The Housing Alliance (AHBs)

Feedback: Development Contributions Submission

April 2026

Background

The Housing Alliance is a collaboration of seven of Ireland's largest Approved Housing Bodies (AHBs): Clúid, Circle Voluntary Housing, Co-operative Housing Ireland, Oaklee, Respond, The Iveagh Trust and Tuath Housing.

The Housing Alliance was formed to promote the delivery of social and affordable housing by larger AHBs, to address barriers and challenges to delivery, and to promote strong professional approaches to housing management.

Our members are independent, not-for-profit organisations, delivering at scale and dedicated to best practice in the supply and management of housing in sustainable communities.

Introduction

We welcome the opportunity to respond to the recent Draft Section 48 Development Contribution Scheme 2026-2029, as proposed by Dublin City Council.

We are extremely concerned regarding the removal of the exemption from the Development Contribution Scheme for Cost Rental Housing, as delivered by Approved Housing Bodies (AHBs) in the draft Scheme. The proposed removal of the exemption for Cost Rental Housing would further undermine consistency in the treatment of AHB delivered housing across local authority development contribution schemes.

Our considered view is that AHBs should be exempt from development contributions on the same basis as local authorities, as both perform an equivalent function in delivering State-supported housing. Differing treatment under development contribution schemes creates an unjustified disparity. Furthermore, this approach appears to contradict national housing policy objectives, including those set out in Delivering Homes, Building Communities.

Contradicting core rationale

Such a change, in the view of the Housing Alliance, would mark a significant departure from the core rationale of the Development Contribution Scheme, which is as a form of planning gain. Development Contributions represent a mode of ensuring that for for-profit developers can contribute an element of the land value uplift gained, as a result of the existence of local public amenities and infrastructure, when planning permission for their development cost is granted. Indeed, the many references to 'not-for-profit'

development and facilities, within the 'Dublin City Council Development Contribution Scheme 2023-2026' policy document, is reflective of this.

AHBs, as not-for-profit organisations, in contrast to for-profit developers, do not benefit, in any way, from a land value uplift. Any surplus is reinvested into housing provision and support. Development levies therefore reduce delivery capacity rather than impacting profit margins, as would be the case the private sector.

AHB social and economic benefit

In addition, in delivering cost rental, AHBs provide invaluable social and economic benefit to the local community, providing an additional element of non-market, more affordable housing to the middle-income cohort. This greater level of affordability for tenants, with no leakage of State funding via profits to shareholders, as well as a greater level of tenure security than is offered within the Private Rental Sector, allows these households to put down roots in their local communities, to live close to employment and educational opportunities offered within Dublin City and, in theory, to spend more in the local economy.

Indeed, AHB housing should be viewed on the same basis as local authority housing, given our shared role in delivering social and affordable housing. The distinction is organisational, not functional.

Impact on cost rental & social housing supply

Finally, on a practical but very important note, the introduction of Development Contributions on cost rental housing, is likely to significantly impact the financial viability of cost rental schemes in the DCC area. Currently, a number of Housing Alliance members are facing critical financial challenges on a number of cost rental schemes, which led to a situation which necessitated the removal of the cost rental element of a large scheme in the DCC area.

Given the commitment of the Housing Alliance and government to mixed-tenure housing, any further viability constraints, such as would be created with the removal of the cost-rental exemption, runs contradictory to our collective aims to create sustainable, thriving communities across Dublin City.

By way of example, if the proposed increase in Residential Development Contributions were to be applied to the cost rental portion (over 60 units) of one of our upcoming schemes in the DCC area, it would add €785,000 to the overall cost, rendering the cost rental element unviable. This demonstrates that such an increase threatens not only the delivery of the cost rental homes, but the entire scheme itself.

Development levies can reduce scheme viability, delay delivery and risk overall housing output.

Conclusion

The current development contribution system is inconsistent with national policy objectives as set out in Delivering Homes, Building Communities to increase the supply of social and affordable housing and with the Dublin City Council Development Contribution Scheme policy itself.

Development Contributions on cost rental would impact the viability of schemes and contradict the affordability objectives of cost rental and affordable housing. Inconsistency and instability regarding Development Contributions across different local authorities will also have a negative impact on our long-term planning and viability modelling.

In summary, the Housing Alliance believes that any removal of the cost-rental Development Contribution exemption would:

- Contradict the core rationale of the Development Contributions policy.
- Ignore the social and economic benefit of cost rental housing to DCC.
- Impact on cost rental and social housing supply in the DCC area.

In contrast, ensuring that cost rental housing in the DCC area continues to be exempted from Development Contributions would:

- Ensure that cost rental housing, in the DCC area, does not face further viability challenges.
- Ensure greater consistency in the treatment of publicly supported housing delivery.
- Support increased housing supply.
- Reduce the cost for the State, AHBs and ultimately the tenant.

To conclude, the Housing Alliance would urge that our submission to the Draft Section 48 Development Contribution Scheme 2026-2029, as proposed by Dublin City Council, be considered, and we would welcome any further engagement with DCC on this issue.

Clúid

Feedback: Introduction

Clúid wishes to respond to the proposed amendments to the Section 48 Development Contribution Scheme 2026-2029.

Clúid is an independent, not-for-profit housing association, and is one of the largest approved housing bodies (AHBs) in Ireland. Established in 1994, Clúid leads the way in providing high quality, affordable rented homes to people in housing need. We work in partnership with local authorities to provide housing to those on social housing waiting lists. Clúid owns and manages over 14,000 properties providing a home to over 35,000 people.

Clúid delivered 1,391 new social and Cost Rental homes in 2025 and plans to deliver over 1,000 new homes in 2026. Currently, we own and manage over 1,000 cost rental homes across Ireland.

We are deeply concerned regarding the removal of the exemption from the Development Contribution Scheme for Cost Rental Housing delivered by Approved Housing Bodies (AHBs).

We believe that AHBs should be exempt from development contributions on the same basis as local authorities, given that we perform equivalent roles in delivering State-supported housing.

Furthermore, application of development contributions to non-profit development appears to contradict national housing and local authority policy objectives, including those set out in Delivering Homes, Building Communities and the Dublin City Council Development Contribution Scheme 2023-2026, and will impact upon supply.

Contradicting core rationale

Such a change, in our view, would represent a significant shift away the fundamental rationale of the Development Contribution Scheme – as a form of planning gain. Development Contributions ensure that for-profit developers contribute an element of the land value uplift afforded to the development, via local public amenities and infrastructure, with the granting of planning permission. Indeed, the many references to 'not-for-profit' development and facilities, within the Dublin City Council Development Contribution Scheme 2023-2026 policy document, appear to acknowledge this.

Clúid, as do all other AHBs, as not-for-profit organisations, in contrast to for-profit developers, do not benefit, in any way, from increases in land values. Development levies therefore reduce our capacity to deliver affordable housing, rather than impacting upon profit margins, as would be the case the private sector.

AHB social and economic benefit

In addition, in delivering cost rental, Clúid and others, in partnership with our stakeholders, including DCC, provide invaluable social and economic benefit to the local community, providing an additional element of non-market, more affordable housing to the middle-income cohort. This improved level of affordability and tenure security for tenants, in contrast to the Private Rental Sector, offers individuals and families the chance to put down roots in their local communities, to live close to employment and educational opportunities offered within Dublin City and, in theory, to increase their expenditure in in the local economy.

Indeed, AHB housing should be viewed on the same basis as local authority housing, given our shared role in delivering social and affordable housing.

Impact on cost rental & social housing supply

Finally, on a practical but very important note, the introduction of Development Contributions on cost rental housing, is likely to significantly impact the financial viability of cost rental schemes in the DCC area.

Given our, and our national and local partners' commitment to mixed-tenure housing, any further viability constraints, such as would be created with the removal of the cost-rental exemption, fails to align with our collective aims to create sustainable, thriving communities across Dublin City.

By way of example, if the proposed increase in Residential Development Contributions were to be applied to a 60-unit cost rental scheme in a mixed tenure scheme, it would add approximately €785,000 to the overall cost. Such an increase would threaten the delivery of the cost rental homes and the entire scheme itself.

Development levies can reduce scheme viability, delay delivery and risk overall housing output.

Conclusion

The application of development contributions to AHB-delivered cost rental housing conflicts with national housing and local authority policy objectives, including those set out in Delivering Homes, Building Communities and the Dublin City Council Development Contribution Scheme 2023-2026.

Development Contributions on cost rental would impact the viability of schemes and contradict the affordability objectives of cost rental and affordable housing. Inconsistency and instability regarding Development Contributions across different local authorities will also have a negative impact on our long-term planning and viability modelling.

In summary, it is our view that any removal of the cost-rental Development Contribution exemption would:

- Contradict the core rationale of the Development Contributions policy.
- Ignore the social and economic benefit of cost rental housing to DCC.
- Impact on cost rental and social housing supply in the DCC area.

In conclusion, Clúid asks that our submission to the Draft Section 48 Development Contribution Scheme 2026-2029, as proposed by Dublin City Council, be considered. We are open to further engagement with DCC on this matter.