

COMHAIRLE CONTAE ÁTHA CLIATH THEAS
SOUTH DUBLIN COUNTY COUNCIL



MEETING OF SOUTH DUBLIN COUNTY COUNCIL

Monday, 13 October 2025

HEADED ITEM NO. 16

Report to Elected Members – NPF Implementation: Housing Growth
Requirements
Development Plan Settlement Capacity Audit – Technical Summary

1. Introduction

This Report has been prepared in accordance with the requirements of Section 3.1 of the 'NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities' ('the Guidelines') issued under Section 28 of the Planning and Development Act, 2000 (as amended), by the Minister for Housing, Local Government and Heritage.

The Report outlines the background, context, methodology and findings of a review of the current South Dublin County Development Plan 2022-2028 ('the CDP') by SDCC to examine the current zoned land capacity available in the County for residential purposes and to ascertain the deliverability of the existing land capacity to fulfil housing targets for the County as set down by Government.

The Report is prepared for the Elected Members of SDCC and sets out a summary of the development capacity of existing zoned lands, including information on forecast deliverability of such lands in terms of, inter alia, serviced and planning status, and the means by which it is proposed, in the form of a recommendation from the Chief Executive, to secure the objectives of the Guidelines. As per Section 3.1 of the Guidelines a copy of the Report is also provided to the Minister for Housing, Local Government and Heritage and the Office of the Planning Regulator (OPR).

It should be noted from the outset that the processes and outputs outlined in this report are based on a high-level assessment of potential development sites across the County in order to ascertain the likely development potential of lands in the County. Site-specific constraints and opportunities have only been reviewed at a high-level based on desktop research and, as such, should not be taken as recommended guidance on the development potential, suitability or deliverability of any individual site.

2. Background

2.1. Legislative and Policy Framework

Key steps involved in this review and subsequent proposed variation to the CDP are informed by, inter alia:

- Section 13 and Part XAB of the Planning and Development Act 2000 (as amended).
- Part 3 of the Planning and Development Regulations 2001 (as amended).
- Climate Action and Low Carbon Development Act 2015 (as amended).
- Wildlife (Amendment) Act 2023.
- Water Framework Directive (2000 / 60 / EC).
- National Planning Framework, First Revision, April 2025.
- Guidelines - NPF Implementation; Housing Growth Requirements, 2025 ('the Guidelines').
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024 ('Compact Settlement Guidelines').
- Development Plans Guidelines for Planning Authorities, 2022 ('the Development Plan Guidelines').
- Regional Spatial & Economic Strategy for the Eastern and Midlands Region, including the Dublin Metropolitan Area Strategic Plan, 2019.

It should be noted that the sections of the Planning and Development Act 2024 relating to development plans, including variations to development plans, have not been commenced as of September 2025.

2.2. National Planning Framework, First Revision, 2025

The National Planning Framework, First Revision, ('the NPF') was approved in April 2025 by Government and both houses of the Oireachtas. The NPF was first adopted in 2018 and is the Government's high-level strategic plan for shaping the future growth and development of the country to the year 2040. The NPF anticipates a need for approximately 50,000 new homes nationally per annum to 2040.

Pursuant to the adoption of the Revised NPF, the Minister for Housing, Local Government and Heritage issued guidelines for Planning Authorities under Section 28 of the Planning and Development Act, 2000 (as amended), the ‘NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities’ (‘the Guidelines’).

2.3. Housing Growth Requirements

The purpose of the Guidelines is primarily to interpret the national housing growth requirements identified in the NPF for implementation at a local authority level through local authority development plans. In this regard, the 2025 Guidelines set out new “Annual New Housing Growth Requirements” for each local authority to 2034 and beyond to 2040. In summary, as it relates to SDCC and the national context the requirements are as follows:

Annual Housing Targets 2025-2040		
	National	SDCC
2025-2034	55,598	3,270
2035-2040	41,312	2,414
Total	c.800,000	c.47,000

Table 1 National and Local Housing Supply Targets

The Guidelines set out the rationale for a higher annual target to 2034 and lower thereafter to 2040 including, inter alia, that the *“national target set out in the Revised NPF also includes a provision for ‘unmet demand’ and it is an objective of these Guidelines that this unmet demand will be addressed in the near term, up to the year 2034”*.

Policy and Objective 1 of the Guidelines states:

“It is a policy and objective of these Guidelines that the housing growth requirements for each planning authority set out in Appendix 1 are reflected in the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.”

2.4. Additional Provision

The Guidelines provide for the consideration of zoning lands up to 50% above the baseline housing growth requirement as “Additional Provision”:

“For the purposes of these Guidelines, planning authorities should address the scope for additional provision of up to 50% in excess of the baseline housing growth requirement set out in Appendix 1, in light of the urgent need to increase housing delivery and to optimise the ability to deliver on the housing requirements of the Revised NPF. ‘Additional provision’ recognises the fact that, for a variety of reasons, a relatively significant proportion of zoned lands are not activated over the period of a development plan.”

Policy and Objective 2 of the Guidelines states:

“It is a policy and objective of these Guidelines that ‘additional provision’ of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 is reflected within the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.”

The Guidelines clarify that when considering the quantum of additional provision *“the justification for this additionality and the criteria for the selection of land and sites should be carried out in accordance with the existing provisions of the “Development Plans - Guidelines for Planning Authorities” (2022), as set out in Section 4.4.3 thereof - “Ensuring Sufficient Provision of Housing Lands/Sites””.*

2.5. Review of Development Plan

The Guidelines require Planning Authorities initially to review their existing development plan core strategy, settlement strategy and zoning objectives against the objectives of the Guidelines to assess the adequacy of existing zoned lands to cater for the housing growth requirement figures.

Where the Planning Authority considers that lands may not come forward for development within the remaining period of the existing plan, it may be necessary to consider the zoning of alternative lands where there is capacity to deliver housing in the short to medium term. The current Development Plan timeframe is to June 2028.

Policy and Objective 3 of the Guidelines states:

“It is a policy and objective of these Guidelines that planning authorities should use all available means to ensure that the objectives of these Guidelines are incorporated within development plans as quickly as possible through the variation of the current adopted development plan. Where a planning authority is undertaking a development plan review under the Act of 2000 or preparing a new development plan under the Act of 2024, a parallel process of varying the current adopted development plan, as appropriate, should be undertaken. The policies and objectives of these Guidelines should not be reflected in Local Area Plans without also being reflected within the relevant development plan.”

2.6. Tiering and Phasing of Land

In accordance with the Guidelines and the Development Plan Guidelines, it is recognised that long-term strategic and sustainable development sites which comprise major urban regeneration and/or transport orientated development sites may be delivered over a longer timescale than a single development plan period. This reflects their significant scale and the need for alignment of development with investment in infrastructure and services.

This is relevant to SDCC which has major Strategic Development Areas (SDAs) at varying stages of delivery, including Clonburris SDZ, Adamstown SDZ, Tallaght Town Centre LAP and City Edge.

The Guidelines (page 9) also invite planning authorities to consider the suitability of lands over the current CDP period and subsequent 10-year plan. Any lands identified as potentially serving the housing need outside of the current CDP will be considered as strategic reserves and/or long-term SDAs.

3. Current Status

3.1. Current Rate of Delivery and Housing Supply Requirement

SDCC carries out regular monitoring of construction and planning activity to monitor progress towards Development Plan objectives using the publicly available SDCC Housing Supply Monitor¹.

¹ <https://experience.arcgis.com/experience/3efef39a761b4a20a727a4eacc9f7bf0>

3.1.1. Previous Housing Supply Targets

The current Development Plan (2022-2028) set an overall housing supply target of 15,576 dwellings, which equates to 2,613 dwellings per annum.

3.1.2. Current Activity

SDCC monitoring indicates that 7,931 dwellings have been completed since the adoption of the CDP in 2022 (Q3 2022 to Q3 2025), which equates to 2,644 dwellings per annum on average, slightly in excess of the target.

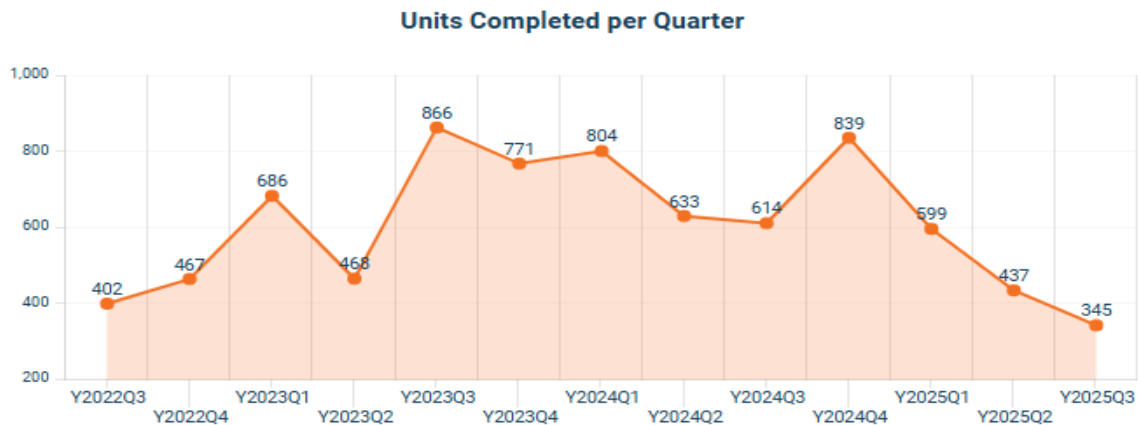


Table 2 Units Completed per Quarter

Currently, there are 5,698 dwellings under construction in the County with 1,381 dwellings completed in 2025 to the end of Q3.

	Completed Q2 2022 to date	Under Construction	Permitted
Regen	540	879	1,046
SDZ	2,580	2,751	3,125
	3,120	3,630	4,171
RES	1,854	324	646
RES-N	2,323	1,152	2,031
	4,177	1,476	2,677

Table 3 Comparison of SDA and Non-SDA

There has been a noticeable reduction in the rate of completions in 2025 to date, reflecting a reduced rate of construction in non-SDAs as some major sites have been built out and there are less available. As per Table 3, the rate of completions since 2022 has been higher in non-SDA lands zoned Res and Res-N compared to SDA lands zoned Regen and SDZ. However, the current rate of

construction and not yet commenced planning permissions, is significantly higher in SDAs and the rate of activity in these areas is increasing.

It is anticipated that the rate of delivery will recover based on increased housing construction in SDAs which have now overtaken the rest of the County and are anticipated to be the main supply of housing in future.

3.1.3. Revised Housing Supply Targets

The baseline housing growth requirements (housing targets) contained in the 2025 Guidelines for South Dublin County are set out in Table 4 aligned with relevant periodic milestones against which forecast supply can be measured.

	2025-28	2029-30	2031-34	2035-40
Annual Rate	3,270	3,270	3,270	2,414
Total for Period (less already delivered in 2025) ²	11,699	6,540	13,080	14,484
Cumulative Total	11,699	18,239	31,319	45,803

Table 4 SDCC Baseline Housing Growth Requirements 2025-2040 (inclusive)

It should be noted that the figures in Table 4 are the baseline housing growth requirement only and do not factor in potential “additional provision”.

At a straightforward view the revised housing targets represent an increase of c.600 dwellings per annum on the current CDP targets and on the annual rate of delivery on average since Q2 2022 to Q3 2025.

The following steps outline the process and outcomes of a review of the existing zoned lands to ascertain the ability of the current CDP to achieve the objectives of the Guidelines.

4. Settlement Capacity Audit

4.1. Introduction

In order to assess the adequacy of existing zoned lands to cater for the housing growth requirement figures of the Guidelines, a review of the existing zoned lands with potential for development / redevelopment for residential uses has been carried out to assess the suitability, deliverability and development potential of such lands. This process is known as a ‘Settlement Capacity Audit’

² *SDCC monitoring indicates 1,381 no. dwellings completed in 2025 up to end Q3*

and is set out in the ‘Development Plans Guidelines for Planning Authorities’, 2022, (the ‘Development Plan Guidelines’) issued under Section 28 of the Planning and Development Act, 2000 (as amended).

The Settlement Capacity Audit comprised of four main elements:

- Land Capacity Audit
- Infrastructure Assessment
- Planning Assessment
- Deliverability Analysis

It should be noted that these processes are not linear, for example infrastructural or planning assessment may determine the classification or development potential of a site to be changed.

A ‘Zoning Land Budget’ tool has been developed to enable all of these exercises to be predominantly carried out through the Council’s GIS system database on a site-by-site basis, utilising existing datasets and incorporating new inputs.

While the Land Budget tool is linked to the Housing Supply Monitor, it should be noted that there are known differences between the figures reported in both tools which would explain slight differences in some of the figures outlined in this Report. This discrepancy arises for the following reasons:

- Unit Thresholds: The Zoning Land Budget tool in general excludes developments with fewer than five units. In contrast, the Housing Supply Monitor tracks all units, regardless of size.
- Update Frequency and Methodology: The Housing Supply Monitor is based on the results of surveys carried out at the end of each quarter. The Zoning Land Budget tool polygons are updated on a best effort basis, and some delays may occur depending on staffing levels and workload.

4.2. Land Capacity Audit

4.2.1. Land Capacity Audit Methodology

The purpose of this exercise is to identify lands currently zoned for residential purposes which are considered to be undeveloped or underdeveloped and attribute a projected development potential in terms of yield of residential dwellings against each site. It comprises of the following main tasks/points:

- Identify lands currently zoned for residential purposes which are considered to have potential for residential development.

- Classify the lands zoned for residential uses or mixed-uses by current status / potential for residential development as follows:

Classification	Description
None	Lands not considered to have any potential for residential development for the foreseeable future.
Under Construction	Lands that have a grant of permission, and development has commenced.
Outstanding Permission	Lands that have a grant of permission, but development has not commenced.
Zoned Available SDA	Lands zoned and considered to be available for residential development within the Strategic Development Areas (SDAs) of Adamstown SDZ, Clonburris SDZ, Tallaght Town Centre LAP and City Edge.
Zoned Available Non-SDA	Lands zoned and considered to be available for residential development outside of the SDAs, i.e. rest of the County.
Long-Term Zoned Potential	Lands zoned for residential uses, considered to be developable over a longer timeframe (up to and beyond 2040) due to, inter alia: • Gradual regeneration, infill or backland development, • Anticipated phased delivery of strategic long-term development areas, and • Significant constraints or infrastructure shortfalls to be addressed.
Future Potential	Lands not zoned for residential uses, but which may have future potential for residential uses subject to assessment.

- The vast majority of plots mapped on SDCC's GIS database will already be set at "None" potential. This includes lands already developed or with existing uses, such as existing homes, parks, businesses, etc. where there is little/no likelihood of development potential in the foreseeable future.
- "Strategic Development Areas" (SDAs) are long-term development sites for major urban regeneration and/or transport orientated development (TOD). These areas are typically developable over a longer timeframe than a standard development plan cycle given their scale and alignment with significant investment in infrastructure and services. The SDAs in SDCC are Adamstown SDZ, Clonburris SDZ, Tallaght Town Centre LAP and City Edge.
- The development potential of a site is then assessed in terms of potential residential yield (no. of dwellings) based on:
 1. If the site has permission, the number of dwellings permitted.

2. If the site does not have permission, a density framework has been prepared, aligned with the Compact Settlement Guidelines, setting out densities to be applied to each site based on location, access to public transport and other locational characteristics.
 3. In areas where there is an existing plan or framework (Clonburris SDZ, Adamstown SDZ, Tallaght Town Centre LAP, City Edge), densities applied align with the parameters of these plans.
- Included in the assessment of potential is an assumption around the net developable area which allows for the exclusion of parts of a site from the density calculations based on existing, or likely the need for, inter alia, strategic open space, ecological considerations, flood risk, link routes, schools, utilities wayleaves, etc.
 - Generally, the densities applied to achieve the projected residential development potential are at the mid-point in a range provided in the Compact Settlement Guidelines, except where there are locational constraints or particularly good public transport accessibility.
 - Other factors are also classified, e.g. greenfield/brownfield, within the existing built-up footprint, etc. to enable monitoring of proposals against NPF and RSES policy objectives.

4.2.2.Land Capacity Audit Output

The results of the Land Capacity Audit is summarised in Table 5. This table represents the current estimate of maximum zoned land capacity in the County and splits that broadly into:

- ‘Current Zoned Land Capacity’ at 35,480no. dwellings across 570 hectares is the estimated capacity of lands assumed to be deliverable up to the NPF timeline of 2040, and
- ‘Long-term Zoned Land Capacity’ at 21,695no. dwellings across 270 hectares is an estimate of the zoned land capacity which is more likely to be deliverable from 2040 onwards, but potentially deliverable before 2040 depending on numerous factors. It is predominantly made up of City Edge and Tallaght LAP Regeneration zoned lands.

Status	Total No. Dwellings	Total Area (Hectares)	Of which are in:		Average Densities
			SDAs*	Non-SDAs*	
Under construction	5,540	96	3,633	1,907	58 dph
Permitted	6,994	136	4,043	2,951	52 dph
Zoned Available Non-Strategic	6,020	123	0	6,020	49 dph
Zoned Available Strategic	16,926	215	16,926	0	79 dph
Total Current Zoned Land Capacity	35,480	570	24,602	10,878	62 dph
Long-term Zoned Potential (up to and beyond 2040)	21,695	270	19,170	2,525	80 dph
Total Long-term Zoned Land Capacity (up to and beyond 2040)	57,175	840	43,772	13,403	68 dph

Table 5 Zoned Land Capacity and Status as of Q3 2025

While the initial stage in this exercise was to identify the relevant lands and apply a projected residential unit yield, it was a cyclical process with subsequent stages, e.g. infrastructure, planning and deliverability assessments, informing the further refining of this and further categorization of lands. For example, sites which did not qualify as Tier 1 (serviced) or Tier 2 (serviceable within the life of the Plan) in the infrastructure assessment or sites which did not pass the Planning Assessment were categorized as ‘Long-term Zoned Potential’ due to potential uncertainty in relation to delivery, unless planning permission was already in place.

It should be noted that this exercise is a point-in-time examination and application of notional development potential assumptions at a high-level.

4.3. Infrastructure Assessment

4.3.1. Infrastructure Assessment Methodology

For the infrastructure, planning and deliverability assessments, sites categorised as “outstanding permission”, “zoned available” or ‘Long-term Zoned Potential’ were assessed. Sites “under construction” were not assessed.

A threshold of 0.2 hectares was applied with sites below this threshold, unless they were part of a larger landbank, assumed to be Tier 1 (serviced) due to their relatively limited development potential.

The purpose of the infrastructure assessment is primarily to:

- a) Identify the strategic infrastructure projects that are of significance to the long-term growth of the entire County, and to the wider region,
- b) Identify the infrastructure requirements of potential development sites in each of the Neighbourhood areas in South Dublin, and
- c) In accordance with NPO 101 of the NPF, apply a tiered approach to sites to differentiate between Tier 1 zoned land that is serviced and Tier 2 zoned land that is serviceable within the life of the plan.

A set of criteria was developed for each category to assess the infrastructural constraints and requirements. The categories assessed were:

- Roads/Access
- Wastewater
- Water Supply
- Drainage and Flood Risk
- Energy

The CDP sets standards and objectives for social and community infrastructure required to serve existing and new communities.

For each of the above categories criteria were devised to assess individual sites, broadly to rate the existing connections, capacity of the wider network, capacity of the local network and the level of upgrades necessary to facilitate the scale of development potential of the relevant sites.

The Council has engaged internally across various directorates and with external stakeholders who have a key role in the delivery and management of infrastructure and services. This has supported the understanding and classification of lands in terms of the infrastructural assessment.

A structured scoring system to aid the analysis process was applied under which individual criteria were scored between 1-5. The scoring system allowed for each individual category to be scored out of 100 with a total maximum score of 500 for the overall infrastructure assessment (the minimum overall score was 100 on the basis of 1 being minimum score for each sub-criteria).

Only overall scores were taken into account in classifying sites as Tier 1, Tier 2 or other, however the individual categories' scores enabled the identification of infrastructural requirements. Sites with an overall score of 70% or more (350+) were deemed to be Tier 1 serviced, sites scoring 50% or more (250+) were deemed to be Tier 2 serviceable and sites below 50% were deemed to require further study to understand the infrastructural constraints/requirements and

were categorised as ‘Long-term Zoned Potential’, unless planning permission was already in place.

An infrastructure assessment was carried out prior to the adoption of the current CDP and is summarised in Appendix 2, Part 1 of that Plan³. The current infrastructure assessment adopted an alternative approach with the introduction of Energy as a new category and different criteria for each category.

4.3.2. Infrastructure Assessment Output

Notwithstanding the differences in approach with the current infrastructure assessment, the findings are broadly aligned with the previous infrastructure assessment in terms of infrastructure requirements.

All of the lands categorized as ‘Total Current Zoned Land Capacity’ are classified as Tier 1 and Tier 2 when considering the timescales involved in the current CDP and the subsequent CDP.

- Tier 1 lands had the potential to accommodate: 21,394 dwellings on c.345 hectares and
- Tier 2 lands had the potential to accommodate: 14,086 dwellings on c.223 hectares.

There are foreseeable infrastructural constraints at a local level and particularly at a regional level and these have been considered in the forecasting of housing delivery to relevant time periods up to 2040, detailed further in Section 5.

It is critical for the achievement of SDCC’s housing growth requirements, particularly from 2030 onwards, that the strategic infrastructure projects and local neighbourhood area projects are delivered upon.

Strategic Infrastructure Projects

In relation to strategic infrastructure projects, some have been completed or nearing completion, including the Saggart Reservoir Project and the Ringsend Wastewater Treatment Plant Project.

Other strategic infrastructure projects which are critical to the long-term growth of the entire County are delayed on the timeframes included in the previous

³ <https://www.sdcc.ie/en/devplan2022/adopted-plan/appendices/>

assessment and not yet at the construction stage, including the Greater Dublin Drainage Scheme and the Water Supply Project Eastern and Midlands Region.

The key strategic transport projects are at varying stages of delivery. Dart+ South West's Railway Order was permitted in November 2024. Bus Connects Core Bus Corridors have commenced in a design and construct contract in a phased manner.

In addition to the projects outlined in the current CDP, the Dublin West Grid Reinforcement Project being progressed by EirGrid and ESB Networks is an important strategic project for the long-term energy security and growth of South Dublin County and the wider region.

Neighbourhood Area Projects

Much of the findings from the current CDP's infrastructural assessment in relation to important projects at a local Neighbourhood Area level are still applicable. These are identified in in Appendix 2, Part 1 of that Plan.

There has been noticeable progress in some of these areas where development is progressing at pace, such as Adamstown and Clonburris SDZs and Tallaght Town Centre LAP lands.

Most of the key strategic and local infrastructure projects necessary to enable the full extent of the 'Total Current Zoned Land Capacity' are considered to be deliverable within the lifetime of the current or next CDP.

The 9B Strategic Sewer Drainage Area Plan project is of particular importance to development across multiple Neighbourhood Areas.

Some other projects which may be critical to unlocking challenging sites identified in the current infrastructure assessment may be included as objectives as part of a forthcoming variation to the CDP in order to improve the opportunities for release of such lands.

4.4. Planning Assessment

4.4.1.Planning Assessment Methodology

The planning assessment is based on the shared goals identified in the NPF and RSES as National Strategic Outcomes and Regional Strategic Outcomes, namely the achievement and delivery of Compact Growth, Accessibility, Sustainable Mobility, Climate Action and a transition to a low carbon climate resilient society.

The purpose of the planning assessment is primarily to identify locations which are considered to be well located / serviced from a sustainable planning perspective and to identify existing constraints and requirements.

The criteria to assess a site's ability to conform to the shared goals of the NPF and RSES included the following:

- Priority growth areas specified in the Metropolitan Area Strategic Plan
- Compact growth and infill development
- Brownfield/greenfield
- Proximity to centres of services and social infrastructure
- Proximity to high-capacity public transport

A structured scoring system to aid the analysis process was applied under which the above criteria were scored between 1-5, and 3-5 for brownfield/greenfield. The scoring system allowed for a total maximum score of 500 for the overall planning assessment (equal weighting to the infrastructure assessment score). The minimum overall score allowable was 140 on the basis of 1 being minimum score for four criteria and 3 for one criteria).

Only overall scores were taken into account, however the individual criteria scores enabled the identification of constraints/requirements across different locations. The planning assessment was a pass/fail with a score of 50% or more passing. Sites below 50% were deemed to require further study to understand the planning constraints/requirements.

It is important to note that the planning assessment is a point-in-time examination and that requirements and the context may change, for example, if community services, retail, etc. are provided and access to high-capacity public transport is improved.

4.4.2.Planning Assessment Output

The vast majority of lands in both the 'Current Zoned Land Capacity' and the 'Long-term Zoned Potential' received a positive planning score indicating that they were capable of delivering residential development within the County in a manner which contributes positively to the achievement of the shared goals outlined in the NPF, RSES and the CDP in relation to Compact Growth, Accessibility, Sustainable Mobility, Climate Action and a transition to a low carbon climate resilient society.

Lands amounting to c12 hectares which have the potential to accommodate 457 dwellings were found to score below 50%, which indicates that further work is required to address locational requirements, such as proximity to services, retail and public transport.

4.5. Deliverability Analysis

A further deliverability analysis was carried out to ensure that the delivery of housing was capable of meeting the needs of current and future population in line with national targets during the course of the plan period and following plan period in a sustainable manner.

In this regard, while the infrastructure and planning assessments informed deliverability analysis, additional factors were analysed to understand other potential challenges to delivery of housing on suitably zoned lands. Such factors included, inter alia:

- rate of delivery to date in relation to specific sites, areas, zoning objectives, and the County as a whole,
- planning history,
- current construction and planning activity,
- status of ongoing/planned infrastructure works,
- anticipated phased delivery in adopted strategic plans,
- existing uses, land ownership and site assembly, and
- other known significant constraints to be addressed.

In recognition of these challenges a flexible approach to provide for housing delivery has been incorporated into the forecasting of delivery of zoned lands to ensure that an adequate supply of suitable lands come forward to complement the supply pipeline and achieve the housing supply targets.

5. Forecasting Delivery of Capacity

At a high level there appears to be sufficient zoned land to meet the achievement of housing growth requirements into the early 2030s. Furthermore, there is additional ‘Long-term Zoned Land Capacity’ which will support the achievement of longer-term housing growth requirements subject to phased delivery, gradual regeneration and investment in infrastructure and services of those areas.

Notwithstanding this, it is recognised that there are numerous factors which affect the actual delivery and timing of delivery of housing on zoned lands.

Increasing the housing target alone does not mean the rate of delivery will increase.

To estimate the potential of the 'Current Zoned Land Capacity' to meet the housing growth requirements, a forecasting exercise was undertaken. This involved analysis and assumptions to estimate the delivery of housing on currently zoned lands up to the NPF timeframe of 2040, which generally aligns with the timeframe of the current and subsequent CDPs.

5.1. Strategic Development Areas

For SDAs, forecasting the delivery of zoned lands over the relevant timeframes took into account the infrastructure, planning and deliverability assessments, as well as other factors, including the rate of delivery to date, current construction and planning activity, status of ongoing/planned infrastructure works, anticipated phased delivery in adopted statutory plans or non-statutory frameworks for those areas and other known constraints to be addressed.

Based on this, individual approaches were taken to each SDA as follows:

- Clonburris SDZ: Pro-rata estimated delivery of 1,000 dwellings per annum from 2026 based on the increasing rate of construction, planning permissions and developer activity in the area.
- Adamstown SDZ: Pro-rata estimated delivery of c.600 dwellings per annum to the full build out of the SDZ, reflecting a continuation of the recent rate of housing completions which has been consistent and having regard to current construction and planning activity.
- Tallaght Town Centre LAP: c.39 hectares with potential for c.4,800 dwellings have been accounted for in the 'Current Zoned Land Capacity' and c.37 hectares with potential for c.4,893 in the 'Long-Term Zoned Land Capacity'. Based on delivery to date, current rates of construction and landowner/developer activity in the area, it is estimated that housing delivery will increase to c.400 dwellings per annum on a pro rata basis to the 'Current Zoned Land Capacity'.
- City Edge: The majority of City Edge is categorised as 'Long-Term Zoned Land Capacity'. c.75 hectares with potential for c.9,000 dwellings are categorised as 'Current Zoned Land Capacity'. Given the prevailing rate of activity and the ongoing preparation of a statutory planning framework for this area, it is not anticipated that significant development will occur prior to 2030. The current CDP Core Strategy figure included provision for 1010 dwellings and this is assumed as the level of housing delivery to

2030. Beyond that, a housing delivery rate of 680 dwellings per annum to 2042 is forecast based on the emerging potential indicated in the 'Priority Development Areas' of the emerging City Edge Strategic Urban Regeneration Framework. It should be noted that given the stage of City Edge in plan preparation and rates of planning and construction activity to date and the physical and social infrastructure required, these estimates are highly uncertain at this point and may vary significantly.

Overall, these estimates reflect prevailing trends around the shift to a higher proportion of SDCC's housing delivery arising from the SDAs.

5.2. Non-Strategic Development Areas (Rest of County)

Based on the infrastructure, planning and deliverability assessments, c.227 hectares with potential for c.10,870 dwellings have been accounted for in the 'Current Zoned Land Capacity' and c.60 hectares with potential for c.2,525 in the 'Long-Term Zoned Land Capacity'.

For non-SDAs, as well as the infrastructure, planning and deliverability assessments, forecasting the rate of delivery of housing considered various factors, including the rate of delivery to date, planning history, current construction and planning activity, status of ongoing/planned infrastructure works, existing uses and other known significant constraints to be addressed.

Following analysis on individual areas and numerous variables, an overall approach was taken to forecast lands categorised as "under construction" (c.40 hectares and 1,886 dwellings) as deliverable pro rata from present to 2028 and lands categorised as "permitted" and "zoned available" (c.187 hectares with potential for c.8,990 dwellings) as deliverable pro rata from 2028-2040. While there are numerous variables that may affect these forecasts this was considered to be the most consistent and balanced approach.

5.3. Estimated Forecast of Land Capacity to 2040

Based on the assumptions outlined, Table 6 provides a summary of the estimated forecast of housing delivery on 'Current Zoned Land Capacity'. Forecasts are to relevant milestones within the period 2025-2040.

Estimated Forecast of Land Capacity Delivery to 2040 (no. of dwellings)					
	2025-28	2029-30	2031-34	2035-40	TOTAL
SDAs	7,706	4,034	7,719	5,143	24,602
Non-SDAs	1,907	1,495	2,990	4,486	10,878
Forecast Land Capacity Delivery	9,613	5,530	10,710	9,629	35,480
Cumulative Forecast Land Capacity Delivery	9,613	15,142	25,852	35,480	
Cumulative Baseline Housing Requirement	11,699	18,239	31,319	45,803	
% of target	82%	83%	83%	77%	
Estimated Shortfall to Target	2,086	3,097	5,467	10,323	
Equivalent Hectare Land Requirement (at average densities of 40-80 dph) ⁴	26-52	38-77	68-136	129-258	

Table 6 Estimated Forecast of Land Capacity Delivery to 2040

It is noticeable that the annualised rate of housing delivery forecast to 2034 as a result of this exercise is generally consistent with (slightly above) the rate of housing delivery from 2022-present.

6. Proposed Approach

6.1. Estimated shortfall

As outlined in Table 6, it is estimated that there will be a shortfall in the rate of housing delivery compared to the new baseline housing growth requirements of the Guidelines as follows:

- 2,086 dwellings between 2025-2028 (c.26-52 hectares)
- 3,097 dwellings between 2025-2030 (c.38-77 hectares)
- 5,467 dwellings between 2025-2034 (c.68-136 hectares)
- 10,323 dwellings between 2025-2040 (c.129-258 hectares)

This would indicate that additional lands are needed which are not currently zoned for residential uses or where the zoning objective currently precludes residential uses to provide for sufficient capacity to achieve the revised targets.

⁴ The equivalent density rates of 40-80 dph (with up to 150 dph at 'accessible locations' are based on the recommended range for 'City – Suburban/Urban Extension' areas in the Compact Settlement Guidelines (2024) as this reflects the majority of the County. Other areas of the County may be categorised as 'City – Urban Neighbourhoods' and Metropolitan Towns where higher and lower density ranges respectively are applicable.

It is therefore proposed to prepare a variation of the CDP in accordance with Section 13 of the Planning and Development Act 2000 (as amended). At a minimum it is proposed that this variation will seek to zone/re-zone c.26-52 hectares of additional lands for residential purposes reflecting the anticipated shortfall to 2028.

Additionally, where specific constraints have been identified to unlocking lands currently zoned for residential purposes, the Planning Authority will consider whether further specific objectives are required to support the release of suitably located and zoned lands for development.

Separately, SDCC will continue to focus on activation of existing zoned brownfield land and delivery of long-term zoned potential, such as:

- City Edge Strategic Urban Regeneration Framework to be progressed as a statutory framework and proposed variation to the CDP.
- Clondalkin Local Planning Framework proposed variation to the CDP ongoing.
- Tallaght Town Centre LAP continued investment in housing delivery services, infrastructure, economic growth and placemaking.
- Clonburris and Adamstown SDZs continued investment in delivery of strategic infrastructure and amenities to support the growing population.

6.2. Additional Provision

“Additional Provision” is outlined in Section 2.3 of the Guidelines and summarised in Section 2.4 of this Report. It should be clarified that “additional provision” does not change the baseline housing requirements but is a measure to provide additional flexibility in achieving the baseline housing target.

The Guidelines clarify that the justification for “additional provision” and the criteria for the selection of land and sites should be carried out in accordance with the Development Plan Guidelines Section 4.4.3, including, inter alia, location of serviced lands, compact growth targets of the NPF, lands must be serviced/serviceable, location must reflect the settlement hierarchy, etc.

Table 7 considers the maximum allowable “additional provision” based on the baseline housing growth requirement to relevant periods represented in equivalent unit numbers and land requirement.

	2025-28	2029-30	2031-34	2035-40
Forecast Land Capacity Delivery	9,613	5,530	10,710	9,629
Cumulative Forecast Land Capacity Delivery	9,613	15,142	25,852	35,480
Cumulative Baseline Housing Growth Target	11,699	18,239	31,319	45,803
% of target	82%	83%	83%	77%
Cumulative Shortfall to Baseline Target	2,086	3,097	5,467	10,323
Equivalent Land Requirement (at densities of 40-80 dph)	26-53 ha	38-77 ha	67-134 ha	126-252 ha
Maximum Potential Additional Provision* (50% capacity/land above baseline target)				
Maximum Potential Additional Provision (Unit Equivalent)	5,850	9,120	15,660	22,902
Maximum Potential Additional Provision (Land Equivalent) (at densities of 40-80 dph)	73-146 ha	114-228 ha	196-391 ha	286-573 ha

Table 7 Forecast of Land Capacity Shortfall & Potential Maximum Additional Provision

The baseline housing growth requirement to 2028 is 11,699. While there is currently sufficient zoned land overall for both the baseline target and the maximum additional provision, it is forecasted that only 9,613 dwellings on that land will be delivered to 2028. While this may be subject to change it is a reasonable assumption based on the analysis carried out and it aligns with a slight increase in the current rate of housing delivery, which has been consistent at c.2,600 homes on average per annum between 2022-2025.

Utilising the maximum “additional provision” would increase the land sought to be zoned/re-zoned under a proposed variation from lands capable of delivering an additional 2,086 homes to 7,936 homes (c.99-199 hectares), i.e. zoned and available land for c.17,549 homes to 2028 (above the target of 11,699).

The current CDP provides for additional provision of c.25% of zoned and serviced land factored into the Core Strategy, which has been in line with the Development Plan Guidelines (2022). This has appeared to be sufficient given the rate of housing supply has been in line with the targets.

Generally, it seems prudent to seek to maintain additional provision of c.25% of zoned and available land above the baseline housing requirement up to 2040.

Notwithstanding this, with the practicalities of planning and construction timelines, subject to numerous variables, it is reasonable to estimate that, assuming such lands are activated, once lands are newly zoned it could take 3-

5 years to start delivering completed housing. Therefore, it would be practical for SDCC to consider the 2030 housing requirements.

In this regard, it is proposed that the zoning of additional lands for the 2028 target should address the anticipated need for additional and alternative lands to achieve the baseline housing requirements and should also include the maximum additional provision to 2028. Overall, this means seeking to zone/re-zone between 99-199 hectares of land equivalent for up to 7,936 homes, equating to 150% above the housing target to 2028 and c.125% of the housing target for 2030 (taking into account the anticipated delivery on currently zoned lands in 2029-2030).

It should be noted that the quantum of land needed to provide for additional provision will be subject to detailed analysis of specific locations corresponding to location, context and appropriate density, as per the Compact Settlement Guidelines 2024 and high-level estimates provided in this Report will change depending on site-specific considerations.

6.3. Criteria for Consideration of Lands

This process leading up to the proposed variation will involve the identification and assessment of lands not currently zoned for residential uses or where the zoning objective currently precludes residential uses. It will also require to be assessed under relevant EU Directives including the Strategic Environmental Assessment, Floods, Water Framework and Birds and Habitats Directives.

Assessment of lands will broadly follow the planning and infrastructure assessment methodology, as outlined in this Report. As the potential locations will require further analysis than already zoned lands, additional assessment of other factors in relation to deliverability, environmental/heritage sensitivities, physical constraints and social infrastructure will be undertaken.

In the first instance, the following criteria will be used in terms of preferable locations for additional lands to ensure the approach is consistent with achievement of the shared goals outlined in the NPF, RSES and CDP in relation to Compact Growth, Accessibility, Sustainable Mobility, Climate Action and a transition to a low carbon climate resilient society.

- Contribute to the achievement of compact growth.
- Are within, or directly contiguous to, the built-up footprint of Dublin City and Suburbs.

- Are located in areas that contribute to Transport-Oriented Development (TOD) by virtue of good availability and proximity to high-capacity public transport.
- Are serviced or serviceable within the next five-year period.
- Are located in areas with good social infrastructure and capacity in schools and community facilities or that can provide for the development of the necessary social infrastructure.
- Support the development of infill housing, housing on brownfield land and/or address vacancy and dereliction.
- Do not have significant challenges or impediments to the development of housing, e.g. Legal, environmental, topographical or servicing.

In order to support the identification of lands it is proposed to commence a non-statutory consultation to invite submissions from the public, landowners and developers to identify suitable lands which meet the criteria outlined above and might support the achievement of SDCC's housing growth requirements.

6.4. Achievement of Long-term Housing Requirements

In accordance with the Guidelines the current review and potential variation of the CDP is focussed on the current CDP period, while considering the long-term need to 2040 and carrying out preparatory work.

In terms of the long-term housing growth requirement up to 2040, this will largely be addressed in the next CDP, which will be a 10-year plan. Notwithstanding this, given the housing need is known and the lengthy plan-making process necessary for Strategic Development Areas it is considered prudent at this point to identify suitable locations which have potential to be future SDAs.

SDCC will identify areas as strategic reserve landbanks to enable the commencement of preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for release of strategic reserve lands as the need arises in the 2030s.

7. Chief Executive's Recommendation

To secure the objectives of the NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities, the following next steps are recommended:

- Commence a non-statutory consultation to invite submissions from the public, landowners and developers to identify suitable lands which meet the criteria outlined above and might support the achievement of SDCC's housing growth requirements.
- Propose to vary the Development Plan to zone additional land of between 99-199 hectares (7,936 dwelling equivalent) in order to provide for the anticipated shortfall to 2028 for the baseline housing requirements and a large proportion of the maximum allowable "additional provision" of 50% land above the baseline requirements.
- Short-term use of a large proportion of "additional provision" is considered necessary due to practicalities of planning and construction timelines and to increase choice. In subsequent Development Plans it is proposed to maintain a consistent rate of additional provision of 25%, subject to reassessment of the needs and circumstances at the time.
- It is critical for the achievement of SDCC's housing growth requirements, particularly from 2030 onwards, that the strategic infrastructure projects and some of the local neighbourhood area projects are delivered upon. SDCC will continue working closely with key stakeholders to plan for the short-term and long-term growth of the County and the delivery of key projects.
- Identify locations for long-term housing delivery (future Strategic Development Areas) as strategic reserve landbanks to enable the commencement of preparatory work by SDCC, utility providers, landowners and other key stakeholders to plan for release of strategic reserve lands as the need arises in the 2030s.
- In tandem with this process, progress a separate proposed variation to the Development Plan for a City Edge Strategic Urban Regeneration Framework in 2026, subject to the commencement of the Planning and Development Act 2024.

Colm Ward

Chief Executive

9 October 2025