Chapter: MA St. Edmundsbury

Topic: MA6.1

I, [L. Kilroy] wish to express my support for the decision of the elected members of South Dublin County Council **to reject the proposed residential rezoning of the lands at St. Edmundsbury, Lucan, under Proposed Variation No. 2 to the South Dublin County Development Plan 2022–2028, and to retain their existing High Amenity (HA-LV) zoning.**

I support the need to provide sufficient land for housing in South Dublin. However, planning decisions must also reflect the increasing importance now placed on protecting landscape, biodiversity and natural heritage in national planning policy.

The Council's own figures show that the revised National Planning Framework (NPF) baseline housing requirement has already been met. The overall package of proposed rezonings provides approximately **30% more residential capacity than the Government's baseline requirement**. As a result, there is no planning necessity to remove the existing High Amenity (HA-LV) zoning from the St. Edmundsbury lands in order to comply with national housing policy.

Recent EPA guidance on **Landscape Character Assessment (LCA)** encourages planning authorities to assess landscapes not only for their visual qualities, but also for their ecological function, biodiversity, cultural heritage, Green Infrastructure and contribution to a sense of place. This reflects a broader understanding that landscapes such as the Liffey Valley are valuable because of the way these qualities interact and support one another.

Similarly, the **Planning and Development Act 2024** strengthens the role of landscape, biodiversity and natural heritage in plan-making. It requires planning authorities, through their development plans, to make provision for the conservation, protection, management and enhancement of landscape, biodiversity, ecological networks, natural heritage and areas of natural beauty. Retaining the existing High Amenity zoning on the St. Edmundsbury lands is consistent with this clear national policy direction.

Given that the Council has already identified sufficient residential capacity to exceed the Government's baseline housing requirement, I believe there is no compelling planning justification to remove the long-established High Amenity protection from these lands.

For these reasons, I respectfully request that the elected members' decision be upheld and that the existing High Amenity zoning at St. Edmundsbury be retained.

Signature: [redacted]

Address: [redacted]

Land Use Planning & Transportation

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South Dublin County Council