



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

13th March 2026

Forward Planning Section,
Planning and Transport,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24,
D24 A3XC.

**Re: Proposed Variation No. 2 to the South Dublin County Development Plan 2022-
2028**

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 2 (proposed Variation) to the South Dublin County Development Plan 2022-2028 (County Development Plan).

As South Dublin County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546 and this submission has been prepared accordingly.

Recommendations issued by the Office further to section 58(9) of the Act relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations issued by the Office pursuant to section 546 of the Act may take the form of a request for further information or justification on a particular matter, or clarification regarding

particular provisions of a plan on issues that are considered necessary to ensure alignment with policy and legislative provisions. Planning authorities are requested by the Office to action an observation.

A submission can also include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will assess it in accordance with the statutory framework in section 63 of the Act.

Overview

The proposed Variation updates the County Development Plan with regard to the implementation of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines) and the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) including changes to:

- the core strategy;
- policy amendments;
- changes to land use zoning objectives for a number of identified lands to facilitate residential uses; and
- the identification of long-term strategic and sustainable development locations to provide for housing needs beyond the lifetime of the current County Development Plan.

The Office recognises the considerable work undertaken by the Planning Authority to implement the Housing Growth Guidelines in particular the assessment of the capacity of currently zoned land to deliver housing within the plan period informed by an infrastructure, planning and deliverability analysis as part of the Settlement Capacity Audit (SCA).

The Office notes and welcomes the amendments proposed to the core strategy table (table 11), which provide a robust and coherent framework for accommodating the county's revised housing growth requirements.

With regard to ensuring an adequate supply of residential zoned land, the Office strongly welcomes the proposal to zone additional lands for residential use, identified as amendments no.1 to no.16 of the proposed Variation, which are vital to enable the delivery of housing within the current plan period, consistent with Policy and Objective 1 and 2 of the Housing Growth Guidelines.

In addition, the Office considers that the proposed Variation supports the recently published housing plan Delivering Homes, Building Communities 2025-2030, which emphasises the need for a strong pipeline of zoned and serviced land to support the delivery of 300,000 new homes to 2030, stating:

...Government will ensure that new homes are built in the right locations, with the necessary services and community facilities in place, in keeping with our climate action goals, and the wider spatial growth of the State.

The Office highlights the importance of the Planning Authority’s continued engagement with relevant infrastructure agencies to ensure that in the short to medium term the delivery of critical infrastructure such as Dart + Southwest is progressed in coordination with housing delivery.

The Office also welcomes the identification of long-term strategic and sustainable development locations to provide for housing needs beyond the lifetime of the current County Development Plan, and highlights the need to ensure that new infrastructure identified and required is delivered in tandem with new residential development, aligning within the lead-in time for infrastructure delivery and the provisions of NPO 97 of the National Planning Framework First Revision (2025) (NPF) related to Transit-Oriented Development.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out one (1) recommendation under the following key theme:

Key theme	Recommendation	Observation
<u>Implementation of the housing growth requirements</u>	<u>Recommendation 1</u>	-

1. Implementation of the housing growth requirements

The Office recognises and fully supports the identification of additional new residential zoned lands, through amendments no.1 to no.16 of the proposed Variation, in meeting the requirements of the Housing Growth Guidelines, based on the evidence set out in the proposed Variation and the accompanying SCA.

As such, the Office considers that the proposed Variation should continue to be progressed and adopted by the Planning Authority to ensure the objectives of the Housing Growth Guidelines are incorporated within the County Development Plan, in accordance with Policy and Objective 3 of the Housing Growth Guidelines.

Recommendation 1 - Implementation of the Housing Growth Requirements

Having regard to the need for development plans to be updated to reflect the new requirements of the National Planning Framework First Revision (2025) (NPF) in respect of housing, and in particular to:

- NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development; and
- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy and Objective 3 to incorporate the objectives of the Housing Growth Guidelines within development plans,

the Planning Authority is recommended to continue to progress the zoning of additional residential zoned lands, identified as amendments no. 1 to no.16 of the proposed Variation.

Summary

The Office requests that your authority addresses the recommendations and observations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 58(11) of the Act must summarise these recommendations and how the Chief Executive proposes they should be dealt with.

Where the Planning Authority makes a variation, it is required to notify the Office **within one week** of the decision to adopt the Variation. Where your authority decides not to comply with the recommendations of the Office, then it shall inform the Office as soon as practicable and provide reasons for the decision not to so comply.

Your authority is also required to send the Office a copy of the Variation and any submissions made by the Minister, the relevant regional assembly and the National Transport Authority during the Variation preparation process.

Please be advised that planning authorities are also required to publish notice of the Variation within a week of the adoption, stating that a copy of the County Development Plan as varied will be available for inspection on a website and at a place specified in the notice no later than five weeks after the date of adoption.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

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Niall Cussen

Planning Regulator

Designated Public Official under the Regulation of Lobbying Act 2015
