



An Taisce

The National Trust for Ireland

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Senior Executive Officer,
Delivery Section,
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South Dublin County Council,
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21st August 2026

Re: Proposed Material Alterations to Proposed Variation No. 3 to the County Development Plan 2022-2028 – MA2.33 and MA2.39.

A Chara,

An Taisce would like to make the following observation on the above consultation.

MA2.33

With regard to Material Alteration Reference: MA2.33, we would have concerns over the removal of the wording "*subject to appropriate environmental safeguards...*" which implies that environmental protections are a hindrance to industrial development. It is our view that this would set a worrying precedent of reducing the prominence of environmental oversight in land-use forward planning for development types which are likely to exhibit biodiversity and climate emissions impacts. Given the current deregulatory "*simplification*" wave evident from EU and national-level policymakers and associated weakening of environmental protections and disapplication of climate law, it is of concern to see environmental safeguard wording being removed from a local-level Development Plan. Rather than framing industrial development as being at odds with environmental safeguards, it is our view that it can occur in tandem with a form of development control which balances development with biodiversity and decarbonisation outcomes. An equal weighting between economic development, social progress and environmental protection has long been a feature of sustainable development. In this respect, we would advocate for a reversion to the original wording of Policy EMP1 Objective 6, or at least a rationale provided for the removal of environmental safeguard wording and a subsequent stated commitment to ensuring that environmental protection is not weakened and in fact is an essential underpinning of the rollout of development in the South Dublin County Council jurisdiction.

MA2.39

Concerning Material Alteration Reference: MA2.39, the wording may be strengthened by adding a reference to how the proposed urban tree cover targets and measures should implement Article 8

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Finbarr Murray, Helen Shaw, Tony Holohan

'Restoration of urban ecosystems' of the EU Nature Restoration Regulation (2024/1991), which contains the following obligations:

"1. By 31 December 2030, Member States shall ensure that there is no net loss in the total national area of urban green space and of urban tree canopy cover in urban ecosystem areas, determined in accordance with Article 14(4), compared to 2024. For the purposes of this paragraph, Member States may exclude from those total national areas the urban ecosystem areas in which the share of urban green space in the urban centres and urban clusters exceeds 45 % and the share of urban tree canopy cover exceeds 10 %.

2. From 1 January 2031, Member States shall achieve an increasing trend in the total national area of urban green space, including through the integration of urban green space into buildings and infrastructure, in urban ecosystem areas, determined in accordance with Article 14(4), measured every six years from 1 January 2031, until a satisfactory level as set in accordance with Article 14(5) is reached.

3. Member States shall achieve, in each urban ecosystem area, determined in accordance with Article 14(4), an increasing trend of urban tree canopy cover, measured every six years from 1 January 2031, until the satisfactory level identified as set in accordance with Article 14(5) is reached."

This represents an opportunity for South Dublin County Council to become a pioneer in national urban greening effort and strengthens the additional Development Plan objective by demonstrating alignment with the Nature Restoration Regulation. Development Plan objectives may not have been updated since the Regulation came into force.

Please acknowledge our submission and advise us of any further consultation periods.

Is mise le meas,

Seán O'Callaghan
Planning and Environmental Policy Officer
An Taisce – The National Trust for Ireland