

Variation No.2,
Senior Executive Officer,
Forward Planning Section,
Planning and Transport,
South Dublin County Council,
County Hall,
Tallaght,
D24 A3XC

Submitted via Portal
30th July 2026

To whom it may concern,

RE: PROPOSED MATERIAL ALTERATIONS TO VARIATION 2 OF THE SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022 – 2028.

The Land Development Agency (The LDA) welcomes the opportunity to make observations to the Material Alterations to proposed Variation 2 to the South Dublin County Council (SDCC) Development Plan 2022-2028.

The Material Alterations which are the subject of this consultation follow on from the special council meetings on 19th and 24th of June 2026. At this meeting it was resolved by elected members to alter Variation no.2 and a number of the proposed Material Alteration are now subject to further public consultation.

1. Proposed Material Alterations – Overall Comments

The Agency supports Variation No.2 and its alignment with the National Planning Framework's First Revision 2025, Section 28 Guidelines on NPF Implementation: Housing Growth Requirements (Housing Growth Guidelines) and Planning Design Standards for Apartments, Guidelines for Planning Authorities, July 2025 and Sustainable Residential Development and Compact Settlement Guidelines (2024).

The variation aims of ensuring key sites come forward to support the delivery of compact, infrastructure-led development, are supported and noted as critical to ensuring the strategic growth of South County Dublin into the future.

The Agency is however seeking due consideration to specific material additions which are the subject of this consultation. This is to ensure that the proposed wording of new SLO's achieve the intended aims to support the overall national and local objectives for increasing housing delivery,

In this regard, it will be important to ensure that any proposed material additions do not inadvertently result in unintended barriers, uncertainties or delivery risks that might adversely affect the LDA's ability to deliver housing within South Dublin in the coming years.

As the state's affordable housing, the Agency has a pipeline of over 10,000 direct delivery homes and a delivery target of at least 8,000 Project Tosaigh homes by 2028.

Alongside the direct delivery channel, the Agency delivers affordable housing at scale through Project Tosaigh. This is a government initiative, whereby the Agency steps in to facilitate the completion of stalled or unviable housing projects and then makes the new homes available to rent on a cost rental basis or to purchase at an affordable price. This generally involves the acquisition of residential blocks within developments.

The completed homes are then owned by the LDA and made available as cost rental to eligible tenants or sold by the LDA in partnership with local authorities through the Starter Home Purchase Scheme, formerly the Local Authority Affordable Purchase Scheme.

The Agency respectfully requests that the Council add all relevant Material Alterations to include the 'LDA' in the wording of the proposed SLO which are referred to in Section 2 below.

This is to reflect the mandate and function of the LDA as the state's affordable housing delivery body, thus enabling the Agency to deliver on its functions and purpose, including purchasing, acquiring or working in partnership to secure residential units as relevant at scale on a number of strategically serviceable and SDZ lands throughout South Dublin.

2. Observations on proposed specific Material Alterations

The Agency's submission relates specifically to a proposed Specific Local Objective (SLO) which has been applied to several additional lands identified in the variation process throughout South County Dublin, stating the following:

'No bulk purchases of residential units developed on these lands shall be permitted, with the exception of acquisitions by the County Council or AHBs for the purposes of meeting its statutory housing functions. Residential units shall otherwise be sold only to individual private purchasers, and this requirement shall be included as a condition of any planning permission granted.'

This Specific Local Objective which the LDA notes have been applied to Material Alterations

*(MA) 1.2 (Ballynakelly),
MA 2.2 (Adamstown SDZ West),
MA 4.2 (Tubber Lane North),
MA 5.2 (Citywest),
MA 7.3 (Edmonstown Road),
MA 8.1 (Kiltipper Road),
MA 9.2 (Knockmeenagh),
MA 10.1 (Stonewall),
MA 12.1 (Cherryfield),
MA 13.1 (Rathcoole),
MA 14.2 (Foxhunter)
MA 15.1 (Ninth Lock Road).*

It is considered that Material Alterations listed above and the subject of the SLO *regarding no bulk purchases with the exception of acquisitions by the county council or AHB's* which is the subject of this submission, would directly impact on the Agency's ability to deliver on the Government's

Project Tosaigh initiative. This is a key government measure to support unlocking and delivering cost-rental and affordable homes. It is considered that this is not a desired or intended outcome of the SLO. The LDA is therefore requesting that alongside the County Council, and the AHB's, that the LDA is listed as one of the exceptions. This is especially to reflect its state mandate and function for the provision of social and affordable housing.

A core part of the Agency's mission and mandate is managing and developing public and other lands to deliver housing for the purpose of performing its functions and for the public good, as set out in the LDA Act:

- Section 14 (h-i) of the Land Development Agency 2021 enables the Agency to acquire relevant public land and to also acquire other land and dispose of land owned by the Agency whereby it is necessary or expedient for the purposes of performing its functions.
- Section 14 (j) of the Land Development Agency Act 2021 enables the Agency to enter into commercial contracts and other arrangements such as Joint Ventures with local authorities or other parties for the purpose of performing its functions.
- Section 14 (o) of the Land Development Agency Act 2021 enables the Agency to enter commercial arrangements for relevant public land development and privately owned land to achieve the purposes of the 2021 Act in expediting the provision of social and affordable housing.

Furthermore, in line with National Policy Objective (NPO) 21, the Agency seeks to fulfil its statutory mandate to deliver homes on State lands and requests that the Planning Authority consider this submission and the implications of the proposed wording for housing delivery on these lands.

Having regard to the need for Development Plans to be updated to reflect the new requirements of the Revised NPF in respect of housing. In particular, NPO 43 *to prioritise the provision of new homes at locations that can support sustainable development* and Policy and Objectives 1 and 2 of the Housing Growth Guidelines *to incorporate the housing growth requirements and the additional provision of up to 50% over and above the baseline housing growth requirement.*

The Agency is seeking due consideration of reference in this Material Alteration and how it can support the development of the zoned and serviced land throughout South County Dublin.

The LDA is committed to delivering affordable housing and sustainable communities, working in partnership with the Local Authority and key partners to realise this objective. In this regard, it will be important to ensure that any proposed material additions do not inadvertently result in unintended barriers, uncertainties or delivery risks: This might adversely affect the LDA's ability to work with partners including South Dublin County Council to deliver much needed affordable and social housing within South Dublin in the coming years.

In support the overall national and local objectives for increasing housing delivery, the Agency respectfully requests that the Council add all the relevant Material Alterations 1.2, 2.2, 4.2, 5.2, 7.3, 8.1, 9.2, 10.1, 12.1, 13.1, 14.2 and 15.1 to include the 'LDA' in the wording of the proposed SLO to acknowledge the mandate, role and function of the LDA as the state's affordable housing delivery body, thus enabling the Agency to deliver on its functions and purpose, including purchasing, acquiring or working in partnership to secure residential units as relevant at scale

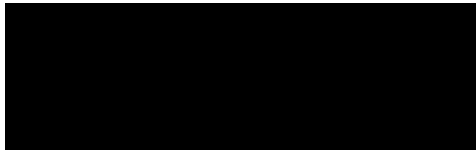
on a number of strategically serviceable and SDZ lands throughout South Dublin. Suggested text should read as follows:

'No bulk purchases of residential units developed on these lands shall be permitted, with the exception of acquisitions by the County Council or The LDA or AHBs for the purposes of meeting its statutory housing functions. Residential units shall otherwise be sold only to individual private purchasers, and this requirement shall be included as a condition of any planning permission granted'.

In support of the overall national and local objectives for housing delivery, the Agency respectfully requests that the Council include the 'LDA' in the wording of the proposed specific local objective proposed as material alterations. This will help to ensure that the LDA can continue to work with partners including South Dublin County Council to deliver much needed affordable and social housing within South Dublin in the coming years.

We look forward to continued dialogue and partnership with South Dublin County Council on the delivery of sustainable residential projects in the county.

Yours sincerely



Dearbhla Lawson,
Director of Planning Services