

Observations

Remove St Edmundsbury from the residential rezoning proposals

Chapter: [MA St. Edmundsbury](#)

Topics: [MA6.1](#)

The following observations are being submitted on behalf of the Ballydowd Grove Residents' Association, Lucan - a residential estate situated directly opposite (off the R835 Lucan Road), the St. Edmundsbury lands.

We wish to strongly argue that the St. Edmundsbury lands should be removed the residential rezoning proposals.

The unique setting of the St. Edmundsbury lands and their inextricable connection to the adjacent designated Liffey Valley Special Amenity Area has been previously set out in detail and will be referred to in summary hereunder.

Observation 1: Adverse impact of rezoning on the lands covered by the Liffey Valley Special Amenity Area Order

The St. Edmundsbury lands are situated in the Liffey valley, immediately adjacent to an area which is subject to a Special Amenity Area Order (SAAO) since 1990. This Order designates the lands along the stretch of the river Liffey from Lucan Bridge to Palmerstown to be an area of special amenity, for reasons of its outstanding beauty, its special recreational value and benefits for nature conservation. SAAOs are regarded as the strongest environmental designation for protecting 'green belts' which are subjected to intense development pressure.

Given the connection of the St. Edmundsbury lands to the area covered by the Special Area Amenity Order and the role of the valley as part of the wider River Liffey Park Strategy, it is our considered submission that the St. Edmundsbury lands cannot be considered in isolation. They must be viewed as inextricably linked and in many respects the lands represent a protective shield around and a gateway to the SAAO lands.

The SDCC should be actively pursuing the objectives of;-

- continuing with the High Amenity Area zoning status,
- bringing the lands within the ambit of the existing SAAO Order and
- making efforts to bring the lands into public ownership.

Any rezoning of the lands or any part of the lands would have a devastating adverse impact on the character, ecology and amenity of the Liffey valley. No "master plan" by SDCC to regulate housing development on the St. Edmundsbury lands will mitigate the damage. from development.

In summary, the Edmundsbury lands are currently in agricultural use and form part of the greenbelt in the Liffey Valley, on the edge of the Special Area Amenity area. It is submitted that the environmental effects of residential rezoning arising from subsequent development of housing would lead to significant adverse effects on the ecological and visual integrity of the boundaries of the SAAO.

Observation 2: Landscape

It is indisputable that the Liffey Valley is a place of natural beauty and contains many scenic views and prospects, when viewed from the river Liffey to St. Edmundsbury lands and vice versa. The unique setting of the Edmundsbury lands is best illustrated by the fact that they border the River Liffey on the northern and western boundary, while the eastern boundary is the Hermitage Golf Club. The current High Amenity zoning (HA) status enjoyed by the St. Edmundsbury lands is a recognition of this unique setting with its special landscapes and character. The removal of the High Amenity zoning, allowing development, would remove a critical component and irreversibly damage the landscape value in the area.

SDCC acknowledges in its current development plan that the landscapes within the county are one of our greatest resources including *“The sweeping scenic views of the Liffey valley to the north of the County”*. The development plan also includes a commitment to *“protect, preserve and improve views and prospects of special amenity and..... and to prevent development which would impede or interfere with Views and / or Prospects”*.

There is an obligation on SDCC to protect and enhance the outstanding landscape character and amenity of the Liffey Valley and also the recreation and amenity value of the Liffey Valley Corridor, taking into account its environmental sensitivities.

We strongly argue that the St. Edmundsbury lands; -

- are an important element in defining the character of the Liffey Valley,
- are unique and special when considered against the Liffey Valley backdrop,
- act as a vital buffer and biodiversity shield around the adjacent Special Amenity Area,
- are a critical component in overall views and prospects.

We believe that it is self-evident that any residential rezoning of the St. Edmundsbury lands would have a devastating adverse impact on the existing landscape in the Liffey Valley and destroy the existing uninterrupted views.

Observation 3: Biodiversity and Ecology

The Liffey Valley is one of seven sites of special ecological interest in SDCC which are designated as proposed Natural Heritage Areas. The Environmental Impact Assessment Report (EIAR) accompanying the SDCC Development Plan (2022-2028 ref Vo. 2, 2.3.3) refers to the Liffey Valley having *“tremendous ecological*

significance in the form of a wide variety of habitats which support diverse plant and animal species". It is our submission that any residential rezoning of the St. Edmundsbury lands would have a devastating impact on those habitats.

The River Liffey in St. Edmundsbury is one of eight Flora Protection Order Sites designated within SDCC area. Loss of areas of managed grassland, trees and areas of woodland which border a protected special area beside the river Liffey will have an adverse impact on ecological connectivity.

Ireland's "Biodiversity - Climate Change Sectoral Adaptation Plan", (2019), under the heading "*improve landscape connectivity to facilitate mobility in a changing climate*", advocated designing "*corridors to enhance the resilience of protected areas and increase opportunities for dispersal across the landscape*". It is submitted that residential rezoning of the St. Edmundsbury lands would have the effect of removing the protective barrier adjacent to the area covered by the Special Area Amenity Order.

Observation 4. Zoning History - Consistent Opposition over four decades

The issue of rezoning / building on St. Edmundsbury lands has been ongoing over the past four decades. RTE archive footage from 1993 shows local politicians (<https://www.rte.ie/archives/2018/0218/941184-liffey-valley-plans/>) opposing proposed rezoning/development of the lands at that time. In summary the following points were made (in the broadcast) in opposing the rezoning; -

- any rezoning would ruin one of the country's great natural amenities,
- damage to woodland and wildlife,
- damage the potential for tourism and recreation,
- "*The owners are the custodians of the property but that does not give them the right to destroy a precious amenity like the Liffey valley*",
- development of housing is akin "*to building houses in the Phoenix Park*".

The main arguments advanced 33 years ago in opposition to rezoning St. Edmundsbury are entirely valid today and are echoed in this submission. That rezoning proposal (1993) was rejected as were several others during the intervening years.

Concluding Remarks

We strongly urge that St. Edmundsbury lands are removed from any residential rezoning proposals. It is submitted that the foregoing observations, when considered individually and collectively, contain compelling arguments.

Peter Kirwan

Secretary

5 August 2026

Ballydowd Residents Association, Lucan, County Dublin.