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South Dublin County Council,
County Hall,
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Our Ref. 26031

05 August 2026

RE: SUBMISSION TO SOUTH DUBLIN COUNTY COUNCIL IN RESPECT OF THE PROPOSED MATERIAL ALTERATIONS TO PROPOSED VARIATION NO. 2 OF THE SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022–2028 (LANDS WEST OF ADAMSTOWN SDZ)

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, Evra, Fitzwilliam Court, Leeson Close, Dublin 2, D02 YW24.

This submission is made in respect of the public consultation on the Proposed Material Alterations to Proposed Variation No. 2 of the South Dublin County Development Plan 2022–2028. It relates specifically to the proposed amendments to CS7 SLO4 and the proposed introduction of CS7 SLO13 in respect of the Adamstown West lands.

This submission is made in advance of the submission deadline of 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,



Conor Owens
Senior Planner
STEPHEN LITTLE & ASSOCIATES

1. EVARA

Our client, Evara, is the largest private residential developer in Ireland, delivering large-scale residential neighbourhoods and associated community infrastructure across the country.

Evara has been active in Adamstown since 2016 and has secured planning permission for over 5,000 residential units from South Dublin County Council of which over 1,500 units are currently on site. Within Adamstown, Evara has delivered The Crossings, which provides over 97,000 sq ft of retail space including two supermarkets, fitness facilities and a range of personal care services. A primary care centre has also been delivered, and Evara has worked in partnership with South Dublin County Council to deliver both Airlie Park and Tandy's Park.

Evara has also been working with South Dublin County Council in Clonburris, where planning permission has been granted for 395 residential units. Development of this scheme has now commenced, with the first homes expected to be completed in 2026.

Outside of the South Dublin County Council administrative area, Evara is also progressing a number of significant residential developments in collaboration with other local authorities.

In Cherrywood, Evara is working with Dún Laoghaire–Rathdown County Council to deliver approximately 2,800 new homes as part of the Cherrywood Strategic Development Zone.

In Portmarnock, Evara is working with Fingal County Council on the delivery of approximately 1,100 homes within a carefully planned and environmentally sensitive setting.

Evara is looking forward to making a positive contribution to the creation of new residential communities in South Dublin, through the development of their lands at Adamstown West.

Evara welcomed the publication of Proposed Variation No. 2 to the South Dublin County Development Plan 2022–2028 and previously made a submission in support of the inclusion of the Adamstown West lands. This submission relates specifically to the Proposed Material Alterations, and in particular the revised wording of Specific Local Objective CS7 SLO4.

2. SUBMISSION LANDS

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

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



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

3. VARIATION NO. 2 TO THE SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028 – PROPOSED MATERIAL ALTERATIONS

Evvara welcomes the publication of the Proposed Material Alterations to Variation No. 2 of the South Dublin County Development Plan 2022–2028. This submission focuses on the proposed amendments to CS7 SLO4 and the proposed introduction of CS7 SLO13 in respect of the Adamstown West lands, and in particular the proposed amendments relating to the DART+ Southwest operational trigger, educational capacity and the proposed restriction on the bulk purchase of residential units.

3.1 Material Alteration MA2.1 – DART+ Southwest

The principal amendment proposed under Material Alteration MA2.1 relates to the requirement concerning the delivery of DART+ Southwest.

The wording of Proposed Variation No. 2 originally provided that:

"Development may not commence until DART+ Southwest has commenced construction."

Evvara considered this wording to represent an appropriate and proportionate mechanism for linking the delivery of strategic transport infrastructure with the phased development of the Adamstown West lands. The proposed trigger recognised the importance of DART+ Southwest while providing certainty that strategic transport infrastructure would be delivered in tandem with the planned growth of Adamstown.

Following public consultation, the National Transport Authority (NTA) recommended that this requirement be reviewed in light of the accessibility characteristics of the lands. In particular, the NTA noted the site's proximity to Adamstown Railway Station, the proposed BusConnects C2 Corridor, its location adjacent to the existing built-up area and its medium-high Public Transport Accessibility Level (PTAL). The NTA concluded that these characteristics more closely align the lands

with the principles of integrated land use and transport planning than other development areas where no equivalent restriction applies.

Having considered the submissions received, the Chief Executive recommended that the wording be amended to read:

"Development may not commence until DART+ Southwest or an equivalent rail service has commenced construction or operation, as may be relevant."

Importantly, the Chief Executive retained the commencement of construction as the principal trigger, recognising that this represented a clear commitment to the delivery of the strategic transport infrastructure necessary to accommodate future growth.

The Proposed Material Alteration adopted by the Elected Members departs significantly from both the wording originally proposed by the Planning Authority and the recommendation of the Chief Executive. The amended wording now provides that:

"No significant residential development other than infrastructure necessary to facilitate the delivery of strategic transport infrastructure shall commence until DART+ Southwest, or an equivalent rail service, is operational."

The Proposed Material Alteration materially changes the effect of the Specific Local Objective. By replacing the commencement of construction trigger with a requirement that DART+ Southwest be operational, it introduces a development constraint that is dependent upon the completion of a major national infrastructure project, the delivery of which is outside the control of both the Planning Authority and the landowner. Based on the current programme for DART+ Southwest, the rail service is unlikely to become operational before 2030. The practical effect of the proposed wording is therefore to sterilise the development of these strategically located residential lands for the remainder of the lifetime of the South Dublin County Development Plan 2022–2028. Such an outcome would unnecessarily delay the delivery of much-needed housing on serviced lands, notwithstanding the availability of existing and planned public transport infrastructure.

As demonstrated in the accompanying Public Transport Assessment prepared by AtkinsRéalis, the Adamstown West lands benefit from a high level of existing and planned public transport accessibility. The site is served by Adamstown Railway Station, existing Dublin Bus services and the proposed BusConnects Core Bus Corridor, providing a strong basis for sustainable travel and supporting the objectives of national, regional and local planning policy.

Furthermore, the development of the Adamstown West lands will be delivered on a phased basis over a number of years, with residential occupation increasing progressively rather than occurring simultaneously across the entire site. The additional transport demand generated by the development will therefore arise incrementally over time. In this context, it is appropriate that the delivery of strategic transport infrastructure progresses in tandem with the phased occupation of development. Requiring DART+ Southwest to be operational before significant residential development may commence goes considerably further than is necessary to achieve this objective and is inconsistent with the phased delivery of both strategic infrastructure and residential development.

Accordingly, Evara respectfully requests that the proposed amendment to CS7 SLO4 be revised to restore the wording originally published as part of Proposed Variation No. 2, namely:

"Development may not commence until DART+ Southwest has commenced construction."

This wording was originally proposed by the Planning Authority for public consultation and provides an appropriate and proportionate link between the commencement of development and the delivery of strategic transport infrastructure. It strikes an appropriate balance by allowing development to proceed once there is a clear commitment to the delivery of DART+ Southwest through the commencement of construction, rather than delaying development until the rail service is operational. The commencement of construction provides a practical and readily identifiable trigger, demonstrating a clear commitment to the delivery of DART+ Southwest without unnecessarily delaying the delivery of housing.

Restoring the original wording would also provide greater consistency with the approach adopted elsewhere in the Proposed Material Alterations. In particular, the proposed Specific Local Objective relating to the lands north of Tubber Lane retains the commencement of construction as the principal trigger, providing that:

"Development may not commence until DART+ Southwest has commenced construction or an equivalent rail service to the DART+ Southwest is operational, as may be relevant."

While the Adamstown West and Tubber Lane lands are subject to separate planning considerations, both form part of the wider strategic growth area and are intended to contribute to the delivery of housing alongside strategic transport investment. In these circumstances, there is no clear planning justification for imposing a materially more restrictive requirement on the Adamstown West lands by requiring DART+ Southwest to be operational before significant residential development may commence. Restoring the original wording would ensure a more consistent and proportionate approach, while maintaining an appropriate relationship between the delivery of strategic transport infrastructure and the timely, phased delivery of housing.

3.2 Material Alteration MA2.2 – Bulk Purchase Restriction

Material Alteration MA2.2 proposes the introduction of a new Specific Local Objective (CS7 SLO13) restricting the bulk purchase of residential units within the Adamstown West lands. Evara objects to the inclusion of this objective on the basis that it is unnecessary, inconsistent with the recommendation of the Chief Executive and extends beyond the requirements of current national planning policy. The proposed objective also seeks to regulate matters that are already addressed through statutory Ministerial Guidelines and the development management process.

The Proposed Material Alterations also seeks the inclusion of CS7 SLO13 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."

The inclusion of this Specific Local Objective is inconsistent with the recommendation contained in the Chief Executive's Report responding to Motion M29/0626, which concluded that:

"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.

The proposed Specific Local Objective is also 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.

Section 2.2 of the Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (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 CS7 SLO13 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, Evara respectfully requests that proposed CS7 SLO13 be deleted. Should the Planning Authority nevertheless decide to retain the objective, it should be amended to align with the Regulation of Commercial Institutional Investment in Housing – Guidelines for Planning Authorities (2023) by limiting its application to own-door houses and duplex units only, consistent with the Ministerial Guidelines, and excluding apartment developments.

3.3 Material Alteration MA2.1 – Educational Capacity

Material Alteration MA2.1 3(f) proposes the inclusion of the following requirement within CS7 SLO4:

"Ensure adequate educational capacity for sites adjacent to Adamstown are catered for in consultation with the Department of Education and Youth."

Evara supports the timely provision of educational infrastructure to serve future residents of the Adamstown West lands and acknowledges the importance of ongoing consultation with the Department of Education and Youth. Given that the development of the lands will be delivered on a

phased basis, educational infrastructure can be planned and delivered in tandem with residential development. Accordingly, Evara has no objection in principle to this proposed material alteration.

4. CONCLUSION

Evara welcomes the opportunity to make this submission in respect of the Proposed Material Alterations to Proposed Variation No. 2 of the South Dublin County Development Plan 2022–2028. While Evara supports the continued inclusion of the Adamstown West lands within the Variation, it respectfully requests that the proposed amendments relating to the DART+ Southwest operational trigger and the bulk purchase restriction be reconsidered in light of the observations set out above. These proposed amendments are considered to be inconsistent with national planning policy and, if adopted, would unnecessarily constrain the timely and phased delivery of strategically important residential lands.

Evara remains committed to working collaboratively with South Dublin County Council and all relevant stakeholders to facilitate the delivery of a sustainable, well-planned residential community at Adamstown West, supported by the timely provision of transport, education and other supporting infrastructure.

Should you have any queries in relation to this submission, please do not hesitate to contact this office. We would be pleased to discuss any aspect of the submission or meet to clarify any issues arising.