Planning Department
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Draft Section 48 Development Contribution Scheme 2026-2029 Submission

17th April 2026

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin, are instructed by our client, Real Estate Acquisitions and Sales Limited, 20 Molesworth Street, Dublin, D02 T250 to make this submission in respect of the Draft Dublin City Council Development Contributions Scheme 2026-2029 (Under Section 48, Planning & Development Act, 2000 as amended).

1. Submission Background

Real Estate Acquisitions and Sales Limited (REAS) is a private residential developer operating primarily within the jurisdiction of Dublin City Council. Their objective is to acquire residential property sites for new build developments and deliver affordable homes to Approved Housing Bodies (AHBs). Their portfolio extends throughout Dublin City and is also wide reaching in terms of the demographic for affordable homes in this region. REAS have recently been involved in the planning and/ or delivery of the following Approved Housing Body developments within the jurisdiction of Dublin City Council:

Planning Ref No.	Description	Project Status	Density & Site Size
3127/21	28 no. residential apartment units for **Focus Housing Association CLG at** 25-27, Bow Lane West, Dublin 8.	Constructed	Density of 337 uph on a site of 0.083 ha.
3295/21	35 no. residential apartment units for **Focus Housing Association CLG** at 15, Richmond Avenue, Fairview, Dublin 3.	Constructed	Density of 318 uph on a site of 0.11 ha.
3483/22	28 no. residential apartment units for **Oaklee Housing** at 9/9a, Richmond Avenue, Fairview, Dublin 3.	Constructed	Density of 311 uph on a site of 0.09ha.

5176/22	42 no. residential apartment units for **Cabhrú Housing Association** at 80, Philipsburgh Avenue, Fairview, Dublin 3.	Under Construction	Density of 161 uph on a site of 0.26ha.
3002/23	35 no. residential apartment units for **Circle Voluntary Housing Association** at 72 Marrowbone Lane and 3 Summer Street South, Dublin 8	Under Construction	Density of 693 uph on a site of 0.0505 ha.
3539/23	37 no. residential apartment units for **Focus Housing Association CLG** at Convent Avenue, Dublin 3	Planning Granted	Density of 291 uph on a site of 0.127 ha.
2260/24	49 no. residential apartment units for **Cabhrú Housing Association** at Crumlin Delivery Service Unit, 11, Saint Agnes Road, Dublin 12.	Planning Granted	Density of 275 uph on a site of 0.178 ha.
4160/24	15 no. residential apartment units for **Housing for Integrated Living CLG** at lands adjacent to 31 Jamestown Road, Finglas, Dublin 11.	Planning Granted	Density of 112 uph on a site of .133ha.
WEBLRD6060/25-S3	116 no. residential apartment units for **The Iveagh Trust** at 43-50, Dolphin's Barn Street, Dublin 8.	Planning Granted	Density of 324 uph on a site of .358 ha.
2373/25	38 no. residential apartment units for **North & East Housing Association** at 42 Marrowbone Lane, Dublin 8.	Planning Granted by DCC, currently under appeal to An Coimisiún Pleanála.	Density of 288 uph on a site of 0.097 ha.

The above table demonstrates that Real Estate Acquisitions and Sales Limited have had a key role, and extensive involvement in, the delivery of social housing units within the jurisdiction of Dublin City Council for the Approved Housing Body sector in the last 5 years.

In addition to these sites, it is noted that REAS have a number of similar sites due to come forward for development, all of which represent small infill sites within the jurisdiction of DCC, to be developed on, or on behalf of, Approved Housing Bodies.

A key common factor across all of the above listed developments is that they represent regenerative development on underutilised and vacant/ derelict small brownfield urban infill sites and deliver high density apartment schemes. This, partnered with the operational management requirements of Approved Housing Bodies, means that it is generally not viable to deliver any areas of meaningful or manageable public open spaces for this type of development. Of the above listed developments, none of these include an element of public open space.

All of the noted infill development sites were selected based on their locational benefits, close to services and amenities within Dublin City Centre, which wholly cater to the requirements of the tenants of the

developments and makes them ideally placed to be provided as social housing units for Approved Housing Bodies. The current regenerative potential of these small urban infill sites means that social housing development can be provided in well serviced central locations.

2. **Dublin City Council Development Contribution Scheme 2023-2026**

Currently, the Dublin City Council Development Contribution Scheme 2023-2026 requires no development contributions to be payable by Approved Housing Bodies, under the terms of Section 10, which includes that:

> ***The following development will not be required to pay development contributions under the Scheme:***
>
> ***Social & Affordable (Purchase & Cost Rental) housing units provided,***
>
> - ***by a voluntary or co-operative housing body, which is recognised as such by the Council***

This section of the 2023-2026 Development Contributions Scheme is a key metric to ensuring that developments by, or on behalf of, Approved Housing Bodies, are viable, as it removes the potential for any development contributions to be applied to grants of permission for social housing development by AHBs. This allows for AHB developments to be designed without an element of public open space included, without requiring a contribution in lieu of same.

This unlocks sites for AHBs which would be undevelopable should an area of public open space be required and reduces cost of delivery of much needed social housing units across Dublin City Council, as contributions in lieu of public open space are not applicable.

3. **Draft Dublin City Council Development Contribution Scheme 2026-2029 Submission**

We now wish to make this submission on the Draft Dublin City Council Development Contributions Scheme 2026-2029, as wording has been included within this draft document that deems Approved Housing Bodies are now liable for development contributions in lieu of provision of public open space, as follows:

> ***The Dublin City Development Plan provides discretion to the Council to determine a financial contribution in lieu of all or part of the public open space requirement for a particular development in the event of the planning authority considering a site to be too small or inappropriate to fulfil Dublin City Development Plan requirements for public open space provision.***
>
> ***A financial contribution of €7,000 per unit towards provision of or improvements to a park and/or enhancement of amenities in the area in line with the City's Park Strategy shall be required.***
>
> ***For clarity residential developments for social, affordable purchase or cost rental provided by Approved Housing Bodies, the Land Development Agency or by agreement with a developer or with Dublin City Council will be required to pay the Open Space financial contribution per unit in lieu of all or part of the public open space requirement.***

It is submitted to Dublin City Council that this requirement for Approved Housing Bodies to pay a contribution in lieu of public open space will mean that the delivery of social and affordable housing schemes on small brownfield infill sites within the city will become unviable as a development type, resultant of increased costs per unit, as the delivery of public open spaces on these sites is not viable, meaning that

Approved Housing Body developments in the city will, in most cases, be subject to a development contribution of €7,000 per unit in lieu of public open spaces, which drives up delivery cost and decreases he economic viability of delivery of this type of development, as units begin to exceed the Dublin City Council price cap for basic unit costs.

The commercial implications of the proposed introduction of a €7,000 contribution in lieu of the provision of public open space are therefore considered profoundly negative for the development of social housing with the DCC Local Authority area. Such proposals would not only add a minimum of €10,000 to the end cost of each apartment delivered for AHBs, once finance, developer fees and VAT are all accounted for, but have far-reaching consequences beyond as, in the majority of cases, they will serve to permanently stop the development of such otherwise-marginal economically viable DCC located brownfield regenerative sites. This seems counter-intuitive, especially as the Government has only recently introduced various measures to improve the economic viability gap.

In this regard, we request that the wording of the **'Contribution in Lieu of Public Open Space'** section of the Draft Dublin City Council Development Contributions Scheme 2026-2029 is amended to read as follows in a final version, with text to be removed shown with a strikethrough in red:

> ***The Dublin City Development Plan provides discretion to the Council to determine a financial contribution in lieu of all or part of the public open space requirement for a particular development in the event of the planning authority considering a site to be too small or inappropriate to fulfil Dublin City Development Plan requirements for public open space provision.***
>
> ***A financial contribution of €7,000 per unit towards provision of or improvements to a park and/or enhancement of amenities in the area in line with the City's Park Strategy shall be required.***
>
> ~~***For clarity residential developments for social, affordable purchase or cost rental provided by Approved Housing Bodies, the Land Development Agency or by agreement with a developer or with Dublin City Council will be required to pay the Open Space financial contribution per unit in lieu of all or part of the public open space requirement.***~~

In addition to this, we submit that the **'Circumstances Where No Contribution Or A Reduced Contribution Apply'** included as Section 10 of the Draft Dublin City Council Development Contributions Scheme 2026-2029 does not account for the non-requirement of payment of development contributions where a private developer is delivering social housing units on behalf of an Approved Housing Body. Currently, this section reads as follows:

> ***The following development will not be required to pay development contributions under the Scheme:***
>
> - ***Social & Affordable Purchase Housing Units provided***
>
> - ***in accordance with an agreement made under Part V of the Planning and Development Act (as amended) or any subsequent or replacement section of legislation of the Act.***
>
> - ***Social Housing units for which planning permission is sought by and granted to an Approved Housing Body (AHB) and constructed as social housing.***

- *Social Housing units for which planning permission is sought by, and granted to the Land Development Agency (LDA) and constructed as social housing.*

- *Affordable Purchase under the Council's Scheme of priority for Affordable Dwelling Purchase arrangements.*

An exemption for Cost Rental Units delivered by, on behalf of, or facilitated by, the Council, AHBs or the LDA may be considered on a case-by-case basis, providing the Council's Housing Department confirms that the development contributions are not due.

In this regard, we request that the wording of the **'Circumstances Where No Contribution Or A Reduced Contribution Apply'** included as Section 10 of the Draft Dublin City Council Development Contributions Scheme 2026-2029 is amended as follows to allow for no development contributions to be applied when a development is delivered by a private developer, delivering social housing units on behalf of an Approved Housing Body. Text to be included is shown in green:

The following development will not be required to pay development contributions under the Scheme:

□ ***Social & Affordable Purchase Housing Units provided***

- ***in accordance with an agreement made under Part V of the Planning and Development Act (as amended) or any subsequent or replacement section of legislation of the Act.***

- ***Social Housing units for which planning permission is sought by, or on behalf of, and granted to, or on behalf of, an Approved Housing Body (AHB) and constructed as social housing.***

- ***Social Housing units for which planning permission is sought by, and granted to the Land Development Agency (LDA) and constructed as social housing.***

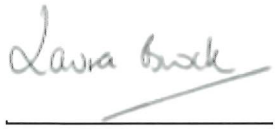
- ***Affordable Purchase under the Council's Scheme of priority for Affordable Dwelling Purchase arrangements.***

An exemption for Cost Rental Units delivered by, on behalf of, or facilitated by, the Council, AHBs or the LDA may be considered on a case-by-case basis, providing the Council's Housing Department confirms that the development contributions are not due.

We trust that this submission will be taken into consideration when finalising the Dublin City Council Development Contributions Scheme 2026-2029, and that the requested amendments will be incorporated to ensure the continued viability of delivery of social housing developments by Approved Housing Bodies on small urban infill sites, removing the proposed financial contribution in lieu of public open space for these developments, and to ensure that planning permissions sought by, and granted to, private developers acting on behalf of Approved Housing Bodies are accurately treated as social housing developments, and can be considered exempted from the payment of development contributions.

We confirm that we act for Real Estate Acquisitions and Sales Limited and request that all future correspondence in relation to this matter be directed to this office. If you have any queries, please contact me directly.

Yours sincerely,



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