

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

Our Ref. 26013

04 August 2026

RE: SUBMISSION TO SOUTH DUBLIN COUNTY COUNCIL IN RESPECT OF THE PROPOSED MATERIAL ALTERATIONS TO PROPOSED VARIATION NO. 2 TO THE SOUTH DUBLIN COUNTY COUNCIL DEVELOPMENT PLAN 2022-2028. FOR THE INCLUSION OF C. 20 HA OF LANDS (CITYWEST) AT THE FORMER CITY WEST GOLF COURSE, CITY WEST, SAGGART, DUBLIN 24

Dear Sir/Madam,

We, Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2 D02 X361, have been instructed to make this submission on behalf of our client, Lydon, Unit 702 Kilshane Drive, Northwest Business Park, Ballycool, Dublin 15, in collaboration with Cape Wrath.

This submission is made in respect of the public consultation stage of proposed Material Alterations to Proposed Variation No. 2 to the South Dublin County Council Development Plan 2022-2028.

This submission is made in prior to the submission deadline of 23:59 on 5 August 2026.

We trust that the Planning Authority will have regard to the contents of this submission, set out below. We would respectfully request that all correspondence regarding same is sent to this office.

Yours sincerely,



Niamh Robinson
Senior Planner
STEPHEN LITTLE & ASSOCIATES

1. LYDON

Our Client, Lydon, is a long established independent Irish housebuilder with almost 50-years' experience in the industry. Lydon recently led a public-private partnership to deliver 1,034no. residential dwellings at Kilcarbery Grange, Dublin 22 and are currently working on a number of proposed new residentially led projects: -

- Approximately 1,000no. dwellings at Mount Avenue, Dundalk, Co. Louth,
- Approximately 700no. dwellings at Baltrasna and Milltown, Ashbourne, Co. Meath
- 345no. dwellings at Priory Fields, Skerries, Co. Dublin, in conjunction with the Land Development Agency

Other notable and completed projects include: -

- 298no. dwellings at Dunvile, Navan, Co. Meath
- 203no. dwellings at Whitefield Hall, Bettystown, Co. Meath
- 203no. dwellings at Kiltiernan Wood, Co. Dublin
- 164no. dwellings at Oaktree, Kildare Town, Co. Kildare

Lydon, in collaboration with Cape Wrath, is looking forward to making a positive contribution to the creation of new residential communities in South Dublin, through the development of their recently acquired lands at Citywest, Co. Dublin.

Lydon, in collaboration with Cape Wrath, welcomes the publication of Variation No. 2 of the South Dublin County Development Plan 2022-2028 and look forward to working in collaboration with South Dublin County Council to ensure the delivery of residentially led development at their lands.

2. SUBMISSION LANDS – CITYWEST

This submission pertains to the City West Amendment Ref. No. 5 of Variation No. 2 to the South Dublin County Development Plan 2022-2028.

Under this Variation, the lands are proposed to be zoned for development under the “New Residential” (RES-N) zoning objective.



Figure 1: Approximate Submission Site Location – Citywest (source: Google Earth with SLA red overlay).

3. VARIATION NO. 2 TO THE SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028

City West Amendment Ref. No. 5 of Variation No. 2 to the South Dublin County Development Plan 2022-2028 outlines a number of Proposed Specific Local Objectives: -

CS8 SLO2

Proposed Specific Local Objective

- a. An Ecological Impact Assessment to ascertain usage of the site and surrounding lands by mobile species, EIAs to be undertaken by appropriately experienced and qualified ecologists and prepared in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine (CIEEM, 2018) and any superseding guidance,*
- b. Lighting design and implementation should be informed by ecological surveys and seek to minimise impacts on wildlife through sensitive design in line with Institute of Lighting Practice Note 23/8 and any superseding guidance,*
- c. Transport and Traffic Assessment detailing the impact of the proposed development and measures to alleviate its impact, and*

- d. Provision for a direct active travel link through the subject lands between Mill Road and Garter Lane,
- e. A site-specific FRA addressing both the ornamental surface water features within the site and the un modelled watercourse to the south,
- f. An analysis of the existing water features to include for their incorporation as part of wider nature-based solutions to surface water management where feasible and appropriate, and
- g. Provision for a community centre / sports hall of approximately 1500sqm, or as agreed with the Planning Authority.

Our client welcomes and is supportive of CS8 SLO2 and look forward to working with the Planning Authority to deliver much needed new homes for the County.

The Proposed Material Alterations also seeks the inclusion of CS8 SLO3 which states: -

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 SLO is contrary to the Chief Executive's Report responding to Motion M73/0626 which stated: -

"The Regulation of Commercial Institutional Investment in Housing (May 2021 Section 28 of the Planning and Development Act 2000) – Guidelines for Planning Authorities were published by the Department of Housing Local Government and Heritage. These guidelines restrict bulk-purchasing of new housing by institutional investors. They mandate planning conditions that ring-fence "own-door" houses and duplex units in developments of 5 or more units for individual owner-occupiers and social/affordable housing.

The Planning Authority is required to impose a planning condition on a site by site basis ensuring the applicant or any person with an interest in the land shall enter into an agreement with the planning authority that restricts all houses and duplex units permitted, to first occupation by individual purchasers i.e. those not being a corporate entity, and/or by those eligible for the occupation of social and/or affordable housing, including cost rental housing.

In addition, the Planning Authority reports to the Minister on the numbers of residential units subject to conditions on bulk-purchasing.

On this basis the suggested SLO is not required given that the appropriate national legislation and local planning conditions are in place to manage any potential Bulk-Buying on a site-by-site basis. Therefore, Bulk-Buying is not concern for the strategic rezoning of the subject lands and is assessed in detail via the planning application process".

Furthermore, the Motion was voted against the advice of the South Dublin County Council Director of Services on the day.

This is objective contrary to current national planning policy. The Regulation of Commercial Institutional Investment in Housing: Guidelines for Planning Authorities 2023 were issued under section 28 of the Planning and Development Act and are therefore statutory planning guidelines to which the Planning Authority is required to have regard. The Guidelines are expressly directed towards preventing the bulk purchase of own-door houses and duplex units. Their purpose is to ensure that houses and duplexes in lower-density developments are not bulk purchased by commercial institutional investors to the exclusion of individual purchasers. There is no equivalent policy within the Guidelines requiring or encouraging restrictions on the bulk purchase of apartment units.

Circular Letter NRUP 01/2023, which accompanied the amended Guidelines, expressly confirms that:

"...there is no longer a planning policy rationale for excluding BTR applications from appropriate planning conditions prohibiting bulk purchasing of new houses and duplex units. Apartments continue to be excluded from the requirements set out within these Guidelines."

The original 2021 Guidelines explained that flexibility in relation to apartment ownership and tenure was intentionally retained to support investment in apartment delivery and to ensure that higher-density urban development remains viable: -

*“This level of flexibility is considered necessary to facilitate broad investment in the delivery of increased housing supply, which remains critical. **It therefore continues to apply to all apartment development, in order to ensure that undertaking such development remains viable, especially higher density schemes in established urban areas...**”*

While the 2023 amendments revised the application of the Guidelines following changes to Build-to-Rent policy, they did not introduce any restriction on the bulk purchase of apartments, nor did they alter the Minister's distinction between apartment developments and own-door housing.

The Section 2.2 of the Apartment Guidelines (2025) acknowledges that viability presents an ongoing challenge to apartment delivery stating: -

“Viability presents an ongoing challenge to housing delivery. This challenge is particularly acute in relation to the delivery of apartments, and in particular the build-to-sell market, where a considerable gap has emerged between the cost of delivering apartment development and comparable general housing market prices”.

Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness supports the delivery of a wide range of residential buildings and tenures.

The proposed wording of CS8 SLO3 goes significantly beyond national policy by applying a blanket prohibition to all residential units, including apartments. Such an approach disregards the clear distinction drawn by the Minister between own-door housing and apartment developments.

Accordingly, CS8 SLO3 should be amended to align with the Regulation of Commercial Institutional Investment in Housing – Guidelines for Planning Authorities (2023). At a minimum, the objective should be confined to own-door houses and duplex units, consistent with the Ministerial Guidelines, and should not extend to apartment developments.

4. CONCLUSION

Lydon, in collaboration with Cape Wrath, welcomes the publication of Proposed Material Alterations to Proposed Variation No. 2 of the South Dublin County Development Plan 2022-2028, are generally supportive of same and look forward to working in collaboration with South Dublin County Council to ensure the timely delivery of residentially led development at their lands proposed to be zoned RES-N at Citywest as part of this Variation.

Lydon, in collaboration with Cape Wrath, respectfully requests that CS8 SLO3 is amended to align with the Regulation of Commercial Institutional Investment in Housing – Guidelines for Planning Authorities (2023). The objective should be confined to own-door houses and duplex units, consistent with the Ministerial Guidelines, and should not extend to apartment developments.

Should you have any queries in relation to this submission, please do not hesitate to contact this office. We would be happy to discuss same or meet with you to clarify any issues arising.