



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

5th August 2026

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

**Re: Proposed Material Alterations to 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 Material Alterations (material alterations) to the proposed Variation No. 2 (proposed Variation) to the South Dublin County Development Plan 2022-2028 (Development Plan).

As South Dublin County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has evaluation and assessment pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546, and this submission sets out the outcome.

In this context, the submission includes recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

Following adoption of the Variation, the Office will carry out a further assessment under section 63 of the Act.

1. Response to the Office's submission on the proposed Variation

The Office notes the Planning Authority's letter issued on 7th July 2026 outlining how the members of the Planning Authority did not comply with Recommendation 1 of the Office's submission at draft stage.

As set out in the submission letter, the Office fully supported the approach followed by the Planning Authority in preparing the proposed Variation, including a thorough assessment of the capacity and deliverability of existing and proposed residential zoned lands. This evidence-based assessment identified some 156.5 ha of additional land to provide a sufficient supply of zoned lands to meet the housing growth requirements set out in the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines¹).

The Office remains of the view that these lands are required to support housing delivery within the functional area of the Planning Authority and are well located to facilitate compact, sequential, and connected residential development.

2. Overview of submission on proposed material alterations

In this context, certain proposed material alterations raise concerns regarding the delivery of homes in line with stated government policy, and specifically National Policy Objective (NPO) 42 of the National Planning Framework First Revision (2025) (NPF) and the Housing Growth Guidelines.

In particular, the reduction of residential development capacity and the introduction of additional constraints on housing delivery have not been supported by sufficient evidence to demonstrate that housing growth requirements can continue to be achieved within the plan period.

The Office also considers that proposed blanket restrictions on bulk purchases of residential units extend beyond the scope of the relevant Regulation of Commercial Institutional Investment in Housing, Guidelines for Planning Authorities (2021) and

¹ Now a National Planning Statement under the Planning and Development Act 2024.

introduces a further constraint on the Planning Authority's capacity to deliver housing consistent with the NPF and Housing Growth Guidelines.

The recommendations and observation set out below are intended to support the Planning Authority in finalising the proposed Variation and ensuring its effective implementation:

Subject	Recommendation	Observation
Residential zoning objectives	MA Recommendation 1	-
Restrictions on bulk purchases	MA Recommendation 2	-
Appropriate Assessment	-	MA Observation 1

3. Residential zoning objectives

The Housing Growth Guidelines were introduced specifically to give effect to the revised NPF and require planning authorities to update development plans to accommodate increased housing demand projections to 2040. The Housing Growth Guidelines state that planning authorities must review and vary their development plans to reflect updated housing growth requirements and ensure sufficient capacity exists to deliver those targets.

In this context, the Office considers that the proposed material alterations that reduce residential development capacity, constrain the delivery of housing on suitably located lands, or introduce additional restrictions are materially inconsistent with NPO 42 and NPO 43 of the NPF to increase housing supply and prioritise the provision of new homes at locations that can support sustainable development.

The Housing Growth Guidelines emphasise that development plans should facilitate the delivery of approximately 50,000 homes annually and provide sufficient zoned and serviceable land, including additional flexibility where justified, to meet projected housing demand. The requirement for additional provision of up to 50% in excess of the baseline housing growth requirement (Policy and Objective 2) is in response to the urgent need to increase housing delivery and to optimise the ability to deliver on the housing requirements of the NPF within the plan period.

The Settlement Capacity Audit prepared by the Planning Authority to inform the proposed Variation provides a robust evidence base demonstrating the capacity of zoned lands to deliver housing within the plan period, including identifying the quantum of additional provision required, recognising that for a variety of reasons, a relatively significant proportion of zoned lands are not activated over the period of a development plan.

Accordingly, the reduction of residential development capacity to accommodate the Planning Authority's revised housing growth requirements, by way of proposed material alterations MA 3.1, MA 6.1 and MA 11.1, risks undermining the delivery of housing targets within the plan period.

While MA 11.1 relates to a relatively small area of land at Coldcut (3 ha) adjacent to Liffey Valley Major Retail Centre (MRC), it is well located to support compact growth and the integration of land use and transport while retaining 7ha of open space for recreational and amenity purposes. The Office therefore remains of the view that the zoning of this land for residential development would facilitate housing growth consistent with national policy.

More concerningly, MA 3.1 lands at Finnstown Castle (18 ha) and MA 6.1 lands at St. Edmundsbury (15ha) comprise substantial land parcels in highly sustainable locations that are well integrated with the existing urban fabric of Lucan. These lands represent a significant opportunity to deliver much-needed housing in proximity to established employment centres, services, public transport and community amenities. Their development is therefore critical to meeting housing need in a planned and sustainable manner.

In relation to the natural heritage concerns raised in respect of the proximity of the St. Edmundsbury lands to the Liffey Valley Special Amenity Area Order (SAAO) and to the tree line along the boundary, the Office notes the Chief Executive's recommendation of measures to address these issues, which would have retained 9.7 ha of zoned land, which was not accepted.

The Office also has concerns regarding MA 2.1, which amends objective CS7 SLO4 to require DART+ Southwest or an equivalent rail service to be operational prior to significant residential development commencing at Adamstown SDZ West. Given the

timelines involved in the delivery of a project of this nature, the effect of the objective is that the lands will not deliver housing within the plan period, further undermining the ability of the Planning Authority to meet the Housing Growth Guidelines.

By reducing the proposed additional provision of residential zoned lands, the Planning Authority would need to be satisfied that all remaining lands will deliver housing units within the plan period, supported by a clear justification and robust evidence base, which has not been provided.

The Office considers therefore that the lack of robust evidence to demonstrate that the proposed Variation will continue to accommodate and maintain consistency with the NPF risks frustrating the implementation of national housing policy.

Therefore, in the absence of a clear assessment showing how the proposed changes support or at least do not undermine the delivery of the updated housing targets, the Office concludes that the proposed material alterations are materially inconsistent with NPO 42 and NPO 43 of the NPF and do not take due account of the requirements of the Housing Growth Guidelines.

MA Recommendation 1 - Residential Zoning Objectives

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 having considered:

- 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),

the Office recommends that the Planning Authority makes the proposed Variation without the following:

- (i) MA 3.1;
- (ii) MA 6.1;

(iii) MA 11.1; and

(iv) MA 2.1.

4. Restrictions on bulk purchases

In addition to the reduction to the extent of residential zoned lands, and the restriction on the development of the Adamstown SDZ West lands, MA 1.2, MA 2.2, MA 4.2, MA 5.2, MA 7.3, MA 8.1, MA 9.2, MA 10.1, MA 12.1, MA 13.1, MA 14.2, and MA 15.1 introduce new objectives prohibiting bulk purchases of residential units.

The proposed restrictions on bulk purchases extend beyond the mechanisms provided for under the Regulation of Commercial Institutional Investment in Housing, Guidelines for Planning Authorities (2021), which provide for such controls through planning conditions and agreements at the development management stage, and could unduly constrain the delivery of apartments. These amendments therefore introduce a further constraint on the Planning Authority's capacity to deliver housing consistent with the NPF and Housing Growth Guidelines.

MA Recommendation 2 - Restrictions on bulk purchases

Having regard to the delivery of housing, and having considered:

- 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;
- the NPF Implementation: Housing Growth Requirements (2025); and
- the Regulation of Commercial Institutional Investment in Housing - Guidelines for Planning Authorities (2021),

the Office recommends that the Planning Authority makes the proposed Variation without the following:

(i) MA 1.2;

(ii) MA 2.2;

- (iii) MA 4.2;
- (iv) MA 5.2;
- (v) MA 7.3;
- (vi) MA 8.1;
- (vii) MA 9.2;
- (viii) MA 10.1;
- (ix) MA 12.1;
- (x) MA 13.1;
- (xi) MA 14.2; and
- (xii) MA 15.1.

5. Appropriate Assessment

The Appropriate Assessment (AA) screening determination concludes that:

Having considered the AA Screening Report prepared by Minogue Environmental Consulting Ltd. the requirements outlined in the relevant legislation and guidance and the level of detailed information regarding proposed alternations to Variation No. 2 of the County Development Plan 2022-2028, it is recommended that South Dublin County Council, as the Competent Authority, makes a determination that Stage 2 AA (including the preparation of a Natura Impact Report) is not required.

The Office notes that the Screening for Strategic Environmental Assessment (SEA) and AA Report does not clearly determine whether MA 65.1 and MA 66.1 have the potential to result in likely significant effects on European Sites. The Office therefore advises the Planning Authority to clarify the outcome of the screening assessment for these proposed material alterations and to clearly state the conclusion in relation to potential effects on European Sites.

MA Observation 1 - Appropriate Assessment

Having regard to the need to ensure all plans and projects are appropriately assessed for significant effects on the environment, and having considered:

- article 6(3) of the Habitats Directive to ensure any plan or project likely to have a significant effect on a Natura 2000 site undergoes an appropriate assessment; and
- NPO 1 of the NPF to ensure all plans and projects are subject to the relevant environmental assessment requirements including Strategic Environmental Assessment (SEA), Environmental Impact Assessment, Strategic Flood Risk Assessment and Appropriate Assessment (AA) as appropriate,

the Planning Authority is advised to clearly state the conclusion in relation to potential effects on European Sites in the Screening for SEA and AA Report for the following:

- (i) MA 65.1; and
- (ii) MA 66.1

6. Summary

The Office requests that the Planning Authority addresses the recommendations and observation set out above.

As part of this process, the Chief Executive's report to the elected members, prepared under section 58(15) of the Act should summarise the Office's recommendations and outline how it is proposed to address them.

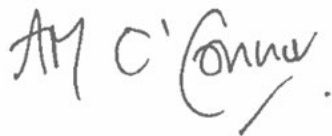
Following adoption of the Variation, the Planning Authority is required to:

- provide the Office with a copy of the adopted Variation, together with any submissions received from the Minister, regional assemblies, and the National Transport Authority during the plan preparation process within **one week** of adoption;

- inform the Office, **as soon as practicable**, where it decides not to comply with a recommendation, including the reasons for this decision; and
- publish notice of the Variation within **one week** of adoption, confirming that the Development Plan as varied will be available for inspection (online and at a specified location) no later than **five weeks** after adoption.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015
