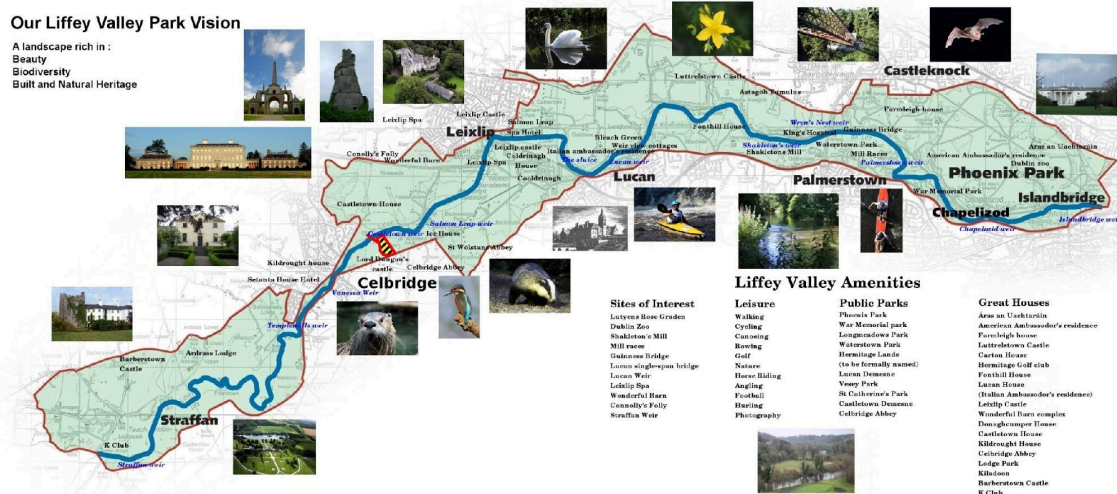


Submission on Material Alteration MA6.1 (St Edmundsbury) Proposed Variation No. 2 to the South Dublin County Development Plan 2022-2028

The Liffey Valley Corridor and lands at St Edmundsbury

Liffey Valley Park Alliance



1. Introduction

The Liffey Valley Park Alliance (LVPA) welcomes the opportunity to make this submission on Proposed Variation No. 2 to the South Dublin County Development Plan 2022-2028. This submission supports Material Alteration MA6.1, which proposes the omission of Amendment No. 6 relating to St Edmundsbury and the retention of the existing High Amenity Area designation.

For decades, the LVPA has advocated for the protection, restoration and enhancement of the River Liffey corridor as a regional greenway, heritage landscape, ecological resource and interconnected public park network. The St Edmundsbury lands form an important part of this wider landscape, contributing to biodiversity conservation, floodplain protection and landscape connectivity. Successive development proposals have highlighted the vulnerability of these lands, and the LVPA has consistently worked to safeguard their environmental, recreational and heritage value for future generations.

The long-standing public debate regarding the future of St Edmundsbury and the Liffey Valley corridor is well documented in national and local media coverage.

This submission examines the environmental, biodiversity, landscape and community wellbeing importance of the St Edmundsbury lands and the wider River Liffey corridor. Drawing on relevant planning policy, biodiversity strategies and green infrastructure frameworks, it demonstrates how retaining the High Amenity designation supports sustainable planning, ecological resilience and community wellbeing.

2. Strategic Importance of the Liffey Valley

The River Liffey Valley is one of the most significant natural and cultural landscapes in the Dublin region. The valley forms a continuous environmental corridor linking habitats, historic estates, parks and recreational spaces across several local authority areas including Kildare, South Dublin, Fingal and Dublin City.

The concept of a Liffey Valley Park was established through the Liffey Valley Park Strategy (2006), which proposed the creation of a connected network of parkland landscapes, ecological habitats and public amenities along the River Liffey corridor. The Strategy recognised the valley as a major regional environmental asset with biodiversity, heritage and recreational value.

The Strategy continues to be actively supported by the Office of Public Works, Dublin City Council, South Dublin County Council, Fingal County Council and Kildare County Council. In May 2026, the Minister of State with responsibility for the Office of Public Works reaffirmed strong support for the objectives of the Liffey Valley Park Strategy, confirmed ongoing progress in its implementation, and announced his intention to reconvene the Liffey Valley Park Stakeholders Group. The Minister noted the Strategy's role in supporting recreation, biodiversity conservation, heritage protection and healthy active lifestyles along the River Liffey corridor.

3. Biodiversity Value

The Liffey Valley contains a wide range of habitats including riparian woodland, wetlands, floodplains, species-rich grasslands and hedgerow networks. These habitats support diverse wildlife populations and provide important ecological connectivity. Species associated with the corridor include protected mammals such as otters and several bat species including Daubenton's bat and Leisler's bat. The riverbanks and surrounding habitats also support bird species such as kingfisher, dipper and grey wagtail, along with freshwater species including Atlantic salmon and European eel.

4. Pollinator and Butterfly Decline

National monitoring by the National Biodiversity Data Centre has highlighted significant declines in pollinators including wild bees and butterflies. Approximately one-third of Ireland's wild bee species are threatened with extinction. Protecting natural grasslands, meadows, hedgerows and river corridors is increasingly recognised as essential for supporting pollinator populations and maintaining ecosystem resilience. Landscapes such as the Liffey Valley therefore play an important role in supporting biodiversity.

5. Planning Policy Context

The protection of biodiversity and green infrastructure within the Liffey Valley aligns with several policy frameworks including:

- South Dublin County Development Plan 2022–2028
- South Dublin County Biodiversity Action Plan
- National Biodiversity Action Plan 2023–2030
- All-Ireland Pollinator Plan
- EU Biodiversity Strategy for 2030
- EU Nature Restoration Regulation

These policies emphasise habitat connectivity, ecosystem restoration and the integration of biodiversity considerations into planning decisions.

EU Nature Restoration Regulation (Regulation (EU) 2024/1991) seeks to restore degraded ecosystems and improve the condition, resilience and connectivity of habitats across the European Union. The Regulation places particular emphasis on restoring urban ecosystems, protecting and enhancing green infrastructure, increasing tree canopy and ensuring there is no net loss of urban green space. Protecting the River Liffey corridor and retaining the High Amenity status of the St Edmundsbury lands would be consistent with these objectives by safeguarding ecological connectivity, supporting biodiversity, strengthening climate resilience and preserving one of South Dublin's most significant green infrastructure assets.

6. Green Space, Health and Wellbeing

Access to natural environments is widely recognised as contributing positively to physical and mental health. Natural green spaces provide opportunities for recreation, walking and social interaction. South Dublin County Council participates in the Healthy Cities and Counties Network and has implemented initiatives such as the Healthy South Dublin Strategy and Active South Dublin Strategy. These strategies highlight the importance of accessible green spaces for community wellbeing.

7. Green Infrastructure and River Corridor Policy

The South Dublin County Development Plan recognises green infrastructure as a network of natural and semi-natural areas that provide ecological, environmental and social benefits. The Development Plan identifies river corridors as key components of the county's green infrastructure network. River valleys support biodiversity, recreation, landscape character, natural flood management and climate resilience.

The St Edmundsbury lands contribute to this wider network within the River Liffey corridor. Their retention as open space helps maintain habitat connectivity, preserve landscape continuity and support the long-term vision of a connected Liffey Valley Park. The retention of undeveloped lands within the river corridor also assists in maintaining natural flood storage capacity and

climate adaptation functions, contributing to the resilience of the wider landscape in the face of increasing flood risk and climate change impacts.

The SEA and AA Screening Report accompanying the proposed material alterations notes that the omission of Amendment No. 6 will result in the retention of the existing zoning for St Edmundsbury and forms part of an overall reduction in the area of lands proposed for rezoning across the county. This environmental assessment is consistent with the retention of the High Amenity designation and supports the protection of the ecological, landscape and green infrastructure functions of the River Liffey corridor.

Incremental development within river corridors can gradually fragment ecological networks. While individual developments may appear limited in scale, cumulative losses can reduce habitat connectivity and weaken the environmental functions that green infrastructure provides.

Rezoning of the lands for development would result in the loss of a significant component of the wider Liffey Valley green infrastructure network and would be contrary to the objective of maintaining ecological connectivity and landscape continuity within the river corridor.

8. Public Support and Historical Context

The protection of the Liffey Valley corridor and the lands at St Edmundsbury has been the subject of sustained public interest and policy discussion for more than two decades. Successive proposals affecting these lands have generated significant public engagement, reflecting their importance as a valued environmental, recreational and landscape resource.

The vision for a Liffey Valley Park has been consistently supported through public policy initiatives and studies, including the 2006 Liffey Valley Park Strategy and subsequent consideration by the Office of Public Works and local authorities. These initiatives recognised the River Liffey corridor as a unique regional asset with significant ecological, heritage, recreational and landscape value.

Continued institutional support for the Liffey Valley Park Strategy remains evident through the ongoing involvement of the Office of Public Works, Dublin City Council, South Dublin County Council, Fingal County Council and Kildare County Council. In a parliamentary response in May 2026, the Minister of State with responsibility for the Office of Public Works stated that the objectives of the Strategy are strongly supported by the OPW and highlighted continuing progress in its implementation. The Minister also confirmed his intention to reconvene the Liffey Valley Park Stakeholders Group, demonstrating that the vision of a connected Liffey Valley Park remains a current and active public policy objective.

Public concern regarding the future of the St Edmundsbury lands has been evident on multiple occasions. Media reports relating to the proposed disposal and future development of lands within the Liffey Valley recorded strong opposition from residents, elected representatives and community organisations. Community campaigns sought the retention of planning protections

and called for the long-term preservation of the lands as part of the wider Liffey Valley landscape.

The proposal to establish a Liffey Valley Park has also received significant public and media attention over many years. Reports concerning a potential national park designation, the development of a regional park strategy and studies undertaken by public bodies have all highlighted the exceptional environmental and amenity value of the corridor and the opportunity to protect it for future generations.

More recently, proposed rezoning of lands at St Edmundsbury generated substantial public opposition. Media reporting noted that a majority of submissions relating to the proposal objected to the rezoning of the lands, while residents, community groups and public representatives highlighted concerns regarding the loss of green infrastructure, biodiversity and landscape character. The Liffey Valley Park Alliance similarly emphasised the importance of maintaining ecological connectivity and protecting one of the remaining undeveloped sections of the River Liffey corridor.

This long-standing pattern of public engagement, combined with ongoing support from the Office of Public Works and the four local authorities participating in the Liffey Valley Park Strategy, demonstrates a continuing commitment to protect the environmental, recreational and heritage value of St Edmundsbury and to advance the wider vision of a connected Liffey Valley Park. Retaining the existing High Amenity Area designation through Material Alteration MA6.1 is therefore consistent not only with planning and environmental policy but also with a well-established public interest in the protection of these lands.

9. Conclusion

MA6.1 proposes the omission of Amendment No. 6 relating to St Edmundsbury and the retention of the existing High Amenity Area designation. The LVPA fully supports this material alteration. The retention of the existing High Amenity Area designation is consistent with the environmental, landscape and green infrastructure objectives of the South Dublin County Development Plan and should be maintained. These lands form part of one of South Dublin's most important green infrastructure assets and contribute to the ecological, landscape and recreational value of the wider River Liffey corridor.

Retaining their current designation is consistent with local, national and European policy objectives relating to biodiversity conservation, ecosystem restoration, climate resilience and public wellbeing. It also supports the long-term vision of a connected Liffey Valley Park, a strategy that continues to be actively supported by the Office of Public Works and the four local authorities through which the River Liffey flows. Retaining the High Amenity Area designation will help safeguard an increasingly important environmental resource while supporting the ongoing implementation of this shared regional vision.

This position is further supported by the continuing commitment of the Office of Public Works and the four local authorities to implementing the Liffey Valley Park Strategy and advancing its objectives for biodiversity, recreation, heritage and public amenity. The Strategy remains an active framework for biodiversity conservation, recreation, heritage protection and public amenity across the wider River Liffey corridor.

In considering Proposed Variation No. 2, the Council should recognise the strategic role of St Edmundsbury within the wider Liffey Valley landscape and retain the existing High Amenity Area designation. Doing so will preserve an important element of the county's green infrastructure network and protect its environmental, landscape and community value for future generations.

Yours sincerely,

Dr. Paul Corcoran

Chairperson, Liffey Valley Park Alliance

Appendix – National Biodiversity Data Centre Records

This appendix summarises biodiversity records obtained from the National Biodiversity Data Centre (NBDC) for grid squares O03H, O03I, O03M, O03N, O03S and O03T. The data provides an overview of species recorded within the wider landscape surrounding the site and is used to inform the ecological assessment.

A.1 Data Source and Limitations

Species records were obtained from the National Biodiversity Data Centre (www.biodiversityireland.ie). These records represent observations submitted by professional ecologists, recording schemes and members of the public. While the dataset provides a useful indication of species presence in the wider landscape, it does not represent a complete inventory of species occurring within the area. The absence of records for a particular species does not confirm that the species is absent.

A.2 Ecological Constraints Summary

The NBDC records indicate the presence of several protected and notable species groups within the surrounding landscape. All bat species in Ireland are protected under the EU Habitats Directive and the Wildlife Acts. Daubenton's Bat (*Myotis daubentonii*) is particularly associated with rivers and waterbodies and may utilise riparian corridors for commuting and foraging. Birds of conservation concern recorded in the wider area include Curlew, Lapwing, Skylark, Swift and Yellowhammer, which are Red-listed in Ireland. In addition, the Moss Carder Bee (*Bombus muscorum*), a species of conservation concern in Ireland, has been recorded in the surrounding landscape.

A.3 Bat Species Recorded

Common Name	Scientific Name	Notes
Brown Long-eared Bat	<i>Plecotus auritus</i>	Typically associated with woodland and hedgerows
Daubenton's Bat	<i>Myotis daubentonii</i>	Strongly associated with rivers and waterbodies
Leisler's Bat	<i>Nyctalus leisleri</i>	Ireland's only globally near-threatened bat
Natterer's Bat	<i>Myotis nattereri</i>	Associated with woodland and tree-lined habitats

A.4 Butterfly Species Recorded

Common Name	Scientific Name
Common Blue	<i>Polyommatus icarus</i>
Green-veined White	<i>Pieris napi</i>
Holly Blue	<i>Celastrina argiolus</i>
Orange-tip	<i>Anthocharis cardamines</i>
Painted Lady	<i>Vanessa cardui</i>
Peacock	<i>Aglais io</i>
Red Admiral	<i>Vanessa atalanta</i>
Ringlet	<i>Aphantopus hyperantus</i>
Silver-washed Fritillary	<i>Argynnis paphia</i>
Small Tortoiseshell	<i>Aglais urticae</i>
Small White	<i>Pieris rapae</i>
Speckled Wood	<i>Pararge aegeria</i>
Wall	<i>Lasiommata megera</i>

A.5 Bumblebee Species Recorded

Common Name	Scientific Name	Notes
Buff-tailed Bumblebee	<i>Bombus terrestris</i>	Common widespread species
Common Carder Bee	<i>Bombus pascuorum</i>	Grassland and meadow habitats
Early Bumblebee	<i>Bombus pratorum</i>	Early emerging species
Red-tailed Bumblebee	<i>Bombus lapidarius</i>	Common open habitat species
Small Garden Bumblebee	<i>Bombus hortorum</i>	Long-tongued species
Moss Carder Bee	<i>Bombus muscorum</i>	Species of conservation concern in Ireland

A.6 Birds of Conservation Concern

Bird species of conservation concern recorded in the wider area include Curlew (*Numenius arquata*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Swift (*Apus apus*) and Yellowhammer (*Emberiza citrinella*). These species are included on the Birds of Conservation Concern in Ireland Red List.

A.7 Relevant Legislation

Bats are strictly protected under the European Communities (Birds and Natural Habitats) Regulations 2011–2021, which transpose the EU Habitats Directive (92/43/EEC) into Irish law. Bats are also protected under the Wildlife Acts 1976–2023. Bird species are protected under the EU Birds Directive (2009/147/EC) and the Wildlife Acts.

A.8 Biodiversity Data Centre Reports Included

The following NBDC reports are included as supporting documentation:

- NBDC Species List – Grid Square O03H
- NBDC Species List – Grid Square O03I
- NBDC Species List – Grid Square O03M
- NBDC Species List – Grid Square O03N
- NBDC Species List – Grid Square O03S
- NBDC Species List – Grid Square O03T