

Land Use Planning & Transportation

04 AUG 2023

South Dublin County Council

27th July 2026

Senior Executive Officer,
Forward Planning Section,
Planning & Transport,
South Dublin County Council,
County Hall, Tallaght,
Dublin 24.

**Re: Proposed Variation to South Dublin Development Plan 2020-2028 / MA St.
Edmundsbury, Lucan / MA6.1**

Dear Sir/Madam,

I strongly support the decision of the elected members of South Dublin County Council not to proceed with 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 I ask that this decision be maintained.

Housing Planning Need Already Met / No Planning Necessity

SDCC has a responsibility to ensure there is sufficient land available to meet Government housing targets under the revised National Planning Framework (NPF). I fully support that objective.

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.

Because of this, there is no planning necessity to remove the existing High Amenity (HA-LV) zoning from the St. Edmundsbury lands to comply with national housing policy, at this point.

These lands make a highly important contribution to the ecology, ancient landscape, biodiversity, Green Infrastructure and the visual amenity of the greater Liffey Valley. Once High Amenity zoning is removed, it is extremely difficult to restore.

Balancing Housing with Environmental Protection

I support the delivery of new homes in South Dublin, but they should be provided in the right locations, and I do not agree that St. Edmundsbury is a correct location.

The South Dublin County Development Plan identifies the Liffey Valley as an important landscape and Green Infrastructure asset. In my view, development should continue to prioritise already zoned and more appropriate land, before considering the loss of protected High Amenity land that has ecological sensitivities and complex ecosystems.

Maintaining the existing High Amenity zoning achieves an appropriate balance between meeting housing needs and protecting one of the County's most important environmental and landscape assets. It reflects the principle that sustainable development should provide for growth, while safeguarding the natural environment for current and future generations.

Protecting the Liffey Valley

The St. Edmundsbury lands form part of the wider Liffey Valley landscape and make an important contribution to rich biodiversity, visual amenity and the County's Green Infrastructure network. They help maintain the distinctive character & ecology of the valley and provide an important green setting, between existing developed areas.

Retaining these lands also avoids the cumulative loss of green space in the Lucan area and protects an important environmental asset for future generations. The gradual erosion of High Amenity land through individual rezoning decisions can have significant long-term consequences for landscape character and ecological connectivity. The Liffey Valley itself is home to ancient woodlands and ancient ecosystems dependent on them, and the greater the buffer we can give around these areas, the better.

Consistency with the County Development Plan

The current zoning objective for these lands is High Amenity (HA-LV), which exists to protect and enhance the outstanding character and amenity of the Liffey Valley. The South Dublin County Development Plan also contains clear objectives to protect landscape character, biodiversity and Green Infrastructure.

Planning decisions should be consistent with the adopted County Development Plan, unless there is a compelling planning reason to depart from it. The existing High Amenity zoning reflects long-standing planning objectives for the protection of the Liffey Valley's landscape, environmental quality and Green Infrastructure. In this case, I do not believe that a sufficiently compelling planning justification has been demonstrated to remove those protections, and the HA-LV should remain as the current zoning or be added to the SAO.

Proper Planning and Sustainable Development

South Dublin needs more homes (especially social & affordable), but it also needs to protect the environmental assets that make it an attractive and sustainable place to live. Good planning is about achieving both objectives together, rather than pursuing one at the expense of the other.

Retaining the existing zoning is, in my view, the more balanced planning outcome. It protects the landscape setting of the Liffey Valley and its associated rich and ancient ecology, safeguards biodiversity and Green Infrastructure, respects the democratic decision of the elected members, and ensures that High Amenity land is not lost where there is no demonstrated strategic need to do so.

Maintaining the High Amenity zoning is therefore consistent with the principles of proper planning and sustainable development by balancing environmental protection with the provision of sufficient land for housing in appropriate locations.

National Planning Policy Now Places Greater Weight on Landscape and Biodiversity

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.

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. Ecological buffer zones are also a necessity near these locations.

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.

Conclusion

As mentioned above, 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.

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 this reason, and the reasons outlined above, I respectfully ask that the elected members' decision be upheld and that the existing High Amenity zoning at St. Edmundsbury remain unchanged and remain in place.

Yours faithfully,


Daniel Roche-Kennedy

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