

Dublin City Council,  
Planning Department,  
Civic Offices,  
Wood Quay,  
Dublin 8.

Date: 31<sup>st</sup> March 2023  
Reference: PT/TD JN 21045

Dear Sir / Madam,

**RE: LARGE SCALE RESIDENTIAL DEVELOPMENT APPLICATION IN RESPECT OF A PROPOSED DEVELOPMENT CONSISTING OF A NEW HOSPITAL BUILDING, 811 NO. RESIDENTIAL UNITS (494 NO. STANDARD DESIGNED APARTMENTS AND 317 NO. BUILD TO RENT APARTMENTS), RESIDENTIAL AMENITY AREAS, A CHILDCARE FACILITY, GYM, CAFÉ/RESTAURANTS, RETAIL, CO-WORKING SPACE, COMMUNITY FACILITIES INCLUDING A LIBRARY AND COMMUNITY HALL, OPEN SPACE AND ALL ASSOCIATED DEVELOPMENT ON A SITE AT ST. VINCENT'S HOSPITAL, RICHMOND ROAD AND CONVENT AVENUE, FAIRVIEW, DUBLIN 3. THE SITE CONTAINS PROTECTED STRUCTURES UNDER RPS REF.: 2032, 8788 AND 8789**

## Introduction

On behalf of the applicant, St. Vincent's Hospital Fairview, we hereby submit this Stage 3 - LRD application for a ten year planning permission for a Large-scale Residential Development on lands at St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3. The subject site is located at and surrounding St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3. The site contains protected structures under RPS Ref.: 2032 (St. Vincent's Hospital old house/convent, including plastered extension to the west, including entrance porch to convent. Two-storey over garden level brick building (with granite steps and entrance door surround) on south front. Four-storey pedimented brick pavilion, with stone trimmings, to the west (including granite balustrading at parapet level). Railings in front of convent building on north side), RPS Ref.: 8788 (Richmond House including former chapel and courtyard with outbuildings) and RPS Ref.: 8789 (Brooklawn, a 'House', including red brick wall and two gate piers). The application site includes an area of the public road / footpaths (extending for approximately 0.8km) to facilitate service connections via Griffith Court, Philipsburgh Avenue and Griffith Avenue, part of the open space within Grace Park Wood to facilitate a pedestrian / cycle connection, and part of Richmond Road to facilitate service connections and associated upgrades.

The site is bound by the Grace Park Wood residential development to the northwest; Griffith Court, the 'Fairview Community Unit' nursing home, Fairview Day Centre, Gheel Autism Services and a graveyard to the north; the An Post Fairview Delivery Service Unit on

Lomond Avenue and properties on Inverness Road, Foyle Road and Richmond Avenue to the east; existing residential and commercial properties on Richmond Road and Convent Avenue to the south and Charthouse Business Centre, Dublin Port Stadium / Stella Maris FC, and Ierne Sports and Social Club to the west of the site.

### **LRD Definition / Application Approach**

This proposal falls under the definition of Large-scale Residential Development, as set out under Section 2 of the Planning and Development Act 2000 (as amended), as the proposal relates to 811 no. residential units (including 494 no. standard designed apartments and 317 no. Build to Rent apartments) and therefore exceeds the LRD threshold of 100 or more houses.

As set out under Q. 13 of Form 19- Supplementary LRD Information, the cumulative gross floor space of the residential accommodation comprises 86.5% (70,671 sq.m, excluding the disregarded LRD floorspace) of the total LRD floorspace (81,670 sq.m) and is therefore consistent with the definition of LRD Part (i) in that in the case of buildings comprising houses "is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development". We refer to Q. 13 of Form 19 (Supplementary form to accompany planning application form for permission for a Large-scale Residential Development (LRD)) and the HQA and Schedule of Areas brochure prepared by STW Architects for further details on the breakdown of the LRD floorspace within this application.

The proposed LRD is located on land that is zoned '*Z1 – Sustainable Residential Neighbourhoods*' '*Z12 – Institutional Land (Future Development Potential)*' and '*Z15 - Community and Social Infrastructure*' and the zoning objective of the land facilitates its use for the purposes of the proposed application, i.e. the uses proposed are either permissible or open for consideration under the relevant land use zonings pertaining to the subject lands.

In relation to the requirement for large-scale residential development to be on land for which '*the zoning of which facilitates its use for the purposes proposed in the application*', we note that under the Dublin City Development Plan 2022-2028, hereafter referred to as the Development Plan, that the Z15 zoning provides for limited residential development under 'highly exceptional circumstances'. The JSA Planning Report and Statement of Consistency, Architectural Design Statement prepared by Scott Tallon Walker and the Business and Operational Plan prepared by St. Vincent's Hospital Fairview demonstrates the '*highly exceptional circumstances*' which exist to support residential development on the Z15 portion of the subject lands and that the proposed development is required in order to maintain or enhance the function / operational viability of St. Vincent's Hospital Fairview. Thus, an LRD application is acceptable in this instance as the proposal complies with the requirements of the proposed Z1, Z12 and Z15 land use zonings pertaining to the overall lands, and this position was reflected in the LRD Opinion from the Planning Authority which did not raise any concerns in respect to the principle of the proposed development.

### **Proposed Development**

A **ten year planning permission** is sought for the proposed development which in summary comprises of the following (see public notices for the detailed description of the proposed development):

- Provision of a new part two and part three storey hospital building, providing mental health services, accommodating 73 no. beds, associated facilities, a single storey

facilities management building, plant rooms and service areas, associated car and cycle parking, access roads, and open space, all on a proposed hospital site of c. 2.67 ha.

- Refurbishment and repurposing of existing buildings on site including Brooklawn (RPS Ref.: 8789), Richmond House, including chapel and outbuildings (RPS Ref.: 8788), the Laundry building and Rose Cottage for ancillary uses associated with the new hospital. The existing gate lodge building will remain in residential use and used by visiting members of staff to the new hospital.
- Change of use, refurbishment, alterations and extensions, to the existing hospital building (part protected structure under RPS Ref.: 2032), to provide residential amenity areas, a gym, a café, co-working space, a library, a childcare facility, and a community hall (referred to as Block K).
- The proposal includes the demolition of existing structures on site with a GFA of 5,872 sq.m, including the (1) westernmost range of the hospital building, which includes St. Teresa's and the Freeman Wing, (2) extensions to the south and north of the main hospital building, including the conservatory extension, toilet block extension, an external corridor, toilet core, lift core, and stair core (which are all part of / within the curtilage of RPS Ref.: 2032), (3) hospital buildings and outbuildings located to the north of the existing main hospital building, (4) St. Joseph's Adolescent School located in the southeast of the site, (5) Crannog Day Hospital located in the southwest of the site, and (6) extensions to the Old Laundry Building and Rose Cottage.
- Provision of 9 no. residential buildings (Blocks A, B, C, D-E, F, G, H, J, and L) providing a total of 811 no. residential units, including 494 no. standard designed apartments (in Blocks A, B, C, G, H, J, and L) and 317 no. Build to Rent apartments (in Blocks D-E and F). Residential amenities and facilities are proposed in Block C, D-E, J and K. A retail unit is proposed in Block A and a café in Block F. Block J is proposed as an extension of the existing hospital buildings (protected structure RPS Ref.: 2032- referred to as Block K).
- The building heights of the proposed residential blocks range from part 2 to part 13 storeys. A proposed basement / lower ground level, containing car and cycle parking and plant areas, is located below and accessed via Blocks C, D-E and F.
- Access to the new hospital and associated grounds is provided from Richmond Road and Convent Avenue, with separate internal access points. A separate vehicular access to the residential development is provided from Richmond Road. The development includes a proposed pedestrian / cycle connection to Griffith Court, requiring alterations to the service yard of the Fairview Community Unit, pedestrian / cycle connections to the Fairview Community Unit campus to the north (providing an onward connection to Griffith Court), a pedestrian / cycle connection to Grace Park Wood, and makes provision internally within the site for a potential future connection to Lomond Avenue / Inverness Road.
- The proposal includes public open space, including allotments, children's play areas, a central park, a linear park and an entrance plaza, with a set down area at Richmond Road, and communal open space at surface level. The proposal includes communal roof terraces on Block C and Blocks D-E and private balconies / terraces for the apartments.
- The proposal also includes provision of internal access roads, car and cycle parking, pedestrian and cycle infrastructure, associated set down areas, alterations to existing landscape features, landscaping, boundary treatments, lighting, telecommunications infrastructure at roof level of Block B, green roofs, lift overruns and plant at roof level, site services, including a watermain connection / upgrade via Griffith Court, Philipsburgh Avenue and Griffith Avenue, site clearance, and all associated site works.

## Summary Justification

The provision of a new hospital, providing mental health services, to replace the aging and unsuitable current hospital buildings is the primary purpose of this application, with supporting residential development being brought forward to fund the new hospital and to provide an appropriate utilisation of the overall landholding in St. Vincent's Hospital Fairview's control. As outlined in the Business and Operational Plan prepared by the applicant, St. Vincent's Hospital Fairview have made a strategic partnership agreement with developers, The Roylton Group, to design and construct a new and much needed state of the art hospital, providing mental health services, on the existing Fairview campus. The unique partnership will ensure the continuing support for the future of mental health services in Dublin, provide new residential accommodation and enhance the leisure amenities available to the surrounding communities.

Thus, through this application, St. Vincent's Hospital Fairview are seeking to provide a new hospital on the subject site to replace the aging and unsuitable current hospital buildings as they are no longer fit for purpose. The main institutional and community uses on the subject lands, including space for any necessary expansion of such uses, will be maintained and improved in the future. In order to fund the new hospital, the Board of St. Vincent's Fairview has agreed to provide a high quality residential development on undeveloped land, which includes a new public park. The entire value of the land will be used to deliver the new hospital on the subject site. The quantum of residential development is required to fund the construction of the new Hospital and therefore is necessary to maintain and provide for the function and operational viability of St. Vincent's Hospital Fairview, which is the primary institutional/community use on the lands, whilst also supporting the reuse and long term viability of the protected structures and historic buildings to be retained on site.

As detailed in the Planning Report and Statement of Consistency, the justification for the proposed development can be summarised as follows:

- The new hospital, providing mental health services, will remain as the main institutional / community use on the subject site with potential for future expansion to the immediate west of the new hospital within a secure campus.
- The quantum of residential development is required to fund the construction of the new Hospital and therefore it is required in order to maintain and provide for the function and operational viability of St. Vincent's Hospital Fairview which is the primary institutional/community use on the lands.
- The proposed residential development also seeks to deliver high quality residential accommodation to meet the existing housing need in a sustainable location close to public transport and significant employment areas.
- As illustrated in STW's Architectural Conservation Report, the proposal provides for the restoration and reuse of protected structures (RPS Ref.: 2032, 8788 and 8789). The existing hospital building will be utilised to provide a mixed use building including community library/community hall, childcare facility and gym facilities to be utilised by the local community. The new hospital element of the overall development also includes for the reuse of other historic buildings for hospital administration / ancillary functions.
- We note that Section 11.5.1 of the Development Plan states that *"In finding the optimum viable use for protected structures, other land use policies and site development standards may be relaxed to achieve long-term conservation"*. As the development includes the restoration and reuse of the protected structures and other historic buildings on site, flexibility to the land use policies can be applied, further supporting a portion of residential development on the Z15 zoned portion of the overall application site.

- The development includes a total of 1.6 ha of public open space (26% of the residential site area) for the enjoyment of the local community.
- The proposals provide for improved permeability through the site with new connections to neighbouring areas through Grace Park Wood to the northwest, to the Fairview Community Unit campus to the north (providing an onward connection to Griffith Court), and makes provision internally within the site for a potential future connection to Lomond Avenue / Inverness Road, which can be delivered by others in the future.

The application site boundary has been extended to include adjacent lands within the Planning Authority's / adjoining landowners control, and we refer to the letters of consent which accompany the application which provide the necessary consents to include these lands within the planning application boundary, with the works in these areas to be implemented as part of the permission subject to agreement with the relevant statutory bodies.

### **Duration of Permission**

A **ten year permission** for the proposed development is sought. This is considered appropriate given the scale and nature of the proposed development, notwithstanding that based on a best case scenario the project is expected to be completed within c. 5 to 6 years from receipt of a final grant of permission (allowing for tender and construction phases).

As set out in the EIAR and CEMP, based on the associated durations of the respective construction stages, which are dependent on a number of factors, at a high level a preliminary estimate would suggest the construction works, including infrastructural works, will take approximately 48 months from commencement of development. In addition, a c. 6 month period would be required for the tender process from receipt of the final grant. Thus, based on a best case scenario the development could be completed within c. 5 years from a final grant of permission. However, a ten year permission is sought for this project, which is considered appropriate given the residential, hospital and protected structure aspects of the project and the need to allow sufficient time to address any unforeseen delays during the construction process.

Also of relevance to this request is recent legislative amendments. Following legislation in 2021<sup>[1]</sup>, Section 42(8) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, provides that a planning authority shall not extend a planning permission where an EIAR or Natura Impact Statement would be required for the project to be extended, and accordingly it is considered appropriate to request a duration beyond the typical five year permission for this application, as it is accompanied by an EIAR and NIS.

Details of the likely phasing of the proposed development is provided in STW's Architectural Design Statement.

### **Site Location and Context**

The subject site is located at St. Vincent's Hospital, Richmond Road, Fairview, Dublin 3. The application site contains protected structures under RPS Ref.: 2032 (St. Vincent's Hospital buildings), RPS Ref.: 8788 (Richmond House including former chapel and courtyard with outbuildings) and RPS Ref.: 8789 (Brooklawn, a 'House', including red brick wall and two gate piers). These RPS references are described as follows in Volume 4, Record of Protected Structures of the Development Plan:

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<sup>[1]</sup> The European Union (Planning) (Habitats, Birds and Environmental Impact) Regulations 2021

*'RPS Ref.: 2032- St. Vincent's Hospital old house/convent, including plastered extension to the west, including entrance porch to convent. Two-storey over garden level brick building (with granite steps and entrance door surround) on south front. Four-storey pedimented brick pavilion, with stone trimmings, to the west (including granite balustrading at parapet level). Railings in front of convent building on north side.'*

*'RPS Ref.: 8788- Richmond House (in the grounds of St. Vincent's Hospital), to include former chapel and courtyard with outbuildings - see Convent Avenue.'*

*'RPS Ref.: 8789- 'Brooklawn' (within the grounds of St. Vincent's Hospital), bow-fronted House, with 19th century red brick wall to its western boundary and two gate piers -see Convent Avenue'.*

The site is bound by the Grace Park Wood residential development to the northwest; Griffith Court, the 'Fairview Community Unit' nursing home, Fairview Day Centre, Gheel Autism Services and a graveyard to the north; the An Post Fairview Delivery Service Unit on Lomond Avenue and properties on Inverness Road, Foyle Road and Richmond Avenue to the east; existing residential and commercial properties on Richmond Road and Convent Avenue to the south and Charthouse Business Centre, Dublin Port Stadium / Stella Maris FC, and Ierne Sports and Social Club to the west of the site.

#### Strategic Location

The subject site is located approximately 550m from the District Centre of Fairview and c. 1km from the District Centre of Drumcondra, as identified in Figure 5.1 of the Development Plan relating to neighbourhoods. Both areas are well served by amenities and services which are accessible to the subject site.

The application site is in an 'Inner Suburban' and accessible location. The site is located c. 300m from the Royal Canal at Ballybough Luke Kelly Bridge, which is located just outside of the City Centre as outlined in the Core Strategy map of the Development Plan. The site is located c. 2km from Connolly Station. The site is therefore considered to be within reasonable walking and cycling distance of the city centre and therefore suitable for the scale and density of development.

#### Public Transport Accessibility

As outlined in the figure below, the site is within reasonable walking distance of high quality public transport. The site is within c. 4 minutes walking distance to the bus stop on Philipsburgh Avenue (350m) via the proposed connection through Griffith Court to the north and c. 6 minutes walking distance to the Fairview Strand bus stop to the east (550m) via the main entrance from Richmond Road. The bus stops at Fairview Strand and Philipsburgh Avenue are served by Bus Route No. 123 (with a peak frequency every 10 mins).

The site is within reasonable walking distance (details included below) of high quality public transport, including existing Drumcondra Road QBC and BusConnects Radial Core Bus Corridor 'H-Spine' at Annesley Bridge Road. The Drumcondra Road QBC is proposed as BusConnects Radial Core Bus Corridor 'A Spine' and due to be launched later in 2023. The site is also located near two proposed Core Bus Corridors including CBC1 - Clongriffin to Marino (submitted to An Bord Pleanála under Ref.: HA29N.313182) and CBC2 - Swords to City Centre (not yet submitted to An Bord Pleanála for approval).

The subject site is within a 7 minute walking distance of Drumcondra Road QBC which is situated c. 560m to the west via the proposed connection through Grace Park Wood. The bus stops on Drumcondra Road Lower, which are within c. 650 metres / c. 8 minutes walking distance from the subject site, include the following bus routes (peak frequencies in brackets):

- Nos. 1 (every 10 mins), 11 (every 15 mins), 13 (every 10 mins), 16 (every 10-12 mins), 41 (every 20 mins) and 44 (every 60 mins).

The proposed Bus Connects 'A Spine' indicates a frequency of between 3-4 minutes between buses during peak hours. It is c. 850m walking distance to the bus stops on Drumcondra Road via Richmond Road.

The site is also within c. 10 minutes walking distance (c. 850m) to the BusConnects Radial Core Bus Corridor 'H-Spine' and bus stops at Annesley Bridge and Fairview (Marino Mart) via the main entrance from Richmond Road. These bus stops are served by Bus Route No's 14 (every 10-12 mins), 15 (every 10 mins), 27 (every 10 mins), 27A (every 35 mins), 27B (every 15 mins), 42 (every 20 mins), 43 (every 15 mins), 130 (every 10 mins), Bus Connects H1 (every 15 mins), H2 (every 30 mins) and H3 (every 30 mins).

In addition, the site is located within 1.6km (20 minute walking distance / 6 minute cycle) of Drumcondra Rail Station and within 1.7km (22 minutes walking distance / 7 minute cycle) of Clontarf DART Station.

Having regard to the above, the subject site can be considered to fall within a 'public transport corridor', which is identified as one of the key locations in the City for increased heights and densities in Appendix 3 of the Development Plan. The public transport accessibility and Inner Suburban location of the site is also reflected in the site's location within Car Parking Zone 2 as identified on Map J of the Development Plan. The accompanying Public Transport Capacity Study prepared by OCSC provides details of the number and frequency of existing bus routes serving the area and demonstrates the capacity of the existing public transport services to cater for the additional demand arising from the proposed development.

The application also makes provision internally within the site for a potential future connection to Lomond Avenue / Inverness Road, i.e. through provision of a pedestrian / cycle path up to the application site boundary, with the potential future connection point identified on the site boundary by the relocated gate piers. This connection will be subject to delivery by others in the future, as these adjacent lands are in third party ownership and it was not possible to reach agreement with the adjacent landowner to include these lands within the red line application site boundary. The scheme is not reliant upon this connection to provide connections to public transport services, as illustrated above and below, and it is apparent that the proposals will deliver significant connectivity and permeability benefits for the area, in accordance with the principles of the 15-minute city.

## **Land Use Zoning**

The application site is subject to three different land use zonings, namely 'Z1 – Sustainable Residential Neighbourhoods', 'Z12 – Institutional Land (Future Development Potential)' and 'Z15 - Community and Social Infrastructure' under the Development Plan, which came into effect in December 2022. The application site also includes an area of the public road / footpaths (extending for approximately 0.8km) to facilitate service connections via Griffith Court, Philipsburgh Avenue and Griffith Avenue, which is unzoned land as per Section 14.3.2 of the Development Plan, i.e. land not covered by a specific zoning objective, and

which correspond with the location of the city's roads, bridges, train lines, or other key infrastructure installations. The infrastructure works proposed on these lands are consistent with the established use / role of these public lands and accord with the policies and objectives of the plan and are necessary to facilitate the delivery of the proposed development.

We refer the Planning Authority to the Statement of Consistency with National, Regional and Local Planning Policy, which provides details of how the proposed development complies with the relevant requirements of the Development Plan.

It is considered that the proposed development of these lands, which will provide for a densification of appropriate community and social infrastructure, the delivery of residential development and a supporting mix of uses (including commercial, recreational, civic, community and leisure), while delivering a quality urban environment, will accord with the land use zoning objectives and overarching policies and objectives of the Development Plan.

The proposed residential development, in addition to the childcare facility, community facilities, co-working space, retail / café units, open space areas and the new hospital providing mental health services proposed will ensure that the proposals deliver on the Z1, Z12 and Z15 zonings relating to the subject lands.

The Z12 and Z15 Masterplan Report, prepared by STW and John Spain Associates, with input from the wider design team where necessary, and the Architectural Design Statement, demonstrates how the proposals for St. Vincent's Hospital Fairview are consistent with and deliver on the relevant objectives / guidance set down in the Development Plan and demonstrate the circumstances that exist to support the provision of an element of residential development, in addition to new hospital uses and public open space, on the Z15 zoned portion of the application site.

### **Section 247 Meetings**

The LRD process comprises three mandatory stages, including Stage 1 which is Section 247 consultations with the Planning Authority (under section 247 of the planning & Development Act, 2000, as amended). The following Section 247 meetings took place with representatives of Dublin City Council:

- 17<sup>th</sup> June 2021
- 27<sup>th</sup> June 2021
- 12<sup>th</sup> October 2021
- 2<sup>nd</sup> December 2021
- 10<sup>th</sup> January 2022
- 21<sup>st</sup> January 2022
- 9<sup>th</sup> February 2022
- 24<sup>th</sup> of March 2022 (site walk/visit)
- 24<sup>th</sup> May 2022

A summary of the Section 247 pre-application consultations undertaken by the Applicant with Dublin City Council is included in the Architectural Design Statement. The applicant / design team also engaged in separate discussions with relevant personnel in DCC Departments where necessary throughout the pre-application process.



## Stage 2- LRD Meeting with the Planning Authority

In relation to Stage 2 of the LRD process, an LRD Meeting was undertaken with the Planning Authority on the 18<sup>th</sup> of November 2022, in accordance with Section 32A of the Planning and Development Act 2000 (as amended) in relation to a person seeking the opinion of the Planning Authority prior to an LRD application. The LRD meeting was attended by Bryan Ward (Senior Planner), Patricia Hennessy (Senior Executive Planner), Catherine Condrot (Drainage), Nicola Conlon (Transportation Planning), Sean Gallagher (Transportation Planning) and Kieran O'Neil (Parks) of Dublin City Council, in addition to attendees on behalf of the applicant.

The LRD Opinion was received on 15<sup>th</sup> December 2022, A copy of the Opinion is included as an attachment to Form 19 (supplementary application form for LRD applications).

This LRD planning application is also accompanied by a Statement of Response to the LRD Opinion prepared by JSA in consultation with the wider design team. The Statement of Response to the LRD Opinion prepared by JSA, which should be read in conjunction with relevant application documentation referenced therein, clearly sets out how the 9 no. additional information items / issues requested by the Planning Authority have been fully addressed in the documentation now submitted for approval.

## Irish Water Requirements

The requirements in respect of Irish Water (IW) set out in Sections 7 of the Form 19 (supplementary application form for LRD applications) are addressed in the form, the IW correspondence received (COF letter dated 18<sup>th</sup> of January 2023 and SODA letter dated 3<sup>rd</sup> March 2023) and the Engineering Services Report prepared by OCSC Consulting Engineers.

The applicant and OCSC Consulting Engineers have undertaken consultation with Irish Water prior to the lodgement of this LRD application. We refer to the Confirmation of Feasibility letter from Irish Water which is attached to Form 19 (supplementary application form for LRD applications).

In respect to the water connection, the IW COF letter states that *"In order to accommodate the proposed connection at the Premises upgrade works are required to increase the capacity of the Irish Water network. The upgrade works will include a new connection main (approximately 470m of new 200mm ID pipe green line) to the existing 12" CI. A new PRV and DMA meter will further be required on the new connection main near the Development." Accordingly, the application site includes an area of the public road / footpaths (extending for approximately 0.8km) to facilitate watermain service connections via Griffith Court, Phillipsburgh Avenue and Griffith Avenue (works to be completed by or on behalf of Irish Water)."*

As detailed in OCSC's Engineering Services Report, the following upgrades will be undertaken (by Irish Water funded by the client), as requested by Irish Water in order to connect to the public water network:

- Replace 100mm uPVC with 200mm ID pipe for 310m in Griffith Court.
- New 200mm ID pipe to be laid for 300m on Philipsburg Ave
- New 250mm ID main for 50m from Philipsburg Ave to Griffith Ave.

The application boundary has been extended to include the area of the public road / footpaths (extending for approximately 0.8km) to facilitate the water connection upgrades

described above via Griffith Court, Philipsburgh Avenue and Griffith Avenue, which will be funded by the applicant and undertaken by or on behalf of Irish Water. A letter of consent has been provided by Dublin City Council to include the area of the public road and footpaths within the red line boundary.

In relation to wastewater connection, Irish Water states the following:

*“The connection of the Hospital can proceed prior to any works as it will replace the existing Hospital and hence does not increase the overall load on the downstream network. In order to accommodate the proposed connection (excluding the Hospital) at the Premises, Storm Sewer Separation works are required to reduce the load on the downstream combined network. Storm separation of the full site including roofs of any buildings must be undertaken as part of the works.*

*This Development is being permitted on the bases that a minimum of 1.238ha of hardstanding on the site discharging to the Irish Water combined network must be fully separated. The removal of surface flows from this land will enable the proposed development to connect. The information included in R517-OCSC-ZZ-XX-0006-S0-P04 will need to be independently verified by Irish Water prior to the connection. Irish Water must be contacted in advance of any onsite works impacting”.*

The OCSC drawings submitted with the application reflect the above approach which has been agreed with Irish Water and therefore there is wastewater capacity for the proposed hospital and residential development.

A Statement of Design Acceptance (SODA) letter has also been received from Irish Water dated 3<sup>rd</sup> of March 2023, which confirms that all the water and foul drainage services are designed in accordance with Irish Water standards. Please refer to OCSC Consulting Engineers application documentation for further information.

## **Part V**

The details of the Part V proposals for this development are provided in the following Part V package accompanying the application:

- DCC Part V Validation Letter
- JSA Part V Cover Letter
- STW Part V Brochure (including drawings and schedules for the proposed Part V units)
- Mitchell McDermott's Estimate of Costs

As illustrated in the above referenced documentation, the applicant proposes to provide 174 no. Part V units in Blocks A, B and H (i.e. 21% of the total no. of units) on site, to satisfy the Part V requirements for the proposed development arising under the Planning and Development Act 2000, as amended. These proposals are indicative and subject to further discussions and agreement with Dublin City Council following a final grant of permission.

## **Drawings, Plans and Particulars**

The LRD application is accompanied by architectural, landscape, arboricultural, M&E and engineering drawings. Each drawing pack is accompanied by a schedule of drawings, as required under Q. 10 of Form 19 (supplementary application form for LRD applications).

The architectural drawings, have been prepared in accordance with the requirements of Articles 22 and 23 of the Planning and Development Regulations 2001, as amended.

### **Planning Report and Statement of Consistency**

A Planning Report and Statement of Consistency prepared by John Spain Associates is enclosed with this planning application which sets out the site location, context and details of the proposed development.

The report also demonstrates that the proposal is consistent with the relevant policies, objectives and standards of the guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and the relevant policies, objectives and standards of the Development Plan.

### **Environmental Impact Assessment Report**

An Environmental Impact Assessment Report (consisting of 4 no. Volumes), including a Non-Technical Summary has been prepared by AWN Consulting and accompanies this planning application.

**Volume 1** of the EIAR follows the following format, ensuring all relevant environmental topics/issues have been reviewed and addressed in the context of the proposed development:

- Non-Technical Summary
- Introduction
- Description of Development
- Alternatives
- Human Health and Populations
- Land, Soils, Geology and Hydrogeology
- Hydrology
- Biodiversity
- Air Quality
- Climate
- Noise and Vibration
- Landscape and Visual Impact Assessment
- Archaeology and Cultural Heritage
- Architectural Heritage
- Traffic and Transportation Assessment
- Waste Management
- Material Assets
- Interactions
- Non-Technical Summary

**Volume 2** includes the EIA Report Appendices from relevant EIAR Chapters as follows:

- Appendix 5.1 NRA Criteria for Rating the Magnitude and Significance of Impacts at EIA Stage
- Appendix 5.2 Selected Extracts From The Ground Investigations Ireland St Vincent's Fairview OCSC Ground Investigation Report April 2022
- Appendix 6.1 Criteria for Rating Site Attributes – Estimation of Importance of Hydrology Attributes
- Appendix 6.2 Water Framework Directive Assessment
- Appendix 7.1 Bat Assessment Report

- Appendix 7.2 Wintering Bird/Flightline Assessment
- Appendix 12.1 SMR/RMP Sites Within the Study Area
- Appendix 12.2 Legislation Protecting the Archaeological Resource
- Appendix 12.3 Impact Assessment and The Cultural Heritage Resource
- Appendix 12.4 Mitigation Measures and The Cultural Heritage Resource
- Appendix 12.5 Geophysical Survey Report
- Appendix 15.1 Resource and Waste Management Plan
- Appendix 15.2 Operational Waste Management Plan

**Volume 3** of the EIAR includes the Verified Photomontages prepared by Modelworks, which should be read in conjunction with Chapter 11- Landscape and Visual Impact Assessment of the EIAR.

**Volume 4** of the EIAR includes the Architectural Heritage Impact Assessment of Historic Buildings & Protected Structures and all associated appendices prepared by Carrig Conservation.

### **EIA Portal**

Appendix 1 of this cover letter includes a copy of a confirmation notice email from the Department of Housing, Planning and Local Government EIA Portal, stating that the information provided to the portal has been uploaded to the EIA Portal on the 28/03/2023 under Portal ID number 2023051.

### **Section 57(10)(b) of the Act**

This application includes documentation which provides a justification for the demolition of (1) westernmost range of the hospital building, which includes St. Teresa's and the Freeman Wing, and (2) extensions to the south and north of the main hospital building, including the conservatory extension, toilet block extension, an external corridor, toilet core, lift core, and stair core, which are part of / within the curtilage of RPS Ref.: 2032 (St. Vincent's Hospital buildings), in order to allow the Planning Authority to assess such proposals in the context of Section 57(10)(b) of the Act.

Accordingly, the Architectural Heritage Chapter of the EIAR, Volume 4 of the EIAR, the Architectural Conservation Report, and the application drawings, identifies exactly what demolition is involved in the application, identifies whether the proposed demolition of buildings / structure technically involves the demolition of a or part of a protected structure, and where it does, a justification is provided in Section 7.5 of the Architectural Heritage Impact Assessment included in Volume 4 of the EIAR having regard to the exceptional circumstances arising under Section 57(10)(b).

We note that in considering any impacts on the protected structures (whether demolition or otherwise), the Planning Authority must have regard to the need to protect the structure, and it is demonstrated that the works / demolition proposed in the context of the protected structure is necessary to achieve the benefit to the overall protected structures and their continued and re-fashioned use. Please refer to Chapter 13 and Volume 4 of the EIAR for further information.

## **Application Site Boundary**

Please note that the application site boundary has been provided by STW Architects in .dwg format on CD ROM with all geometry referenced to ITM as specified in Section 4 of the LRD Application Form.

## **Fee**

Please find enclosed with the planning application form confirmation of EFT payment for the application fee of €80,000, i.e. the maximum fee amount for an LRD application, which has been paid to Dublin City Council for this LRD application in advance of lodgement, in accordance with Section 2(14) and Section 3 of the Planning and Development Regulations 2001-2022.

## **Website**

The application may also be inspected online at the following website set up by the applicant:

- [www.stvincentshospitalLRD.ie](http://www.stvincentshospitalLRD.ie)

A final PDF of all application documents has been uploaded to the above website address, which will go live on the day of lodgement.

## **Enclosures**

Given the application is accompanied by an EIAR, an NIS, and the site includes protected structures, 10 no. hard copies and 2 no. soft copies of the application documentation is enclosed. The planning application is accompanied by the following comprehensive set of documentation and information to ensure all relevant planning matters are addressed:

## **Planning Particulars**

- 2 no. soft copies (USB's) of the application documentation;
- Planning application form, Form 19 (supplementary application form for LRD applications), and attachments including letters of consent from Targeted Investment Opportunities ICAV and Dublin City Council, Irish Water COF and SODA letters, copy of DCC's LRD Opinion, confirmation of EFT payment of the planning application fee (€80,000), and the BTR draft legal covenant;
- Copies of the site notice (yellow) and newspaper notice (including original copy of newspaper notice);
- This cover letter prepared by John Spain Associates, with the EIA Portal confirmation appended;
- Part V pack containing DCC Part V validation letter, Part V cover letter prepared by JSA, Part V brochure including drawings and schedule prepared by STW Architects, and an estimate of costs prepared by Mitchell McDermott;

## **Planning Reports**

- Planning Report and Statement of Consistency prepared by John Spain Associates;
- Statement of Response to DCC's LRD Opinion prepared by John Spain Associates in association with the design team;
- Social and Community (including Cultural) Infrastructure Audit / Assessment prepared by John Spain Associates;
- Build to Rent Justification Report prepared by John Spain Associates;

### **Architecture**

- Architectural Drawings and Schedule of Drawings prepared by Scott Tallon Walker Architects;
- Architectural Statement of Response to LRD Opinion prepared by Scott Tallon Walker Architects;
- Architectural Design Statement prepared by Scott Tallon Walker Architects;
- Architectural Conservation Report prepared by Scott Tallon Walker Architects;
- Housing Quality Assessment and Area Schedule Statement prepared by Scott Tallon Walker Architects;
- Z12 and Z15 Masterplan Document prepared by Scott Tallon Walker and John Spain Associates;
- Building Life Cycle Report prepared by Scott Tallon Walker Architects;

### **Engineering**

- Engineering Drawings and Schedule prepared by O'Connor Sutton Cronin Consulting Engineers;
- Response to Notice of LRD Opinion (Item 7 – Drainage) prepared by O'Connor Sutton Cronin Consulting Engineers;
- Response to Notice of LRD Opinion (Item 8 – Traffic and Transportation Issues) prepared by O'Connor Sutton Cronin Consulting Engineers;
- Engineering Services Report prepared by O'Connor Sutton Cronin Consulting Engineers;
- Basement Impact Assessment prepared by O'Connor Sutton Cronin Consulting Engineers;
- Site-Specific Flood Risk Assessment prepared by O'Connor Sutton Cronin Consulting Engineers;
- Traffic Impact Assessment prepared by O'Connor Sutton Cronin Consulting Engineers;
- Public Transport Capacity Study prepared by O'Connor Sutton Cronin Consulting Engineers;
- DMURS Compliance Statement prepared by O'Connor Sutton Cronin Consulting Engineers;
- Servicing & Delivery Access Strategy prepared by O'Connor Sutton Cronin Consulting Engineers;
- Parking Management Plan prepared by O'Connor Sutton Cronin Consulting Engineers;
- Mobility Management Plan prepared by O'Connor Sutton Cronin Consulting Engineers;
- Construction and Environmental Management Plan prepared by O'Connor Sutton Cronin Consulting Engineers;
- Outline Demolition Method Statement prepared by O'Connor Sutton Cronin Consulting Engineers;
- Stage 1 Road Safety Audit prepared by Bruton Consulting Engineers;

### **Landscape**

- Landscape Drawings and schedule of drawings prepared by NMP Landscape Architects;
- Landscape Design Statement prepared by NMP Landscape Architects;
- Arboricultural Assessment, Arboricultural Impact and Tree Protection Report, Arboricultural drawings and issue sheet prepared by CMK Horticulture and Arboriculture Ltd;

### **Mechanical and Electrical**

- Climate Action Energy Statement prepared by IN2;
- Site Lighting Report and drawings prepared by IN2;

- M&E Utilities Report prepared by IN2;
- Microclimatic Wind Analysis and Pedestrian Comfort Report prepared by IN2;

#### **Environmental**

- Environmental Impact Assessment Report, consisting of 4 no. Volumes, prepared by AWN and others;
- Appropriate Assessment Screening Report prepared by Altermar Ltd;
- Natura Impact Statement prepared by Altermar Ltd;
- Daylight and Sunlight Analysis Report prepared by IN2;
- Telecommunications Report prepared by ISM;
- Demolition Works Justification Report prepared by Passive Dynamics;

#### **Other Reports**

- CGI Views brochure prepared by Modelworks;
- St. Vincent's Hospital Business and Operational Plan prepared by St. Vincent's Hospital Fairview;
- Mixed Use Development Operational Management Plan prepared by Hooke and MacDonald; and
- Justification for Proposed BTR Development and Amenity Areas at SVHF prepared by CBRE.

#### **Conclusion**

In preparing this LRD planning application, including all drawings and reports, the applicant and design team have responded to the items raised in pre-application consultation meetings and the LRD Opinion.

If you have any queries, please do not hesitate to contact us.

Yours faithfully,



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**John Spain Associates**

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**APPENDIX 1 – EIA PORTAL CONFIRMATION**

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**From:** Housing Eiaportal <EIAportal@housing.gov.ie>  
**Sent:** Tuesday 28 March 2023 13:53  
**To:** Paul Turley  
**Subject:** EIA Portal Confirmation Notice Portal ID 2023051

Dear Paul,

An EIA Portal notification was received on 28/03/2023 in respect of this proposed application. The information provided has been uploaded to the EIA Portal on 28/03/2023 under EIA Portal ID number 2023051 and is available to view at <http://housinggovie.maps.arcgis.com/apps/webappviewer/index.html?id=d7d5a3d48f104ecbb206e7e5f84b71f1>.

**Portal ID:** 2023051

**Competent Authority:** Dublin City Council

**Applicant Name:** St. Vincent's Hospital Fairview

**Location:** St. Vincent's Hospital, Richmond Road and Convent Avenue,  
Fairview, Dublin 3

**Description:** Proposal for a new hospital, 811 residential units, other associated uses and all associated development (see proposed newspaper notice wording attached for the detailed description)

**Linear Development:** No

**Date Uploaded to Portal:** 28/03/2023

Regards

Hugh Wogan,

EIA Portal team

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**An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreachta**  
Department of Housing, Local Government and Heritage

**Teach an Chustaim, Baile Átha Cliath 1, D01 W6X0**  
Custom House, Dublin 1, D01 W6X0

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T +353 (0) 1 888 2000

[www.gov.ie/housing](http://www.gov.ie/housing)

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