burial grounds and emergency facilities."* and highlights that *"social infrastructure should be easily accessible by walking, cycling and public transport. Shared use and co-location of facilities should be encouraged, in order to align service provision, use land more efficiently and facilitate opportunities for further inclusion and community participation."*

RPO 9.13 – Local authorities and relevant agencies shall ensure that new social infrastructure developments are accessible and inclusive for a range of users by adopting a universal design approach and provide for an age friendly society in which people of all ages can live full, active, valued and healthy lives.

RPO 9.14. - Local authorities shall seek to support the planned provision of easily accessible social, community, cultural and recreational facilities and ensure that all communities have access to a range of facilities that meet the needs of the communities they serve.



Figure 2 Healthy Placemaking Strategy (RSES)

4.3 South Dublin County Development Plan 2022 – 2028

Section 9.9 'Tourism and Leisure' of the County Development Plan refers to a Specific Local Objective in relation to the subject site, this SLO relates to the Greenways, Trails and Loops.

EDE20 SLO 1: *To work in collaboration with the owners of lands at St. Edmundsbury, Lucan to seek to provide appropriate public access to these lands in the Liffey Valley.*

Specific Local Objectives surrounding the subject site include 'NCBH7 SLO 1' north of the site and 'NCBH7 SLO 2' along the southern boundary of the site. Both objectives relate to the context of 'Natural, Cultural and Built Heritage' as defined in the CDP.

NCBH7 SLO 1: *To investigate the potential of collaborating with Fingal County Council for the re-use of Shackleton's Mill as a tourism destination given its location in proximity to Lucan Village.*

NCBH7 SLO 2: *To work in collaboration with the owners of St Patrick's Hospital lands at St Edmundsbury, Lucan in the preparation of a Masterplan to examine the potential for the future provision of mental health services and accommodation on the existing hospital campus lands. The Masterplan will have full regard to the setting and integrity of the Protected Structures on the lands, the highly sensitive environmental characteristics of the site in relation to the Liffey Valley and Green Infrastructure principles and the need to provide appropriate public access including an area of accessible public realm within the lands and connectivity to adjacent lands to further the overall objective of developing a Liffey Valley public park.*

5. Demographic Profile

An analysis of the ten Electoral Divisions (EDs) intersecting the 10-minute cycle catchment shows a population increase of 11% between 2016 and 2022, rising from 104,703 to 116,170 persons. This rate of growth is above the national average (7.6%) and broadly in line with trends in South Dublin (10%).

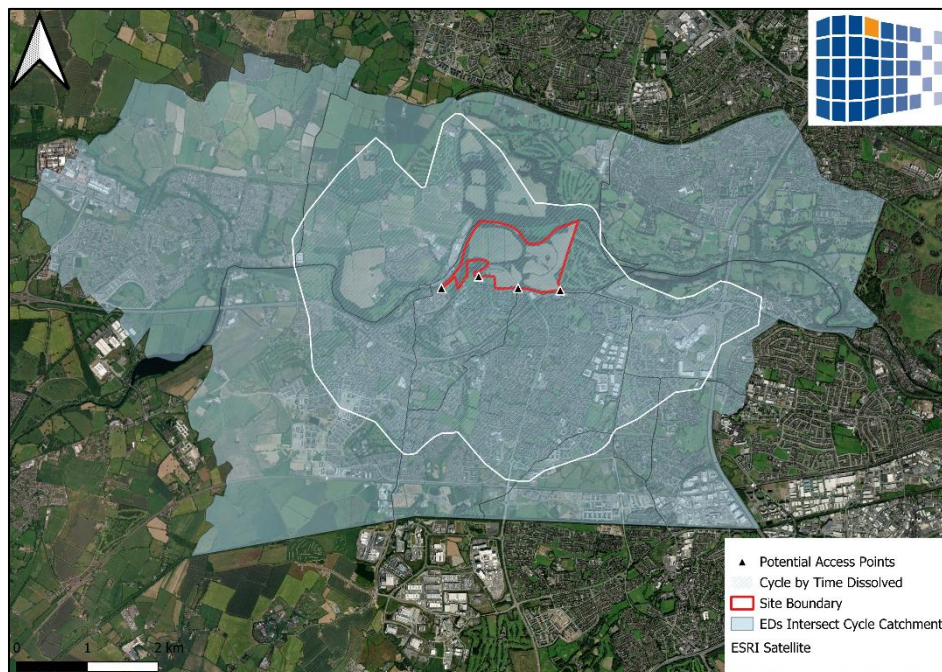


Figure 3: Electoral Divisions within 10-Minute Cycle Catchment Area of the Subject Lands

The age structure of the catchment reflects a predominantly young to middle-aged population, with the largest cohorts in 2022 being ages 35–44 (16.5%), ages 5–14 (17.1%), and ages 45–54 (14.3%). The proportion of children (0–14 years) accounts for 21.8% of the total population, slightly higher than the South Dublin average (21.3%) and national level (19.7%), highlighting strong family representation within the area.

The working-age population (15–64 years) makes up 67.6% of the catchment, slightly above both South Dublin County (65.5%) and national averages (65.3%). Notably, there has been growth in the young adult cohorts, particularly ages 20–24 (+30%) and 15–19 (+17%), which may reflect the maturing of existing families and in-migration of younger households.

The older population (65+ years) has also seen significant growth, increasing by over 30% since 2016, with the most notable rises in ages 70–74 (+63.7%) and 75–79 (+73.3%). Despite this growth, older people still represent a relatively modest 10.7% of the catchment population, below the national share (15.1%), suggesting the area remains demographically younger than the State overall.

Population pyramids for 2016 and 2022 confirm these trends, the catchment retains a broad base of younger age groups, but with a visible expansion in

older age cohorts, reflecting the dual dynamic of family growth and ageing in place.

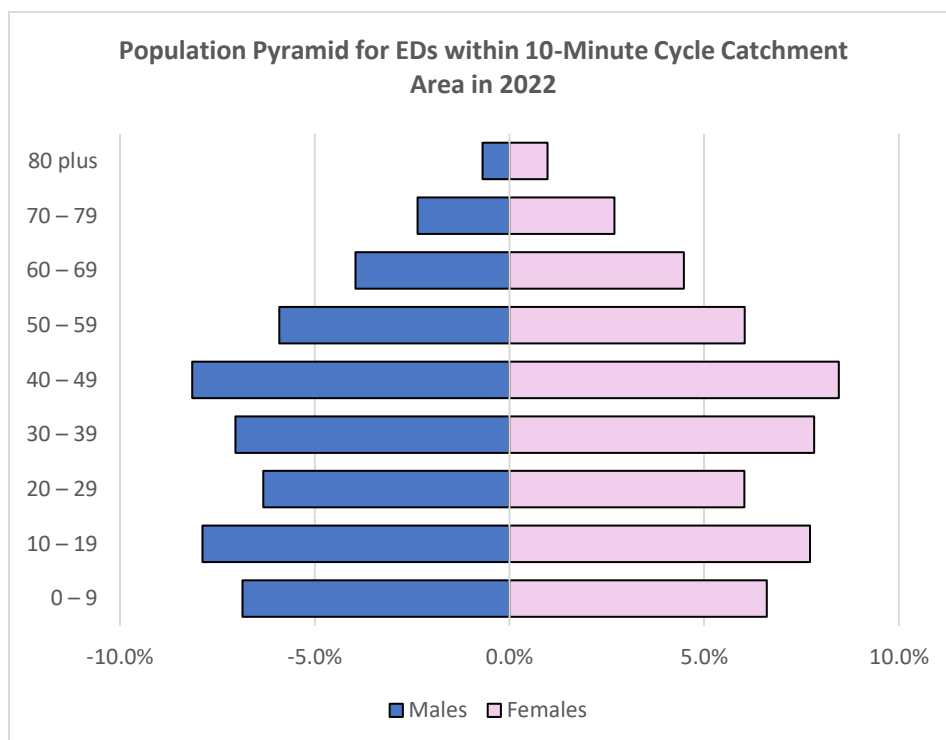


Figure 4: 10-Minute Cycle Catchment Area Population by Age and Sex in 2022
(Source: CSO, 2022)

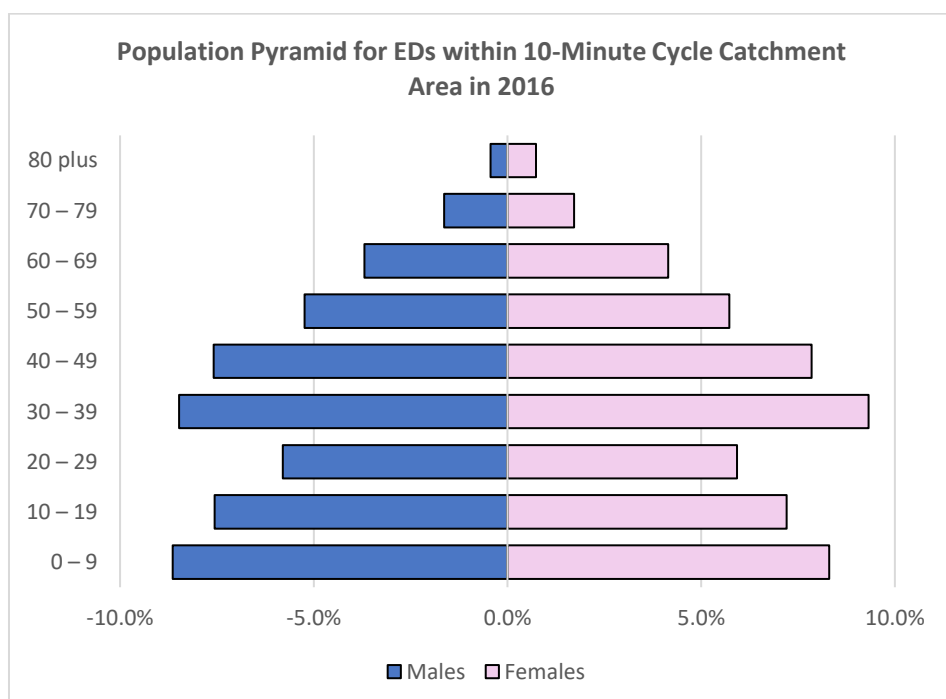


Figure 5: 10-Minute Cycle Catchment Area Population by Age and Sex in 2016
(Source: CSO, 2016)

Table 1: Population aged 0 - 19 by sex and year of age, persons aged 20 years and over by sex and age group (10 no. ED's within 10-Minute Cycling Catchment)

Population	Study Area	-	-	-	South Dublin	Ireland
Persons	2016 (#)	2022 (#)	Change	2022 (%)	2022 (%)	2022 (%)
Age 0 - 4	8,504	7,075	-16.8%	6.1%	6.2%	5.7%
Age 5 - 9	9,241	8,569	-7.3%	7.4%	7.2%	6.7%
Age 10 - 14	8,179	9,596	17.3%	8.3%	7.9%	7.3%
Age 15 - 19	7,287	8,529	17.0%	7.3%	6.8%	6.6%
Age 20 - 24	5,775	7,510	30.0%	6.5%	6.2%	6.0%
Age 25 - 29	6,501	6,839	5.2%	5.9%	5.9%	5.7%
Age 30 - 34	8,763	7,706	-12.1%	6.6%	6.7%	6.5%
Age 35 - 39	9,871	9,557	-3.2%	8.2%	8.1%	7.4%
Age 40 - 44	8,800	10,310	17.2%	8.9%	8.7%	8.0%
Age 45 - 49	7,359	8,978	22.0%	7.7%	7.2%	7.3%
Age 50 - 54	6,155	7,611	23.7%	6.6%	6.1%	6.6%
Age 55 - 59	5,323	6,275	17.9%	5.4%	5.2%	6.0%
Age 60 - 64	4,506	5,237	16.2%	4.5%	4.8%	5.3%
Age 65 - 69	3,706	4,565	23.2%	3.9%	4.3%	4.6%
Age 70 - 74	2,199	3,600	63.7%	3.1%	3.8%	3.9%
Age 75 - 79	1,309	2,269	73.3%	2.0%	2.5%	3.0%
Age 80 - 84	696	1,127	61.9%	1.0%	1.5%	1.9%
Age 85 and over	529	817	54.4%	0.7%	1.1%	1.6%
Total	104,703	116,170	11.0%	100.0%	100.0%	100.0%

5.1 Implications for Social Infrastructure & Recommendations

The age structure of the catchment indicates a predominantly young to middle-aged population, with a strong representation of children (0–14 years) and working-age adults (15–64 years). This demographic profile suggests the following implications for social infrastructure provision:

1. **Education and Childcare:** With children accounting for 21.8% of the population, slightly above county and national averages, there is a clear need to ensure sufficient school capacity and early years/childcare provision to accommodate both existing demand and additional households from future development.
2. **Youth and Recreational Facilities:** Growth in the 15–24 age cohorts highlight the importance of accessible youth and recreational amenities, including sports facilities, open space, and informal play areas, to serve maturing families and young adults.

3. **Healthcare and Older Adult Services:** While older residents (65+) remain a smaller proportion of the population (10.7%), recent growth in older cohorts indicates an emerging need for healthcare provision, community support services, and age-friendly facilities to meet the needs of an ageing population over the lifetime of the development.
4. **Community and Social Facilities:** The broad base of younger age groups, combined with the dual dynamic of family growth and ageing in place, underscores the importance of flexible, multi-use community facilities that can accommodate diverse population needs.

Overall, the demographic profile of the 10-minute cycle catchment highlights a family-oriented, growing community, with above-average shares of children and younger adults, alongside a steadily increasing older population.

This creates demand for a balanced mix of services and infrastructure, including schools, childcare, healthcare, recreation, and age-friendly facilities, to meet the evolving needs of both younger families and an ageing population.

6. Transport and Movement

6.1 Public Transport

The land is well served by public transport infrastructure, benefitting from recently upgraded bus connections through Bus Connects as well as proximity to the national road network.

The area is directly connected to Dublin City and the wider metropolitan area by high-frequency bus routes C3, C4, C5, and C6, which operate along the Lucan corridor, as well as the L54 orbital route, linking residential areas to key employment and retail destinations.

These services have been significantly enhanced through the Lucan BusConnects Corridor Scheme, which introduced dedicated bus lanes, improved interchange facilities, and upgraded bus stop infrastructure to increase journey time reliability and capacity.

The nearby N4 national road corridor further strengthens connectivity, offering a direct route into Dublin City Centre and to the M50 orbital motorway.

Collectively, this transport network ensures that the subject lands are highly accessible, with strong sustainable transport options to support existing and future populations.



Figure 6: Bus Stops/Public Transport within the Surrounding Area

6.2 Active Travel and Green Infrastructure Opportunities

The findings of the Lucan House and Demesne Public Consultation (2025) strongly reinforce the community's desire for safe, accessible, and connected green spaces, with a particular emphasis on walking, cycling, and informal recreation.

Stakeholders consistently highlighted the importance of linking sites to surrounding parks, and creating continuous green corridors that enhance accessibility, mobility, and overall wellbeing.

This proposal presents a significant opportunity to respond to these community priorities. The subject lands border the River Liffey, with existing informal walkways largely in situ, which can be enhanced to provide direct, safe, and attractive connections into Lucan Village and onward to Lucan House. By improving these routes, the development can:

- Deliver active travel infrastructure that aligns with community expectations and the Development Plan's emphasis on sustainable movement;
- Integrate open space and amenity areas within the development in a way that supports recreation, mental wellbeing, and family use; and,
- Contribute to a connected network of green corridors, reinforcing Lucan's identity as a settlement where walking and cycling are safe, convenient, and enjoyable.

The development of this land would enhance and formalise riverine and greenway connections, ensuring that pedestrian and cycling routes are inclusive, accessible, and continuous, thereby supporting both sustainable movement and the creation of a highly connected, amenity-rich neighbourhood.

7. Community and Social Audit

7.1 Childcare

A review of childcare facilities within a 10-minute walking distance of the subject site indicates that there are four existing facilities catering to a range of age groups from 2 to 12 years. Collectively, these facilities provide a maximum capacity of 190 childcare places.

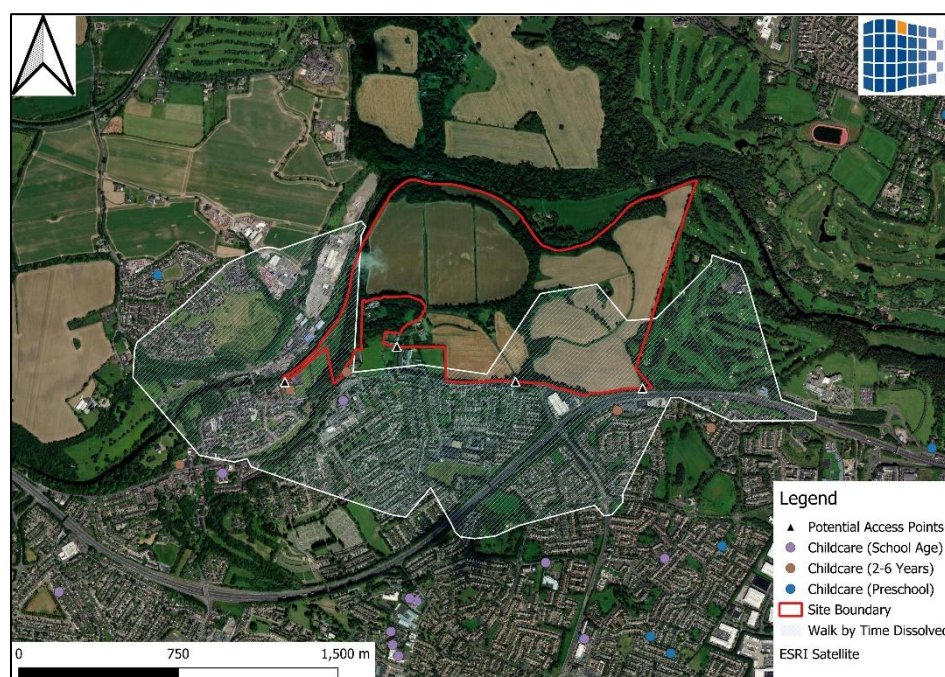


Figure 7: Childcare Facilities within a 10-Minute Walking Distance of the Subject Site

This distribution demonstrates that there is a reasonable mix of early years preschool capacity (sessional and part-time) as well as after-school provision for older children. The largest share of places is provided through sessional services, which may limit flexibility for working parents who require full-day care.

Table 2: List of Childcare Facilities and Service Provision within a 10-Minute Walking Distance of the Subject Site

Facility	Age Range	Location	Max Capacity	Service
Little Folk Preschool	2-6 years	Hermitage Gardens	18	Sessional
The Village Montessori	2-6 years	Chapel Hill	88	Sessional
Nexus ASD Preschool	3-6 years	Chapel Hill	24	Part-time
Sherpa Kids	4-12 years	Old Lucan Main Road	60	Standalone
Max Capacity within a 10 Minute Walking Distance			190	-

There are a further 2 no. 2-6 Years childcare facilities, 20 no. school age facilities and 18 no. preschool facilities within a 10-minute cycling distance of the subject lands.

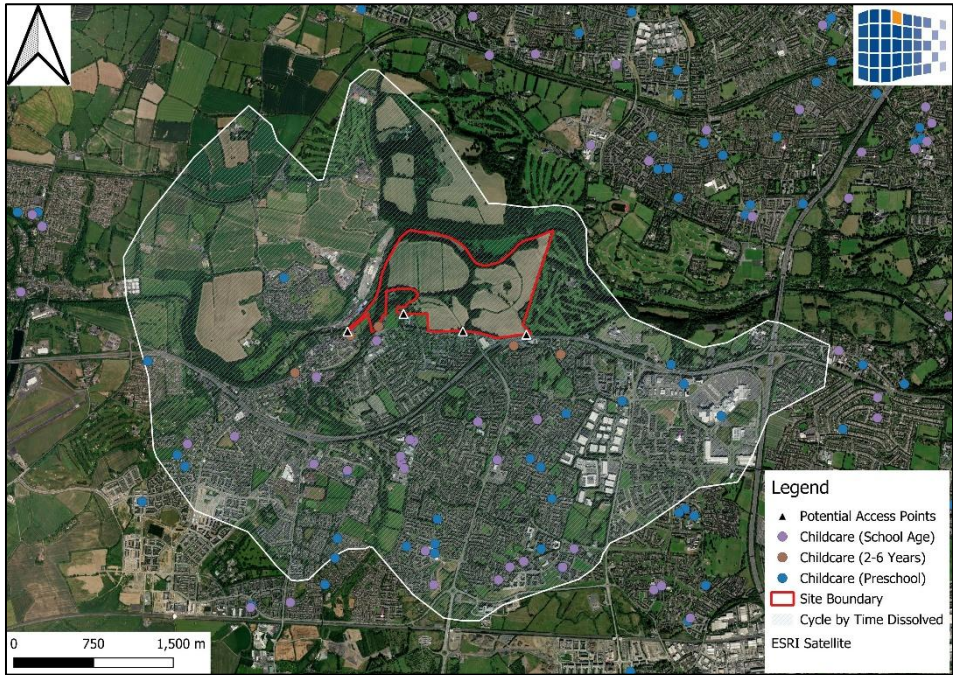


Figure 8: Childcare Facilities within a 10-Minute Cycling Distance of the Subject Site

7.1.4 Capacity based on Pobal Data

In 2023/24, there were 179 childcare services operating across South Dublin, supporting approximately 10,085 enrolments.

Across all age groups, South Dublin reported 651 vacant places, with a near-even split between early learning and care (ELC, 217 vacant places) and school-age childcare (SAC, 434 vacant places). However, these vacancies are unevenly distributed across age categories and service types.

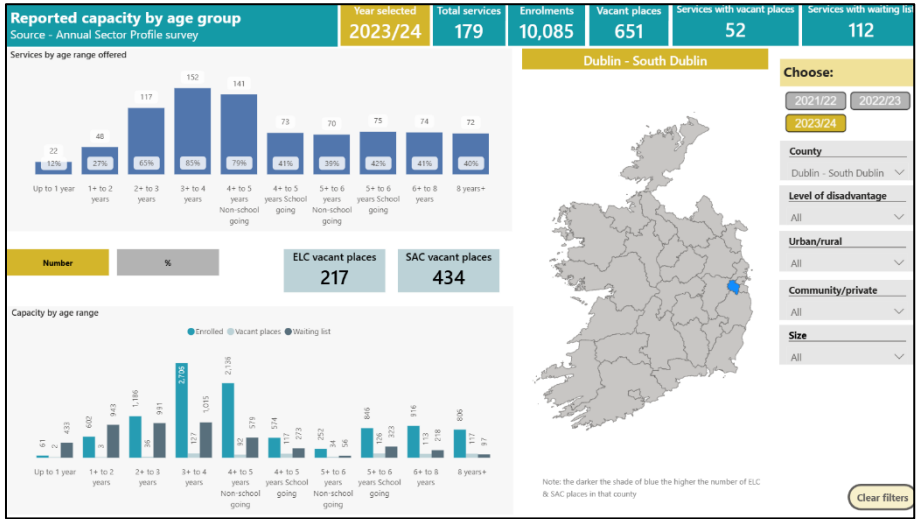


Figure 9: Pobal Report 2023/24 Childcare Capacity by Age Group

By age group, the greatest availability exists in the 3-4 year and 4-5 year non-school going brackets, which together account for a large proportion of the

reported vacancies. This reflects a pattern where preschool-aged children are more likely to access services due to the ECCE scheme, ensuring higher coverage and capacity. In contrast, provision for infants under 1 year remains very limited, with very few places and correspondingly few vacancies, highlighting the ongoing challenge of sourcing care for this youngest age group.

By service type, sessional morning services account for the majority of vacancies, with 139 services (78%) offering this model, reflecting its alignment with the ECCE programme. Conversely, part-time care and sessional p.m. care services have fewer reported places and higher levels of demand, leading to smaller pools of vacancies. Full day care and after-school care services show moderate vacancy levels, but these are offset by strong waiting lists, suggesting high demand and limited flexibility in matching families to available spaces.

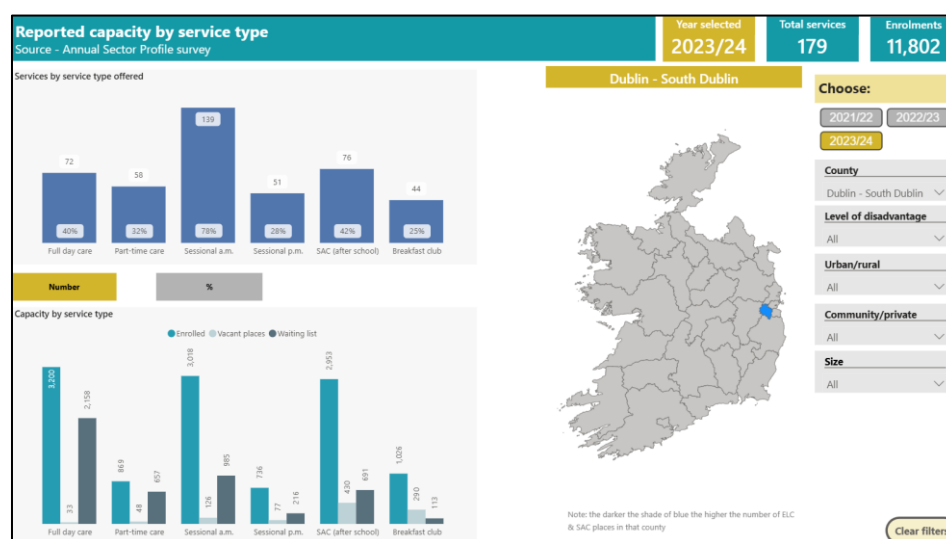


Figure 10: Pobal Report 2023/24 Childcare Capacity by Service Type

When compared to the previous year, South Dublin recorded a net gain of 928 enrolments (+8%). However, services with vacant places declined by 13%, while services with waiting lists increased by 7%. This signals tightening capacity, where growth in enrolments is absorbing available space more quickly than supply is expanding.

Table 3: Change in Childcare Capacity in South Dublin 2022/23 to 2023/24

County	Enrolments	Services with Vacant Places	Services with Waiting Lists
Dublin – South Dublin	+928	-13%	+7%

Overall, while South Dublin has a relatively large childcare sector, the imbalance between vacant and oversubscribed services indicates persistent mismatches between supply and demand. Infant care remains particularly undersupplied, while preschool-age capacity, largely supported through sessional schemes, offers more flexibility. The rising proportion of services with waiting lists underlines the need for targeted investment in both full day

care provision and infant/toddler places, to ensure the system can meet the needs of working families.

In developing the planning framework for the subject site, provision for childcare should be considered as an integral component, ensuring that sufficient capacity for infants and preschool-aged children is delivered in a manner that is accessible, phased in line with residential growth, and integrated with wider community infrastructure. This will help support family households and contribute to the creation of a sustainable, inclusive, and well-served neighbourhood.

7.2 Primary Schools, Post-Primary Schools & Additional Needs Schools

An assessment of primary, post-primary, and additional needs schools within the study area indicates that there is strong educational provision in close proximity to the subject lands.

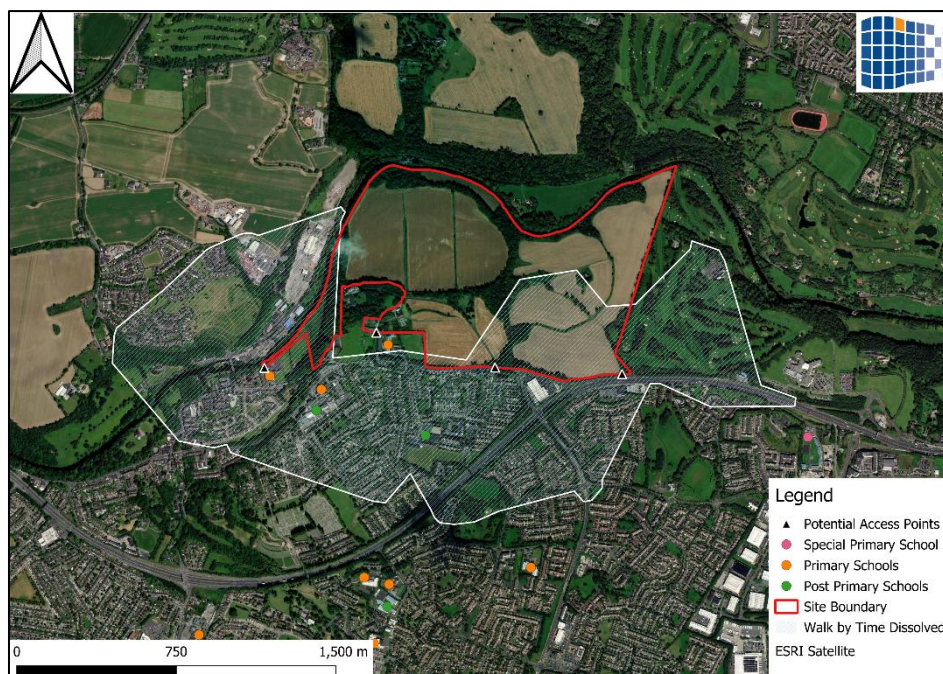


Figure 11: Primary, Post Primary & Special Schools within a 10-Minute Walking Distance of the Subject Lands

Within a 10-minute walking distance, there are three primary schools (St Andrew's NS, Scoil Mhuire, and Lucan Boys NS) and two post-primary schools (St Joseph's College and Coláiste Phádraig CBS).

Collectively, these schools have demonstrated increasing enrolments year-on-year, with growth ranging from +18 to +26 pupils in the last school year. This reflects a continued demand for school places in the local area, particularly at primary level where all three schools recorded steady increases in enrolment. Notably, a site (Folio DN202638F) immediately adjacent St. Andrews NS is undeveloped and owned by the Department of Education.

Table 4: Primary, Post Primary & Special Schools within a 10-Minute Walking Distance of the Subject Lands

School	Roll Number	Location	Enrolment 2024/25		2023/24	Change
			Boys	Girls		
Primary Schools						
St Andrew National School	12014D	K78NX88	210	177	363	+24
			387			
Scoil Mhuire	13447Q	K78DK18	-	576	550	+26
Lucan Boys National School	00714P	K78YD27	515	-	491	+24
Post Primary Schools						
St. Josephs College	60263V	K78VW74	-	937	911	+26
			937			
Coláiste Phádraig CBS	60264A	K78E927	704	-	686	+18
			704			

Within the 10-minute cycle distance catchment, the number of available schools expands significantly to include a wider range of primary, post-primary, and special schools. This includes well-established schools such as Lucan Community College, Kishoge Community College, St Kevins Community College, Gaelscoil Naomh Pádraig, and Divine Mercy schools, among others. Within this broader network, capacity pressures are more balanced, with some schools showing increases in enrolments (e.g. Lucan Community College +37, St Kevins +54, St Thomas Junior NS +45), while others have declining or stable enrolments, suggesting that additional capacity exists across the wider area.

Table 5: Primary, Post Primary & Special Schools within the remainder (excluding schools within a walking distance of 10 mins) 10-Minute Cycling Distance of the Subject Lands

School	Roll Number	Location	Enrolment 2024/25		2023/24	Change
			Boys	Girls		
Special Primary Schools						
Ballydowd High Support Special School	20390E	D20EW44	4	2	6	0
			6			
Stewarts School	19032R	K78K8W7	99	43	136	+6
			142			
Primary Schools						
St. Marys National School	19817H	K78KP94	272	223	496	-1
			495			
	19542R	K78PF57	300	268	523	+45

St Thomas Junior National			568			
Esker Educate Together NS	20274C	K78N239	206	185	402	-11
			391			
Gaelscoil Naomh Padraig	19940G	K78RK40	206	172	389	-11
			378			
Gaelscoil Eiscir Riada	20223I	K78YX77	180	201	392	-11
			381			
Lucan Educate Together NS	20066S	K78C922	201	183	400	-16
			384			
Griffeen Valley Educate Together	20166W	K78YA07	240	240	503	-23
			480			
Lucan East ETNS	20303G	K78FA37	208	219	422	+5
			427			
Lucan Community NS	20426W	K78TF76	194	189	386	-3
			383			
Divine Mercy Senior NS	20187H	K78A393	161	145	343	-37
			306			
Divine Mercy Junior NS	19865S	K78FW98	97	116	225	-12
			213			
St Bernadette Junior NS	19743E	D22CD39	95	77	162	+10
			172			
St Bernadette Senior NS	19785U	D22PW58	95	104	201	-2
			199			
Post Primary Schools						
Lucan Community College	70080T	K78TF67	517	449	929	+37
			966			
Coláiste Cois Life	76065H	K78Y330	285	335	635	-15
			620			
Kishoge Community College	76152C	K78DC89	500	425	905	+20
			925			
St Kevins Community College	70042L	D22K314	269	219	434	+54
			488			
The Kings Hospital	60272W	D20V256	328	375	720	-17
			703			

This analysis indicates that within the catchment analysed there is capacity to absorb additional demand arising from new residential development.

7.2.5 Future Demographic Trends in School Age Population

In July 2024, the CSO released population projections based on the 2022 Census, outlining three scenarios: high, moderate, and low net migration. While fertility and mortality assumptions remain constant, total population is expected to grow under all scenarios, with the high migration scenario pushing Ireland's population beyond 7 million by 2057.

However, certain age groups, notably primary (ages 5-12) and post-primary (ages 13-18) school cohorts, are projected to decline.

- In 2022, there were 569,700 children aged 5-12. This number is expected to drop by up to 99,000 by 2032, mainly due to the decline in birth rates since 2010. The decline rate varies by migration scenario—highest under low migration and lowest under high migration.
- For post-primary students (ages 13-18), the 2022 population was 421,500. This group is projected to surpass 2022 levels by 2032, peaking in 2027 before declining across all migration scenarios. Even under moderate migration, there will be nearly 20% fewer post-primary students by 2057—a drop of between 44,000 and 121,600 children.

Primary and post-primary populations will decline long-term under every scenario. The moderate migration scenario is the most balanced but still predicts decreases by 2057. The post-primary cohort will exceed 2022 numbers until 2032, potentially straining school facilities in the short term, with peak pressure around 2027, before falling below 2022 levels by 2037.

The Forward Planning Unit of the Department of Education recommends that the estimated student population be determined using the following percentages:

- Primary School: 12%
- Post primary school: 8.5%

7.2.6 Department of Education Large Scale projects

Significant planned investment by the Department of Education under the Large-Scale Capital Programme provides assurance that additional capacity is being delivered to meet growing demand.

The Divine Mercy Junior and Senior National Schools are at Stage 2b (Detailed Design) of the Department of Education's delivery process, with planning secured for a major redevelopment that includes the demolition of an older classroom block, construction of substantial two-storey extensions providing 15 new classrooms for the junior national school and 8 new classrooms for the senior school. Temporary prefabricated accommodation will be provided during works to maintain capacity. This represents one of the largest recent primary school investments in Dublin Mid-West, significantly expanding and

modernising facilities to meet the needs of Lucan's growing school-age population.

At post-primary level, Lucan Community College is at Stage 2b (Detailed Design) under the Department of Education's Capital Programme, with planning permission (SD22A/0078) secured for a 5,620 sq.m extension incorporating a Special Education Needs Unit, PE hall, specialist teaching rooms and general classrooms. The project will also deliver the removal of all prefabricated buildings, provision of 92 car parking spaces and 200 sheltered bicycle spaces, and a comprehensive reconfiguration of outdoor facilities, including six ball courts for school and community use and a secure SEN play area, alongside new pedestrian and cycle connections linking the school to adjoining parklands and playing fields.

Together, these projects represent a strategic expansion of both primary and post-primary provision in Lucan. They directly address the current enrolment pressures evident within the walking catchment of the subject lands, while ensuring sufficient capacity exists in the medium to long term. The delivery of these projects will also enhance the quality and flexibility of education facilities, including specialist ASD provision, sports facilities, and improved pedestrian/cyclist permeability.

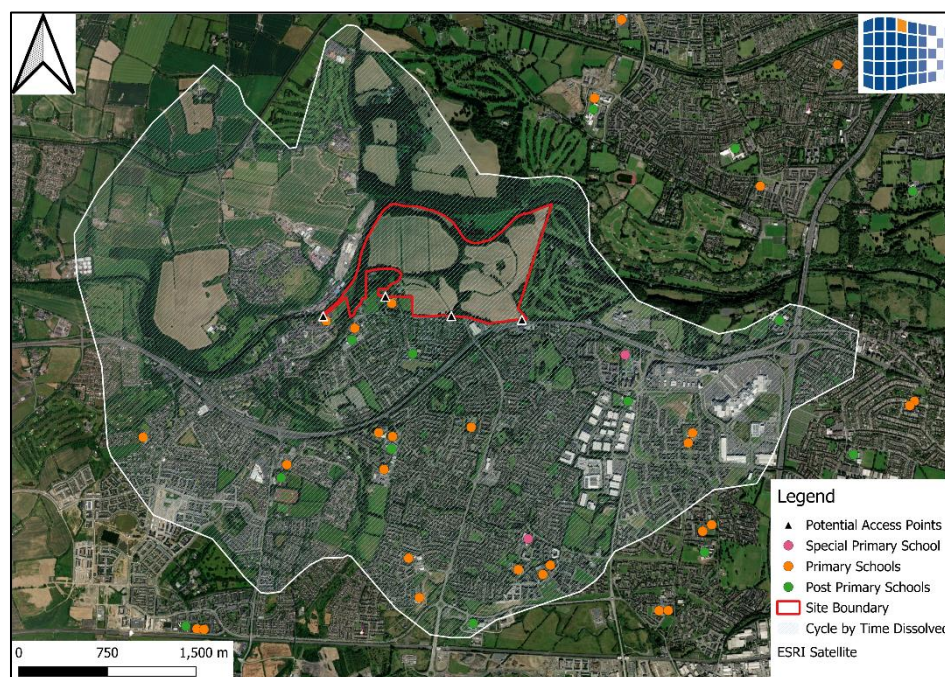


Figure 12: Primary, Post Primary & Special Schools within a 10-Minute Cycling Distance of the Subject Lands

7.2.7 Schools Conclusion

The Tier 1 land, with an anticipated population of 3,200, is expected to generate approximately 384 primary school-aged children and 272 post-primary school-aged children, based on DOE forward planning assumptions (12% primary, 8.5% post-primary).

Analysis of schools within a 10-minute catchment shows that local primary and post-primary schools have available capacity or manageable enrolment trends, providing flexibility to accommodate additional pupils. Post-primary

enrolments are projected to peak around 2027, meaning the development aligns with future demographic trends, helping offset long-term declines in school-aged populations. Special and diverse education provision within the catchment ensures all pupils can be accommodated locally. Overall, the development supports local school sustainability, strengthens community infrastructure, and integrates with existing education capacity, offering clear strategic benefits for the area.

7.3 Sports and Recreation

The subject lands are well served by a broad range of sports and recreational facilities, with playing pitches, clubs, and amenity spaces located within both a 10-minute walking and cycling catchment. These facilities include established playing fields, GAA and soccer grounds, and wider recreational amenities. Safe zones for kayaking, sports, and nature walks



Figure 13: Sports & Recreation within a 10-Minute Walking Distance of the Subject Lands



Figure 14: Sports and Recreation within a 10-Minute Cycling Distance of the Subject Lands

There are no defined capacity standards for sports. We have reviewed the most recent public consultation for Lucan House, which provides a valuable insight into local priorities for recreation, wellbeing, and community facilities. The consultation demonstrates strong community support for the provision of diverse recreational opportunities, including both active sports and leisure-based activities. In particular, there is a clear demand for sports facilities, including tennis, football, basketball courts, indoor sport courts for badminton and cricket, and wheelchair-accessible astro pitches. Water-based recreation, with suggestions for canoeing, kayaking, river paddling, and safe swimming areas, highlighting the value of the river as a recreational resource are identified.

By enabling residential development alongside the creation of a structured public park, the site could deliver these amenities to meet local demand.

7.4 Open Space

South Dublin County Council (SDCC) applies a layered and sustainability-driven policy structure to open space. Its overarching goal is to establish a connected, accessible open space network contributing to health, climate resilience, and sustainable development. The Parks and Open Space Strategy and TeenSpace Programme guide local priorities. SDCC adheres to an open space standard of 2.4 hectares per 1,000 population, ensuring space is multifunctional, inclusive, and environmentally sustainable. A notable mechanism for implementation is the use of a Green Space Factor (GSF), a policy tool used to assess the quality and quantity of green infrastructure in new residential developments. The GSF assigns weighted values to various green elements such as trees, permeable surfaces, green roofs, and public lawns, and calculates whether a proposed development achieves a minimum threshold (South Dublin County Council, 2022). This ensures developments

integrate functional green components that contribute meaningfully to stormwater management, biodiversity, and public amenity. The GSF also supports the council's climate action targets and reinforces links between green infrastructure and liveability. Crucially, SDCC ties open space provision to the National Physical Activity Plan to reduce sedentary lifestyles and improve mental well-being through engagement with nature.¹

Table 6: Council Open Space Zoning Provision Statistics

Council	Total Land Cover (ha)	Open Space Zoning (ha)	%Open Space Provision
South Dublin	22,300	1,965	8.81%

7.4.8 Green Space per Capita and Density

The open space per 1,000 residents was calculated using the “Summarise Within” tool in ArcGIS Pro to obtain open space hectares within each ED. A new field was then created dividing this by population and multiplying by 1,000. The resulting field represented green space availability per 1,000 people, aligning with planning standards employed by Dublin local authorities, specifically SDCC as per their adopted Development Plan.

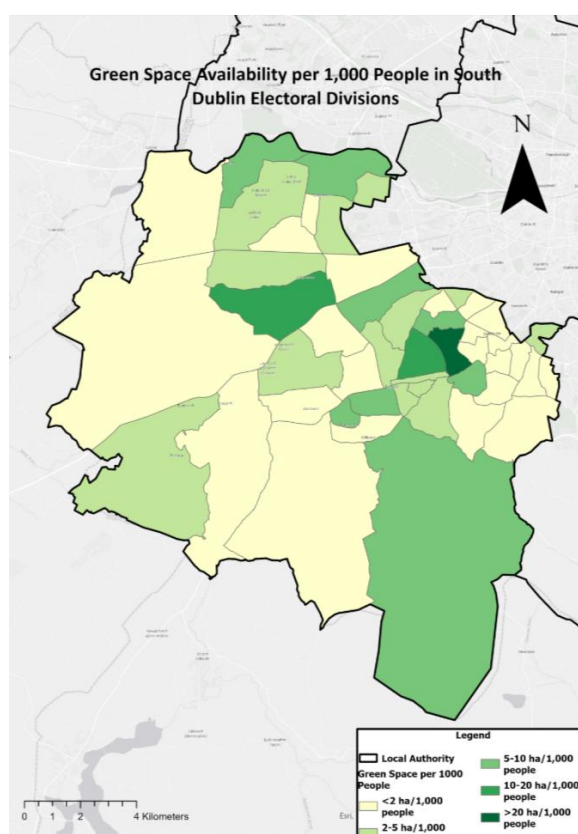


Figure 15: Green Space Availability per 1,000 People in Dublin Electoral Divisions

¹ South Dublin County Council (2022). South Dublin County Development Plan 2022–2028.

South Dublin accommodates a significant quantum of zoned green and open space, representing almost 9% of its total land cover. This confirms that while high-quality open space remains an essential consideration in the design of future development, the rezoning of the subject lands can be accommodated without creating deficits, given the strong baseline of provision in South Dublin.

7.4.9 Open Space at Edmundsbury & Woodville

Under this proposal, the SAAO portion (61 hectares) of the land would become accessible to the public. A new Liffey Valley Park would provide formal public access to a significant amenity that is currently in private ownership and only accessible on an informal basis. By securing this land as a structured public park, the proposal would deliver a substantial community benefit, transforming the site into a safe, inclusive, and multifunctional recreational resource.

The park could accommodate a wide range of passive and active activities. It is clear from the public consultation for Lucan House that there is a strong desire locally to maximise green and blue spaces. Water based recreation emerged as a key issue including facilities for canoeing and kayaking, fishing and educational water activities. As regards connection and access, the community are seeking walking and cycle paths along the river. Riverbank restoration, wildlife habitats, birdwatching were raised as matters the public would like to see addressed.

There is a strong desire for diverse, multi-use green spaces that combine recreation, education, and community interaction. The desired infrastructure includes access for all paths and trails, playgrounds, outdoor gyms, sensory gardens, picnic areas, spaces for communal gardening.

Importantly, the site's strategic location allows it to link seamlessly to the wider network of green spaces and cycle paths, enhancing connectivity across the area and providing opportunities for integrated active travel. Formalising access in this way represents a major gain for the local community, ensuring long-term protection and enjoyment of a key natural and recreational resource that would otherwise remain privately controlled.

7.5 Community and Cultural Facilities

The subject lands are well supported by a broad network of community and cultural facilities within both walking and cycling distance, contributing to the social and civic fabric of the area.

Community services include the Lucan Garda Station, Lucan Library, and several post offices (Lucan, Dodsboro, Ballyowen), alongside a range of community and leisure centres such as Quarryvale Community and Leisure Centre, Lynch's Park Community Centre, and the Cannon Despard Centre.

Social and wellbeing supports, including Pieta House and the Lucan Youth Centre, further strengthen local provision.

Cultural assets in the area include historic sites such as Esker Church (ruin) and Luttrellstown Castle, recreational heritage at Lucan Demesne, and dedicated cultural venues such as the Vue Cinema Dublin.

In addition, there are a number of public art pieces and installations (e.g. *The Flight of the Wild Geese*, *The Butterfly Effect*, *Strawberry Yields Forever*) which enrich the area's cultural identity.

Taken together, this combination of community infrastructure and cultural landmarks provides a strong base of services and amenities that meet day-to-day needs while also contributing to the identity, heritage, and vibrancy of the wider Lucan area.

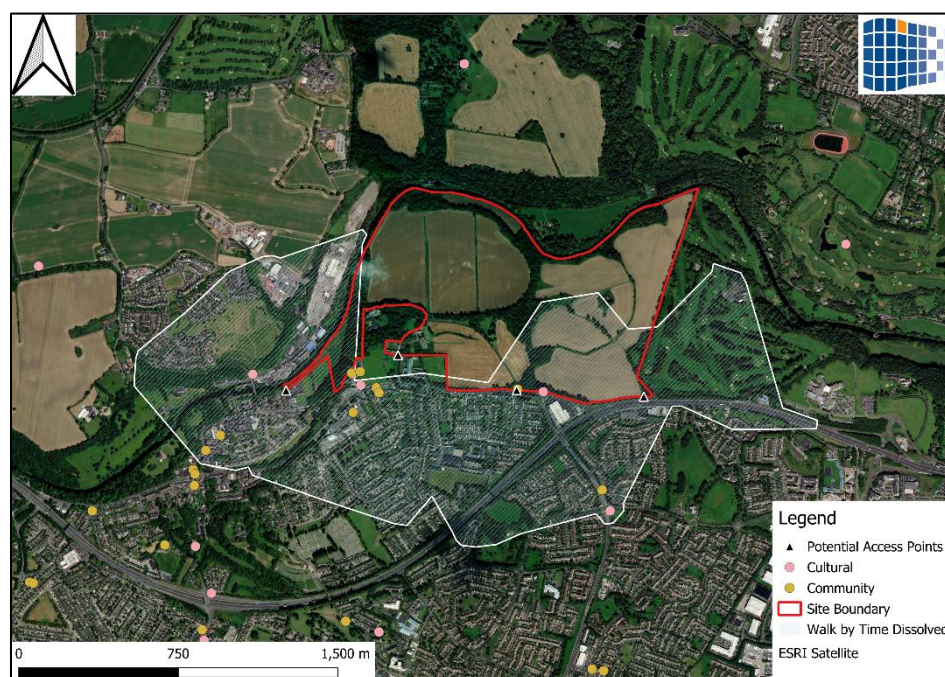


Figure 16: Community and Cultural Facilities within a 10-Minute Walking Distance of the Subject Lands

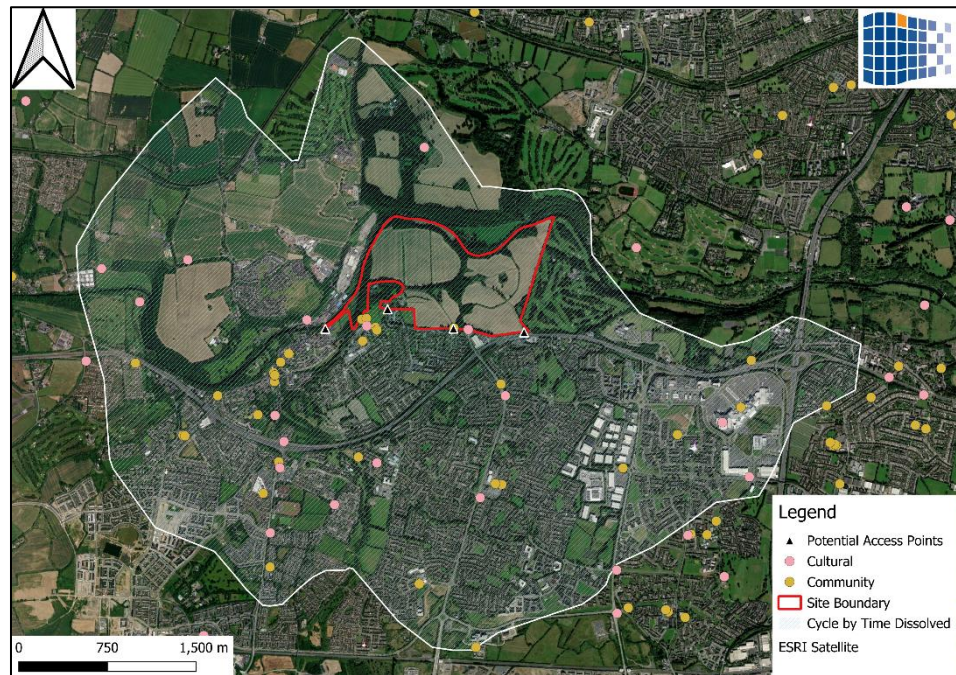


Figure 17: Community and Cultural Facilities within a 10-Minute Cycling Distance of the Subject Lands

This proposal could further build on the existing assets by actively integrating the historic buildings, transforming them into multifunctional spaces that would complement Lucan House offering. By combining historic preservation with active community use, the proposal not only safeguards the heritage but also strengthens social cohesion, supports local economy, and enhances the overall quality of life in the area.

7.6 Faith Based Facilities

The subject lands are supported by a diverse range of faith-based facilities within the wider Lucan area, accessible by both walking and cycling. These include several established Christian churches such as St Patrick's Church, Saint Andrew's Church, Saint Mary's Church, and the Church of Divine Mercy, alongside the Lucan Presbyterian Church and a Methodist Church, reflecting the mix of denominational provision in the locality.

In addition, the area accommodates more diverse faith expressions such as the Chinese Gospel Church of Dublin, contributing to cultural and religious inclusivity.

Other significant sites include New Esker Cemetery and St Catherine's Well, which provide burial, commemoration, and heritage-related functions.

Collectively, this network of churches, cemeteries, and cultural-religious sites demonstrates a strong level of provision for spiritual, cultural, and community needs, ensuring that the faith-based requirements of both the existing and future population are well supported within the catchment of the subject lands.



Figure 18: Faith Based Facilities within a 10-Minute Walking Distance of the Subject Lands

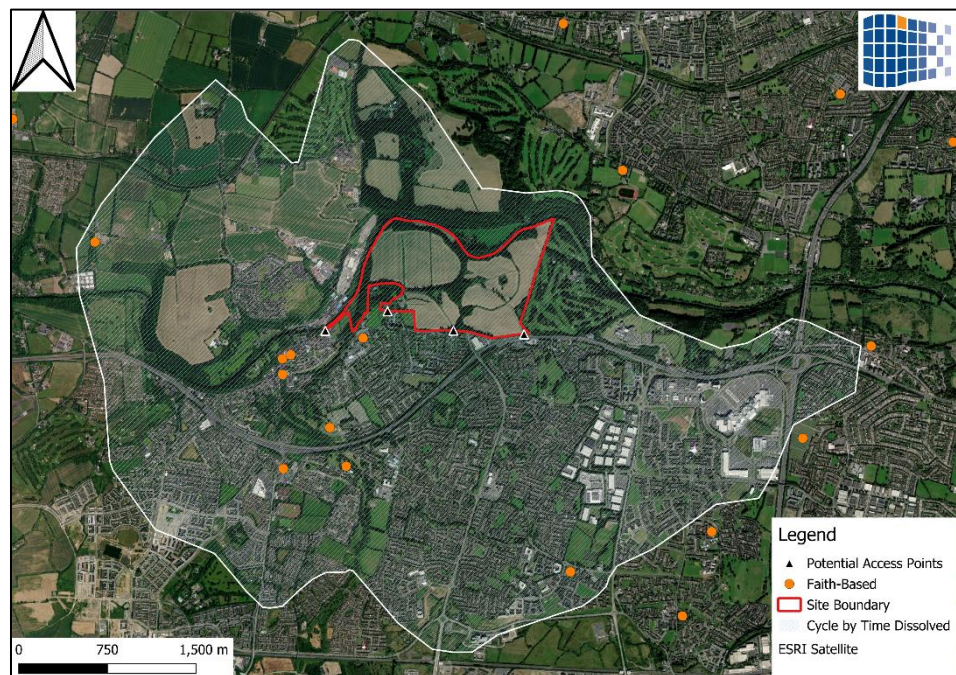


Figure 19: Faith Based Facilities within a 10-Minute Cycling Distance of the Subject Lands

7.7 Healthcare Facilities

The subject lands are well served by a comprehensive range of healthcare facilities within a 10-minute cycling distance, ensuring strong provision for both primary and specialist care needs. The area contains numerous pharmacies (e.g. Boots, Life Pharmacy, Liffey Valley Pharmacy, McCabes, Lloyds) alongside a wide choice of medical centres and GP practices, including Hermitage Medical Clinic, Chapel Hill Medical Centre, Finnstown Medical Centre, Ballyowen Lane Medical Centric Health, and Glenfield Family Practice.

In addition, there are specialist clinics such as St. Patricks Hospital, the Central Dental Clinic Lucan and The Lucan Clinics, along with wellness and private practices including Agarwal Wellness and Medical Centre.

Provision for elderly care is available in Lucan Lodge Nursing Home, Marymount Care Centre, and Griffeen Valley Nursing Home.

Collectively, this network provides access to everyday healthcare, emergency response, long-term care, and specialist services, supporting the needs of the existing community.

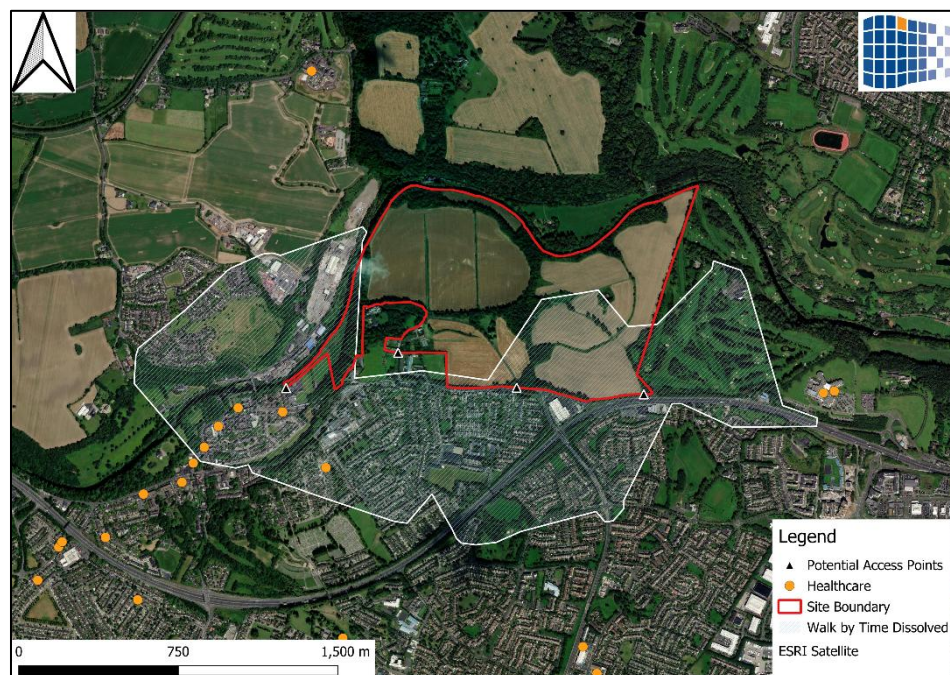


Figure 20: Healthcare Facilities within a 10-Minute Walking Distance of the Subject Lands

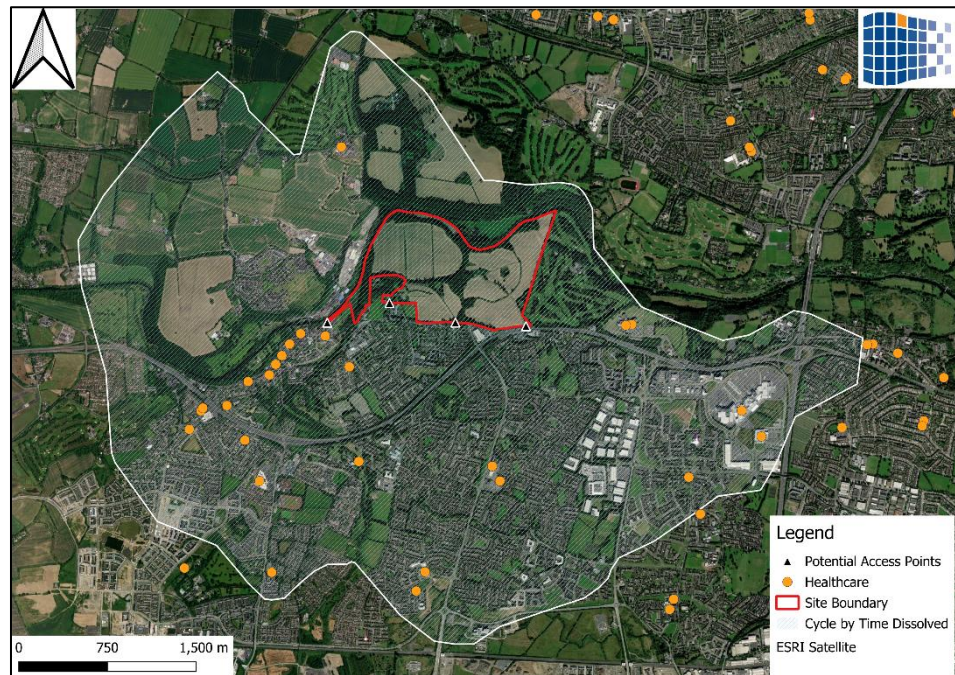


Figure 21: Healthcare Facilities within a 10-Minute Cycling Distance of the Subject Lands

Developing a public park adjacent to St. Patrick's hospital will provide significant therapeutic and social benefits. Access to green spaces has been widely shown to reduce stress, promote relaxation, and improve overall mental well-being. For patients, the park offers opportunities for safe outdoor recreation, gentle exercise, and restorative interaction with nature, all of which support recovery and complement clinical care.

7.8 Retail

The subject lands are well served by a comprehensive range of retail and convenience facilities within both walking and cycling distance, ensuring strong access to everyday shopping and higher-order retail.

At the local level, there are numerous convenience stores and supermarkets including Tesco, Lidl, ALDI, SuperValu, Centra, and Spar, alongside smaller independent shops and service outlets that provide for daily needs.

A variety of food and beverage outlets such as Costa, Starbucks, McDonald's, Burger King, Nando's, Eddie Rocket's, and a mix of restaurants, cafés, and takeaways (including Roma Takeaway, Gourmet Burger Kitchen, and Camile Thai) add to the diversity of choice.

For larger-scale retail, the area benefits from proximity to Liffey Valley Shopping Centre and Retail Park, as well as Fonthill Retail Park, which provide a wide range of fashion, homeware, technology, and leisure outlets including Marks & Spencer, Dunnes Stores, TK Maxx, H&M, Specsavers, Vision Express, and Superdrug, alongside recreational and dining options such as Five Guys, Freshly Chopped, and Krispy Kreme. In addition, there are banks, pharmacies, and personal services (e.g. Permanent TSB, Bank of Ireland, AIB,

Specsavers, Peter Mark, Boston Barber Bars) integrated into the retail network, reinforcing the role of the area as a well-rounded retail destination.

Overall, this combination of local convenience outlets and major shopping destinations ensures that the retail provision in the area is well provided to meet the day-to-day and higher-order needs of both existing and future populations, reducing reliance on longer trips and supporting the sustainability of the subject lands.



Figure 22: Retail Facilities within a 10-Minute Walking Distance of the Subject Lands



Figure 23: Retail Facilities within a 10-Minute Cycling Distance of the Subject Lands

Development of the Woodville Tier 1 site has the potential to positively enhance the nearby Lucan Retail Park. A well-planned, high-quality residential development at Woodville could help strengthen the local catchment, supporting the vitality and viability of existing retail and service uses.

8. Conclusion

Edmundsbury and Woodville lands, located adjacent to Lucan Village, present a logical and sequential opportunity for sustainable residential development. The site's proximity to existing amenities, services, and transport networks provides strong capacity for integration with the established urban fabric.

A comprehensive, masterplanned approach will ensure the coordinated delivery of residential uses, a new public park, childcare facility, and associated community infrastructure within the site boundary. This framework will enhance local amenity, complement the plans for Lucan House, and reinforce the area's social and environmental value.

Drawing on the extensive technical and contextual information already gathered, this Social Infrastructure Audit demonstrates that a "10-minute neighbourhood" concept is achievable.

The development of this land will therefore contribute meaningfully to the creation of a connected, balanced, and high-quality living environment for Lucan and the wider area.

Amdt No.	Site	Landowner Details (Land Direct)	Status	Area (ha)	Proposed Zoning	Net Developable %	Net Developable Area (HA)	CSG Settlement Category	Settlement Name	CSG Area Type	Estimated Density (dph)	Projected Residential Yield (Housing Capacity)
1	Ballynakelly, Newcastle	2	Retained	19.60	RES-N	42%	8.2	Metropolitan Towns and Villages	Newcastle	Suburban / Urban Extension	42.5	350
2	Adamstown SD2 West	1	Retained	24.51	RES-N	65%	15.9	Dublin City and Suburbs	Lucan, Adamstown, Palmerstown	City - Urban Neighborhoods	150	2390
3	Finnstown Castle	3	Removed	17.94	RES/OS	60%	10.7	Dublin City and Suburbs	Lucan, Adamstown, Palmerstown	City - Suburban / Urban Extension	95	1017
4	Tubber Lane North	4	Retained	8.15	RES-N	65%	5.3	Dublin City and Suburbs	Lucan, Adamstown, Palmerstown	City - Suburban / Urban Extension	45	238
5	Citywest	1	Retained	20.80	RES-N	71%	14.7	Metropolitan Towns and Villages	Saggart	Suburban / Urban Extension	42.5	625
6	St Edmundsbury	2	Removed	9.67	RES-N	80%	7.7	Dublin City and Suburbs	Lucan, Adamstown, Palmerstown	City - Suburban / Urban Extension	60.0	464
7	Edmondstown Road	Not Available	Retained	13.23	RES	80%	10.6	Dublin City and Suburbs	Templeogue, Walkinstown, Rathfarnham, Firhouse	City - Suburban / Urban Extension	60	635
8	Kiltipper Road	1	Retained	8.50	RES	46%	3.9	Dublin City and Suburbs	Tallaght	City - Suburban / Urban Extension	60	235
9	Knockmeenagh Framework Site	6	Retained	10.00	REGEN	27%	2.7	Dublin City and Suburbs	Clondalkin, Clonburris and Grange Castle	City - Urban Neighborhoods	150	404
10	Stonewall	1	Retained	4.71	RES/OS	65%	3.1	Dublin City and Suburbs	Lucan, Adamstown, Palmerstown	City - Urban Neighborhoods	45	138
11	Coldcut Road	2	Removed	3.15	RES	78%	2.5	Dublin City and Suburbs	Clondalkin, Clonburris and Grange Castle	City - Suburban / Urban Extension	95	234
12	Cherryfield Way	2	Retained	3.43	RES	80%	2.7	Dublin City and Suburbs	Templeogue, Walkinstown, Rathfarnham, Firhouse	City - Suburban / Urban Extension	60	165
13	Rathcoole	1	Retained	2.02	RES-N (Remove reserve Obj)	80%	1.6	Metropolitan Towns and Villages	Rathcoole	Suburban / Urban Extension	42.5	69
14	Foxhunter	2	Retained	1.18	RES	80%	0.9	Dublin City and Suburbs	Lucan, Adamstown, Palmerstown	City - Suburban / Urban Extension	60	57
15	Ninth Lock Road	1	Retained	0.32	RES	80%	0.3	Dublin City and Suburbs	Clondalkin, Clonburris and Grange Castle	City - Suburban / Urban Extension	95	24
16	Liffey Valley MRC	4	Retained	62.88	MRC (Add resi use)	80%	50.3	Dublin City and Suburbs	Lucan, Adamstown, Palmerstown	City - Urban Neighborhoods	150	7546
17	Adamstown South and West	6	Retained	253.68	Add Long-Term Development Area	80%		Dublin City and Suburbs	Lucan, Adamstown, Palmerstown	City - Urban Neighborhoods	150	0
18	Grange Castle	1	Retained	4.35	Add Long-Term Development Area	80%		Dublin City and Suburbs	Clondalkin, Clonburris and Grange Castle	City - Suburban / Urban Extension	60	0
19	Newlands	5	Deleted	104.71	Add Long-Term Development Area	80%		Dublin City and Suburbs	Tallaght	City - Suburban / Urban Extension	95	0
65	Cornerpark (Haughans Field), Newcastle	1	Added	7.23	RES-N	71%	5.1	Metropolitan Towns and Villages	Newcastle	Suburban / Urban Extension	42.5	217
66	Elmcastle Court Kilnamanagh	1	Added	0.08	RES	50%	0.0	Dublin City and Suburbs	Tallaght	City - Suburban / Urban Extension	60	2

Omitted

Added

Estimated Yield Methodology
Area x Net Developable Factor (80% max) x Compact Settlement Guidelines Density Range (Midpoint)
Compare Tables 10 (capacity of additional zoned lands) and 11 (Core Strategy) between the proposed Variation and the Material Amendments

Notes on Methodology and Interpretation

- The information in this appendix has been compiled from Proposed Variation No. 2, the Chief Executive's Report, the Proposed Material Alterations, information provided by South Dublin County Council, publicly available land ownership information and the density parameters contained in the Sustainable Residential Development and Compact Settlements Guidelines.
- The housing capacities are approximate and do not all derive from an identical methodology or evidential basis. Where the Planning Authority provided or published an individual site capacity, that figure has been adopted and rounded to the nearest dwelling. Where an individual figure was not available, an indicative estimate has been derived from the site area, the relevant settlement and area type, an assumed net developable area and the applicable density range, with reference to the settlement-level capacity figures contained in the Council's Tables 10 and 11. Some estimates have therefore been inferred from aggregated Council data and should not be treated as definitive site-specific capacity assessments.
- Net developable-area percentages are analytical assumptions used to reconcile gross site area, density and indicative housing capacity. They do not represent development parameters fixed by the Planning Authority and may vary materially following masterplanning, site surveys, infrastructure design, environmental assessment and the provision of roads, schools, parks, community facilities and other non-residential uses.
- The approximate capacity attributed to Liffey Valley MRC has been treated separately from a theoretical area-and-density calculation. The lands remain a mixed-use Major Retail Centre and the ultimate residential yield will depend upon the balance between existing and future retail, commercial, community and residential uses. No reliance has therefore been placed on a theoretical maximum-density calculation applied across the full land area.
- The longer-term strategic areas identified at Adamstown South and West, Grange Castle and Newlands have not been included in the immediate residential yield totals, as they are intended to be subject to further plan-led assessment and infrastructure coordination.
- Ownership information reflects the available LandDirect and other publicly accessible information reviewed for the purposes of this comparative planning exercise. It has not been independently verified through a comprehensive legal-title investigation and should therefore be regarded as indicative.
- This appendix is intended to facilitate a comparative assessment of the scale, ownership and delivery characteristics of the residential sites. It is not a substitute for detailed masterplanning, development-management assessment or a site-specific residential capacity study.