

# **Planning Report & Statement of Consistency**

*In respect of*

## **St. Vincent's Hospital Fairview Redevelopment (LRD Planning Application)**

*at*

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

*Prepared for*

**St. Vincent's Hospital Fairview**

*Prepared by*

**John Spain Associates**

**March 2023**



**John Spain Associates**

Planning & Development Consultants  
Chartered Town Planners & Chartered Surveyors

39 Fitzwilliam Place

Dublin 2, D02 ND61

Telephone: (01) 662 5803

E-mail: [info@johnspainassociates.com](mailto:info@johnspainassociates.com)

Web: [www.jsaplanning.ie](http://www.jsaplanning.ie)

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## DOCUMENT CONTROL SHEET

<b>Applicant:</b>	St. Vincent's Hospital Fairview
<b>Project Title and Job No.:</b>	St. Vincent's Hospital Redevelopment / 21045
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## 1.0 INTRODUCTION

On behalf of the applicant, St. Vincent's Hospital Fairview, we submit this Planning Report and Statement of Consistency to accompany an LRD planning application to Dublin City Council (hereafter DCC) for a 10 year planning permission for a proposed redevelopment at 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.

This report sets out the site location, context and details of the proposed development and also demonstrates that the proposal is consistent with the relevant guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and the relevant policies, objectives and standards of the Dublin City Development Plan 2022-2028 (hereafter referred to as the Development Plan).

This report shall take the following format:

1. Introduction
2. Site Location and Context
3. Planning History
4. Details of the Proposed Development
5. Consistency with National and Regional Planning Policy
6. Consistency with Local Planning Policy
7. Conclusion

following policy documents are discussed within this document:

### 1.1 Description of Proposal

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

- 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.

An Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) accompanies the LRD application.

## 1.2 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.

### 1.3 LRD Definition / 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. In relation to the proposed LRD floor space (residential, hospital and other proposed uses providing a total GFA of 81,670 sq.m), the cumulative gross floor space of the residential accommodation (70,671 sq.m) comprises **86.5%** and it 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*”. Please see Question 13 of Form 19 (Supplementary form to accompany planning application form for permission for a Large-scale Residential Development (LRD)).

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. 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 Development Plan 2022-28 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 Business Plan prepared by St. Vincent's Hospital 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. 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.

### 1.4 Section 247 Pre-Application Consultations and LRD Opinion

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.

A 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 Opinion was received on 15<sup>th</sup> December 2022 which states that “*the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the Act constitutes a reasonable basis for an application for Large-scale Residential Development subject to the applicant addressing the issues outlined below in any future application.*”

This planning application is 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 specific information items and further information

requested by the Planning Authority have been fully addressed in the documentation now submitted for approval.

## 2.0 SITE LOCATION AND CONTEXT

### 2.1 Site Location

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.

**Figure 2.1: Aerial Photograph of Subject Site**



*Note: The red line indicates the approximate outline of the land within the ownership of the applicant, please refer to STW's Site Location Map and Site Layout Plan for the full extent of the proposed development.*

## 2.2 Site Description

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). These RPS references are described as follows in Volume 4, Record of Protected Structures, of the Development Plan:

*'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 and the 'Fairview Community Unit' nursing home, Gheel Autism Services and a graveyard to the north, the An Post depot on Lomond Avenue and residential properties on Inverness Road to the east, existing residential and commercial properties on Richmond Road and Convent Avenue to the south and Charthouse Business Centre, Dublin Port Stadium and Ierne Sports and Social Club to the west of the site.

The principal access to the site is from Richmond Road and Convent Avenue, via the existing entrances to the hospital. A vehicular route continues around the day hospital and continues eastwards to join the laneway which acts as a secondary access for the main hospital complex to the east. Access to the eastern portion of the site is via Convent Avenue which runs southwards along the east of the nursing home. An emergency vehicular connection exists to the northern site boundary which provides a connection from Grace Park Close.



**Figure 2.2: Aerial View of St. Vincent's Hospital Buildings (RPS Ref.: 2032)**



Source: STW Architectural Conservation Report

**Figure 2.3: Richmond House (RPS Ref.: 8788)**



Source: STW Architectural Conservation Report

**Figure 2.4: Brooklawn (RPS Ref.: 8789)**



Source: STW Architectural Conservation Report



**Figure 2.5: Existing Site Context**

Source: STW Architectural Design Statement. (Note: The red line indicates the approximate outline of the land within the ownership of the applicant, please refer to STW's Site Location Map and Site Layout Plan for the full extent of the proposed development).

### 2.3 Site Context

The surrounding context of the site includes a mix of residential, commercial, institutional / educational and amenity uses. Building heights in the surrounding area generally range from 1 to 3 storeys, with recent 4 and 5/6 storey residential development along Richmond Road including Deakin Court to the south-west and Richmond Hall to the south-east. Land use zonings in the immediate area include Z1 (Residential), Z2 (Residential Conservation), Z4 (Mixed-Services), Z9 (Open Space), Z10 (Mixed Use), Z12 (Residential Amenity) and Z15 (Institutional & Community).

#### 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.

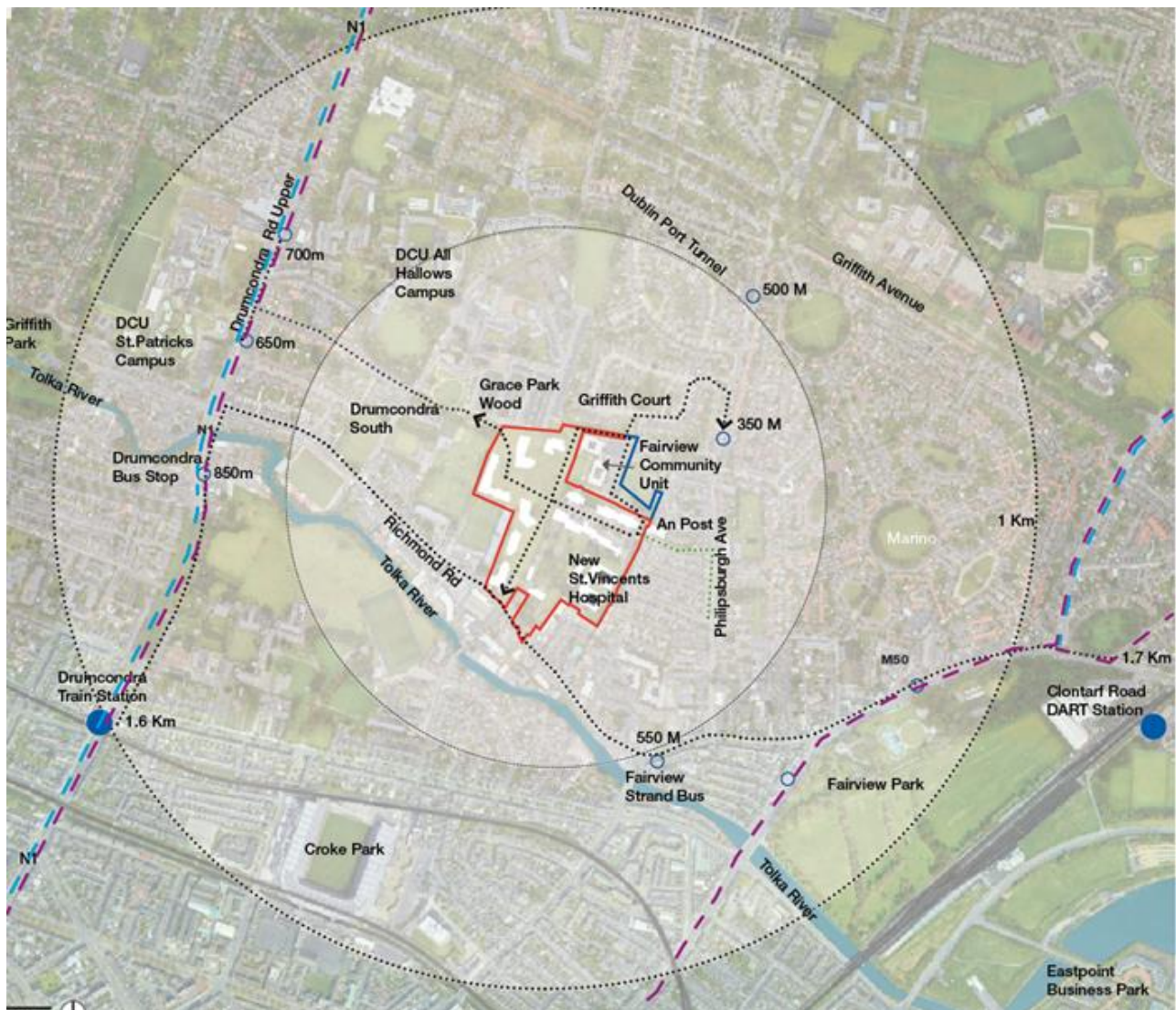
Having regard to the above, the subject site can be considered to fall within a 'public transport corridor', which is identified as one of the key locations in the City for increased heights and densities in Appendix 3 of the Development Plan. The public transport accessibility and Inner Suburban location 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.

As discussed above and illustrated below, the proposed scheme has good connections public transport services and the proposals will deliver significant connectivity and permeability benefits for the area, in accordance with the principles of the 15-minute city, delivery of compact growth and the creation of sustainable neighbourhoods.

**Figure 2.6: Proximity to Public Transport**



Source: STW Architectural Design Statement (Note: The red line indicates the approximate outline of the land within the ownership of the applicant, please refer to STW's Site Location Map and Site Layout Plan for the full extent of the proposed development).



Figure 2.7: Connectivity to Public Transport



Source: OCSC Traffic Impact Assessment

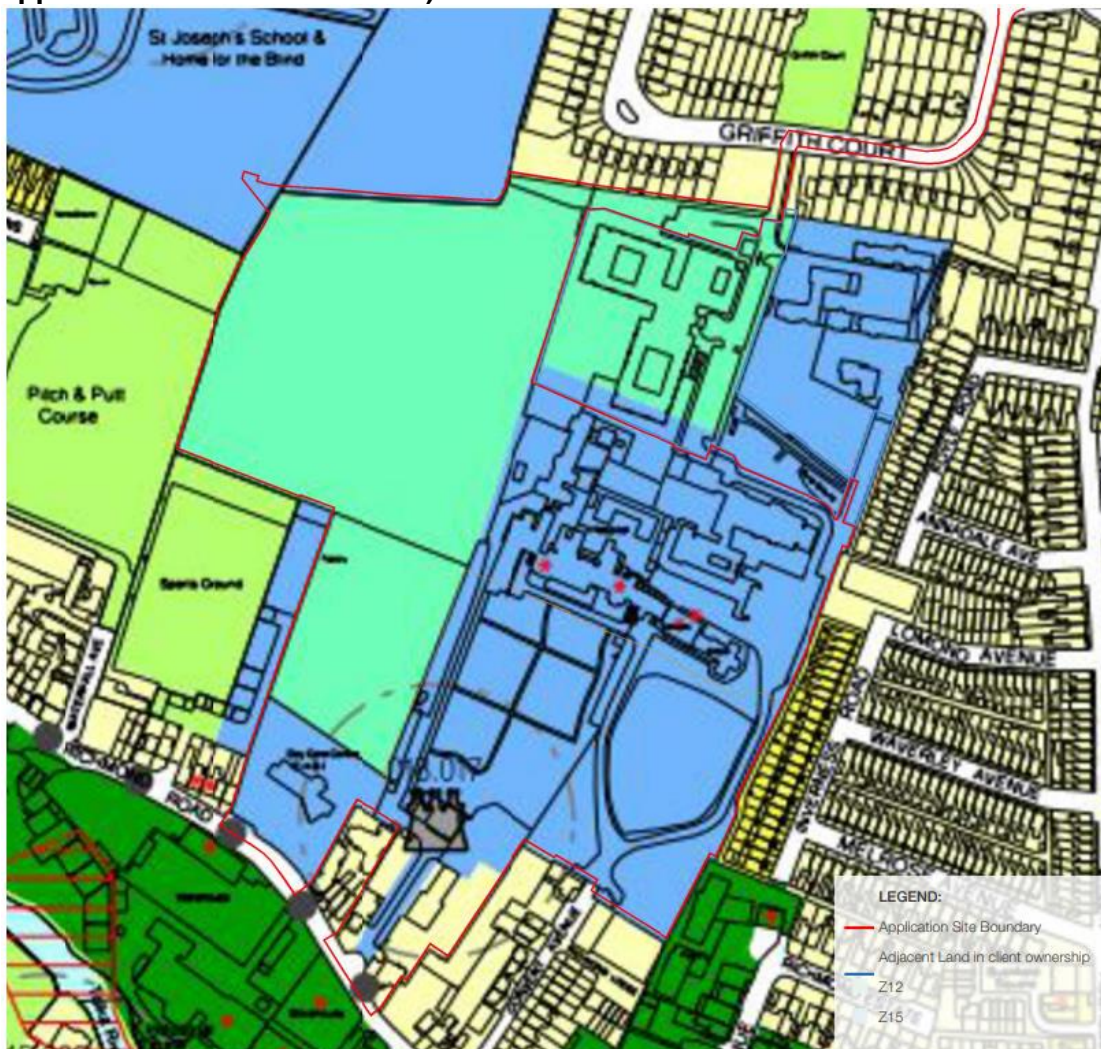
## 2.4 Land Use Zoning Objectives

As illustrated in Figure 2.8, 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, Philipsburg 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.

The land use zoning map indicates that the southern portion of the site includes a recorded monument within the proposed development area, the site of a castle DU018-017. The zone of notification for this monument encloses a large portion of the southern extent of the proposed development area. See IAC's Archaeological Assessment included in EIAR Chapter 12 for further details.



**Figure 2.8: Extract from Map E of the Dublin City Development Plan 2022-2028 (majority of application site outlined in red)**



Source: Map E of the Dublin City Development Plan 2022-2028

## 2.5 S. 247 and LRD Pre-Application Consultations

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.

A 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 Opinion was received on 15<sup>th</sup> December 2022 which states that *“the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the Act constitutes a reasonable basis for an application for Large-scale Residential Development subject to the applicant addressing the issues outlined below in any future application.”*

This planning application is 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 specific information items and further information requested by the Planning Authority have been fully addressed in the documentation now submitted for approval.

### 3.0 PLANNING HISTORY

The following provides planning history of the surrounding area, including details of permissions on the subject site and permissions in the vicinity of the site.

In undertaking the planning history search for the purposes of this Planning Report and Statement of Consistency, relevant planning applications have been identified with regard to their size and scale, their use mix and composition, and their proximity to the proposed development. A zone of influence of c. 500 metres was initially used for the desk-based identification of relevant development in close proximity to the site (for example the SHDs at Conliffe Road and Richmond Road) with larger developments of relevance from a planning and development perspective also considered in the wider area beyond this 500 metre radius (for example the substantial residential development at Griffith Wood, No. 87 North Strand Road / Poplar Row and No. 61 and 63 Fairview Strand (which are all located within a 1km radius of the subject site)).

#### 3.1 Subject site

There have been no recent applications for any significant form of redevelopment on the subject site. The following planning history for the subject lands has been identified based on an online planning history search.

- Reg. Ref.: 4147/09 - DCC issued a final grant of permission on 26<sup>th</sup> January 2010 for removal of 1 no. parking space and the provision of a standby electrical generator and surrounding fence beside the existing ESB substation along an access road to the south west of St. Vincent's Hospital, a protected structure ref. no. 2058.
- Reg. Ref.: 2183/94 - DCC issued a final grant of permission on 23<sup>rd</sup> March 1995 for construction of a single storey glazed conservatory extension to the existing dining area of St. Vincent's Hospital.
- Reg. Ref.: 2185/91 - DCC issued a final grant of permission on 29<sup>th</sup> January 1992 for construction of a single storey 40 bed acute unit an E.S.B. Sub-station and a water storage tank in the hospital grounds.

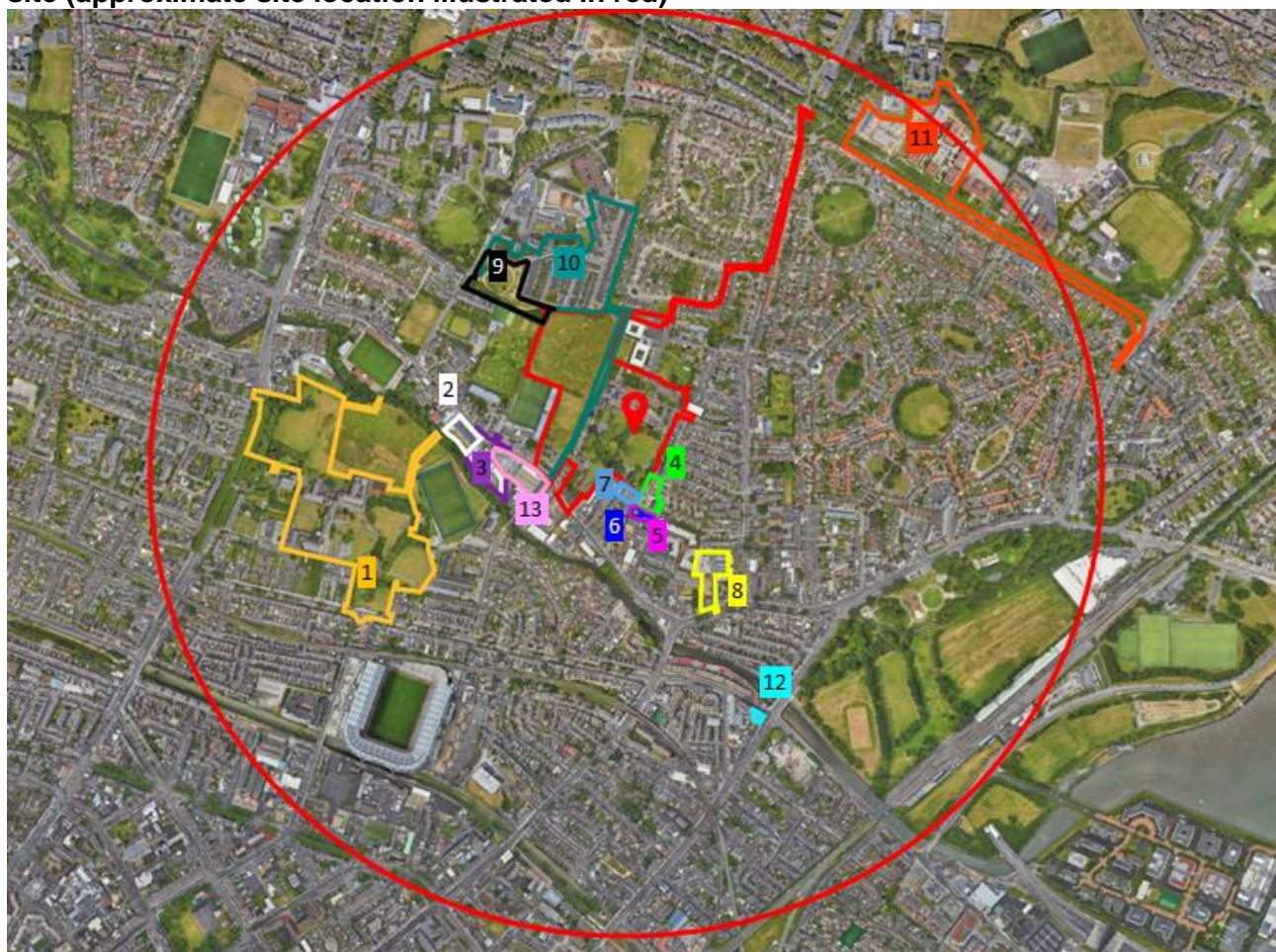
Please refer to EIAR Chapter 4 and Volume 4 of the EIAR for details of a Section 57 Declaration of relevance to the subject lands.

#### 3.2 Other Significant Planning Permissions in the Wider Area

The following provides planning history relating to significant permissions in the surrounding area within the vicinity of the site, with the locations of the applications illustrated in Figure 3.1 for ease of reference.



**Figure 3.1: Map showing locations of significant planning permissions in proximity to subject site (approximate site location illustrated in red)**



**Legend:**

- 1km radius
- 📍 Saint Vincent Hospital Fairview (Subject Site)
- 1 Holy Cross College - ABP Ref.: 310860-21
- 2 No. 144 Richmond Road - DCC Reg. Ref.: 2945/15
- 3 No. 146A and 148-148A Richmond Road - ABP Ref.: 312352-21
- 4 21 and 29 Richmond Avenue - DCC Reg. Ref.: 2575/03
- 5 17 and 19 Richmond Avenue - DCC Reg. Ref.: 3657/21
- 6 No. 17 Richmond Avenue - DCC Reg. Ref.: 4353/19 & ABP Ref.: 306562-20
- 7 Convent Avenue - DCC Reg. Ref.: 3143/22
- 8 Esmond Avenue LRD - DCC Reg. Ref.: LRD6015/22-S3
- 9 Grace Park Wood - DCC Reg. Ref.: 5386/22
- 10 Grace Park Wood DCC Ref.: 2991/15 & ABP Ref.: PL29N.245745
- 11 Griffith Avenue, Marino - SHD ABP Ref.: 303296-18
- 12 No. 87 North Strand Road / Poplar Row - DCC Reg. Ref.: 3601/18
- 13 158A, The former Leydens Wholesalers & Distributors, Richmond Road – DCC Reg. Ref.: LRD6006/23-S3

**Reg. Ref.: 2991/15 & ABP Ref.: PL29N.245745 – Grace Park Wood**

An Bord Pleanála upheld DCC's decision to grant permission in an Order dated 2<sup>nd</sup> March 2016, subject to 17 no. conditions, for residential development of 166 no. dwellings on lands at St. Joseph's Centre, Gracepark Road, Dublin 9. This development has been implemented and is known as Grace Park Wood and is located to the immediate north and north west of the application site.

The development included 125 no. houses and 41 no. apartment units in 4 no. residential blocks, a creche, car and cycle parking and a public park.

Following a request for further information, the scheme was revised including the redesign of Blocks A and B to be merged and provide 12m setback.

Following the submission of a first and third party appeals, the Board in deciding to grant permission states the following in the Order:

*"The Board considered that subject to the amendments of the layout consequent to the conditions attached the proposed development would protect the architectural character and setting of Drumcondra Castle and surrounding buildings and would conform, to the provisions of the Development Plan in relation to the quantum of open space required in the Z15 Zoning area.. The Board further considered that the amendments would satisfy the concerns of the inspector with regard to open space provision permeability and layout and would protect the residential and visual amenities of the area and would, therefore be in accordance with the proper planning and sustainable development of the area."*

Condition 2 of the Board's order states *"The combined apartment Blocks A/B shall be omitted, and the area thus released shall be included in the public open space park situated to the west and northwest. A revised plan shall be submitted to, and agreed in writing with, the planning authority prior to commencement of works on site."*

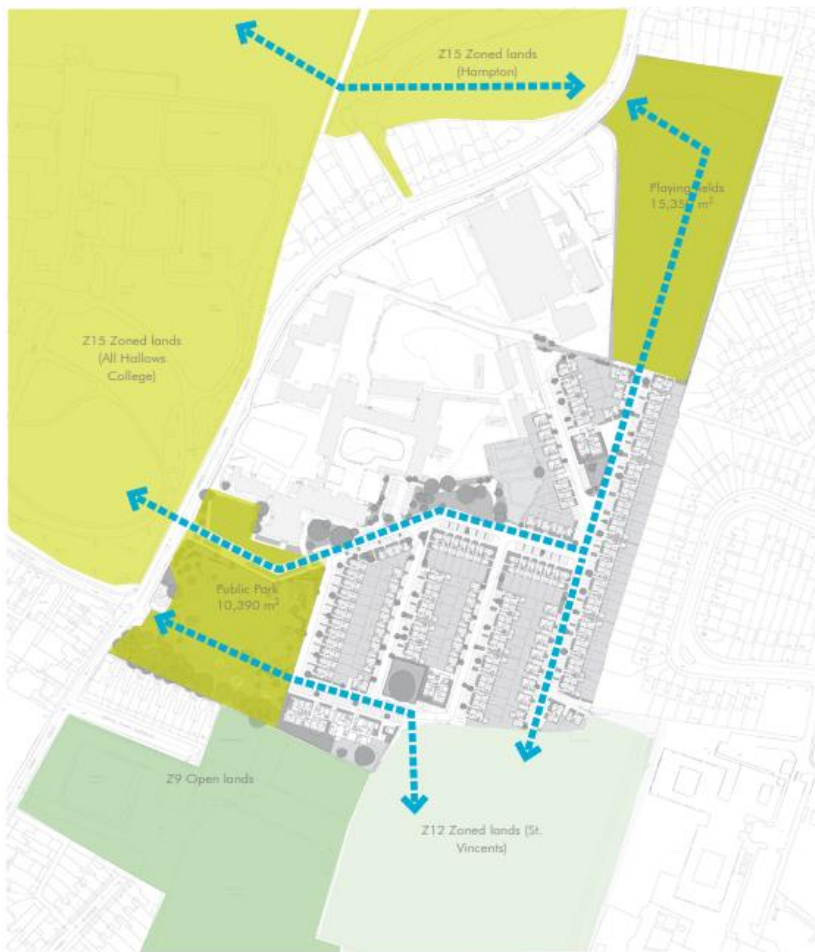
Condition 3 of the Board's order states *"House numbered 73 and 74 shall be omitted and replaced with a suitably designed and landscaped pocket park. Details shall be submitted to, and agreed in writing with, the planning authority prior to commencement of works on site."*

DCC granted permission for the completion and retention of works under Reg. Ref.: 3133/19 consisting of change of house types on Plot No. 45 and Plot No. 46.

The Grace Park Wood residential development and associated public open space has been completed under this permission, and is located to the north / north west of the application site.

As noted below, there is a current application, under Reg. Ref.: 5386/22, for retention and amendments of minor aspects of the development and which is currently subject to a FI request.

**Figure 3.2: Extract from Design Statement for Reg. Ref.: 2991/15 & ABP Ref.: PL29N.245745**  
STRATEGIC LINKAGES



The site strategy allows for strong linkages with the adjoining Z15 zoned lands of Rosmini, All Hallows, and Hampton. There is also the potential for the site to link to the Z12 lands to its south in the future (no such link is part of the current application).

**SHD ABP Ref.: 310860-21 - Clonliffe Road Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9 (subsequently quashed by the High Court)**

Although the High Court issued an order to quash the An Bord Pleanála permission for this site, it is included here for reference purposes. We have reviewed the High Court's judgement and our application seeks to address any items of relevance to the subject application, particularly in respect to the demolition of protected structures and the assessment of development within the curtilage of the protected structures (see relevant Chapters of the EIAR for further information).

An Bord Pleanála issued an Order to grant permission for a Strategic Housing Development at Holy Cross College, Clonliffe Road, on the 4<sup>th</sup> of November 2021. The site is located within 500m of St. Vincent's Hospital. The order was subject to 33 no. conditions. The Board required omission of 22 residential units by condition. A recent judgement from the High Court quashed An Bord Pleanála's decision to grant permission for the development on site.

This SHD development comprised the demolition of a number of existing office/former college buildings on site and the construction of a residential development in 12 no. residential blocks, ranging in height from 2 to 18 storeys to accommodate 1,614 no. Build to Rent apartments with associated residential tenant amenity, 1 no. retail unit, 1 no. café, and a crèche. The development includes a total of 508 no. car parking spaces and 2,507 no. bicycle parking spaces in three separate



basement/podium areas and at surface level. The development also included extensive new public open spaces and communal courtyards, podiums and roof terraces.

**Figure 3.3: Extract of Proposed Site Plan- Masterplan for SHD ABP Ref.: 310860-21**



Condition No. 3 of the Order to grant requires the following amendments / details to be agreed prior to commencement of development:

- The footprint of Block B3 shall be reduced by approximately 18 metres on its eastern side, thereby increasing its buffer zone with Red House. This will result in the loss of 22 number residential units. The proposed access road in front of Red House shall be rerouted accordingly so as to also increase the buffer zone with Red House. Additional, revised landscaping proposals for the buffer zone in front of Red House within the red line boundary shall be submitted. Amended plans, section and elevations, at scale of not less 1 :200, shall be submitted and agreed with the planning authority, prior to the commencement of construction of Block B3.
- Further details of proposed residential tenant amenity facilities to include the provision of increased workstations, working from home hubs and laundry facilities.
- Existing trees within the buffer zone between Block D2 and Red House shall be retained and maintained, where possible.
- Additional planting along the boundary with the Archbishop's House.
- Additional privacy details for ground floor terraces.
- The internal bin store at ground floor level to Blocks A2 and A3 shall be repositioned so as provide greater separation distance with adjoining residential units.
- Elevational drawings, at an appropriate scale, of proposed Electricity Supply Board substations.
- Method Statement detailing construction of proposed basement underneath Formal Garden.



As noted above, a recent judgement from the High Court quashed An Bord Pleanala's decision to grant permission for the development on site.

***SHD ABP Ref.: 303296-18 Griffith Avenue, Marino, Dublin 9 (Griffith Wood)***

An Bord Pleanala issued an Order to grant permission for a Strategic Housing Development at Griffith Avenue, Marino, Dublin 9, on the 27<sup>th</sup> of March 2019. The site is located within c. 1km of St. Vincent's Hospital. The Order was subject to 19 no. conditions.

The permitted development comprises the construction of a residential development (377 apartments and 8 five-bedroom houses). The apartments are in 7 no. residential blocks, ranging in height from 4 to 8 storeys to accommodate 377 no. apartments with associated residential tenant amenity, a mixed use building comprising a creche, café and multi-purpose area. The development also includes extensive new public open spaces and communal courtyards, podiums and roof terraces.

The development is now substantially complete and operated as a private rental sector (PRS) scheme and known as Griffith Wood. It was not applied for as BTR scheme and is not subject to any legal covenants, etc., of relevance to BTR developments.

***DCC Reg. Ref.: 2945/15 - No. 144 Richmond Road, Drumcondra, Dublin 3***

DCC issued a final grant of permission dated the 11<sup>th</sup> January 2016 subject to 22 no. conditions for a 4 no. storey mixed-use development (including 39 no. apartments and 2 no. commercial units) over basement car parking and all associated site development works.

This development has been completed and is located to the south west of the application site, on the southern side of Richmond Road, as illustrated in Figure 3.4 below.

**Figure 3.4: Streetview of No. 144 Richmond Road**



***DCC Reg. Ref.: 3601/18 – No. 87 North Strand Road / Poplar Row, Dublin 3***

Dublin City Council issued a final grant of permission on 7<sup>th</sup> December 2018, subject to 17 no. conditions, for demolition of existing structure on site & the construction of a five-storey mixed use development consisting of: ground floor commercial/ café unit, with 14 apartments (six one-bedroomed, seven two-bedroomed and one three-bedroomed) which include balconies to the north, southeast and west elevations with roof terrace on fourth floor level, internal bike storage, refuse store, new common pedestrian access from Poplar Row, with associated landscaping and site works.

Dublin City Council issued a final grant of permission for amendments to Reg. Ref.: 3601/18 on 1<sup>st</sup> July 2020 under Reg. Ref.: 2213/20, subject to 6 no. conditions, for the increase in height to six storeys and 3 no. additional units. We understand the development has been commenced and is nearing completion at time of writing.

The site is located to the south east of St. Vincent's Hospital and is now substantially complete.

**Figure 3.5: Streetview of No. 87 North Strand Road / Poplar Row, Dublin 3**



***Reg. Ref.: 4353/19 & ABP Ref.: 306562-20 - No. 17 Richmond Avenue, Drumcondra, Dublin 3***

An Bord Pleanála upheld Dublin City Council's decision to refuse permission for the demolition of warehouse and construction of a five storey building for a new 40 no. bedroom student accommodation development at No. 17 Richmond Avenue.

The Board's refusal was subject to 2 no items. The first reason for refusal was in relation to the proposed development would be contrary to principles of good streetscape design and would not make a positive contribution to the built environment in terms of design quality, scale, height and relationship to adjacent buildings. The second reason for refusal relates to the development would result in significant overlooking of adjoining sites and have serious and undue impact on existing residential amenities.

***Reg. Ref.: 2553/00 – No's 21, 23, 27, 29 & 30 Richmond Avenue, Dublin 3***

Dublin City Council refused permission on 29<sup>th</sup> January 2001 for the demolition of existing building No. 21, 23, 27, 29 & 30 Richmond Avenue, demolition of industrial units at rear of No. 21 and 30 Richmond Avenue, and construction of 4 residential blocks with a total of 77 apartments over underground carpark.

***Reg. Ref.: 2575/03 - Rear of 21 and 29 Richmond Avenue and, Site to Side of 31 Richmond Avenue, Fairview, Dublin 3***

Dublin City Council granted permission on 12<sup>th</sup> November 2003, subject to 17 no. conditions, for the demolition of existing buildings at 21 and 29 Richmond Avenue, the construction of 3 no. three to four storey blocks, over basement car park, comprising 48 no. apartments. Dublin City Council granted an extension of duration of this permission under Reg. Ref.: 2575/03/x1 until the 11<sup>th</sup> of November 2011.

Dublin City Council issued a split decision under Reg. Ref.: 6547/06, for amendments to the permitted development under Reg. Ref.: 2575/03 which comprise the addition of 1 no. unit on the penthouse level of Block A, increasing the number of floors in Blocks A and Blocks B (from 4 to 5 storeys over basement, inclusive of penthouse level), accommodating 10 no. extra apartments. Dublin City Council granted permission for the proposed additional apartment at penthouse level of Block A. Dublin City Council refused permission for the additional storey for Block A and B based on an insufficient quantum of car parking, that the development would contain insufficient proportion of family sized housing and the scale, height and density of development would represent overdevelopment of the site.

Dublin City Council granted permission under Reg. Ref.: 4155/08 for the demolition of the existing house and construction of a 6 storey development, above basement, of 10 no. apartments at No. 19 Richmond Avenue.

This development adjoins the application site to the southeast. The permission was partially implemented but not completed. We note that a second application to extend the duration under Reg. Ref.: 2575/03/x2 was subject to a FI request but no response was submitted and therefore the application was declared invalid.

### ***Reg. Ref.: 3143/22 - Convent Avenue, Dublin 3***

Dublin City Council refused permission on 21<sup>st</sup> March 2022 for a student accommodation development on a site at Convent Avenue, Dublin 3. The site is located to the south of the proposed new hospital building. The development comprised the demolition of the existing single-storey warehouse structure, and other structures, and the construction of an apartment development of 2 no. six storey blocks with a total of 18 no. student accommodation apartments.

The decision to refuse was subject to 2 no. reasons. The first reason for refusal was that the proposal would detract from the visual amenities of the area due to its height, scale and massing and detract from the residential amenities of existing residents and potential occupants through overbearing and overlooking impacts. The second reason for refusal related to insufficient quantum of appropriate and usable indoor and outdoor communal and recreational facilities to serve the student accommodation development.

The decision was subject to a first party appeal to ABP; however, the appeal was withdrawn.

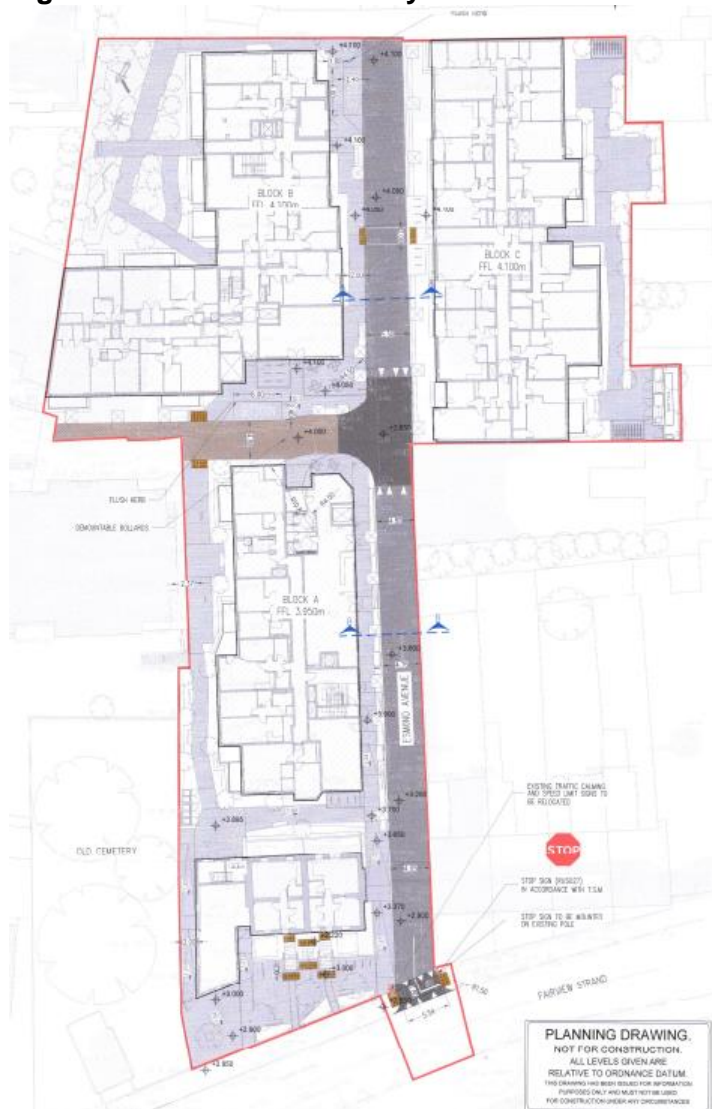
### ***3.3 Other relevant permissions which are under consideration***

#### ***Esmond Avenue LRD - Reg. Ref.: LRD6015/22-S3 – No. 61 Fairview Strand and No. 63 Fairview Strand, No. 59A Fairview Strand, at Warehouse on Esmond Avenue, at No.19 Esmond Avenue and No.21 Esmond Avenue and at rear No.19 Philipsburgh Avenue, Fairview, Dublin 3***

DCC issued a notification of decision to grant permission on the 13<sup>th</sup> of December 2022 for an LRD application consisting of 114 apartments and 4 commercial units with a total combined gross floor area (excluding basements) of 9,456.15 sqm. The development included demolition of existing structures, construction of three new apartment blocks of 2 to 5 storeys in height, reinstatement of the 2 houses at No's 61 and 63 Fairview Strand to form 2 three bedroom apartments and reorder existing underground car park. The density is 220 units per hectare.

The notification of decision to grant is subject to 32 no. conditions. The application is currently subject to a third party appeal under ABP Ref.: 315584-23. A decision is due by the 8<sup>th</sup> May 2023.

The site is situated c. 500m to the southeast of St. Vincent's Hospital.

**Figure 3.6: Extract of Site Layout for LRD under Reg. Ref.: LRD6015/22-S3**

**Richmond Road SHD ABP Ref.: 312352-21 - No. 146A and 148-148A Richmond Road, Dublin**

An SHD application was submitted to An Bord Pleanála on the 23<sup>rd</sup> of December 2021 on a site which is situated c. 500m to the east of the St. Vincent's Hospital application site. The development comprised the demolition of all existing structures and the construction of mixed use development of a café/retail unit and 183 no. BTR apartments in a part 6 No. to part 10 No. storey building over basement. The development also includes the construction of a new section of flood wall to the River Tolka along the site's southern boundary. The development will also include the repair and maintenance of the existing river wall on site adjacent to the River Tolka. The development also provides ancillary residential amenities and facilities and all associated development.

A decision was due to be made by the Board on the 22<sup>nd</sup> of April 2022, however, the statutory deadline was not met and there is no revised decision date available at present.

Further details of the application can be found on: [www.richmondroadshd.ie](http://www.richmondroadshd.ie)

**Reg. Ref.: 3657/21- 17 and 19 Richmond Avenue**

A decision to grant was issued by DCC, dated the 14<sup>th</sup> of April 2022, for development at 17 and 19 Richmond Avenue, 100m to the south east of the subject lands. The decision was subject to third



party appeals to ABP and the target decision date was the 13/09/22, however, no decision has been issued to date.

The development applied for was described as follows in the public notices:

*“The development will consist of; (A) Demolition of existing dwelling and existing steel shed to the rear of subject site. (B) The construction of 2 no. separate apartment blocks yielding a total of 27 no. apartments (21 no. 1-bed units and 6 no. 2-bed units), comprising (i) Block 1 - 6 storeys in height consisting of 6 No. 1-bed units and 6 No. 2-bed units (ii) Block 2 - 5 storeys in height consisting of 15 No. 1-bed units. (iii) Pedestrian access via Richmond Avenue. (iv) Provision of 60 no. bicycle parking spaces. (v) Communal open space including 2 no. roof gardens. (vi) Substation and Plant rooms. (vii) Bin Storage. (viii) All associated engineering and site development works necessary to facilitate the development.”*

Condition 3 of the notification of decision to grant clarifies that the permission granted is for 21 no. apartments, following revisions at FI stage and conditions attached to the decision.

This site is located to the south of the unfinished apartment development to the north, which consists of a four storey shell structure, and which currently detracts from the amenity of the area.

**Reg. Ref.: 5386/22 - Grace Park Wood, St. Joseph's, Grace Park Road, Drumcondra, Dublin 9**

An application was submitted to Dublin City Council for retention and amendments to the permitted development under Reg. Ref.: 2991/15 and ABP Ref.: PL29N.245745. Retention permission related to revisions to the public park at the entrance to Grace Park Wood and permission is sought for landscaping revisions to the permitted public park.

A request for further information was issued by Dublin City Council on the 8<sup>th</sup> February 2023.

**Reg. Ref.: LRD6006/23-S3 - Leyden's Cash and Carry, Richmond Road, Dublin 3, D03 YK12**

An application was submitted on 1<sup>st</sup> March 2023 for Large-scale Residential Development (LRD) comprising the demolition of existing industrial structures on site and the construction of a mixed-use development including artist studios, a creche, a retail unit, a gym and 133 No. residential units (65 No. one bed apartments and 68 No. two bed apartments). The development will be provided in 3 no. blocks ranging in height from part 1 no. to part 10 no. storeys. The site is located to the south of Richmond Road and includes upgrades to the public road up to part of the application site and there is an overlap in the red line boundary.

The proposed improvements to Richmond Road provided for in both applications, and the new entrance plaza on the St. Vincent's Hospital Fairview site, will be positive additions to the area.

A decision is due to be made by the Planning Authority on the 25<sup>th</sup> of April 2022.

Further details of the application can be found on: [www.leydenslrd.ie](http://www.leydenslrd.ie)

## 4.0 DETAILS OF THE PROPOSED DEVELOPMENT

The following sections provides a summary of key aspects of the proposed development with reference to accompanying application documentation and seeks to address the requirements of the Form 19- Supplementary Information for LRD Applications.

### 4.1 Key details of the proposed development

Key details of the proposed development are broken into its constituent parts and presented in Tables 4.1 and 4.2 below for ease of reference and described in the following sub-sections below. For a further detailed description of the development and the proposed architectural design, please refer to the Architectural Design Statement prepared by Scott Tallon Walker. For further details in respect of the landscape design proposals please refer to the Landscape Design Statement and drawings prepared by Niall Montgomery + Partners and for further details on transport and drainage services please refer to the documentation prepared by OCSC Consulting Engineers.

**Table 4.1: Overall Proposed Development Details**

	Proposed Development
<b>Application Site Area</b>	<ul style="list-style-type: none"> <li>• <b>Overall Application Site Area:</b> 9.46 hectares</li> <li>• <b>Land in applicant's ownership:</b> 8.71 hectares</li> <li>• <b>Residential Site Area:</b> 6.04 ha</li> <li>• <b>Hospital Site Area:</b> 2.67 ha</li> </ul>
<b>No. Units</b>	811 no. residential units (including 494 no. standard designed apartments and 317 no. BTR units) 73 no. beds in a new hospital building, providing mental health services
<b>Demolition</b>	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 building located in the southeast of the site, (5) Crannog Day Hospital building located in the southwest of the site, and (6) extensions to the Laundry building and Rose Cottage.
<b>Residential Density</b>	<ul style="list-style-type: none"> <li>• Residential Net density: 182.66 dwellings per hectare (811/4.44 ha). Based on residential site area excluding public open space and hospital site</li> <li>• Gross density: 134 dwellings per hectare (811/6.04 ha). Based on total residential site (6.04 ha).</li> <li>• Net density based on total site area (excluding public open space): 114 dwellings per hectare (811/7.11 ha)</li> </ul>
<b>Plot Ratio</b>	- Total Site: 0.985 (total site based on land in applicant's ownership)  - Hospital Site: 0.314 (based 8,411 sq.m / 2.67 ha) - Residential Site: 1.25 (based on 75,261 sq.m / 6.04 ha)
<b>Site Coverage</b>	- Total Site: 21.6%
<b>Public and Communal Open Space</b>	Provided for the residential site area (6.04 ha):  - Z12 Zoned Area – 3.74 Ha

	<p>Public Open Space Area Required (25%) 0.935 Ha  Public Open Area Provided (25.8%) 0.965 Ha  - Z15 Zoned Area – 2.29 Ha  Public Open Area Required (25%) 0.573 Ha  Public Open Area Provided (28.3%) 0.65Ha</p> <p>Total Site Public Open Area Required (25%) 1.51 Ha  Total Site Public Open Area provided (26.2%) 1.6 Ha</p> <p>- 5,645 sq.m external communal open space</p>
<b>Car Parking</b>	<p>Hospital – 76 no. spaces (72 spaces + 4 disabled parking spaces)</p> <p>Residential - 247 no. spaces (0.3 per unit) (240 no. spaces in basement + 7 no. spaces at surface level) (7 no. car club spaces identified in the basement)</p> <p>Commercial/community – 9 no. spaces (surface level)</p> <p>Total – 329 no. spaces</p> <p>124 no. EV spaces for the residential development, 39 no. EV spaces for the new hospital building and 4 no. EV spaces for the commercial and community uses.</p>
<b>Cycle Parking</b>	<p>Hospital – 50 no. spaces, including 42 no. long stay spaces (85 staff) and 8 short stay spaces (73 beds).</p> <p>Residential - 1,680 no. cycle spaces, including 1,274 no. long stay and 406 no. visitor spaces. 947 no. cycle spaces (including cargo and electric) are located within cycle stores at basement level and 733 no. spaces at surface level.</p> <p>Commercial/community uses – 84 no. spaces at surface level</p>

Source: STW's Architectural Design Statement and Schedule of Accommodation

**Table 4.2: Key Residential Development Details**

Proposed Development			
<b>Application Site Area</b>	<ul style="list-style-type: none"> <li><b>Overall Application Site Area:</b> 9.46 hectares</li> <li><b>Land in applicant's ownership:</b> 8.71 hectares</li> <li><b>Residential Site Area:</b> 6.04 ha</li> <li><b>Net Residential Area:</b> 4.44 ha</li> </ul>		
<b>No. Units</b>	811 no. units including 494 no. Standard Design Apartments (SDA) and 317 no. Build to Rent (BTR) units		
<b>Demolition</b>	GFA to be demolished- 2,641.6 sq.m		
<b>Mix</b>	SDA – 10 studios (2%) 236 1 beds (48%) 199 2 beds (40%) 49 3 beds (10%) Total= 494 (61%)	BTR- 8 studios (2.5%) 151 1 beds (48%) 150 2 beds (47%) 8 3 beds (2.5%) Total= 317 (39%)	Total 18 studios (2%) 387 1 beds (48%) 349 2 beds (43%) 57 3 beds (7%)
<b>Part V Units</b>	174 (21.45%)		
<b>Plot Ratio</b>	1.25 (based on 75,261 sq.m / 6.04 ha)		
<b>Site Coverage</b>	21.6% Residential		

<b>Accessibility</b>	<p>Central and/or Accessible Urban Location.</p> <p>The site is within reasonable proximity to the city centre and easy walking distance to high quality public transport corridors and stops, two third-level institutes, contains an existing / proposed hospital facility and is located in proximity to a range of employment uses</p>
<b>Density</b>	<ul style="list-style-type: none"> <li>Residential Net density: 182.66 dwellings per hectare (811/4.44 ha). Based on residential site area excluding public open space and hospital site.</li> <li>Gross density: 134 dwellings per hectare (811/6.04 ha). Based on total residential site (6.04 ha).</li> <li>Net density based on total site area (excluding public open space: 114 dwellings per hectare (811/7.11 ha)</li> <li></li> </ul>
<b>Building Heights</b>	<p>Block A – Part 2 to 7 storeys  Block B – 8 storeys  Block C – Part 6 to 7 storeys over part lower ground / basement level  Block D-E – Part 5 to 13 storeys over basement  Block F – Part 4 to 9 storeys  Block G – Part 4 to 9 storeys  Block H – 5 storeys  Block J – 4 storeys  Block K - Existing part 3 to 4 storey protected structure and adjoining older buildings  Block L - Part 4 to 6 storeys</p> <p>Max height 47.15m (Block D-E)</p>
<b>Dual Aspect</b>	<p>54% (436 units)  No north-facing single aspect apartments</p>
<b>Car Parking</b>	247 (0.3 per unit)
<b>Cycle Parking</b>	Residential - 1,680 no. cycle spaces including 1,274 no. long stay and 406 no. visitor spaces. 947 no. cycle spaces (including cargo and electric spaces) at basement level and 733 no. spaces at surface level (bike stores and Sheffield stands).
<b>Motorcycle Parking</b>	13 no. for the residential development
<b>Storage and Private Amenity Space</b>	Apartment storage complies with Apartment Guidelines 2020 / 2022 – confirmed in STW HQA and Area Schedule document.
<b>Minimum floor areas</b>	Minimum floor areas in apartments complies with Apartment Guidelines 2020 / 2022 – confirmed in STW HQA and Area Schedule document
<b>Floor to ceiling height</b>	<p>2.7m at ground floor  Minimum 2.4m at upper levels</p>
<b>Apartments per floor per core</b>	<p>The maximum permitted number of apartments per floor per core is 12 for Standard Design Apartments (approx. 61% of this development). The ratio in this development varies from 6 to 12 units/core/floor.</p> <p>In the BTR element of the scheme (approx. 39% of all apartments) the ratio ranges from 7 to 16.</p>



<b>Commercial/Community Uses + Resident Support Amenities and Facilities</b>	Total= 4,781.5 sq.m Total resident's services and amenities – 1,264.4 sq.m Gym, creche, co-working, library, community hall in Block K = 3,412 sq.m
<b>Public and Communal Open Space</b>	5,645 sq.m external communal open space
<b>Children's Play Area</b>	420 sq.m of Natural Play Area

## 4.2 Demolition Works

As illustrated in Figure 4.1, the proposal includes the demolition of existing structures on site with a gross floor area (GFA) of 5,872 sq.m including the westernmost range of the hospital building, which includes 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 building located in the southeast of the site, (5) Crannog Day Hospital building located in the southwest of the site, and (6) extensions to the Laundry building and Rose Cottage.

**Figure 4.1: Extract of the Existing / Demolition Site Plan (buildings to be demolished shown in red)**



Source: STW Architectural Drawing (SVRD-STW-ST-ZZ-DR-A-022101). Note: please refer to full scale version

This application includes documentation (EIAR Chapter 13, EIAR Volume 4 and STW Architectural Conservation Report) 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 and having regard to the High

Court decision for the Clonliffe College SHD (see Section 3.0 Planning History for further information).

Accordingly, STW architectural drawings and Section 7.5 of the Architectural Heritage Impact Assessment, submitted under Volume 4 of the EIAR, identifies exactly what demolition is involved in the application, identify whether each individual element of demolition technically involves the demolition of any part of a protected structure, and where it does it provides a justification 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.

We refer to Section 7.5 of Architectural Heritage Impact Assessment (Volume 4 of the EIAR) prepared by Carrig, which summarises circumstances, rationale and justification for the demolition of structures forming part of / within the curtilage of protected structures and associated mitigation measures proposed, as follows:

**Table 4.3: Architectural Heritage Impact Assessment Summary of Demolition, Justification and Mitigation Measures Proposed**

Structures/Features to be demolished	Justification	Mitigation Measures Proposed
<b>Removal of later additions to the protected structure Hospital Buildings</b> <i>RPS Ref.: 2032</i>	<ul style="list-style-type: none"> <li>- To rationalize the external elevations of the protected structures which form the former Convent and Hospital buildings, it is proposed to remove a number of structures and features which are considered to be inappropriate later additions.</li> <li>- They do not enhance the character of the protected structures, nor does their loss represent a major loss of historic fabric.</li> <li>- In some instances, removing these structures creates the opportunity to expose original features and in all cases it supports the new function and improved accessibility of these buildings as amenity facilities for the new residential development.</li> </ul>	<ul style="list-style-type: none"> <li>- Details of any alterations to openings and new doors/windows will be in keeping with the materials and proportions of the original finishes.</li> <li>- Careful demolition will be undertaken where fabric to be removed abuts the retained heritage fabric in accordance with BS: 7913:2013 and Architectural Heritage Protection, Guidelines 2011.</li> <li>- Any scarring to the heritage buildings will be made good using salvaged bricks, lime mortar and finished with lime render.</li> <li>- Some original openings be re-exposed and window joinery redecorated.</li> <li>- Adjusted levels will improve the overall site accessibility which is a key public benefit for this site.</li> </ul>
<b>Demolition of the westernmost wing of Hospital Phase 2 complete.</b>	<ul style="list-style-type: none"> <li>- The buildings proposed to be demolished in this location are not in active use by the hospital.</li> <li>- Demolition of the existing buildings is required to allow for the construction of the new residential development, the new hospital providing mental health services, and their associated amenities.</li> <li>- Refurbishing the existing buildings on the site proposed for demolition</li> </ul>	<ul style="list-style-type: none"> <li>- The loss of original historic fabric will be balanced against the provision of new high-quality residential facilities.</li> <li>- Allow for the conservation, repair and regeneration of the protected structures on the site and facilitate the development of the new hospital (providing mental health services).</li> </ul>

	<p>would not result in the delivery in the sufficient quantum of units which is required to fund the new hospital.</p> <ul style="list-style-type: none"> <li>- Due to the volumetric form and layout of the wards and clinical spaces they cannot be adapted to provide the residential units needed.</li> <li>- A reduction in unit numbers will have a financial impact for the development of the hospital and could jeopardise its development.</li> <li>- The conservation of the protected structures will represent a considerable cost outlay. The developer is investing heavily in the reuse of Block K [the current Hospital building], the Laundry building, Richmond House, Brooklawn and the wider grounds as public open space. These structures pose a challenge as there is finite opportunities for viable reuse.</li> <li>- The risk of the new hospital not being built is a significant one which will impact on patients and the local community, and result in the possibility of the existing protected structures falling into further disrepair if St. Vincent's Hospital does not continue to operate on this site.</li> <li>- The existing buildings proposed for demolition divide the site creating an enclosed space that is counterintuitive to what the scheme is trying to achieve and compromises the quality of the shared open spaces.</li> <li>- The demolition of buildings will improve connectivity and permeability of the site. The existing site is located within a very large and highly impermeable urban block. The overall site masterplan has the potential of becoming a key link at a pedestrian level that can support local amenities and create the opportunity for the site to become a destination at a neighbourhood level.</li> <li>- There is a need for the provision of this public open space and parklands within the scheme for patients, tenants and local residents.</li> </ul>	<ul style="list-style-type: none"> <li>- The wing proposed for demolition is of historical and architectural value. It was built as a later addition to the 1861 first Phase of the hospital and mirrors the form of the opposite wing. The demolition of this later wing does not represent a permanent loss of architectural detail as the original form is represented by the eastern 1861 wing.</li> <li>- The Phase 2 wing has been significantly obscured and altered by the 1970s development of the Freeman wing and other later additions to the rear, compromising its significance and overall form.</li> <li>- The introduction of the 19<sup>th</sup> and 20<sup>th</sup> century hospital wings served to consolidate the various component parts, but at the same time fundamentally altered their form and legibility with each iteration. This development represents an ongoing process of integration, development and adaption which has characterised the hospital's presence on this site over the centuries.</li> <li>- The proposed scheme will conserve and rehabilitate approximately 3,500 sq.m of historic buildings on the site and provides for long term sustainable uses for them.</li> <li>- Careful demolition will be undertaken where fabric to be removed abuts the retained heritage fabric in accordance with BS: 7913:2013 and Architectural Heritage Protection, Guidelines 2011.</li> </ul> <p>Scarring to be finished using salvaged cut stone. Undamaged high-quality materials are to be salvaged for reuse either on this site or elsewhere</p>
<b>Demolition of the Freeman Wing building complete.</b>	<ul style="list-style-type: none"> <li>- The existing buildings to be demolished currently divide the site creating an enclosed space that is</li> </ul>	<ul style="list-style-type: none"> <li>- 1970's wing is considered to have low historic and architectural significance.</li> </ul>



	<p>counterintuitive to what the scheme is trying to achieve and compromises the quality of the shared open spaces.</p> <ul style="list-style-type: none"> <li>- The westernmost end of the hospital has been altered significantly and from the front is predominantly obscured by the Freeman Wing which was added in the 1970s and is incongruous to the setting, compromising the group value of the range of hospital buildings.</li> <li>- There is a need for the provision of Public Open Space and parklands within the scheme for patients, tenants, and local residents.</li> </ul>	<p>The mitigation is to balance the loss of fabric against the provision of newly designed high-quality facilities which allow for the practical upgrades to the majority of the historic structures and to ensure that the protected structures on the site can be afforded a sustainable future use.</p>
<p><b>Demolition of St. Teresa's Ward complete.</b></p>	<p><b>[Refer to justification provided above]</b></p> <ul style="list-style-type: none"> <li>- St Teresa's is not in active use and was last used as hospital accommodation in 2014.</li> <li>- The demolition of buildings is required in phase 1 of construction to allow for access to the hospital complex buildings for their refurbishment.</li> <li>- Analysis was undertaken by STW to assess viability of incorporating this building into the scheme. It has been determined that it cannot be viably adapted to good quality, functional apartment accommodation due to the scale and form of the existing spaces</li> <li>- which is required in this location to ensure the viability of the overall scheme.</li> </ul>	<ul style="list-style-type: none"> <li>- The removal of this structures allows for progression of wider masterplan providing significant public and social benefit through allowing for the building of a new hospital and housing scheme.</li> <li>- Historic fabric from St Teresa's will carefully salvaged for repair of the main hospital. Fabric may include timber parquet flooring, fireplaces, internal window joinery.</li> <li>- Careful demolition will be undertaken where fabric to be removed abuts the retained heritage fabric in accordance with BS: 7913:2013 and Architectural Heritage Protection, Guidelines 2011. Ref to Vol X St Teresa &amp; Salvage Report.</li> </ul>
<p><b>Demolition of the Outbuildings and Nurse Training School to the north of the protected structures</b></p>	<ul style="list-style-type: none"> <li>- The demolition of buildings is required in phase 1 of construction to allow for access to the hospital complex buildings for their refurbishment.</li> <li>- Analysis was undertaken by STW to assess viability of incorporating these buildings into the scheme. It has been determined that it cannot be viably adapted to good quality, functional apartment accommodation which is required in this location to ensure the viability of the overall scheme.</li> </ul>	<ul style="list-style-type: none"> <li>- These buildings are considered to be of little or no architectural merit, nor do they contribute to the character and setting of the historic structures.</li> <li>- The removal of this structures allows for progression of wider masterplan providing significant public and social benefit through allowing for the building of a mixed use development (new hospital and housing scheme).</li> </ul>

Source: Chapter 13 Architectural Heritage of and Vol 4 AHIA EIAR

The Architectural Heritage Impact Assessment states that *“On the basis of the above analysis, it is our opinion that exceptional circumstances exist which allow the granting of planning permission by the Planning Authority, or the Board on appeal, in accordance with section 57(10)(b) of the Planning and Development Act 2000 (as amended).”*

#### 4.3 Protected Structures

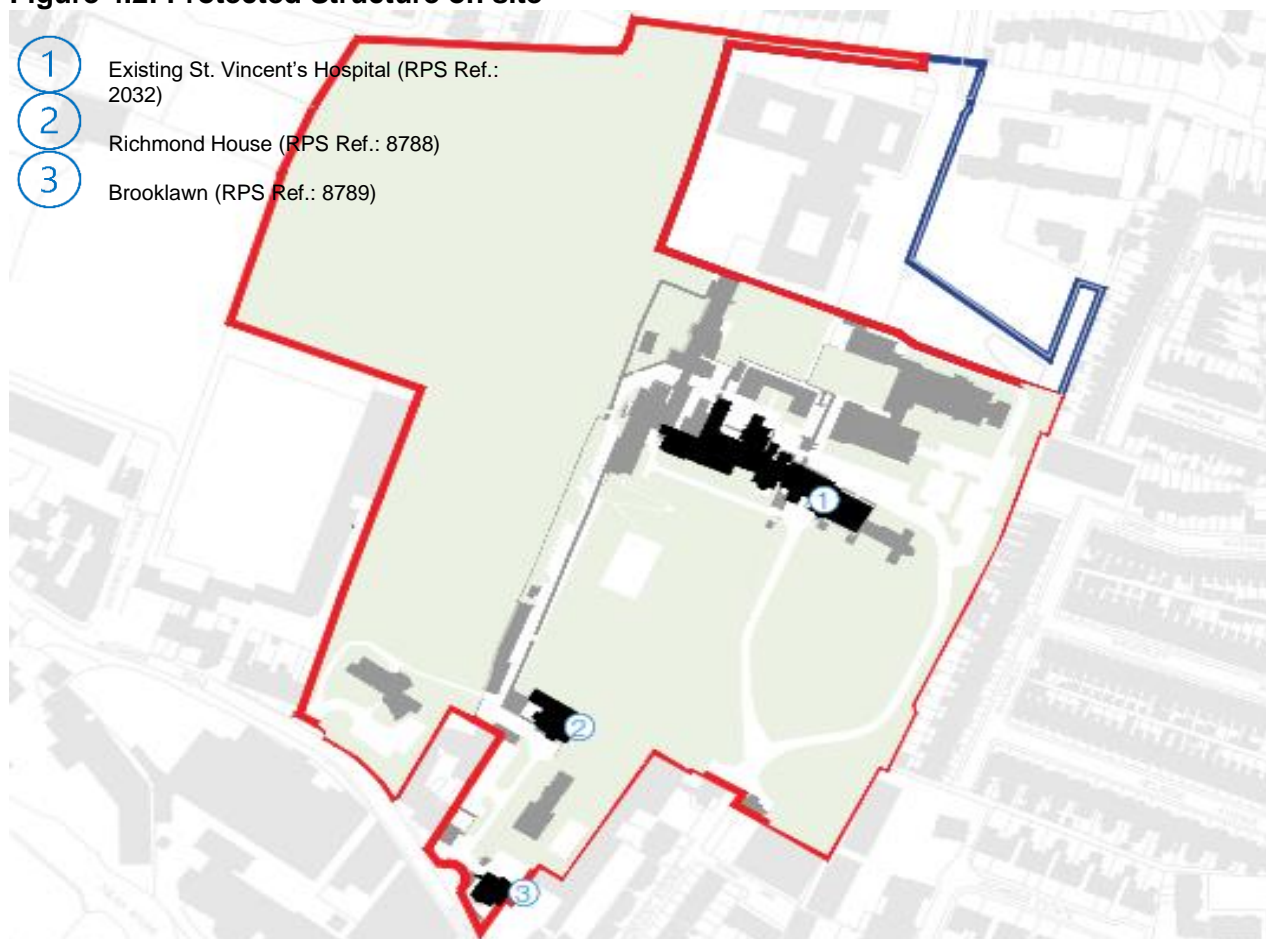
As outlined above, the site comprises 3 no. protected structures, Richmond House (RPS Ref.: 8788), Brooklawn (RPS Ref.: 8789) and the existing St. Vincent's Hospital (RPS Ref.: 2032) referred to as Block K in the planning application documentation. These RPS references are described as follows in Volume 4, Record of Protected Structures of the Development Plan:

*‘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’.*

These buildings are to be retained and reused, with internal and external works required for the repurposing and to ensure their long-term future. Over 4,800 sq.m of historic fabric will be retained and restored.

**Figure 4.2: Protected Structure on site**

Source: Scott Tallon Walker Architects - Architectural Conservation Report. Note: The red line indicates the approximate outline of the land within the ownership of the applicant, not the overall application site boundary.

#### 4.3.1 Existing St. Vincent's Hospital - Block K (RPS Ref.: 2032 except for the Chapel) and Block J

The application includes for the change of use and alterations to the existing St. Vincent's Hospital buildings, part of which is a protected structure under RPS Ref.: 2032, (referred to as Block K) from lower ground to third floor level to provide for a mixed use building including community facilities, commercial uses and residential amenities and facilities. The building will be separated into 4 no. parts (Block K1, K2, K3 and K4).

Block K1 will include a gym at ground and first floor levels and residential amenities and facilities at second and third floor levels. Block K2 will include a café and a community library at ground floor level and co-working spaces at first, second and third floor levels. Block K3 will include a childcare facility over three levels at lower ground, ground and first floor level and Block K4 is proposed as a community hall. Alterations to the existing buildings include the removal of external walls, a stair core, external elements to the northern and southern façade, internal walls, windows and doors, repairs and alterations, and the construction of a new lift and stair core for Block K1, K2, K3. A part two to part four storey building is proposed as an extension to the western end of Block K (referred as Block J and is described below).

Figure 4.3 illustrates the existing hospital complex, with buildings no. 2 and 3 protected structures that are to be retained along with building no. 1, which is the existing hospital building and chapel, resulting in 3,353 sq.m of retained buildings on this part of the site. The proposal includes the

demolition of the westernmost range of the hospital building, which includes St. Teresa's and the Freeman Wing (within the curtilage of RPS Ref.: 2032).

The alterations to the existing St. Vincent's Hospital buildings to facilitate the change of use, includes the removal of external walls, a stair core, external elements to the northern and southern façade, internal walls, windows and doors, new rainwater goods, associated repairs and alterations, the construction of a new lift and stair core for Block K1, K2 and K3, and all associated conservation works.

**Figure 4.3: Protected Structure at the existing St. Vincent Hospital complex**



Source: Scott Tallon Walker Architects - Architectural Conservation Report



**Figure 4.4: Protected Structure to be removed highlighted in red – South Façade**

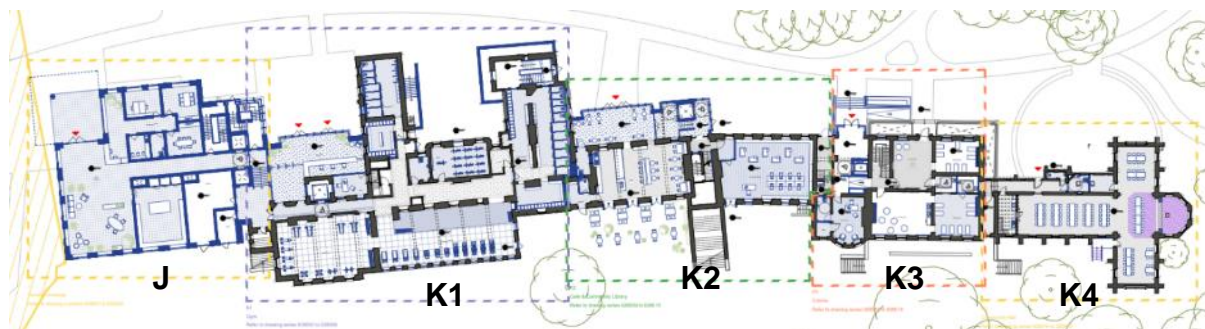
Source: Scott Tallon Walker Architects - Architectural Conservation Report

**Figure 4.5: Protected Structure to be removed highlighted in red – North Façade**

Source: Scott Tallon Walker Architects - Architectural Conservation Report

More details of the proposed modifications are provided in the Architectural Conservation Report prepared by Scott Tallon Walker Architects and Chapter 13 – Architectural Heritage and Volume 4- Architectural Heritage Impact Assessment, and associated appendices, of the EIAR.



**Figure 4.6: Extract of the Proposed Ground Floor Plan for Block K**

Source: Scott Tallon Walker Architects - Architectural Conservation Report

**Figure 4.7: Aerial View of the existing St. Vincent's Hospital**

Source: Scott Tallon Walker Architects - Architectural Conservation Report

#### 4.3.2 Richmond House (RPS Ref.: 8788)

Richmond House and associated structures (RPS Ref.: 8788) will be refurbished for hospital administration use, with a GFA of 397 sq.m, and the proposed refurbishment works include the removal of an external staircase and balcony, removal of some internal walls, internal renovations, repair of the facades, repair and renewal of rainwater goods, and all associated conservations works.

#### 4.3.3 Brooklawn (RPS Ref.: 8789)

Brooklawn (RPS Ref.: 8789) will be refurbished for hospital administration use, with a GFA of 301 sq.m, and the proposed refurbishment works include the removal of an external staircase, replacement of rooflights, removal of some internal walls, internal renovations, repair of the facades, repair and renewal of rainwater goods, and all associated conservations works.

Please refer to the Architectural Conservation Report and relevant drawings prepared by Scott Tallon Walker Architects for more detail on the existing buildings on site and the proposed interventions to them and to Chapter 13 – Architectural Heritage and Volume 4- Architectural Heritage Impact Assessment, and associated appendices, of the EIAR prepared by Carrig Conservation for an assessment of the impact of the proposed works on the existing structures and the proposed mitigation measures.

#### 4.4 Additional Retention and Repurposing Works

Within the hospital area, the Gate Lodge, Rose Cottage, and the Laundry Building are also to be refurbished for use associated with the new hospital, as summarised below.

##### 4.4.1 Rose Cottage

Rose Cottage will be refurbished and extended for hospital administration use, with a GFA of 161 sq.m, and the proposed refurbishment works include the removal of a single storey extension, provision of a single storey extension to the southeast, and all associated works.

##### 4.4.2 Laundry Building

The Laundry building will be refurbished for hospital administration use, with a GFA of 135 sq.m, and the proposed works include the demolition of the adjacent electric hub building to the north, the adjoining structures to the south of the building, and the refurbishment of the building including replacement rooflights and door and window opens, and all associated conservations works.

**Figure 4.8: Aerial View of the existing Laundry Building**



Source: Scott Tallon Walker Architects - Architectural Conservation Report

##### 4.4.3 Gate Lodge

The Gate Lodge building will be retained in residential use, to be used by visiting members of staff to the new hospital.

#### 4.5 New Hospital Building

The new hospital building is proposed centrally within the Z15 part of the application and to the south of the existing St. Vincent's Hospital group of buildings and is proposed to be set within a mature new campus setting, with the protected structures and other historic buildings to the south, which have been described above, also located within the new hospital campus, on an overall site of c. 2.67 ha.

The application provides for a new part two and part three storey hospital building, providing mental health services (with a total gross floor area (GFA) of 7,188 sq.m), accommodating 73 no. beds, and including treatment/consultation rooms, education rooms, reception, family visitation and resource areas, therapy areas, multifaith rooms, staff and visitor canteen/café, staff offices, back of house areas including changing facilities, public and staff circulation areas, plant rooms and zones, and



related servicing areas. The hospital includes 2 no. courtyards at ground floor level, a terrace at first floor level, and open space adjacent to the building to be used by patients and staff. A total of 76 no. car parking spaces (including 39 no. EV charging spaces), 50 no. bicycle spaces and 4 no. motorcycle spaces are proposed for the new hospital.

A facilities management building, with a GFA of 149 sq.m, is located northwest of the new hospital building and will accommodate a generator area, a disposal hold area, an ESB substation, a MV switch room, a LV off loader room and a plant area.

**Figure 4.9: CGI of Proposed new hospital building**



Source: CGI Views Brochure prepared by Modelworks

Access to the new hospital and associated grounds is provided from Richmond Road and Convent Avenue, with separate internal access points.

#### **4.6 Residential Development**

Table 4.1 and 4.2 above has provided key details of the proposed residential, and ancillary elements, of the overall development, which can be summarised as follows:

- Block A is a part two to part seven storey building comprising a 2 storey retail unit at ground and first floor levels and a total of 58 no. standard design apartment (SDA) units from ground to sixth floor level with 7 no. studio units, 27 no. 1 bed units, 18 no. 2 bed units, and 6 no. 3 bed units. Private balconies / terraces for the apartments are provided on the east, south and west elevations.
- Block B is an eight storey building comprising 86 no. SDA units with 54 no. 1 bed units, 23 no. 2 bed units, and 9 no. 3 bed units. Private balconies / terraces for the apartments are provided on the west and east elevations.
- Block C is a part six to part seven storey building, above a lower ground floor / basement level, comprising 82 no. SDA units with 40 no. 1 bed units and 42 no. 2 bed units, with a residential amenity area at ground floor level. A communal roof terrace is proposed at sixth floor level. Private balconies / terraces for the apartments are provided on the west, east, and south elevations.
- Block D-E is a part five to part thirteen storey building, above basement level, comprising 199 no. Build-to-Rent (BTR) units with 7 no. studio units, 88 no. 1 bed units, and 104 no. 2 bed units. Residential amenity and facility areas are proposed at ground, sixth, and twelfth floor levels. Five communal roof terraces are proposed, one terrace at fifth floor level, two terraces at sixth floor

level, one terrace at ninth floor level, and one terrace at twelfth floor level. Private balconies / terraces for the apartments are provided on the west, east, north and south elevations.

- Block F is a part four to part nine storey building, above basement level, comprising a café/restaurant and residential amenity area at ground floor level and 118 no. BTR units with 1 no. studio unit, 63 no. 1 bed units, 46 no. 2 bed units, and 8 no. 3 bed units. Private balconies / terraces for the apartments are provided on the west, east, south and north elevations.
- Block G is a part four to part nine storey building comprising 139 no. SDA units with 1 no. studio unit, 71 no. 1 bed units, 54 no. 2 bed units and 13 no. 3 bed units, with a residential amenity area at ground floor level. Private balconies / terraces for the apartments are provided on the west, east, south, and north elevations.
- Block H is a five storey building comprising 30 no. SDA units with 1 no. studio unit, 10 no. 1 bed units, 14 no. 2 bed units and 5 no. 3 bed units. Private balconies / terraces for the apartments are provided on the west, east, south, and north elevations.
- Block J is a four storey building, which is an extension to Block K (St. Vincent's Hospital building-RPS Ref.: 2032), comprising 13 no. SDA units with 6 no. 1 beds and 7 no. 2 beds, and residential amenities and facilities at ground floor level. Private balconies / terraces for the apartments are provided on the north, west and south elevations.
- Block L is a part four to part six storey building comprising 86 no. SDA units with 1 no. studio unit, 28 no. 1 bed units, 41 no. 2 bed units and 16 no. 3 bed units. Private balconies / terraces for the apartments are provided on the north, east, south, and west elevations.
- A proposed basement / lower ground floor level is located below and accessed via Blocks C, D-E and F, and includes a total of 240 no. car parking spaces allocated for the residential development (including 6 no. accessible spaces, 7 no. car share spaces and 120 no. EV charging spaces), 9 no. bicycle stores providing a total of 947 no. cycle spaces (including cargo bikes and electric bikes), 13 no. motorcycle spaces, 15 no. storage units, bin storage areas, an ESB substation and switchroom, various plant rooms and lift and stair cores.
- A total of 16 no. car parking spaces and 817 no. bicycle spaces are proposed at surface level for the proposed residential, commercial, and community uses.

#### **4.7 Architectural Design and Layout**

The documentation submitted herewith illustrates how the site layout, overall massing, scale and architectural design has evolved following consideration of key site features, and constraints and opportunities. We refer the Planning Authority to the Architectural Design Statement prepared by Scott Tallon Walker for details of the design strategy and architectural justification for the proposed development.

**Figure 4.9: Extract from the Proposed Site Layout Plan**

Source: STW Proposed Site Layout. (Note: The red line indicates the approximate outline of the land within the ownership of the applicant, please refer to STW's Site Location Map and Site Layout Plan for the full extent of the proposed development).

### **Residential Development - Number, Mix and Type of Residential Units**

The residential units are proposed to be contained within 9 no. apartment buildings (A, B, C, D-E, F, G, H, J and L). The proposal is for 811 no. residential units including 317 no. Built-to-Rent apartments and 494 no. standard apartments, and 4,802 sq.m of residential amenity space. The proposed mix for the residential units is as follows:

- 18 no. studios (2%)
- 387 no. 1 bed apartments (48%)
- 349 no. 2 bed apartments (43%)
- 57 no. 3 bed apartments (7%)

### **4.8 Density and Building Height**

The proposed residential net density is c. 182 units per hectare, based on net site area of 4.44 ha (excluding public open space and hospital site) for the residential development. As outlined in Section 5 and 6, this is considered appropriate for the Inner Suburban location of the development and given the proposed connections and permeability benefits the scheme will bring for the area and the scheme itself, which ensures that the development is within reasonable proximity to the city centre and easy walking distance to high quality public transport corridors, employment locations including two third-level institutes and the new hospital, providing mental health services, on the overall application site.



**Figure 4.10: CGI View of Block DE**

Source: CGI Views Brochure prepared by Modelworks

The proposed building heights of the residential buildings range from 2 to 13 no. storeys. The locations of the proposed buildings and overall site layout / masterplan is discussed in Scott Tallon Walker's Architectural Design Statement.

The proposal includes a landmark building to the northwest of the site, at the western end of the central park. The highest part of Block D-E, which acts as a local landmark, is situated in a location that will mark places of local visual and functional importance, whilst being suitably separated from sensitive uses and helping to frame the Central Park to the east. The maximum height of the building, and therefore of the proposed development, is 47.965m from the lowest adjacent site level, and is from the lower ground / basement level to the top of parapet. The Architectural Design Statement prepared by Scott Tallon Walker demonstrates the location of the proposed landmark building and general building heights across the site is justified and that the height is proportionate to the surrounding context and corresponds to the significance of their role and location. The buildings will form meaningful local landmarks, enhance the distinctiveness of the area, and will have a positive contribution to place making, legibility and character of the area.

#### **4.9 Retail Unit**

A 2 storey retail unit is proposed at ground and first floor level of Block A with a total GFA of 765 sq.m. This retail unit is located adjacent to the proposed gateway plaza and will provide for activity onto this space.

#### **4.10 Cafe Units**

2 no. cafe units are proposed, one in Block F and one in Block K2, both at ground floor. The GFA of the proposed café in Block F is 133 sq.m and in Block K2 is 160 sq.m. These units are suitably located to attract pedestrian footfall and will help enliven the proposed development and attract customers from the immediate catchment.

## **4.11 Community and Other Ancillary Uses**

### *4.11.1 Childcare Facility*

Block K3 is part of the protected structure of the existing hospital which was formerly a convent (Richmond Convent RPS Ref.: 2032) and it is proposed to reuse it in part for a new childcare facility with a proposed GFA of 730 sq.m at ground and first floor levels. The proposals accord with objective QHSNO16 and also include an associated outdoor play area to the east of the building.

STW have estimated that the childcare facility has capacity to accommodate c. 77 childcare spaces, however, this could be greater depending on the end users requirements / operational model and noting the generous size of 730 sq.m.

The childcare facility is part of the change of use of the existing hospital facility (Block K), along with a gym, a café, a co-working space, a library and a community hall that are detailed below. In total, for all the uses, 71 no. cycle spaces are proposed to serve the needs of Block K.

### *4.11.2 Community Library and Co-working Space*

A community library is proposed in Block K2 at ground floor level with a GFA of 163 sqm. At first, second and third level of the same block a co-working space of 817 sqm is proposed. These uses will be available to the residents and the wider community.

### *4.11.3 Community Hall*

It is proposed to use the existing chapel located at the eastern end of the existing St. Vincent's Hospital buildings as a community hall (referred as Block K4) over one level with a GFA of 243 sqm. It is envisaged that this space could be managed by the developer / operator with a structure in place for use by the local community, for meetings, etc..

### *4.11.4 Gym and Residential Amenities / Facilities*

Block K1 is part of the protected structure (RPS Ref.: 2032) and it is proposed to provide a gym at ground floor level with a GFA of 1,459 sq.m, which will be available for use by the general public.

The first, second and third floor includes amenities only accessible to residents of the development, i.e. not for use by the wider public.

The proposals for a childcare facility, community hall, library, co-working space, and gym, will contribute to the community amenities for the proposed development and the wider area, which in addition to the new hospital and public open space, will be very positive additions arising from the redevelopment of the lands. The development also includes resident amenity facilities within the apartment buildings and protected structures, which will be another positive amenity provision for residents and aligns with emerging trends in modern apartment developments.

## **4.12 Plant / Utilities Infrastructures**

The proposed development includes heat pumps and ESB Substations.

### *4.12.1 Heat Pump Area*

The proposed development includes an enclosed heat pump area located to the south of Block D-E and west of Block C. The historic buildings Rose Cottage, Richmond House, Brooklawn and the Laundry Building, and the proposed hospital are served by a local heat pump. Blocks A, B, C, DE,

F, and J are served from a centralised residential heat pump system. Block L and K are served from an individual CO2 heat pump of natural gas system.

#### *4.12.2 ESB Infrastructure*

Existing 10/20kV underground cables and 400/230V overhead LV lines are located in the surroundings of the site.

6 no. substations are to be provided within the residential site, all sized accordingly based on the number of apartments within the development. Substations have been provided in Blocks A, B, C, F, G and D-E (double substation) where a core electrical load exceeds 200 kVA.

A Medium Voltage (MV) ESB connection has been designed into Block D-E as the mechanical plant heat pump load shall exceed 500kVA, this is as per ESB requirements. Associated MV switchroom and Transformer rooms have been included in the design.

The ESB sub-stations have been sized to accommodate the electrical loads associated with the future provision of EV charging to all parking spaces.

1 no. ESB Substation is to be provided on the FM building to the northwest of the new hospital building within the hospital area.

Please refer to the M&E Utilities Report and to the drawing SVRD-IN2-ST-ZZ-DR-ME-0105 prepared by IN2 Engineering Design Partnership for more details.

#### *4.12.3 Telecommunications*

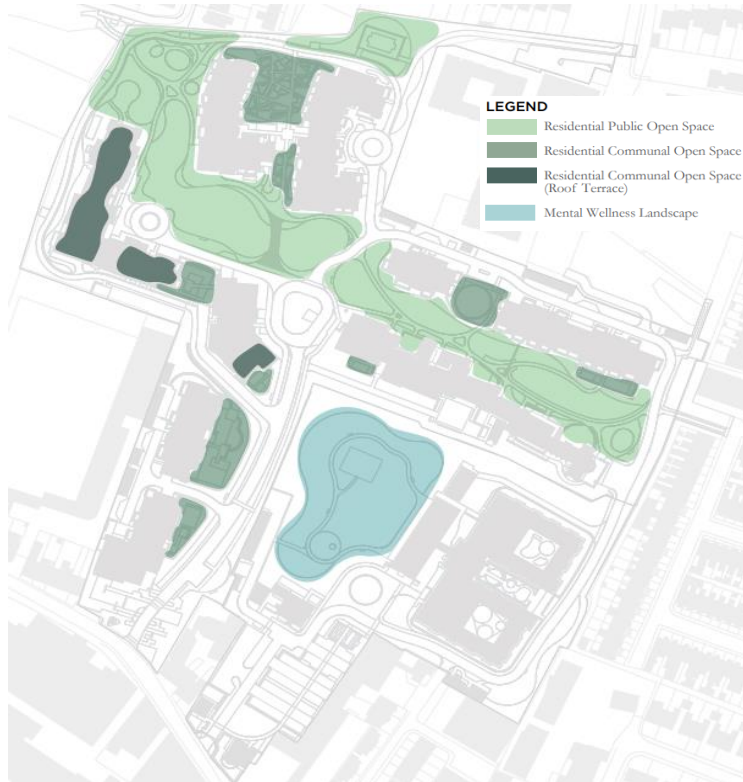
Telecommunications infrastructure is proposed at roof level of Block B in order to ensure that the existing telecommunications infrastructure in the area is not impacted by the new development.

### **4.13 Landscape and Open Space**

The Landscape Design Statement prepared by NMP Landscape Architecture describes and illustrates how the proposed development seeks to deliver high quality public and communal open space (see Figure 4.11 below), a high-quality setting, public realm improvements and associated connections and routes, for this new residential and hospital development. The proposed public open space provision within the residential area consists of c. 1.6 ha of public open space (26% of the Z12 / Z15 zoned portion of the application site).

Nine different areas of communal open spaces are proposed at surface level and a series of communal roof terraces are proposed at roof level of Blocks C and D-E. We refer to NMP Landscape Architecture landscape drawings and Landscape Design Statement for further details of the communal areas. The total external communal amenity space proposed is 5,645 sq.m and exceeds the minimum requirement of 4,946 sq.m as required under the Apartment Guidelines 2020 / 2022 and Chapter 15 of the Development Plan.



**Figure 4.11: Open Space Strategy**

Source: NMP Landscape Design Statement

**Figure 4.12: Landscape Masterplan**

Source: NMP Landscape Design Statement

Please refer to the Landscape Design Statement prepared by NMP Landscape Architect and accompanying drawings for further details.

#### **4.14 Access, Transport and Parking**

Please refer to the Traffic Impact Assessment and Mobility Management Plan prepared by OCSC for further details on transport matters and the accompanying engineering drawings from OCSC, with the key aspects summarised below.

##### *4.14.1 Proposed Entrances*

It is proposed to provide 6 no. accesses to the subject site including 4 no. for the residential area and 2 no. for the hospital area.

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 hospital area will be accessible by all type of users from Richmond Road and from Convent Avenue to the south of the site.

The main vehicular site entrance for the residential area is to be provided from Richmond Road to the south of the site area.

The application includes a proposed pedestrian / cycle connection to Griffith Court, requiring alterations to the service yard of the Fairview Community Unit, two pedestrian / cycle connections to the Fairview Community Unit campus to the north (providing an onward connection to Griffith Court), and a pedestrian / cycle connection to Grace Park Wood, within the red line application site boundary. NMP drawings 104-1 and 104-2 provides details of the proposed connections.

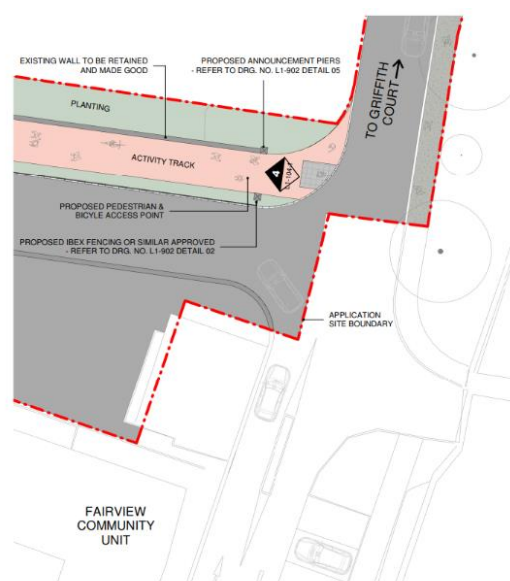
The application is accompanied by a letter of consent from Targeted Investment Opportunities ICAV, which provides consent for the inclusion of lands to provide for the pedestrian / cycle connection to Grace Park Wood, as illustrated on STW's site layout plans. The area of the site required to deliver the three connections to Griffith Court (including the two connection points via the Fairview Community Unit campus) are within the ownership of the applicant, St. Vincent's Hospital Fairview, and therefore letters of consent are not required to include these connections within the application site boundary.

The connections to Grace Park Wood and to Griffith Court, which requires alterations to the existing service yard of the Fairview Community Unit in order to ensure a safe pedestrian and cycle route is provided along the northern perimeter of the site, which in turn links into the various pedestrian and cycle routes, and which are proposed as part of this application, are included within the first phase of development (see STW Architectural Design Statement) and are included within the red line boundary, and are to be provided by the applicant.

The applicant wishes to note that detailed discussions were undertaken with An Post prior to lodgement in respect to including the proposed connection to Lomond Avenue within the red line boundary, however, it was not possible to reach agreement on same prior to lodgement of the application and given the extent of the proposed connections included for as part of the application / within the red line boundary, it is respectfully submitted that Item 3(a) above has been sufficiently addressed. We note that the Planning and Development Act 2000, as amended, does not give the applicant or the Planning Authority the powers to include lands which are beyond their control within an application or to be included as requirement under any planning permission that might be granted. Thus, in this instance, it is respectfully submitted that the applicant has addressed this item of the opinion in an appropriate manner.

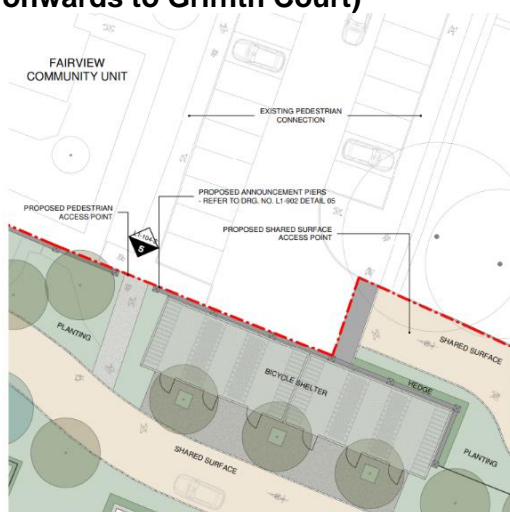
**Figure 4.13: Illustration of the Proposed Connections to Grace Park Wood and Griffith Court**

① PLAN VIEW - PROPOSED GRACE PARK WOOD CONNECTION  
SCALE: 1:200 @A1

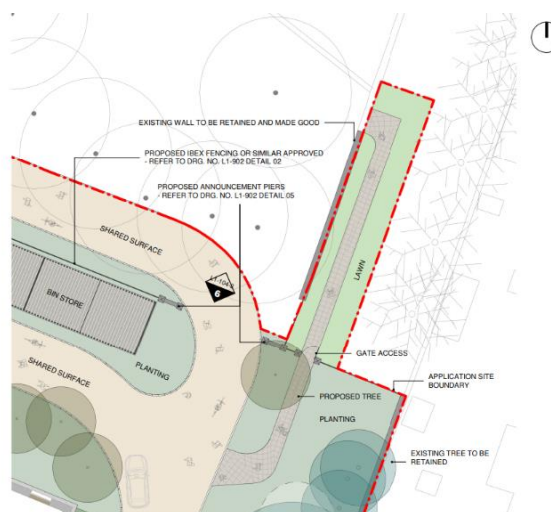


② PLAN VIEW - PROPOSED GRIFFITH COURT CONNECTION  
SCALE: 1:200 @A1

Source: NMP Drawing 104-1 Proposed Connections Sheet 1 of 2 (see drawing for further details)

**Figure 4.14: Illustration of the Proposed Connections to Fairview Community Unit (and onwards to Griffith Court)**

① PLAN VIEW - PROPOSED GRIFFITH COURT CONNECTION VIA FAIRVIEW COMMUNITY UNIT  
SCALE: 1:200 @A1



② PLAN VIEW - PROPOSED GRIFFITH COURT CONNECTION VIA FAIRVIEW COMMUNITY UNIT  
SCALE: 1:200 @A1

Source: NMP Drawing 104-2 Proposed Connections Sheet 2 of 2 (see drawing for further details)

It is also proposed to provide works outside the site boundary along Richmond Road where 1 no. access is to be provided for the hospital area and 1 no. access is to be provided for the residential area. These works have been discussed with DCC and we refer to the letter of consent submitted with the application.

#### 4.14.2 Vehicular, Cycle and Pedestrian Infrastructure

In summary, the proposal includes road, pedestrian and cycle upgrades and associated alterations to the road infrastructure within the application site boundary. The development includes the internal road to provide pedestrian, cyclist and vehicular access to the basement level.



A woodland walk is to be provided along the western boundary through the western part of the residential area and footpaths are proposed across all the residential area increasing significantly the permeability of the site.

Further details on servicing are set out in the TIA and the Mobility Management Plan prepared by prepared by OCSC.

#### *4.14.3 Residential Car, Motorcycle and Cycle Parking Provision*

In respect to parking provision, provision is made for 247 no. car parking spaces, including 124 no. EV spaces (50%), 7 no. car share spaces and 13 no. disabled spaces, for the residential units. 240 no. spaces are located in the basement and 7 no. spaces are located at surface level. This is a ratio of 0.3 car parking spaces per apartment, which is considered to be appropriate given the inner suburban location, proximity to the city centre and access to high quality public transport. This reduced level of residential parking is considered to be in accordance with the Apartment Guidelines 2020 /2022 given the accessibility of the site. 13 no. motorcycle parking spaces are provided at basement level for the residential units.

It is proposed to provide 76 no. car parking spaces, including 39 no. EV spaces, and 4 no. mobility impaired parking bays for the hospital development. 4 no. motorcycle parking spaces are provided in the hospital area.

9 no. car parking spaces including 4 no. EV spaces are proposed for the commercial and community uses.

In accordance with the Apartment Guidelines 2020 / 2022 and Chapter 15 of the Development Plan, provision is made for 1,680 no. cycle parking spaces for residential units, including 1,274 no. long stay and 406 no. visitor spaces. A total of 947 no. cycle spaces (including cargo and electric) are located at basement level and 733 no. spaces at surface level. As illustrated in STW drawings the cycle spaces are located in covered, secure parking enclosures and open bike racks at surface level and secure bike parking areas at basement level.

Provision is made for 50 no. cycle parking spaces including 42 no. long stay spaces and 8 no. short stay spaces for the hospital unit, and 84 no. cycles parking spaces are provided for the other commercial and community uses.

#### **4.15 Indicative Phasing**

In relation to phasing, this will be developed as the design progresses and as part of the tender / detailed design stage, however, in summary it is anticipated that the scheme will be delivered in 2 no. phases (as indicated in Figure 4.15 below) as follows:

- Phase 1 and 1A: Access New Hospital building, new apartments and associated site works in the Z12 lands while the full access is maintained to the existing hospital facilities for patients and staff.
- Phase 1B: New Welcome Gardens to Richmond Road and construction of Building A
- Phase 2: Decant all medical functions into the new buildings,
- Phase 2A: Demolition of former hospital buildings, refurbish retained Historic Structures, Buildings J, H and L, Complete Public Park north of historic buildings and link to Griffith Court via the Community Unit.

The phasing will include all necessary site clearance and preparation work, site development and construction. The construction phases will involve the excavation of soil and bedrock for the construction of building foundations, basement, carparking areas, access roads and filter drains, the surface / foul water drainage network and all ancillary works. The phasing will allow the provision or

upgrading of any external infrastructure and services to be provided on a phased basis and provide an appropriate quantum of development and supporting infrastructure within each part of the overall scheme. A ten-year permission is sought for the development, which has regard to the scale of development, likely timeframe for tendering and construction of each phase.

**Figure 4.15: Indicative Phasing**



Source: Scott Tallon Walker Architects - Architectural Design Statement

Please refer to STW's architectural drawings, HQA and Schedule of Areas Brochure and the Architectural Design Statement for further details of all aspects of the proposed development.

## 5.0 CONSISTENCY WITH NATIONAL AND REGIONAL PLANNING POLICY

This section will demonstrate that the proposed development has been brought forward with due consideration of national and regional planning policies / guidelines and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against:

### National

- Project Ireland 2040 – National Development Plan 2021-2030 and the National Planning Framework 2018;
- Housing for All: A New Housing Plan for Ireland
- Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2022 (and 2020 where Circular Letter NRUP 07/2022 applies)
- Sustainable Residential Developments in Urban Areas -Guidelines for Planning Authorities (2009)
- Urban Design Manual – A Best Practice Guide (2009);
- Design Manual for Urban Roads and Streets (2013);
- The Planning System and Flood Risk Management (2009), and Circular PL 2/2014 (Department of Environment, Community and Local Government, August 2014);
- Architectural Heritage Guidelines (2011); and
- Guidelines for Planning Authorities on Childcare Facilities (2001)

### Regional

- Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly 2019; and
- Greater Dublin Area Transportation Strategy 2022-2042.

### **Apartment Guidelines- Transitional Arrangements**

We note that Circular Letter NRUP 07/2022, which was published with the amended Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities (December, 2022) (hereafter the Apartment Guidelines 2022), provides for transitional arrangements for BTR schemes which are 'in the system', stating the following:

*“Transitional Arrangements - All current appeals, or planning applications (including any outstanding SHD applications and appeals consequent to a current planning application), that are subject to consideration within the planning system on or before 21st December 2022, will be considered and decided in accordance with the current version of the Apartment Guidelines, that include SPPRs 7 and 8.*

*Furthermore, in cases where a request for a Large-Scale Residential Development (LRD) meeting has been submitted to a local authority for a proposal that includes specified BTR development in accordance with S.32B of the Planning and Development Act on or before the date of this Circular (21<sup>st</sup> December 2022), even if the LRD meeting has yet to take place, the opinion has yet to issue, or a planning application has yet to be made but is made within 6 months of receipt of the opinion as required by s.32A of the Act, the development will be assessed by the local authority and where applicable, on appeal to the Board, in accordance with the Guidelines issued prior to the BTR update, i.e. the version of the Apartment Guidelines that includes SPPRs 7 and 8, will remain applicable.”<sup>1</sup>*

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<sup>1</sup> DoHLGH Circular Letter NRUP 07/2022, dated 21/12/2022, pg.4



The subject application received the LRD Opinion from Dublin City Council under Ref.: LRD6009/22-S2 on the 15<sup>th</sup> of December 2022, and thus, as demonstrated below the BTR elements of the overall development should be assessed against the provisions of SPPR 7 and SPPR 8 of the Apartment Guidelines 2020 where relevant, rather than the new BTR provisions in the Apartment Guidelines 2022, and this report demonstrates that the BTR element of the scheme is consistent with relevant BTR policies, objectives and standards in the Guidelines and the Development Plan.

### 5.1 Project 2040 – The National Development Plan and the National Planning Framework

Project Ireland 2040 is the Government's overarching policy initiative for the country and is comprised of the National Planning Framework (hereafter referred to as the NPF) and the National Development Plan (hereafter referred to as the NDP), 2018 - 2027. The vision for housing is to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.

The NPF predicts that between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet people's needs for well-located and affordable housing. Within this figure, there is a wide range of differing housing needs that will be required to be met. The Framework states that achieving this level of supply will require increased housing output into the 2020s to deal with a deficit that has built up since 2010. To meet projected population and economic growth as well as increased household formation, annual housing output will need to increase between 30,000 to 35,000 homes per annum in the years to 2027 and will be subject to monitoring and review.

The NPF identifies a number of national core principles to guide future housing as follows:

- Ensure a high standard quality of life for future residents as well as environmentally and socially sustainable housing and placemaking through integrated planning and consistently excellent design.
- Allow for choice in housing location, type, tenure and accommodation in responding to need.
- Prioritise the location of new housing provision in existing settlements as a means to maximising better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure.
- Tailor the scale and nature of future housing provision to the size and type of settlement where it is planned to be located.
- Integrate housing strategies where settlements straddle boundaries (county and/or regional).
- Utilise existing housing stock as a means to meeting future demand.

**Response:** The proposed new hospital and residential development is consistent with national policy objectives as set out throughout this section, as it provides a much needed new mental health hospital, a range of apartment sizes and types with a range of supplementary resident facilities that will meet the needs of the future residents, and supporting commercial and community infrastructure.

Section 2.2 of the NPF sets out an overview of the NPF Strategy which includes reference to 'Compact Growth' as follows:

- Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas.
- Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport'.

The NPF expressly seeks the densification of brownfield, infill sites close to public transport and services and facilities such as the subject site. National Policy Objective 35 states that it is an objective to:

*'Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site based regeneration and increased building heights.'*

The NPF also sets out the following regarding future growth needs in Section 6.6:

*'Increased residential densities are required in our urban areas...to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland's cities.'*

**Response:** The NPF recognises that a more compact urban form is important to effectively address the housing crisis. Therefore, we consider that there is a significant importance placed in the National Planning Framework to develop high quality accommodation, including increasing building heights and residential densities in existing urban areas.

It is our opinion that the NPF supports the provision of the proposed hospital and residential development through increased density and height at the subject site having regard to the underutilised status of the site which is situated in close proximity to public transport, employment, services and facilities. The subject site is ideally positioned to absorb the heights proposed as part of the subject scheme, especially due to the site's size, as detailed in the appropriate technical assessments including Daylight/Sunlight, Wind Assessment and the LVIA which are enclosed as part of this LRD planning application.

Section 10.3 of the NPF identifies a list of 10 No. National Strategic Outcomes which sets out the vision of the NPF (to create a shared set of goals for every community across the country). The table below sets out how the proposed development will contribute towards achieving the 10 No. National Strategic Outcomes identified in the NPF as follows:

**Table 5.1: Consistency with National Strategic Outcomes**

No.	Objective?	How is it Addressed by this development?	Meets criteria?
1:	Compact Growth;	Sustainable and efficient redevelopment of a key underutilised site in an existing urban area.	Yes
2:	Enhanced Regional Accessibility;	<p>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).</p> <p>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</p>	Yes

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.	
<b>3:</b>	Strengthened Rural Economies and Communities;	N/A – Urban Area	<b>N/A</b>
<b>4:</b>	Sustainable Mobility;	Promoting active and sustainable transport due to proximity of high-quality public transport, provision of bicycle parking spaces, and inclusion of a total of 167 no. EV car parking spaces. A reduced provision of car parking has been provided for the residential element of the development to promote sustainable modes of transport (0.3 spaces per unit)	<b>Yes</b>
<b>5:</b>	A Strong Economy supported by Enterprise, Innovation, and Skills;	<p>The proposed development provides for a new hospital, providing mental health services. This hospital will contribute towards strengthening the local economy and the regeneration of the surrounding area.</p> <p>The development also provides gym, co-working, community uses and a childcare facility which will also contribute towards strengthening the local economy and the regeneration of the surrounding area.</p> <p>Dublin City Centre is easily accessible from the subject site and therefore the proposed development is in close proximity to significant Employers/Higher Education Institutions such as Dublin City University, providing access to much sought-after residential accommodation for employees/students.</p>	<b>Yes</b>
<b>6:</b>	High Quality International Connectivity;	N/A –Relates to Ports and Airports	<b>N/A</b>
<b>7:</b>	Enhanced Amenity and Heritage;	The scheme provides for the refurbishment and reuse of protected structures. The development also provides a high level of amenity space for future residents and the public with a significant amount of public open space, the provision of internal communal amenity space and communal open space.	<b>Yes</b>
<b>8:</b>	Transition to a Low Carbon and Climate Resilient Society;	The proposed development which seeks to deliver compact growth and deliver on the principles of the 15-minute city, will contribute to the move towards a low carbon and climate resilient society, supported by the strong public transport links and short bicycle journey time to many areas around the City, which will encourage the use of sustainable modes of transport. The provision of bicycle parking spaces, electric scooter storage, electric vehicle	<b>Yes</b>

		<p>parking spaces will also promote sustainable modes of transport.</p> <p>Green Roofs and SUDS infrastructure have been included within the design of the subject scheme to achieve a high energy rating and compliance with building standards.</p>	
<b>9;</b>	Sustainable Management of Water, Waste and other Environmental Resources; and	Sustainable modes of transport encouraged, and sustainable management of water use and waste output, as detailed in accompanying reports.	<b>Yes</b>
<b>10</b>	Access to Quality Childcare Education and Health Services;	Please refer to SCIAA prepared by JSA.	<b>Yes</b>

In respect to the delivering on key requirements of the NPF, the following is noted:

- The proposal will provide a new and much-needed state-of-the-art hospital, providing mental health services for acute patients on the existing Fairview campus, whilst providing for the long-term future and reuse of existing protected structures and other historic buildings on the site.
- The development will provide residential accommodation to meet the needs of the projected growth in population and persons in employment in the Eastern and Midland Region, in line with National Policy Objectives.
- The development will provide new housing within the existing settlement which maximises the quality of life for people through accessing services in Drumcondra, Fairview and Dublin City Centre, ensuring a more efficient use of land and allowing for greater integration of existing infrastructure.
- The proposed development accords with compact development, reusing land, building up infill sites, and reusing or redeveloping existing sites and buildings. The proposed development reusing existing buildings (including protected structures) and is located on infill land in a core urban location that is built-up, well served by public transport and is within easy cycling distance of the city centre.
- The proposed scheme involves the redevelopment of an underutilised, infill site in an existing built-up area and therefore is fully in accordance with the preferred approach of the NPF.
- The development will encourage social interaction between the residents of the scheme particularly by providing high-quality attractive public and communal spaces, creating a strong sense of community. The provision of a permeable link through the site to the newly proposed pedestrian and bicycle landscape area is also a significant planning gain for the wider area.
- The development will rejuvenate this site and is a direct response to current trends in tenure and household formation. The development will generate more jobs and activity within the existing urban area and will contribute towards the target of delivering 550,000 No. additional households to 2040.
- The proximity of the subject site to the city centre, which is easily accessible by foot, by bicycle and by public transport, will encourage future residents of the subject scheme to avail of more sustainable modes of transport.
- The proposal actively encourages the use of sustainable modes of transport such as public transport through the discouragement of car ownership. The development also includes attractive open spaces, which will encourage occupants to engage in regular physical activity.

## 5.2 Housing for All: A New Housing Plan for Ireland

'Housing for All: A New Housing Plan for Ireland', reinforces the critical and strategic need for new dwellings where it is a target to provide 300,000 housing units by the year 2030.

Housing for All - a New Housing Plan for Ireland' is the government's housing plan to 2030. It is a multi-annual, multi-billion-euro plan which will improve Ireland's housing system and deliver more homes of all types for people with different housing needs.

In order to achieve this, Housing for All provides four pathways to achieving four overarching Housing Policy Objectives:

1. Supporting Homeownership and Increasing Affordability
2. Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;
3. Increasing New Housing Supply; and
4. Addressing Vacancy and Efficient Use of Existing Stock.

The government's overall objective is that every citizen in the State should have access to good quality homes:

- *to purchase or rent at an affordable price;*
- *built to a high standard and in the right place;*
- *offering a high quality of life.*

The government's vision for the housing system over the longer term is to achieve a steady supply of housing in the right locations with economic, social and environmental sustainability built into the system.

**Response:** The proposed development, which includes 811 no. apartments, will provide for a new residential community, built to a high standard and quality, with a range of amenities and services at St. Vincent's Hospital Fairview and also close to high quality high frequency/capacity public transport services.

The proposed mixed-use development at St. Vincent's Hospital Fairview will provide a mixed tenure of dwellings comprising build to rent, social housing apartments and standard design apartments, which will assist in the delivery of much needed homes, close to existing amenities as well as high quality public transport options and employment opportunities, thereby contributing to meeting the objectives of 'Housing for All'.

## 5.3 Urban Development and Building - Heights Guidelines for Planning Authorities (December 2018)

The Urban Development and Building - Heights Guidelines for Planning Authorities 2018 (hereafter referred to as Building Height Guidelines) set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the National Planning Framework and Project Ireland 2040 and Regional Spatial and Economic Strategy.

Under Section 28 (1C) of the Planning and Development Act 2000 (as amended), Planning Authorities and An Bord Pleanála are required to have regard to the guidelines and apply any specific planning policy requirements (SPPR's) of the guidelines in carrying out their functions.

In relation to redevelopment and enhancement of the city core, the guidelines state that *"to meet the needs of a growing population without growing out urban areas outwards requires more focus in planning policy and implementation term on reusing previously developed "brownfield" land, building*



up urban infill sites (which may not have been built on before) and either reusing or **redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements**".

The Building Height Guidelines state that the:

*'Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by **building up and consolidating the development of our existing urban areas.**'*

The Building Height Guidelines further note that:

*'A key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.'* [Our Emphasis]

The Building Height Guidelines also emphasise that increasing prevailing building heights have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and it notes that the planning process must actively address how this objective will be secured.

The Building Height Guidelines expressly seek increased building heights in urban locations:

*'In relation to the assessment of individual planning applications and appeals, it is Government policy that **building heights must be generally increased in appropriate urban locations.** There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.'* [Our Emphasis].

The Building Height Guidelines also advise that taller buildings can assist in contributing to a sense of place and can indicate important street junctions:

*'Furthermore, while **taller buildings** will bring much needed additional housing and economic development to well-located urban areas, they **can also assist in reinforcing and contributing to a sense of place** within a city or town centre, such as indicating the main centres of activity, **important street junctions**, public spaces and transport interchanges. In this manner, **increased building height is a key factor in assisting modern placemaking** and improving the overall quality of our urban environments'.* [Our Emphasis]

Chapter 3 of the *Building Height Guidelines* expressly seeks increased building heights in urban locations:

*'In relation to the assessment of individual planning applications and appeals, it is Government policy that **building heights must be generally increased in appropriate urban locations.** There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.'* [Our Emphasis]

Under the heading, Development Management Principles, the *Building Height Guidelines* state (at paragraph 3.1) that it is Government policy that building heights must generally be increased, and that Planning Authorities must apply certain broad principles when considering development proposals for buildings taller than prevailing building heights in pursuit of the Building Height Guidelines. The third bullet point or "broad principle" in paragraph 3.1 requires consideration to whether the implementation of the pre-existing policies of a plan that predates the Building Height Guidelines align with and support the objectives and policies of the NPF.

Section 3.1 of the Building Height Guidelines states that '*Planning Authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines*', each of which are outlined below and a response to each provided.

***Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?***

**Response:** The proposed scheme involves the development of an underutilised infill site, in a core, urban location. The subject development will contribute towards delivering compact growth in Dublin City. The scheme is therefore fully in accordance with the preferred approach of the National Planning Framework.

***Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these Guidelines?***

**Response:** Compliance of the proposed development with the building height provisions of the Development Plan is addressed in Section 6 and Appendix 1 of this Planning Report and Statement of Consistency which demonstrates compliance with the performance-based criteria for increased building heights in Table 3 of Appendix 3 of the Development Plan, and which was prepared by the Planning Authority in response to the Building Height Guidelines. The criteria are to ensure that a form and intensity of urban development is achieved that contributes to the overarching objectives of the Development Plan to create sustainable communities and high quality places for people to live and work.

***Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?***

**Response:** This does not apply, as the Development Plan has been prepared in accordance with the guidance set down in the Urban Development and Building - Heights Guidelines for Planning Authorities (December 2018). We refer to Appendix 1 of this Planning Report and Statement of Consistency, which provides a response to the requirements of Appendix 3 of the Development Plan.

Paragraph 3.2 of the Building Height Guidelines, in respect to the development management functions of the consenting authority, states that "*In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria;*"

### **Consideration of Criteria under Section 3.2 of the Building Height Guidelines**

The response to each of the criteria in Section 3.2 is set out below and demonstrates that the proposed heights of the development, which range from 2 no. storeys to 13 no. storeys are appropriate for the subject lands.

*The criteria for assessment of developments at the scale of the relevant city/ town*

The guidelines set out the criteria for developments at the scale of the relevant city / town (underlined below) as follows:

The site is well served by public transport with high capacity, frequent service, and good links to other modes of public transport.

**Response:** As outlined in Section 5.1 and 5.2, 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.

We refer to the Public Transport Capacity Study and Traffic Impact Assessment prepared by OCSC which includes detail on the frequency and capacity of public transport serving the subject site. The study carried out a survey of capacity on Irish Rail and Dublin Bus Routes 1, 123, 14, 16. The study concludes that there is high frequency and available capacity on relevant routes. The TTA outlines that there is an estimated total maximum capacity for 48,348 rail trips and 196,650 bus trips during



the peak morning period which is considered to represent the peak daily demand period. According to the report:

*"In the context of the aforementioned bus and rail service capacity locally, the demand generated by the development equates to approximately 0.2% of the bus capacity and 0.1% of the rail capacity which is considered negligible."*

*Taking the above into consideration, there is considered to be sufficient capacity available in the local public transport network to cater for the estimated demand for the proposed development. It is further noted that there is flexibility with respect to these services to provide increased frequency should demand on a wider basis justify it through the provision of additional buses on key routes by the respective service operators."*

Having regard to the above, the proposed development has access to and is in proximity to existing high quality, high capacity and high frequency public transport services.

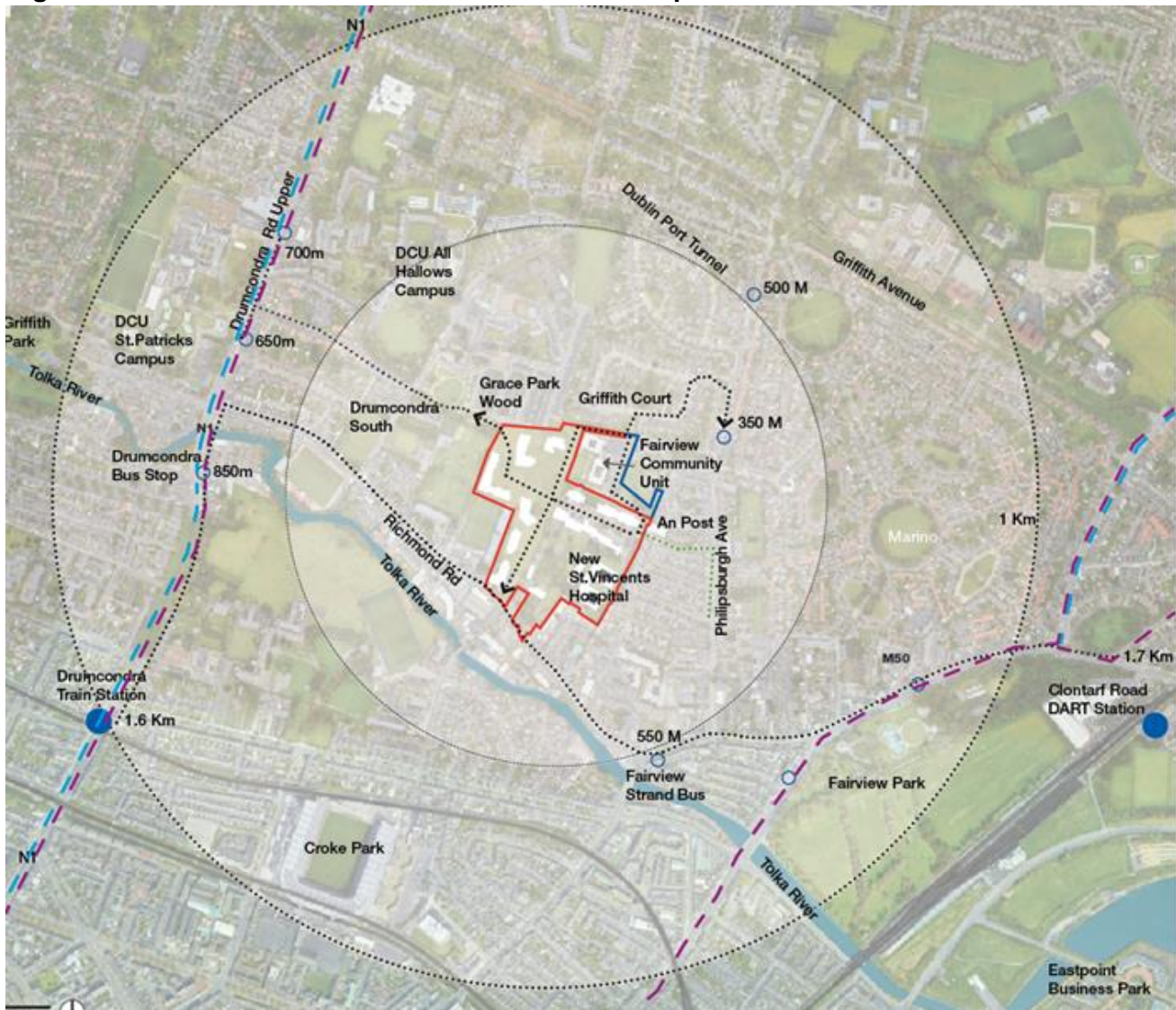
**Figure 5.1: Connectivity to Public Transports**



Source: OCSC Public Transport Capacity Study



Figure 5.2: Site Location and Context to Public Transport



Source: STW Architectural Design Statement

Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.

**Response:** The scale of the proposed development is considered to integrate appropriately with its surroundings, whilst introducing increased height on these underutilised lands, as illustrated in CGI's in Figure 5.3 and 5.4.

The accompanying contiguous elevations and sections provided by STW Architects illustrate the proposed building height in the context of the existing inner suburban environment.

The visual impacts of the proposal are discussed in greater detail in Chapter 11 – LVIA of the EIAR prepared by Modelworks which states:

*“As a contemporary, high density neighbourhood in an historically low density urban environment, the proposal diverts from the established townscape character. This is an unavoidable and not undesirable outcome of compact growth policy, and it can be complementary to the existing urban*



structure and character. There are several aspects/elements of the proposal that display respect/consideration of the context and the constraints in the area, including:

- The retention, refurbishment and re-use of all buildings of architectural heritage value on the site (the protected structures in the St Vincent's Hospital complex, Richmond House and Brooklawn House). In addition to improving the condition of the buildings and their environs, by extending the public realm through/across the site, the development would integrate these buildings (which were previously enclosed in institutional grounds, separated from the public realm, and in sub-optimal condition) into the evolved urban structure. The townscape would benefit from the buildings' improved condition and new uses, and the community would benefit from increased exposure to/ appreciation of the site's architectural heritage.
- The setback of buildings from the boundaries (see graphic below), with the spaces between the boundaries and the buildings densely planted for visual screening.
- The stepping down of building height towards boundaries shared with sensitive neighbouring areas (to the north).
- The concentration of height adjacent to existing neighbouring open spaces (e.g. Dublin Port Stadium and Ierne Social and Sports Club), exploiting the opportunity presented by these spaces.
- The concentration of height closer to the modern, mixed density neighbourhood of Grace Park Wood.
- The modest height of the hospital building, ensuring relatively limited townscape and visual impacts on the Victorian neighbourhood to the east, including the Residential Conservation Area-zoned Inverness Road.

In addition to the constraints, the proposal displays consideration of the opportunities in the urban structure, such as the opportunity to locate new open space and pedestrian and cycle entrances and routes in order to connect to the surroundings."

"Design measures such as the articulated form (recesses and steps in height to disaggregate the massing, and a meaningful/effective 'stepping down' towards the lower neighbouring development), articulated facades (large windows and variations in material to emphasise the articulated form), the texture and natural colours of the brick, and the rooftop gardens, combine with the extensive open space and the many existing trees to integrate the buildings into the landscape despite their scale."

**Figure 5.3: Aerial CGI of the Proposed Development**



Source: CGI Views Brochure prepared by Modelworks



**Figure 5.4: Aerial CGI of the Proposed Development**

Source: CGI Views Brochure prepared by Modelworks

*On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.*

**Response:** The land within the ownership of the applicant is 8.71 ha and is therefore considered to be a 'larger urban redevelopment site'. This report and Architectural Design Statement demonstrates that the proposed development makes a positive contribution to place-making through a high-quality development which integrates with the existing development in the area.

As outlined in Chapter 11 Landscape and Visual Impacts of the EIAR prepared by Modelworks, the proposed development includes several 'placemaking' elements supporting physical and community health, including: - A new plaza off Richmond Road beside the entrance to the neighbourhood, fronted by Block A, which has retail use in the ground and first floors (see Figure 5.5). The combination of a new open space and active use, contiguous with the street, would create a distinct new 'place' in the public realm, substantially improving the environmental quality of Richmond Road in addition to providing new community facilities.



**Figure 5.5: Proposed CGI of Public Plaza entrance at Richmond Road**

Source: CGI Views Brochure prepared by Modelworks

The development also includes a new community hub in the refurbished and re-purposed protected structure and historic buildings of St Vincent's Hospital Fairview, as illustrated in Figure 5.6. This hub of community facilities includes (a) a community hall in the chapel, (b) a childcare facility in the former convent, (c) a café, (d) community library and (e) co-working facility in the former school, and (f) a gym in the former hospital buildings. This large concentration of community uses in the cluster of restored historic buildings, would create a new 'place' of high environmental quality and strong identity, with multiple community benefits.

**Figure 5.6: Proposed Community/Social Facilities in Block JK**

Source: STW Architectural Conservation Statement

The development provides significant public open space and a new 'central park' as illustrated in Figure 5.7. This substantial parkland, comprised of a series of interconnected lawn areas framed by planting, and enclosed by the proposed buildings and restored historic buildings, would constitute a significant new green structure asset and 'place' in the townscape – with positive impact on the environment and community. We refer to NMP Landscape Design Statement for further details of the proposed public open space.



**Figure 5.7: Proposed CGI of Central Park**

Source: CGI Views Brochure prepared by Modelworks

*At the Scale of District/Neighbourhood/Street*

The guidelines set out the relevant criteria for district/ neighbourhood / street context, as defined below, as follows:

*The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.*

**Response:** As set out in STW's Architectural Design Statement and Chapter 11 – LVIA of the EIAR, the proposed development will provide for high quality contemporary design at an appropriate urban location and make a significant positive contribution to the existing urban neighbourhood and streetscape at this location. The proposal includes a new state of the art hospital and associated grounds, the provision of 1.6 ha of public open space, as well as the reuse of historic and protected structures for increased community and social facilities. The combination of a new open space and active use, contiguous with the street, would create a distinct new 'place' in the public realm, substantially improving the environmental quality of Richmond Road in addition to providing new community facilities (see Figure 5.8).



**Figure 5.8: Proposed Aerial CGI from Richmond Road**

Source: CGI Views Brochure prepared by Modelworks

We refer to Chapter 11 - Landscape & Visual Assessment and Volume 3- Verified Photomontages brochure of the EIAR, and the CGI's Views Brochure, all prepared by Modelworks, which illustrates how the proposal visually integrates successfully with the surrounding urban landscape.

The LVIA prepared by Modelworks states the arrangement of height responds to both the sensitivities and the opportunities presented by the surrounding lands/development and states the following:

*“At its interface with the northern boundary, facing the Grace Park Wood and Griffith Court estates, the buildings (Blocks F and G) step down to four storey volumes closest to the boundary. Through a series of steps they rise to 10 no. and nine storeys respectively where they front the ‘central park’ internal to the site.*

*The tallest building, a volume of Block D, is located in a corner of the site adjacent to the Ierne pitch and putt golf course and the Dublin Port Stadium. Both of these are zoned open spaces (i.e. they will remain open space), and they form a wide green space buffer between the development and any and sensitivities (other than the sports grounds themselves) to the west and south west.*

*These variations in height, responding to the surroundings, also create visual interest and identity (a) within the neighbourhood itself, and (b) in the wider townscape – thereby contributing to legibility.”*

*The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered*

**Response:** As illustrated in the proposed CGI's included above, the proposed development provides for a variety of building heights and forms within the scheme. The proposed use of materials and façade modulation provides for variety and visual interest to the scheme. The proposed development is divided into a number of separate buildings which creates an interesting site layout and substantial



open space areas within the development. It is therefore considered that the proposed development is not monolithic and avoids long interrupted walls of buildings.

The Architectural Design Statement sets out that the proposal introduces a series of residential apartment buildings with high quality materials which relate well to the site's location and the style and palette of neighbouring properties and the wider existing context. This approach also breaks up the scale and massing of the scheme, ensuring that it will be pleasing to the eye when viewed from a distance, as much as within the scheme itself.

No long, uninterrupted walls are proposed in the form of perimeter or slab blocks, as the scheme effectively varies in height, and steps to avoid any sense of monotony. Elevations have been carefully designed and introduce varied aspects, through recessed styles and elements stepped out from the dominant building lines. This provides variety and visual interest to the buildings. This is complemented by a high quality hard and soft landscaping scheme, as set out in the NMP Landscape proposals, which further enhances the visual appeal of the proposals, as well as attracting public use and animation along the street frontages and within the internal courtyard and garden spaces.

The proposal employs buildings of linear footprint in response to a variety of factors including the shape of the site, the footprint and relationship with the historic elements of St. Vincent's Hospital buildings, and the objective for the buildings to enclose/define a central public open space (see Figure 5.9 and 5.10). In order to avoid 'long slab blocks', each building is vertically divided into a series of volumes, with the volumes distinguished from each other by recesses and variations in façade material/treatment and steps in height. The photomontages show that this disaggregation of form and articulation of the facades succeed in avoiding monolithic massing and reducing the perceived scale of the buildings.

The use of brick, which is finely textured and naturally coloured, as the predominant material, contributes further to the buildings' integration into the landscape.

*The LVIA states that the "Design measures such as the articulated form (recesses and steps in height to disaggregate the massing, and a meaningful/effective 'stepping down' towards the lower neighbouring development), articulated facades (large windows and variations in material to emphasise the articulated form), the texture and natural colours of the brick, and the rooftop gardens, combine with the extensive open space and the many existing trees to integrate the buildings into the landscape despite their scale."*

**Figure 5.9: Proposed CGI from Central Park**

Source: CGI Views Brochure prepared by Modelworks

**Figure 5.10: Proposed Central Park**

Source: NMP Landscape Design Statement



*The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009)*

**Response:** As noted above and in Section 6 below, the proposal introduces a development which is compatible with its land use zoning and adjacent development. The scheme will contribute to the creation of a sense of place translated through high quality landscaping proposals which serve to enhance the experience of residents and visitors. The new 'central park' is a substantial Parkland, comprised of a series of interconnected lawn areas framed by planting, and enclosed by the proposed buildings and restored historic buildings, would constitute a significant new open space asset and 'place' in the townscape – with positive impact on the environment and community.

The landscape is transformed from back land to urban in character, with buildings of high quality defining and overlooking the open space. The development has a favourable effect of the open space to the west of the site in creating capacity to accommodate height. Despite the density and height of the proposed development there is no sense of excessive enclosure. The height proposed makes optimal use of an underutilised area of land which benefits from a strategic location near significant employment locations (DCU St. Patricks, All Hallows Campus and in the City Centre) and close to a number of high quality public transport services.

As illustrated in the Verified Photomontages and CGI View brochures prepared by Modelworks, along Richmond Road in front of the existing Crannog hospital, a new plaza is proposed, incorporating the main entrance to the new neighbourhood. The seven storey Block A is set back from the street behind the plaza, with retail use in a projecting two storey volume. This will activate the plaza and the street, and the five set-back levels above would provide passive surveillance. The 'urban design context' of Richmond Road would be considerably improved along the affected stretch. With Block A set well back from the street there would be no undue increase in built enclosure.

The Site-Specific Flood Risk Assessment prepared by OCSC Consulting Engineers demonstrates the compliance of the scheme with "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009) and concludes:

*"As detailed with in the previous sections of this report, the proposed buildings for this development are located within Flood Zone C. Pluvial and groundwater flooding will be managed through the implementation of the mitigation measures outlined in Section 5.3. Therefore, in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities, there is no significant risk for flooding in the proposed development and it appropriate for use.*

*It has been demonstrated in the earlier sections that the site is not at risk of flooding from external sources, or as result of the proposed development. In order to minimise the risk of flooding within the development, it is recommended that all drainage infrastructure is designed and installed in accordance with the relevant standards. As the proposed units are located outside the 1 in 100 and 1 in 1000-year fluvial flood extents. The Dublin Pluvial Study identified a portion of the site as being at risk of pluvial flooding. The proposed development includes a new surface water network which will mitigate he pluvial risk to the site."*

*The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.*

**Response:** As noted above, the variations in height, responding to the surroundings, also create visual interest and identity within the neighbourhood itself, and in the wider townscape – thereby contributing to legibility. The proposed development makes a positive contribution to legibility in an



area in a cohesive manner by reflecting and reinforcing the role and function of streets and places and enhancing permeability.

As detailed in the Architectural Design Statement, the existing grain of the housing and streets in Grace Park Wood is acknowledged by the proposed layout and the set out of buildings D-E, F and G. A new pedestrian link connecting the existing residential area with the new development is proposed.

The proposed development would improve the character, quality/condition and permeability of the Richmond Road and environs. Along its two stretches of frontage to Richmond Road the improvements at the site interface (see cell below) would improve the condition of the streetscape, better reflecting the status of the street in the urban structure. Additionally, the removal of long stretches of high concrete wall from the site boundary would improve the visual permeability and legibility of the area. Importantly, the development would create public pedestrian and cycle routes north to south across the site, connecting Grace Park Wood and Griffith Court to Richmond Road via public routes across the site. The new entrances and routes across the site would result in a substantial improvement in permeability in the area, benefitting the wider community.

**Figure 5.11: Proposed Masterplan Image showing connections**



Source: St. Vincent's Hospital, Fairview - Masterplan Document

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 proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.*

**Response:** The proposed development provides a diverse mix of uses including communal/social infrastructure, residential and commercial development, as follows:

- Provision of a new two storey hospital building providing mental health services and accommodating 73 no. beds, a single storey facilities management building, associated car parking and open space.
- Retention and repurposing of existing buildings on site including Brooklawn (RPS Ref.: 8789), Richmond House (RPS Ref.: 8788), the laundry building, Rose Cottage and other buildings for ancillary uses associated with the new hospital building. The existing gate lodge building will be retained in residential use and used by visiting members of staff to the new hospital building.
- Retention and change of use of the existing hospital building (part of which is a protected structure under RPS Ref.: 2032) to provide residential amenity areas, a gym, a café, co-working units, a library, a childcare facility, and a community hall (referred to as Block K).
- Provision of 9 no. residential blocks (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 building (protected structure RPS Ref.: 2032- referred to as Block K).

The proposed residential development provides for a range of unit types, standard designed apartments, build to rent apartments and social/affordable housing and therefore complies with this criteria of the Guidelines.

#### *At the Scale of the Site/Building*

The guidelines also set out the following criteria for developments at the scale of the site / building:

*The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.*

*Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd Edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'.*

*Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.*

**Response:** We refer to the Daylight and Sunlight Analysis Report prepared by IN2 which accompanies this submission. All of the apartments have been designed in accordance with the

relevant guidelines in relation to Daylight and Sunlight including the recently adopted 2022 BRE Guidelines, incorporating EN 17037:2018. IN2 have carried out a detailed analysis of the scheme (set out in a separate report) which finds that 99% of all habitable rooms in all units are fully compliant, with the few that fail coming close to the pass standard. This report sets out both ADF and SDA results for every habitable room. Please refer to the report for the full details and the methodology used which applies with best practice.

Buildings H and L provide large, glazed windows to the living room offering a full view of the Central Park and improving the quality of the daylight into the room by reducing overshadowing. A section of the balcony balustrade in front of the bedroom windows is solid, providing privacy, while adding additional texture to the richness of the elevation.

The taller elements of the scheme - the higher parts of buildings D-E, F and G, are all situated around the west and north of the Central Park, framing the space without overshadowing it.

Building D-E acts as a key landmark building to the overall scheme. The massing of this building has been carefully modelled to break up the building into elements with a vertical emphasis to create visual interest and variety. The stepped form also creates generous roof terraces that provide private communal spaces. The building form is articulated by an alternating palette of light and dark buff brick elements, enlivened by the light bronze aluminium clad circulation elements and panels of textured brickwork.

#### *Specific Assessments*

Specific assessment as set out in the Guidelines also include the following:

*Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.*

**Response:** We refer to the Microclimatic Wind Analysis and Pedestrian Comfort Report prepared by IN2 which states the following:

*“The analysis illustrated how conditions for pedestrians at ground level were predicted to be suitable for “Outdoor Dining/Pedestrian Sitting” across the majority of the proposed development which presents excellent sheltered conditions for its intended use as amenity spaces. Certain regions around Building DE were predicted to be slightly less comfortable as they were suited more for “Pedestrian Walking”.*

*The outdoor seating area between Building DE and C was identified to require a wind mitigation measure, the original design presented conditions suited predominantly to “Pedestrian walking” which was less desirable for its intended use. Many design options were looked in conjunction with Scott Tallon Walker and Niall Montgomery & Partners.*

*The final solution used strategically places landscaping and hedging to now provide more comfortable conditions for the seating areas.*

*Roof terrace level amenity spaces were also assessed for pedestrian wind comfort. The report confirms that all roof terrace amenity spaces on Buildings C and DE assessed are determined to be predominantly suitable for “Outdoor Dining” and are therefore suitable for their intended use.*

*The balconies on all buildings in the proposed site were assessed. Originally with the exception of 10 balconies on Building DE, the remaining balconies were predicted to be suitable for “Outdoor Dining”. The 10 balconies on the SW façade of Building DE, outlined in Section 4.13, were*



determined to be suitable for "Pedestrian Standing/ Walking", and therefore uncomfortable for their intended use.

1.1m high solid balustrades were assessed as part of the design solution and found to have significantly improved the pedestrian comfort of those balconies to be primarily suitable for "Outdoor Dining". The final design now incorporated these into the building design and provides comfortable sheltered conditions.

Overall, the proposed development was determined to not negatively impact on its receiving environment in terms of wind microclimate, allowing for the mitigation measures that were identified through the process of analysing microclimatic effects."

In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.

**Response:** We refer to Chapter 7 – Biodiversity of the EIAR which sets out that the proposed building heights would not be considered to have a significant effect on flightlines. The Biodiversity Chapter states the following:

*"In relation to the proposed buildings' height and the potential for this to pose a collision risk to local bats, the proposed development site is not within an important site for bats. Bats observed on site are in low numbers and are the most common species observed in Ireland. Investigations into the reasons for bat collisions with buildings noted that building material and their sound reflecting properties are important elements to be considered in relation to collision risk (Greif et al., 2017). Smooth vertical surfaces such as windows and large expanses of glass can be problematic to bats (Timm, 1989; Greif et al., 2017). Glazing has been included in the facades of buildings. However, glazing will be broken up with additional materials including concrete which have good reflective properties. The proposed structures would represent a low risk in terms of collision and the effect of this development would be of low significance to the local bat population. The landscape plan has been designed in consultation with the ecologists to provide additional foraging resources for bats on site. Bat boxes have been included into the building design where feasible on site. Lighting design has been carried out in consultation with the project ecologists."*

It would be expected that the buildings on site, which are within a dense urban environment with buildings that are taller than the proposed development, will be clearly visible to birds and that as outlined in the wintering bird assessment the preferred flightlines are to the south and north of the proposed development. No significant impact on flightlines would be foreseen as a result of building heights on site.

The Biodiversity Chapter also states that *"No bat roosts will be lost due to this development. The proposed development is within a dense urban area and is not proximate to an important bat area. No significant bat activity was noted on site. The buildings would not be seen to cause a negative impact on the flightlines of bats given the low activity of bats on site."*

An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.

**Response:** We refer to the Telecommunications Report prepared by ISM, which has recommended mitigation in the form of telecommunications infrastructure on the roof of Block B which has been incorporated into the application, and which in turn confirms that *"ISM can conclude based on the findings outlined herein that the proposal being made by the Applicant within its submission to the Planning Body allows for the retention of important Telecommunication Channels, such as Microwave links, and therefore satisfies the criteria of Section 3.2 of the Building Height Guidelines (2018)."*

*An assessment that the proposal maintains safe air navigation.*

**Response:** Block DE is the tallest residential block of 13 no. storeys and has a maximum height of c. 47.965 metres from the lowest adjacent ground level to the top of parapet. We notified IAA in relation to the proposed development as part of the pre-application consultation process and we refer to the response they provided which is included as Appendix 2. The response from IAA states the following:

*"Based on the information provided, the development appears to be located approximately 5.8km South of Runway 34 Threshold at Dublin Airport with a maximum height 47.965m AGL. During the formal planning process, the Safety Regulation Division – Aerodromes will likely make the following general observation:*

*"In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to agree appropriate obstacle warning lighting arrangements and to notify daa / Dublin Airport and the Authority of the intention to commence crane operations with at least 30 days prior notification of the erection."*

Having regard to above, it is considered that the development will not impact on the safety of aircraft operations at Dublin Airport given the site is not located in close proximity to an airport or airfield.

*An urban design statement including, as appropriate, impact on the historic built environment.*

**Response:** The application is accompanied by the following documentation of relevance to this requirement:

- 1) Architectural Design Statement prepared by STW Architects.
- 2) Architectural Conservation Report prepared by STW Architects.
- 3) EIAR Chapter 13- Landscape and Visual Impact Assessment, EIAR Volume 3 Verified Photomontages Brochure, and CGI Views Brochure prepared by Modelworks.
- 4) Landscape Design Statement prepared by NMP Landscape Architects.
- 5) Chapter 13- Architectural Heritage and Volume 4- Architectural Heritage Impact Assessment of the EIAR prepared by Carrig Conservation.
- 6) Chapter 12- Archaeology and Cultural Heritage of the EIAR prepared by IAC (included as part of EIAR).

*Relevant environmental assessment requirements, including SEA, EIA, AA, and Ecological Impact Assessment, as appropriate.*

**Response:** This application is accompanied by an AA Screening Report and Natura Impact Statement prepared by Altamar. The NIS concludes by stating the following:

*"Following the implementation of the mitigation measures outlined, the construction and operation of the proposed development will not result in direct, indirect or in-combination effects which would have the potential to adversely affect the qualifying interests/special conservation interests of the European sites screened in for NIS with regard to the range, population densities or conservation status of the habitats and species for which these sites are designated (i.e. conservation objectives). All other European Sites were screened out at AA Screening Stage. The proposed project will not will adversely affect the integrity of European sites.*

*On the basis of the content of this report, the competent authority is enabled to conduct an Appropriate Assessment and consider whether, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European site."*

In addition, an EIAR, including Biodiversity Chapter (i.e. an ecological impact assessment of the proposed development), accompanies this LRD application which demonstrates that the proposed building heights will not result in any significant adverse environmental impacts.

#### **5.4 Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2022 (and 2020 where Circular Letter NRUP 07/2022 applies)**

The Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2020 (Apartment Guidelines, 2020) were recently amended by 'The Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities' (herein referred to as the Apartment Guidelines, 2022), which were issued under S. 28 of the Planning and Development Act on the 22<sup>nd</sup> December 2022.

As noted above, Circular Letter NRUP 07/2022, which was published with the Apartment Guidelines 2022, provides for transitional arrangements for BTR schemes which are 'in the system', stating the following:

*"Transitional Arrangements - All current appeals or planning applications (including any outstanding SHD applications and appeals consequent to a current planning application), that are subject to consideration within the planning system on or before 21st December 2022, will be considered and decided in accordance with the current version of the Apartment Guidelines, that include SPPRs 7 and 8.*

*Furthermore, in cases where a request for a Large-Scale Residential Development (LRD) meeting has been submitted to a local authority for a proposal that includes specified BTR development in accordance with S.32B of the Planning and Development Act on or before the date of this Circular (21<sup>st</sup> December 2022), even if the LRD meeting has yet to take place, the opinion has yet to issue, or a planning application has yet to be made but is made within 6 months of receipt of the opinion as required by s.32A of the Act, the development will be assessed by the local authority and where applicable, on appeal to the Board, in accordance with the Guidelines issued prior to the BTR update, i.e. the version of the Apartment Guidelines that includes SPPRs 7 and 8, will remain applicable."*<sup>[1]</sup>

The subject application received an LRD Opinion from Dublin City Council under Ref.: LRD6009/22-S2 on the 15<sup>th</sup> of December 2022, following the submission of a Stage 2- LRD Opinion request on the 25<sup>th</sup> of October 2022 i.e. in advance of the update to the Guidelines being published, and thus, as demonstrated below, the BTR element of the proposed development should be assessed in accordance with the Guidelines issued prior to the BTR update i.e. the version of the Apartment Guidelines that includes SPPRs 7 and 8, rather than the new BTR provisions in the Apartment Guidelines 2022. The standard design apartments proposed within the scheme are assessed under the provisions of the updated Apartment Guidelines 2022.

It is noted that Section 5.5 of the Development Plan seeks to build upon and enhance the provisions of the Apartment Guidelines 2020. Policy QHSN2 states *"To have regard to the DEHLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2020), 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009), Housing Options for our Aging Population 2020 and the Design Manual for Urban Roads and Streets' (DMURS) (2019)."*

In this regard, we refer to Section 6 which provides further detail how the development is compliant with the requirements of Section 15.9 of the Development Plan which relates to Apartment Standards. The following sets out a brief summary of how the scheme complies with the SPPRs and

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<sup>[1]</sup> DoHLGH Circular Letter NRUP 07/2022, dated 21/12/2022, pg.4



Appendix 1 of the Apartment Guidelines 2022, and SPPR 7 and SPPR 8 of the Apartment Guidelines 2020 in respect to the BTR aspect of the scheme.

In respect to future housing need, the Apartment Guidelines 2022 recognises the need for alternative types of accommodation to facilitate the societal and economic changes that have affected household formation and housing demand as it states the following:

*Demographic trends indicate that two-thirds of households added to those in Ireland since 1996 comprise 1-2 persons, yet only 21% of dwellings completed in Ireland since then comprise apartments of any type. The 2016 Census also indicates that, if the number of 1-2 person dwellings is compared to the number of 1-2 person households, there is a deficit of approximately 150%, i.e. there are approximately two and half times as many 1-2 person households as there are 1-2 person homes.*

*The 2016 Census indicates that 1-2 person households now comprise a majority of households and this trend is set continue, yet Ireland has only one-quarter the EU average of apartments as a proportion of housing stock. Dublin as a whole has approximately one-third the rate of apartments as comparable cities in Europe, with which it competes for investment and talent to secure continued growth and prosperity.*

**Response:** The proposed development includes 494 no. standard designed apartments and 317 no. Build-to-Rent apartments and will therefore provide a range of suitable housing accommodation type for people seeking residential accommodation in Dublin. In addition, it is highlighted that the development provides 174 no. social housing units (21% of the total units), which exceeds the requirements of Part V of the Planning and Development Act 2000 (as amended).

#### Location

In support of the proposed density, building heights, provision of car parking of the proposed residential development (which includes 317 no. Build to Rent units), we set out below how the development is justified from in respect to the site's location.

It is considered that the subject site is located within a 'central and/or accessible urban location' as set out in the Apartment Guidelines, which states:

*'Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:*

- ***Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;***
- *Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and*
- ***Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.***

**Response:** As illustrated in Figure 5.1, 5.2 and in Section 2.3, 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 proposed development includes the provision of a new hospital, providing mental health services, with a total staff in the order of c. 200 no. persons and is considered to be a significant employment location as defined under Section 2.4 of the Apartment Guidelines 2020 / 2022 which

states “*Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or **significant employment locations, that may include hospitals and third-level institutions***”.

We refer the Planning Authority to the previous sections which outlines the proximity and accessibility to high quality high capacity public transport.

We refer to the Public Transport Capacity Study and Traffic Impact Assessment prepared by OCSC which includes detail on the frequency and capacity of public transport serving the subject site. The study carried out a survey of capacity on Irish Rail and Dublin Bus Routes 1, 123, 14, 16. The study concludes that there is high frequency and available capacity on relevant routes. The TTA outlines that there is an estimated total maximum capacity for 48,348 rail trips and 196,650 bus trips during the peak morning period which is considered to represent the peak daily demand period. According to the report:

*“In the context of the aforementioned bus and rail service capacity locally, the demand generated by the development equates to approximately 0.2% of the bus capacity and 0.1% of the rail capacity which is considered negligible.*

*Taking the above into consideration, there is considered to be sufficient capacity available in the local public transport network to cater for the estimated demand for the proposed development. It is further noted that there is flexibility with respect to these services to provide increased frequency should demand on a wider basis justify it through the provision of additional buses on key routes by the respective service operators.”*

Having regard to the above, the proposed development has access to and is in proximity to existing high quality, high capacity and high frequency public transport services. The subject site is therefore considered to be a ‘central / accessible’ location under Section 2.4 of the Apartment Guidelines, being a location suitable for higher density development, and also suitable for greater building heights and Build-to-Rent development having regard to the provisions of the Development Plan (see Section 5.5.7 for further details).

### **SPPR1 – Unit Mix**

The subject scheme comprises the following:

**Table 5.2: Proposed Unit Mix**

SDA – 10 studios (2%) 236 1beds (48%) 199 2beds (40%) 49 3beds (10%)	BTR- 8 studios (2.5%) 151 1 beds (48%) 150 2 beds (47%) 8 3 beds (2.5%)	Total 18 studios (2%) 387 1 beds (48%) 349 2 beds (43%) 57 3 beds (7%)
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We note Specific Planning Policy Requirement 8(i) of the Apartment Guidelines, 2020, state that there are no restrictions on dwelling mix shall apply to Build-to-Rent developments.

The 494 no. standard designed apartments provides with a maximum of 50% studio and 1 bed units and therefore complies with requirements of SPPR1 of the Apartment Guidelines 2022 and Section 15.9.1 of the Development Plan.

Furthermore, the overall scheme including the BTR units complies with SPPR1 mix requirements in any event.

**SPPR2 – Small Urban Infill Sites**

*N/A the site is not a small urban infill site.*

**SPPR3 – Minimum Floor Areas**

All apartments meet, and in many cases, exceed the minimum apartment floor areas set out in SPPR3 as demonstrated in the Housing Quality Assessment Table prepared by STW Architects.

The proposed development includes a total of 17 no. 2 bed 3 person units which is c. 2% of the total units and is in therefore in accordance with this requirement.

We refer to the Housing Quality Assessment prepared by STW Architects which outlines how the majority of units exceed the minimum floor area by 10%. Having regard to above, the proposed standard designed apartments therefore exceed the minimum requirements of SPPR3 of the Apartment Guidelines 2022.

**SPPR4 – Dual Aspect**

The proposed development provides a total of 54% dual aspect units (436 no. units). We refer to the Architectural drawings / Appendix A of the Design Statement which identify / provide details of the dual aspect units. The Design Statement sets out that the proposal avoids single aspect north facing apartments. The high level of dual aspect units demonstrates the high quality design of the subject scheme. The proposal therefore exceeds the minimum requirements of SPPR4 of the Apartment Guidelines 2022.

**SPPR5 – Floor to Ceiling Heights**

Floor to ceiling heights throughout will exceed 2.4 metres clear internally. All ground floor apartments have a ceiling height of 2.7m and therefore exceeds the minimum requirements of SPPR5 of the Apartment Guidelines 2022.

**SPPR6 – Lift and Stair Cores**

The maximum number of apartments per floor per core is 12 for Standard Design Apartments which accords with the requirements of SPPR6 of the Apartment Guidelines 2022. The ratio in this development varies from 6 to 12 units/core/floor for standard design apartments.

In the BTR element of the scheme the ratio ranges from 7 to 16 units per core per floor. We note this is acceptable under SPPR8(v) of the Apartment Guidelines 2020.

**Build to Rent – SPPR 7 and 7 (Apartment Guidelines 2020)**

As noted above, the subject application received the LRD Opinion from Dublin City Council under Ref.: LRD6009/22-S2 on the 15<sup>th</sup> of December 2022, and thus, as demonstrated below, the BTR element of the proposed development should be assessed in accordance with the Guidelines issued prior to the BTR update i.e. the version of the Apartment Guidelines that includes SPPRs 7 and 8, rather than the new BTR provisions in the Apartment Guidelines 2022.

**SPPR7 – Build to Rent**

As detailed in STW's Architectural Design Statement, the proposed development includes a total of 4,781 sq.m of residential amenity space, community facilities and commercial floorspace (excluding the new hospital), to serve the overall residential development and the wider public. This includes the following:



**Table 5.3: Overall Commercial, Community and Residential Amenity Areas**

Residential Amenity	Building	Area m <sup>2</sup>
Concierge, Post, Laundry	J	327
Gym	K1	1,459
Dedicated Tenant Facilities	K1	711
Creche	K3	730
Co-working	K2	817
Library	K2	N/A
Community Hall	K4	N/A
Residents Lounge	C	55
Residents Lounge / Dining / Meeting	DE	561
Resident's Meeting	F + G	122
<b>Total</b>		<b>4,781.5m</b>

Table 5.4 below provides a summary of the proposed resident support facilities and amenities for the BTR development in accordance with Section 15.10.1 of the Development Plan and SP7 of the Apartment Guidelines 2020 (Circular NRUP 07/2022 applies), which include the following:

- Resident Services and Amenities: Resident lounge, function rooms, recreational areas etc.
- Resident Support Facilities: Concierge, management facilities etc

**Table 5.4: Summary of Proposed Residential Support Facilities and Amenities for the BTR Element of the Development**

Number of BTR Units	Number of bedspaces	Total Resident Services & Amenities	Total Resident Support facilities (note this is shared with SDA units)	Total Residential Support Facilities + Resident Services & Amenities	DCC Requirement (3 sq.m per person for BTR)	Total per person
317	958	1,264.4 sq.m*	3,713.35 sq.m**	4,977.75 sq.m	2,874 sq.m of (3 sq.m X 958 no. bedspaces for the 317 no. BTR units).	5.2 sq.m

\* Block K1 (residents lounge & library), Block D-E (residents lounges, meeting rooms and a cinema room at ground floor level, resident's lounge, cooking and dining facilities at sixth floor level and a residential lounge at twelfth floor level), Block F (lounge / Meeting Area at ground floor level)

\*\* Block DE (concierge), Block J (concierge, post room, laundry), Block K2 (co-working, community library), Block K4 (community hall), bin store, bike store (NOTE: Resident Support facilities shared with SDA units)

Section 15.10.1 of the Development Plan recognises that the Apartment Guidelines 2020 do not provide a quantitative standard for resident support facilities and resident services and amenities and states that 'a general guideline of 3 sq.m per person is recommended'. As demonstrated above, the total resident support facilities and resident services and amenities provides for 5.2 sq.m per BTR bedspace, which has regard to best practice and satisfies the 'guideline' recommendation in the Plan. We also note that the dedicated resident amenities for the BTR units provide c. 4.2 sq.m per BTR unit which is generous in comparison to other permitted and existing BTR developments. It is

submitted that the provision of resident support facilities and resident services and amenities is suitable for the proposed BTR units, having regard to the provision in other exiting and permitted BTR schemes, and the range of other community and commercial uses proposed within the St. Vincent's Hospital Fairview Redevelopment, which all future residents will have access to.

As set out in the Hooke and MacDonald Operational Management Plan, a professional property management services provider will be appointed (the "Property Manager") which will include an on-site resident management team ("Resident Management Team"), based in the tenant concierge area of Block D-E for the Build to Rent apartments and Block J servicing the standard design apartments. The Resident Management Teams' key responsibility will be for the management of day to day operations including customer engagement, both in person and electronically. There will be multiple staff on site during the week and it is envisaged that the main on-site hours will be 8.30am-8.30pm Monday-Friday; 10am-4pm Saturday; Sunday & Bank Holidays 11am-2pm.

As outlined in the Operational Management Plan, the other facilities outlined in Table 2.1, which include the concierge in Block J, gym in Block K1, co-working in Block K2, community hall in Block K4, library in Block K2, and will be made available to the residents of the Build to Rent units, as well as serving the standard designed apartments and the wider community.

In addition to the dedicated residential support and amenity spaces in Block K1, D-E, F, communal roof terraces are proposed in Block D-E, with one at fifth floor level, two terraces at sixth floor level, one terrace at ninth floor level, and one terrace at twelfth floor level. The development also includes the provision of public open space, communal open space and other communal internal amenities for the overall residential development which will ensure that a high-quality standard of living that encourages social interaction will be provided for the future tenants.

Section 5.11 of the Apartment Guidelines 2020 states that *"The provision of specific BTR amenities to renters will vary and the developer will be required to provide an evidence basis that the proposed facilities are appropriate to the intended rental market."*

**Response:** We refer to CBRE's Justification for Proposed BTR Development and Amenity Areas addressing Section 5.11 of the Apartment Guidelines 2020 and which states *"in our analysis of similar developments to the proposed development, the amenity space on offer in the subject scheme comprises both an appropriate quantum and mix of facilities. These amenities are appropriate for the target market of the scheme"*.

### **SPPR8 – Build to Rent**

SPPR8(i) of the Guidelines 2020 states there is no restriction on unit mix for BTR schemes and therefore the proposed mix of 8 studios (2.5%), 151 no. 1 beds (48%), 150 no. 2 beds (47%) and 8 no. 3 beds (2.5%) for the BTR development is therefore considered to be appropriate.

We refer to the Housing Quality Assessment prepared by STW Architects which outlines how the proposed residential units comply with the minimum internal storage requirements set out in Appendix 1 of the Apartment Guidelines 2020 / 2022, notwithstanding that SPPR8(ii) allows flexibility in relation to the provision of a proportion of the storage and private amenity space associated with individual units.

In respect to car parking, it is proposed to provide a total of 247 no. spaces for the overall residential portion of the development. This translates to an approximate ratio of 0.3 spaces per unit (247/811). The parking provision also includes 7 no. car share spaces which forms part of the wider Mobility Management Plan and 124 no. EV charging spaces. The provision is a reduction on the maxima standards set out within the Development Plan, which would require a maximum of 811 no. spaces, however it is submitted that this is an appropriate car parking strategy. We refer to the Traffic Impact Assessment prepared by OCSC for a rationale of the proposed reduced parking provision.

In the BTR element of the scheme the ratio ranges from 7 to 16 units per core per floor. We note this is acceptable under SPPR8(v) of the Apartment Guidelines 2020.

We note SPPR8(iv) outlines that the requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR scheme. In accordance with this provision the proposed BTR units do not exceed the minimum floor areas by 10%.

#### *Other Requirements*

We refer to the Housing Quality Assessment prepared by STW Architects which outlines how the proposed residential units comply with the minimum internal storage requirements set out in Appendix 1 of the Apartment Guidelines 2020 / 2022.

We refer to the Housing Quality Assessment prepared by STW Architects which outlines how the proposed residential units comply with the minimum private amenity space requirements set out in Appendix 1 of the Apartment Guidelines. We also refer to the NMP landscape design report which provides details of the 1.5m wide defensible space to serve as a landscaped physical and visual buffer for ground floor apartments.

The proposed development provides 5,645 sq.m external communal open space and therefore exceeds the minimum communal amenity space required under the Apartment Guidelines 2020 / 2022, as outlined in the table below.

**Table 5.5: Communal Amenity Space Requirements for Proposed Development**

Unit Type	No. of Units	Communal Amenity Space	Total Communal Amenity Required
Studio	18	4 sq.m	72 sq.m
One Bedroom	387	5 sq.m	1,935 sq.m
Two Bedroom (4 person)	332	7 sq.m	2,324 sq.m
Two bedroom (3 person)	17	6 sq.m	102 sq.m
Three Bedroom	57	9 sq.m	513 sq.m
<b>Total:</b>	<b>811</b>		<b>4,946 sq.m</b>

We refer to STW Architectural Design Statement for a response to security and demonstrates how the proposed development provides for passive surveillance. NMP landscape design report provides details of the proposed privacy strips.

#### *Cycle Parking*

The Apartment Guidelines 2022 outline the minimum standard of 1 cycle storage space per bedroom. This equates to 1,274 no. spaces based on the proposed unit mix. Visitor cycle parking shall also be provided at a standard of 1 space per 2 residential units which equates to 406 no. spaces.

**Response:** Provision is made for a total of 1,680 no. cycle parking spaces, including 1,274 no. long stay and 406 no. visitor spaces, for residential units which complies with the requirements of the Apartment Guidelines 2022. A total of 947 no. cycle spaces (including cargo and electric) are located



at basement level and 733 no. spaces at surface level. A covered, secure parking enclosure and open bike racks at surface level and secure bike parking areas at basement level.

Additional provision is made for 84 no. spaces for the commercial/community uses and 50 no. spaces for the hospital to comply with the Development Plan requirements.

## 5.5 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)

The role of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009, (SRDUA hereafter) is to ensure the sustainable delivery of new development throughout the country. The Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:

- Prioritise walking, cycling and public transport, and minimise the need to use cars;
- Are easy to access for all users and to find one's way around;
- Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;
- Provide a mix of land uses to minimise transport demand.

The SRDUA Guidelines also provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. In this regard, the Guidelines are accompanied by a Design Manual discussed below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

These SRDUA support a plan-led approach to development as provided for in the Planning and Development Act 2000, as amended. Section 2.1 of the Guidelines note that *'the scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy'*.

The SDRUA Guidelines reinforce the need to adopt a sequential approach to the development of land and note in Section 2.3 that *'the sequential approach as set out in the Departments Development Plan Guidelines (DoEHLG, 2007) specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities...'*

**Response:** In respect to the above, the subject site is zoned 'Z1, Z12 and Z15' and the proposed development will make the most efficient use of the subject land increasing residential development in an existing urban area and providing for high density residential development, a new hospital, and other community uses, in a key urban location, which is well served by existing and planned public transport and local services. The proposed development is therefore compliant with the Guidelines in respect to the sequential development approach.

Sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally.

**Response:** As set out in Section 4 and STW Design Statement, a new community hub is proposed in the refurbished and re-purposed historic buildings of St Vincent's Hospital. This hub of community facilities includes a community hall in the chapel, a creche in the former convent, a café, community library and co-working facility in the former school, and a gym in the former hospital buildings. This large concentration of community uses in the cluster of restored historic buildings, would create a new 'place' of high environmental quality and strong identity, with multiple community benefits.

Section 5.8 of the Guidelines recommends that *'in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes'*.

**Response:** The subject lands are located in an area where minimum densities of 50+ units per hectare are supported by the Guidelines. Section 6.1.12.13 of this report demonstrates that the net density proposed is appropriate for the subject lands in the context of the Guidelines and the guidance set down in the new Development Plan of relevance to the subject lands.

As outlined in STW's Design Statement, the overall proposed development provides a net density of 182 units per hectare based on the net area of the residential part of the site (Z1, Z12 and Z15) excluding the proposed public open space (as per the approach recommended in the 2009 Guidelines). The Development Plan does not include any density requirements for Inner Suburban areas. The proposed density is considered to be appropriate having regard to the site being located within an 'Inner Suburban area', and which is zoned objective 'Z1, Z12 and Z15' in the Development Plan. Residential and Build to Rent Residential uses are either permissible or open for consideration under these zoning objectives (see Section 6 for justification for residential development on Z15 zoned lands and addressing the highly exceptional circumstances requirement for same).

The subject site is underutilised and given its 'Central and/or Accessible' location (as defined under Section 2.4 of the Apartment Guidelines 2022) and location within a 'Public Transport Corridor', which is defined as a 'Key Location' for increased heights and density in Appendix 3 of the Development Plan, is considered suitable for the density of residential development proposed.

Appendix 3 of the Development Plan acknowledges that *"There is recognised scope for height intensification and the provision of higher densities at designated public transport stations and within the catchment areas of major public transport corridors."* These are noted to include bus connects routes and core bus corridors. The subject site, as noted previously, is situated within 1km of a range of existing high capacity, high frequency bus routes.

Appendix 3 further states that *"Locations for intensification must have reasonable access to the nearest public transport stop. In line with national guidance, higher densities will be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station in the plan."* As 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 which are served by Bus Route No. 123 (with a peak frequency every 10 mins) and is considered to be an 'Inner Suburban' site, and therefore appropriate for increased heights and density over that of the prevailing context in the area.

The proposed development responds to the Development Plan policies and National planning objectives for consolidation and densification in suitable locations within urban areas served by public transport through the provision of a high quality development on underutilised institutional lands with high density residential and mixed use development, provision of community uses to serve the existing population and significant public open space maintaining the open character of the space. It is noted that this has taken place throughout the city, including in the north inner suburbs, for example Griffith Wood, Griffith Avenue, Marino, the SHD permitted at Clonliffe College, Drumcondra (subsequently quashed at JR), Richmond Hall and the apartment developments within the residential area of Grace Park Wood.

Section 5.10 of the Guidelines relates to Institutional Lands and states *"In the event that planning authorities permit the development of such lands for residential purposes, it should then be an objective to retain some of the open character of the lands, but this should be assessed in the context of the quality and provision of existing or proposed open space in the area generally. In the*

development of such lands, average net densities ***at least*** in the range of 35-50 dwellings per hectare should prevail and the objective of retaining the open character of the lands achieved by concentrating increased densities in selected parts (say up to 70 dph)”

**Response:** The Development Plan does not include such recommendations in respect to densities for Z15 – Social and Community Infrastructure lands. However, it is considered appropriate to provide a justification for the proposed net residential density on the Z15 zoned portion of the lands, in the context of the above recommendation in the Guidelines.

Firstly, it is noted that the objective of '*retaining the open character of the lands achieved by concentrating increased densities in selected parts*' is complied with as part of the proposed development and significant area of public open space proposed as part of the proposed redevelopment of the lands.

In respect to the density recommendations, the Guidelines state that the average net densities should be '*at least*' in the range of 35-50 dwellings per hectare and say '*up to 70 uph*' in selected parts. This reference to 35-50 units per hectare is therefore considered to be a minimum recommendation, not a maximum of 50 dwellings per hectare and that densities can be greater than this minimum range. The reference to '*say up to 70 uph*' is also not expressed as an absolute maximum and therefore density can be greater than the figures included in the Guidelines. As set out below, the proposed density is greater than the ranges outlined above in the Guidelines, however, this must be considered in the context of the subsequent and more recent objectives of the National Planning Framework and Urban Design Building Height Guidelines 2018, which represent a significant change in national policy since the publication of the 2009 Guidelines, calling for consolidation and densification of land use to make more efficient use of the land resource and services, particularly public transport in urban areas, to help achieve national sustainability goals.

The Minister for Housing, Planning and Local Government foreword for the Building Height Guidelines 2018 acknowledges this in the statement “*We need to shift away from energy intensive “business as usual” development patterns and **create more mixed, more dynamic and more sustainable cities and towns, that carefully employ the delivery of increased building heights to tackle our problems with urban sprawl.***” The Minister also states that “*Our cities and our towns must grow upwards, not just outwards, if we are to meet the many challenges ahead. **Constant expansion of low-density suburban development around our cities and towns cannot continue.....** Furthermore, there are serious and unsustainable carbon emission implications due to increased commuting distances to the city and town centres, never mind the sheer waste of time in travelling, when instead we could be living. There is an opportunity for our cities and our towns to be developed differently. Our urban centres could have much better use of land facilitating well located and taller buildings, meeting the highest architectural and planning standards. These guidelines are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of our cities and towns upwards, rather than ever outwards.*”

The proposed development includes c. 155 no. units on the Z15 portion of the residential site (zoning cuts diagonally across residential Block A), and the net residential density for the residential development on the Z15 lands is 94.5 units per hectare (based on the residential net site area of 1.64 ha which excludes public open space and the hospital site). Whilst it is noted that the proposed density is greater than the ranges discussed above for institutional lands set out in the 2009 Guidelines, these are not considered maximums and must be considered in the context of the subject lands and the current Development Plan, for which the density justification has been summarised above.

it is noted that higher densities for residential development in established urban areas are supported by the Development Plan, and NPOs 11 and 35 of the National Planning Framework, and the 2009 Guidelines were published well in advance of the National Planning Framework was adopted in 2018 and the Development Plan had regard to these guidelines. It is considered that the proposed

densities are acceptable and in accordance with the Development Plan objectives, which seeks to deliver on national planning policies to promote more compact growth and increased densities in appropriate locations near public transport services.

Thus, the net residential density of c. 94.5 units per hectare on the Z15 zoned portion of the lands is considered appropriate in the context of the Development Plan, the National Planning Framework, the Building Height Guidelines 2018, which place significantly greater emphasis on the importance of achieving a compact urban form including increased residential densities in urban areas, and is not precluded by the 2009 Guidelines, given the recommendations for institutional lands are not set as a maximum density requirement for such lands.

## 5.6 Urban Design Manual – A Best Practice Guide (2009)

The aim of Sustainable Residential Development Guidelines 2009 is to set out the key planning principles which should be reflected in development plans and local area plans, and which should guide the preparation and assessment of planning applications for residential development in urban areas. The document sets out high level aims that:

*'Need to be translated into specific planning / design policy and objectives which can be applied at different scales of residential development, ranging from districts or neighbourhoods within large urban centres, to expansion of smaller towns and villages, and finally down to the level of the individual home and its setting.'*

There are 10 no. high-level aims set out in the document.

**Response:** We refer to Appendix A of the Architectural Design Statement prepared by STW for a response to each of the criteria set out in the Urban Design Manual.

## 5.7 Design Manual for Urban Roads and Streets (2019)

The Design Manual for Urban Roads and Streets (DMURS) sets out an integrated design approach for creating new and redeveloping existing routes to ensure that they are secure, connected and attractive. The guidance document outlines several key objectives and design principles, most notably the promotion of sustainable modes of transport such as; prioritising walking, cycling and use of public transport. DMURS outlines practical guidance for the design of roads and streets which have been taken into consideration during the design process of the proposal at the subject of the report.

**Response:** We refer to DMURS Compliance Statement prepared by OCSC which demonstrates how the scheme complies with the relevant DMURs Design Principles.

## 5.8 The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)

The Planning System and Flood Risk Management Guidelines (2009) published by the Government of Ireland includes the following core objectives:

- Avoid inappropriate development in areas at risk of flooding.
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.



We also note the subsequent Circular PL2/2014, Department of Environment, Community and Local Government, August 2014 relating to use of OPW Flood Mapping in assessing planning applications, and clarifications of advice contained in the 2009 DECLG Guidelines for planning authorities – “The Planning System and Flood Risk Management”.

**Response:** The Flood Risk Assessment prepared by OCSC Consulting Engineers concludes as follows:

*“The assessment is carried out in full compliance with the requirements of “The Planning System & Flood Risk Management Guidelines” published by the Department of the Environment, Heritage and Local Government in November 2009.*

*As detailed with in the previous sections of this report, the proposed buildings for this development are located within Flood Zone C.*

*Pluvial and groundwater flooding will be managed through the implementation of the mitigation measures outlined in Section 5.3. Therefore, in accordance with the Planning System and Flood Risk Management Guidelines for Planning Authorities, there is no significant risk for flooding in the proposed development and it appropriate for use.”*

*“It has been demonstrated in the earlier sections that the site is not at risk of flooding from external sources, or as result of the proposed development. In order to minimise the risk of flooding within the development, it is recommended that all drainage infrastructure is designed and installed in accordance with the relevant standards.*

*As the proposed units are located outside the 1 in 100 and 1 in 1000-year fluvial flood extents. The Dublin Pluvial Study identified a portion of the site as being at risk of pluvial flooding. The proposed development includes a new surface water network which will mitigate he pluvial risk to the site.”*

## **5.9 Architectural Heritage Guidelines (2011)**

These Guidelines were published by the Department of the Environment, Heritage and Local Government originally in 2004, and reissued in 2011 following the transfer of functions to the Department of Arts, Heritage and the Gaeltacht. The Guidelines are issued under Section 28 of the Planning and Development Act 2000.

Having regard to the presence of protected structures and recorded monuments, in and adjacent to the site, the ‘Architectural Heritage Protection, Guidelines for Planning Authorities’ are considered relevant. These guidelines are issued under Section 28 and Section 52 of the Planning and Development Act 2000. Under Section 52 (1), the Minister is obliged to issue guidelines to planning authorities concerning development objectives:

- a) for protecting structures, or parts of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest, and*
- b) for preserving the character of architectural conservation areas.*

The guidelines provide guidance in respect of the criteria and other considerations to be taken into account in the assessment of proposals affecting protected structures. The guidelines seek to encourage the sympathetic maintenance, adaption and reuse of buildings of architectural heritage. Chapter 13 deals with Curtilage and Attendant Grounds and Section 13.5 relates to Development within the Curtilage of a Protected Structure and Section 13.8 of the Guidelines relate to Other Development Affecting the Setting of a Protected Structure or an Architectural Conservation area and the following sections are relevant:

- Section 13.8.1

- Section 13.8.2
- Section 13.8.3

**Response:** We refer to Chapter 13 - Architectural Heritage and Volume 4 of the EIAR (Architectural Heritage Impact Assessment and Appendices) prepared by Carrig Conservation (included as Volume 4 of the EIAR) which analyses all potential impacts of proposed development on the historic fabric, character and setting of the historic buildings, structures and grounds of St Vincent's Hospital. The Architectural Heritage Impact Assessment adheres to the government publication Architectural Heritage Projection, Guidelines for Planning Authorities.

In summary, the proposal entails the following works relating to protected structures:

- Richmond House and associated structures (RPS Ref.: 8788) will be refurbished for hospital administration use, with a GFA of 397 sq.m, and the proposed refurbishment works include the removal of an external staircase and balcony, removal of some internal walls, internal renovations, repair of the facades, repair and renewal of rainwater goods, and all associated conservations works.
- Brooklawn (RPS Ref.: 8789) will be refurbished for hospital administration use, with a GFA of 301 sq.m, and the proposed refurbishment works include the removal of an external staircase, replacement of rooflights, removal of some internal walls, internal renovations, repair of the facades, repair and renewal of rainwater goods, and all associated conservations works.
- 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),
- The change of use, refurbishment, alterations, and extensions, to the existing St. Vincent's Hospital buildings, part protected structures under RPS Ref.: 2032 (referred to as Block K), from lower ground to third floor level to provide for a mixed use building including community facilities, commercial uses and residential amenities and facilities. The building will be separated into 4 no. parts (Block K1, K2, K3 and K4). Block K1 includes a gym at ground and first floor levels and residential amenities and facilities at second and third floor levels. Block K2 includes a café and a community library at ground floor level and co-working spaces at first, second and third floor levels. Block K3 includes a childcare facility over three levels at lower ground, ground and first floor level and Block K4 is proposed as a community hall. The alterations to the existing buildings to facilitate the change of use includes the removal of external walls, a stair core, external elements to the northern and southern façade, internal walls, windows and doors, new rainwater goods, associated repairs and alterations, the construction of a new lift and stair core for Block K1, K2 and K3, and all associated conservation works. A part one to part four storey building is proposed as an extension to the western end of Block K (referred to as Block J)

In relation to the proposed refurbishment and change of use of protected and historic structures, the assessment states:

*"The conservation and refurbishment of the designated and non-designated structures on the site will represent and significant public and cultural benefit. The protected parts of the hospital structure, Brooklawn, Richmond House, Rose Cottage and the Laundry will be provided with sustainable and viable future uses and their fabric will be conserved and maintained, extending their lifespans. The alterations to the retained fabric and resulting loss of heritage value will be mitigated through quality conservation works and sensitive detailing."*

As noted in Section 4, 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 Impact Assessment and the application drawings, identifies exactly what demolition is involved in the application, identifies whether each individual element of demolition technically involves the demolition of any part of a protected structure (including whether it is in the curtilage of a protected structure), and where it does, provides a justification and sets out 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. This also addressed in detail in the Architectural Heritage Impact Assessment included as Volume 4 of the EIAR.

Section 7.5 of Architectural Heritage Impact Assessment summarises as set out above the demolition of structures within the curtilage of protected structures and associated mitigation measures proposed which will balance the potential negative impact against the arising public benefit (see Table 4.3 in Section 4 for details).

The Architectural Heritage Impact Assessment states that *"On the basis of the above analysis, it is our opinion that exceptional circumstances exist which allow the granting of planning permission by the Planning Authority, or the Board on appeal, in accordance with section 57(10)(b) of the Planning and Development Act 2000 (as amended)."*

In relation to the proposed demolition of part of the existing hospital buildings, the report states:

*"The proposed demolition of the westernmost range of the hospital complex and St. Teresa's Ward will represent a significant loss of historic fabric and will alter the current form of the hospital complex. The mitigation of this loss is represented by the established necessity of new development, the detailed archival recording of structures proposed for demolition and the provision of new high quality designed accommodation and facilities."*

In relation to the new residential development, the report states *"The new buildings will be set back from the range of protected structures allowing them to be considered as a whole within a new linear public landscape which will connect the site on an east-west axis. The loss of value resulting from the demolition of heritage structures is mitigated against through archival recording, the provision of high-quality residential accommodation and the facilitation of a viable redevelopment plan for the site.... The scale of the proposed buildings will have a visual impact on the setting of the protected structures, but this impact is not considered to be unacceptable and is an inevitable aspect of the zoning designation. Any harm caused to the historic setting will be mitigated against by the massing and landscaping strategies which will graduate the transition from historic garden to new residential infill parkland."*

## **5.10 Guidelines for Planning Authorities on Childcare Facilities (2001)**

The Guidelines for Planning Authorities on Childcare Facilities (2001) ("Childcare Guidelines, 2001") sets out that:

*'Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities...In relation to new housing areas, a standard of one childcare facility providing for a minimum 20 childcare places per approximately 75 dwellings may be appropriate.'*

The Childcare Guidelines, 2001 identify appropriate locations for childcare facilities including 'New communities/Larger new housing developments' stating "*Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments.*"

**Response:** Based on the Guidelines a total of 219 no. childcare spaces would be required ( $811/75 * 20 = 216.2$ ). However, both the Childcare Facilities Guidelines and the Apartment Guidelines 2020 / 2022 also acknowledge that studios and one-bedroom units can be omitted from this calculation. In the context of the above statement, studios and one-bedroom units would not be considered to contribute towards a requirement for childcare provision.

Thus, the total number of units within the scheme that should be used to calculate estimated childcare requirements is 406 units (811 minus 18 no. studios and 387 no. 1 bed units). Based on this, the maximum recommended quantum of childcare places to be provided within the proposed development is 108 no. places ( $411/75 * 20 = 108.2$ ). This is without taking into account that the remaining 2- and 3-bedrooms units may not be all occupied by families with children. This represents a theoretical maximum figure, and assumes all children being cared for in a commercial childcare facility.

The proposed development includes a childcare facility with a GFA of 730 sqm located on lower ground, ground and first floor level of Block K (existing protected structure). The childcare facility has been estimated by STW and their fire consultants as being capable of accommodating c. 77 childcare spaces, however, based on the classroom sizes and the requirements of Appendix 1 of the Childcare Facility Guidelines for full-day care childcare services. It is noted that based on the proposed GFA that the childcare facility has the potential to accommodate greater numbers depending on the end users operational requirements.

We refer to the Social and Community Infrastructure Audit / Assessment prepared by John Spain Associates which accompanies this LRD planning application request which provides a justification that the proposed childcare facility to cater for the expected future demand due to the proposed development, having regard to the relevant planning policy guidelines, the quantum of 2 and 3 bed units proposed, and having regard to existing provision in the wider area.

In summary, for a proposed residential development, consisting of a total 18 no. studios, 387 no. 1 beds, 349 no. 2 bed apartments and 57 3 bed apartments, and based on the demographic profile of expected end users, it is considered that the 77 no. childcare spaces proposed within the childcare facility in Block K are sufficient, along with the existing childcare facilities serving the area to cater for the childcare needs that may arise from the proposed development in the future based on unit mix and projected household formation within the development.

Overall, as demonstrated throughout this section, the proposed scheme is consistent with all relevant National Policy Documents.

## 5.11 Regional Spatial and Economic Strategy for the Eastern and Midlands Region, 2019

The Regional Spatial and Economic Strategy for the East and Midlands Regional Assembly (EMRA RSES), 2019, comprises a number of core Regional Policy Objectives which coincide with the National Planning Framework ("NPF"). The purpose of the guidelines is to direct all Local Authority future plans, projects and activities requiring consent of the Regional Assembly. The key policies, objectives and requirements of the EMRA RSES are outlined below, with responses to each provided in order to demonstrate how the proposals for the subject site accord with the aims of the EMRA RSES.

Under RPO 4.3 'Consolidation and Re-intensification' the following objective is stated:



*'Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin city and suburbs and ensure that the development of future development areas is coordinated with the delivery of key water infrastructure and public transport projects.'*

**Response:** The subject scheme will provide a new hospital providing mental health services, 811 no. residential units and ancillary commercial uses for residents and the general public on an underutilised site within the existing built-up area of Dublin, therefore appropriately densifying this key underutilised site in a core inner suburban location, in accordance with RPO 4.3.

The Metropolitan Area Spatial Plan (MASP) for Dublin contained within the EMRA RSES states the following:

*RPO 5.4: 'Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments Guidelines', and 'Urban Development and Building Heights Guidelines for Planning Authorities'.*

**Response:** The proposed development will provide for higher densities, as set out above.

RPO 5.5 of the EMRA RSES relating to MASP Regeneration states the following:

*'Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.'*

**Response:** The subject site is contained within an established built-up area of Dublin City, a short distance from high quality public transport and within cycling distance of the city centre. The proposed development provides an appropriate design response that will consolidate the surrounding residential land uses as per RPO 5.5. The site can absorb a higher density residential development with ancillary residential facilities and amenities and communal open spaces at this location. The proposed development represents consolidated growth on an inner suburban site. Supporting environmental reports are submitted with this application to demonstrate the suitability of the site to accommodate the proposed development.

Under Section 8.1 the EMRA RSES states the following with regard to integrating land use and transport planning:

*'The RSES identifies regional strategic outcomes which include integrated transport and land use planning, the transition to a low carbon economy by 2050, compact growth, enhanced regional and international connectivity, enhanced green infrastructure and the provision of sustainable settlement patterns.'*

**Response:** By providing reduced car parking, the proposed scheme seeks to encourage future residents to avail of the high-quality public transport and that the development is within cycling distance to the city centre. Therefore, the subject development contributes to consolidated growth, the reduction in carbon emissions and represents a sustainable settlement pattern.

The EMRA RSES sets out the following in relation to 'Economic Strategy: Smart Specialisation, Clustering, Orderly Growth and Placemaking':

*'Orderly Growth: Though the identification of locations for strategic employment development in line with our Growth and Settlement Strategy, compact growth will be achieved. This involves managing and facilitating the growth of Dublin and to increase the scale of our Regional Growth Centres to be able to provide the range of functions to their hinterlands. This needs to be facilitated by appropriate effective and sustainable infrastructure development in these centres, and at the same time avoid sprawl. This encompasses connectedness aimed at facilitating a network of skills and talent living in our settlements. It requires a support network of infrastructure - including broadband - in order to make the Region more connected and competitive. This will help to deliver high quality jobs that are well-paid and sustainable.'*

**Response:** The proposed development is located on appropriately positioned lands in proximity to public transport and employment locations.

The proposed scheme addresses the economic strategy by providing an appropriate, effective and sustainable development by virtue of the provision of a new state of the art hospital, and a high-quality design and higher density residential development in an urban location which helps to counter urban sprawl. Appropriately located residential accommodation within Dublin is important to the continued growth and maintenance of Ireland's competitiveness in both the private residential market and Build-to-Rent sector and its response to the evolving needs of the modern, mobile workforce.

Under Section 8.1, the EMRA RSES states the following with regard to integrating land use and transport planning:

*'The RSES identifies regional strategic outcomes which include integrated transport and land use planning, the transition to a low carbon economy by 2050, compact growth, enhanced regional and international connectivity, enhanced green infrastructure and the provision of sustainable settlement patterns.'*

**Response:** The subject development contributes to consolidated growth and the reduction in carbon emissions through lower parking standards and the increased provision of bicycle parking spaces. We refer to Climate Action Energy Statement prepared by IN2 which demonstrates how low carbon, low energy and heating solutions have been considered for the proposed development, to achieve compliance to Building Regulations Technical Guidance Document (TGD) Part L 2021 and aligned with Dublin City Climate Action Plan.

Through the provision of green roofs, landscaping, tree protection and planting, the development also helps maintain a high standard of natural and green infrastructure within an intensified and more dense residential setting. The large quantum of public and communal open spaces provided within the development will also significantly enhance the green infrastructure of the area and will also contribute to sustainable settlement patterns by providing permeable routes through these spaces and the overall site.

By locating in close proximity to key public transport and in close proximity to employment, services and facilities, the subject development can be seen as a sustainable development pattern, which seeks to increase density, reduce car dependency, and provide permeability throughout the scheme.

Under Section 8.2, the EMRA RSES discusses responses to urban sprawl and justification for the move towards compact growth:

*'The Strategy aims to provide a spatial framework to promote smart compact growth as an alternative to continued peri-urban sprawl around our cities and towns, with a resultant negative impact on the environment and people's health and wellbeing due to increased commuting and loss of family and leisure time.'*

**Response:** The subject development seeks to provide a welcoming and attractive alternative to a car dominated development, which is well located in proximity to public transport, employment locations, services and facilities. Car parking is provided at basement level and as a result, there is very limited vehicle movements at the site and maximum use can be made of the available surface level amenity spaces. The location of this development on a site within close proximity of public transport and accessible to the city centre allows for reduced commuting time and greater work life balance for future residents.

Additionally, the provision of a café/retail unit, amenity spaces and facilities aides in the facilitation and promotion of healthy lifestyles and social interaction between residents and the public which will ultimately result in the creation of a strong sense of community.

The EMRA RSES Objective RPO 9.4 states that in relation to new apartment developments:

*'Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and an ageing population.'*

**Response:** The area is currently in transition with higher density development recently being permitted in the area. It is our opinion that there is a significant opportunity to densify this area of Dublin with a mix of studio, 1, 2 and 3 no. bedroom units, which will allow people to rent in this area. As such the scheme will cater for a wide cohort of persons.

## 5.12 Transport Strategy for the Greater Dublin Area 2022-2042

The National Transport Authority (NTA) has prepared an updated Transport Strategy for the Greater Dublin Area (2022-2042) which replaces the previous 2016-2035 version. This new strategy sets out the framework for investment in transport infrastructure and services over the next two decades to 2042.

The overall aim of the Transport Strategy is *"To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports economic growth."*

The Transport Strategy includes measures that are considered to be essential in meeting the high level objectives of fostering sustainable development and fully integrating land use planning and transport planning, including the following:

- Consolidation of development, to ensure more people live close to services and public transport, and to minimise urban sprawl and long distance commuting;
- Transit-oriented development to guide the growth of our cities and towns on the basis of accessibility;
- Mixed use development, to minimise travel distances between homes and local services, and to ensure vibrancy of urban areas;
- Filtered Permeability so that people can move about more easily by walking and cycling than by car;

The strategy includes a number of integrated and inclusive initiatives with specific projects / programmes / sub strategies in regard to (i) Walking, Accessibility and Public Realm, (ii) Cycling and Personal Mobility Devices, (iii) Public Transport including bus, light rail, and heavy rail, (iv) Road Infrastructure, (v) Traffic Management and Travel Options, (vi) Freight, Delivery and Servicing, and (vii) Climate Action Management measures.

The Transport Strategy refers to the BusConnects scheme and states that in the early months of the strategy that it is intended to submit applications to An Bord Pleanála for the remainder of the Core Bus Corridors. The Core Bus Corridors will facilitate faster and more reliable bus journeys on the

busiest bus corridors in the Dublin region, making the overall bus system more convenient and useful for more people. In addition, key elements of the Cycling Network Plan for the GDA will be delivered as part of these corridors.

**Response:** The proposed mixed use development provides an appropriate, effective and sustainable development by virtue of the high-quality design and higher density residential development in an urban location which helps to counter urban sprawl. The proposed development is fully consistent with and supports the core principles of compact growth by providing a mix of uses in a sustainable urban neighbourhood which will provide a new hospital, a place to live, shop and also provides recreational areas (public open space) which is within walking distance of a range of essential and recreational services, public transport, facilities and amenities in Dublin City Centre and neighbourhoods in Drumcondra and Fairview.

As set out in preceding sections above, the site is within reasonable walking distance of BusConnects Radial Core Bus Corridor 'H-Spine' at Annesley Bridge Road and the proposed BusConnects Radial Core Bus Corridor 'A Spine' on Drumcondra Road, which is due to be launched later in 2023. The proposed Bus Connects 'A Spine' indicates a frequency of between 3-4 minutes between buses during peak hours. The site is 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)).

**Figure 5.12: BusConnects Core Bus Corridor**



Source: Busconnect.ie

## Conclusion

Overall, as demonstrated throughout this section, the proposed scheme is consistent with the relevant regional scale planning policy framework.



## 6.0 LOCAL PLANNING POLICY

This section will demonstrate that the proposed development has been designed in accordance with Local Policy and is consistent with the objectives and guidance as set out within the Dublin City Development Plan 2022-2028, hereafter referred to as the Development Plan.

The Development Plan came into effect in December 2022.

### 6.1 Dublin City Development Plan 2022-2028

Chapter 1 of the Development Plan states that the Development Plan sets out the spatial framework for the city within the context of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RSES) 2019, the NTA Transport Strategy 2016-2033 and with the Specific Planning Policy Requirements (SPPRs) set out in the relevant Section 28 Ministerial Guidelines.

The Development Plan notes the framework set out in national and regional plans and the proposed strategic approach for Dublin promotes the consolidation of the city, maximising efficient use of land and integrating land use and transport, within the context of an over-arching philosophy of sustainability and quality of life factors. The Development Plan is fully consistent with all of these higher level plans,

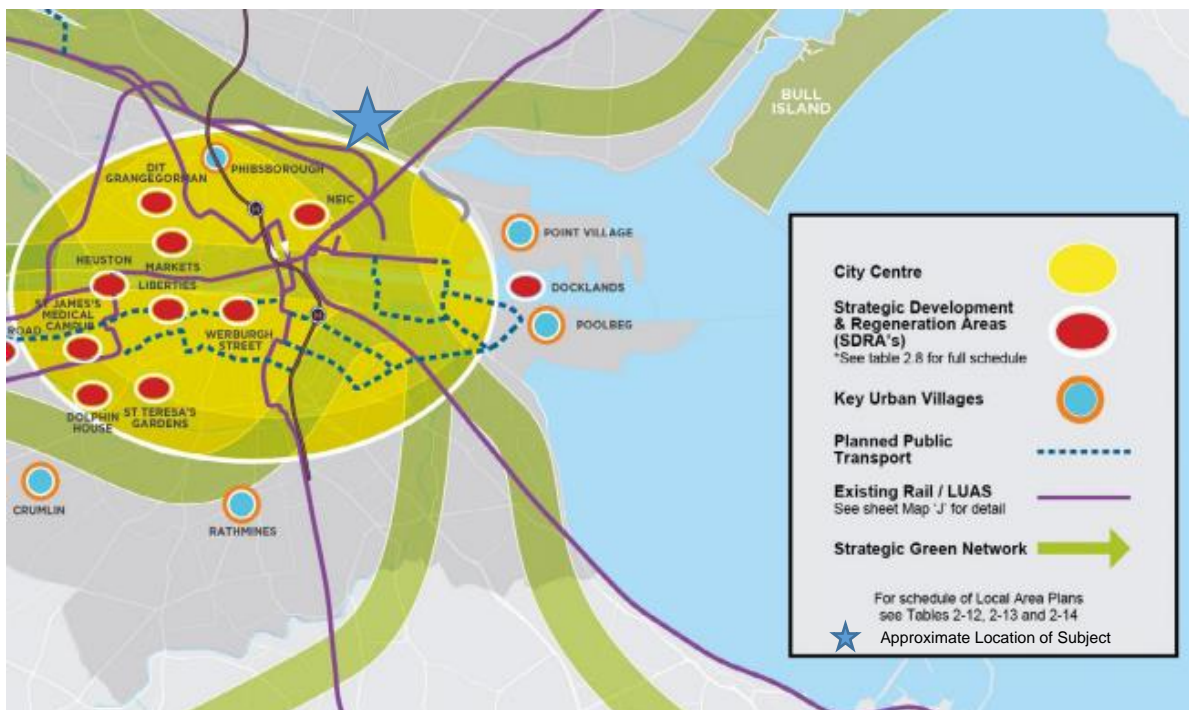
#### 6.1.1 Core Strategy

The Development Plan has been prepared in the context of the National Planning Framework which advocates an approach of consolidation and densification in the city and also in the context of the EMRA RSES which further endorses the NPF's principles of consolidation, brownfield development, densification and compact growth.

The Development Plan states that, *"Based on the population targets and calculated housing need set out within national and regional planning policy, guidelines and prescribed methodology, the development plan must accommodate between 20,120 – 31,520 additional persons up to an overall population target of between 625,750 and 640,000 by 2028. The housing demand calculated sets a requirement for the development plan to provide for approximately 40,000 housing units between 2022 and 2028."*

The Development Plan seeks to implement a core strategy that continues to build mixed use communities within the city that can sustain and grow a low carbon society by providing for housing in locations that fully support sustainable forms of development and allow large numbers of people live, move and work in a way that limits their carbon footprint. The Development Plan notes that City life provides the critical mass that creates the opportunity for people to engage with a wide range of services and social opportunities as well as a work location all within distances that are well served by high quality public transport, premium cycle routes and attractive public realm.

Objective CS07 of the Development Plan relating to Promote Delivery of Residential Development and Compact Growth seeks *"To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas."*

**Figure 6.1: Extract of Core Strategy Map Dublin City Development Plan 2022-2028**

Source: Dublin City Development Plan 2022-2028

**Response:** The proposed development will assist in meeting core strategy housing numbers by providing 811 no. residential units on the subject lands, which are located in an Inner Suburban area, in addition to a new state of the art mental health hospital, in accordance with the core strategy of the Plan.

It is our opinion that the proposed mixed use development through increased density and height at the subject site is in accordance with Objective CS07 having regard to the underutilised status of the site in close proximity to public transport, employment, services and facilities. The subject site is ideally positioned to absorb the heights proposed as part of the subject scheme especially due to the site's size, as detailed in the appropriate technical assessments including Daylight/Sunlight, Wind Assessment and the LVIA which are enclosed as part of this LRD planning application.

### 6.1.2 Land Use Zoning and Map Based Objectives

The land use zoning objectives of the subject site under the Development Plan are as follows:

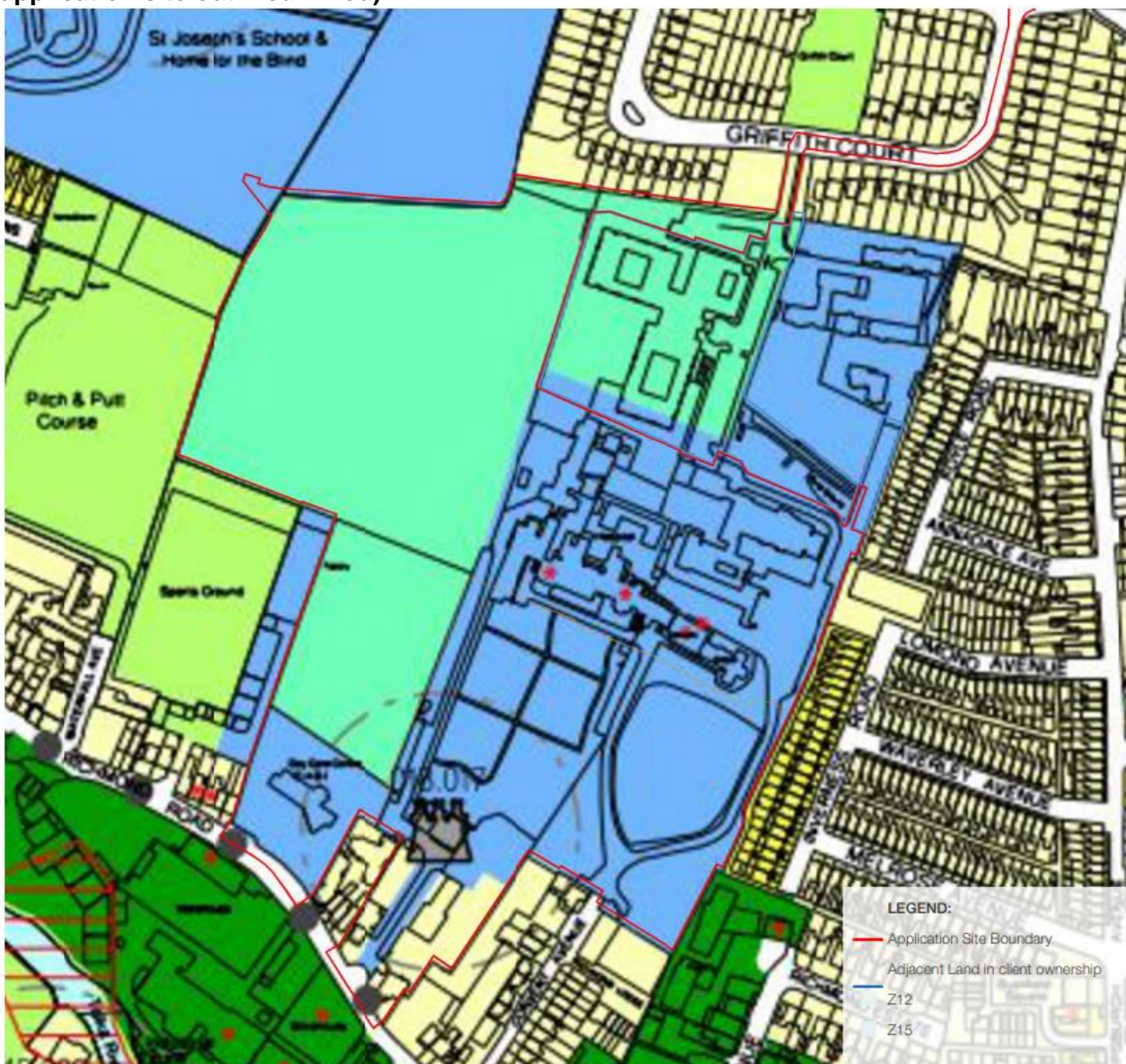
- Z1 Sustainable Residential Neighbourhoods - *To protect, provide and improve residential amenities.*
- Z12 Institutional Land (Future Development Potential) - *To ensure existing environmental amenities are protected in the predominantly residential future use of these lands*
- Z15 Community and Social Infrastructure - *To protect and provide community uses and social infrastructure.*

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), 8788 (Richmond House) and 8789 (Brooklawn), as identified on the land use zoning map (see Figure 6.2). These RPS references are described as follows in Volume 4, Record of Protected Structures of the Development Plan:

- *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'.*

There is one recorded monument within the proposed development area, the site of a castle (DU018-017), and therefore the site is also located within a zone of archaeological interest.

**Figure 6.2: Extract of Map E Dublin City Development Plan 2022-2028 (majority of the application site outlined in red)**



Source: STW Design Statement



**Response:** The Z15 Community and Social Infrastructure lands are currently used by St. Vincent's Hospital as a mental health facility. It is clearly explained in the Masterplan Report prepared by STW and JSA, and elaborated below, how the institutional /community use, i.e. St. Vincent's Hospital Fairview, will be maintained and improved into the future. The Z12 Institutional Land (Future Development Potential) lands are currently underdeveloped.

The accompanying Masterplan is prepared to give an overview of the future use of the lands zoned Z12 – *'To ensure existing environmental amenities are protected in the predominantly residential future use of these lands'* and the lands zoned Z15 – *'To protect and provide for community uses and social infrastructure.'*

The Masterplan sets out a contextual framework for the future development of the Z12 and Z15 zoned lands. It also identifies how the 25% public open space requirements can be met, which in turn is delivered through the subject application.

Consistency with each of the zoning objectives and further guidance in the Development Plan is set out in the sections below.

#### 6.1.2.1 Consistency with Z12 Institutional Land

Section 14.7.12 of the Development Plan sets out further guidance for Z12 Institutional Land (future development potential). Residential, café/tearoom and 'Shop – Local' are listed as permissible, 'Build to Rent Residential' is listed as open for consideration under Z12 zoning objective.

**Response:** The Z12 portion of the site, as illustrated in Figure 6.3 below, includes part of residential Block A and Blocks B, C, D-E, F and G. Blocks DE and F comprise a total of 317 no. Build to Rent residential apartments and associated residential amenity areas. Block F includes a café unit which faces onto the Central Park. All proposed uses are either permissible or open for consideration under Z12.

The following demonstrates how the proposed development is consistent with the guidance for Z12 lands as set out in the Development Plan.

- *A minimum of 25% of the site, will be required to be retained as accessible public open space to safeguard the essential open character and landscape features of the site.*

**Response:** The Z12 portion of the site has a total area of 3.74 ha. The requirement for 25% public open space equates to 9,350 sq.m. The proposed development provides a total of 9,528 sq.m of public open space on the Z12 portion of the site which exceeds the minimum requirement of 25% public open space (see Figure 6.5). The proposed development therefore complies with this requirement as set out in the Development Plan.

- *Where such lands are redeveloped, the predominant land-use will be residential.*

**Response:** The predominant use proposed on the Z12 lands is residential, with supporting open space and infrastructure. Blocks A, B, C and G comprise a total of 365 no. standard design apartments and Blocks D-E and F comprise a total of 317 no. Build to Rent residential apartments and associated residential amenity areas. Block F includes a café unit which faces onto the Central Park. All proposed uses are either permissible or open for consideration under Z12.

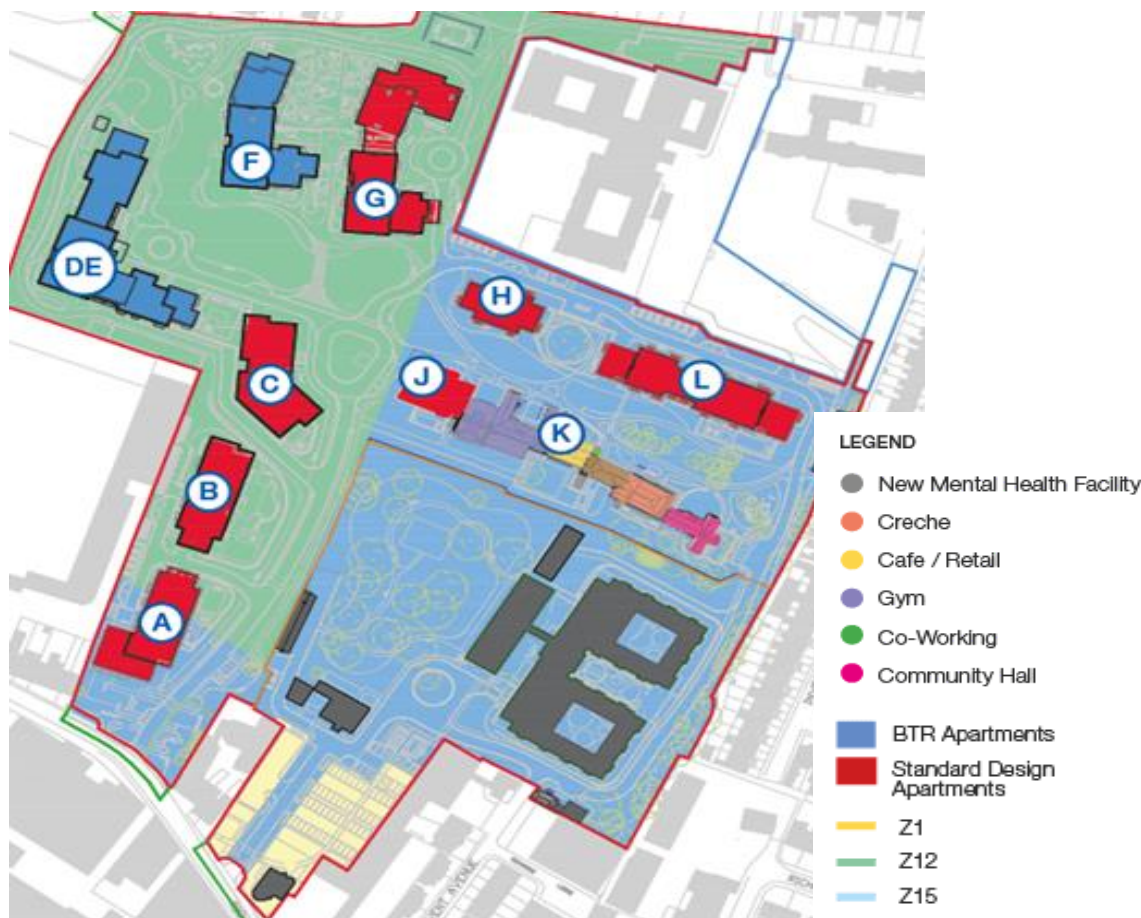
- *Dublin City Council will require the preparation and submission of a masterplan setting out a clear vision for the future for the development of the entire land holding.*

**Response:** We refer to the accompanying Z12 - Institutional Land (Future Development Potential) and Z15 -Community and Social Infrastructure Masterplan which has been prepared and which



provides a vision for the future and long-term use of these lands, which the subject application seeks to deliver upon. The masterplan demonstrates how the primary institutional / community use on the Z15 zoned lands, i.e. the hospital, will be protected and facilitated into the future, with new residential apartment buildings and generous new public open spaces, primarily on the Z12 zoned portion of the lands, and facilitating permeability through the site and connections to surrounding neighbourhoods. to describe the vision for the future use of these lands, as illustrated in Figure 6.3.

**Figure 6.3: Proposed Development on Z12 Zoning Objective**



Source: STW Design Statement (Note: The red line indicates the approximate outline of the land within the ownership of the applicant, please refer to STW's Site Location Map and Site Layout Plan for the full extent of the proposed development.)

### Figure 6.4: Masterplan for the Z12 and Z15 Lands



Source: STW Z12 and Z15 Masterplan Document

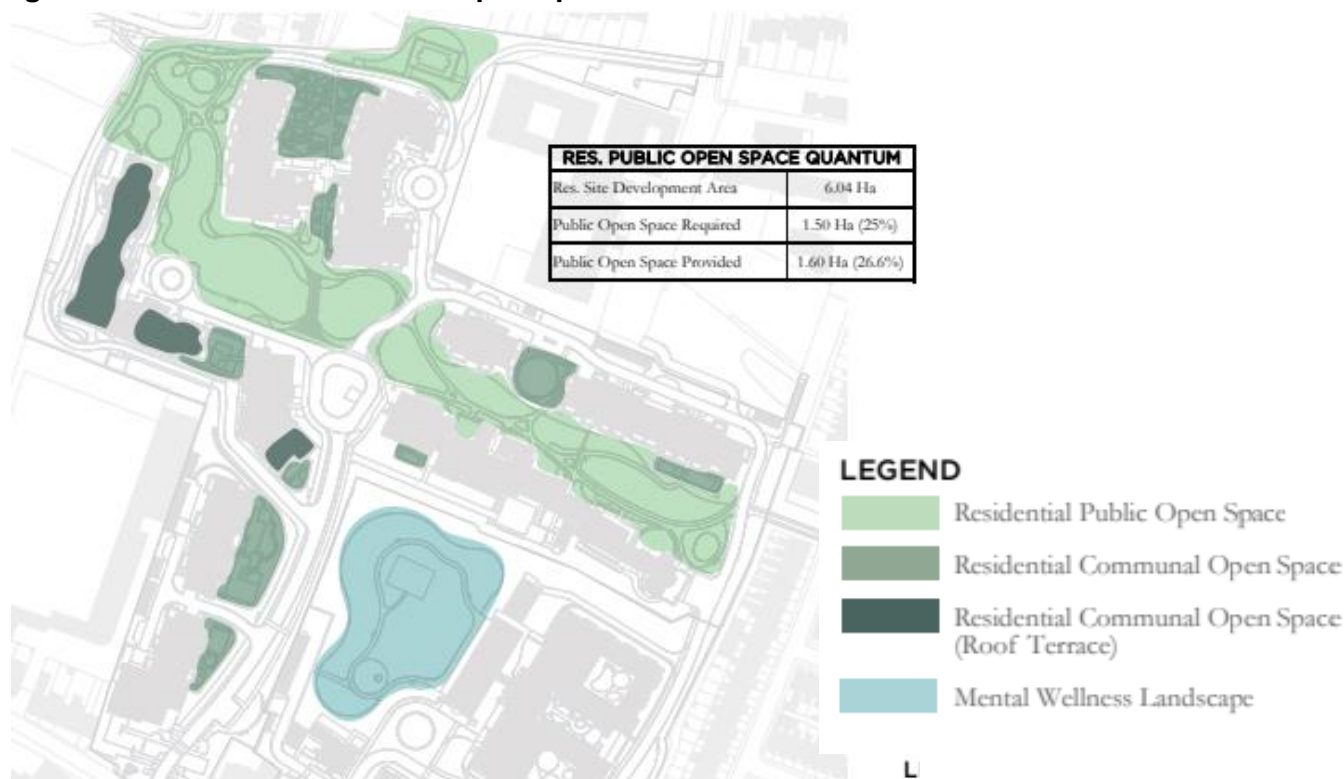
- *The masterplan will need to identify the strategy for the provision of the 25% public open space requirement associated with any residential development, to ensure a co-ordinated approach to the creation of new high-quality public open space linked to the green network and/or other lands, where possible.*

**Response:** As outlined in the accompanying Masterplan and illustrated in Figure 6.4, the masterplan provides for 25% public open space. The overall site includes 1.6 ha of public open space to meet the 25% requirement for the Z12 and Z15 zoned lands on the residential site, including a central public park (total area of 1.32 ha) for the benefit of the wider community which provides permeability through the site and generous open lawn spaces. A new public plaza on Richmond Road (0.14 ha) are also proposed. In the northern part of the site an area for allotments (0.14 Ha in size) is also proposed.

As discussed in the Landscape Design Statement, the proposed public open space is envisaged as a large expanse of parkland landscape, is the heart of the development and accessible to the public 24/7. The open space will function as an amenity to cater for all ages, abilities and family groups. It is also envisaged that the programme, as a series of purposed destinations and experiences dotted within the public open space, will create an activated, inviting and engaging landscape expression, thereby assisting in promoting a sense of community within the broader neighbourhood and encouraging social interaction with health and well-being, being brought to the forefront. The intention is to draw the residents and surrounding community into the space by providing programme that is

both functional and appropriate for their abilities, thereby catering for all age groups. The proposed plants palette will assist in creating an inviting and legible parkland landscape and add to the net gain in biodiversity, thereby incorporating a substantial value add to the wider neighbourhood.

**Figure 6.5: Breakdown of Public Open Space**



Source: NMP Landscape Design Report

- *The minimum 25% public open space shall not be split up into sections/fragmented and shall comprise soft landscape suitable for relaxation and children's play*

**Response:** The 25% public open space is of a significant size of parkland to be enjoyed by residents and members of the public including the Central Public Park which spans the entire site from East to West and facilitates permeability through the site from East to West and North to South. The Gateway gardens provides south-facing space acts as a suitably scaled entrance to the scheme and creates a welcome relief along the very narrow Richmond Road. Inclusive children's play spaces are provided throughout. A natural play area (420m<sup>2</sup>) and allotments area (295m<sup>2</sup>) are proposed in the north-western part of the site which promotes health & wellbeing, learning & social interactions. Thus, the public open space provision is considered to comply with the above requirements of the zoning objective.

#### 6.1.2.2 Consistency with Z15 Community and Social Infrastructure

The Z15 Community and Social Infrastructure zoning objective seeks 'To protect and provide for community uses and social infrastructure'. Section 14.7.14 of the Development Plan, as revised by the PMA, sets out further guidance for Z15 Community and Social Infrastructure. The following provides a summary of how the proposed development delivers on the requirements of the Z15 zoned lands by maintaining and providing for the longer-term functioning and operational viability of St. Vincent's Hospital Fairview which is the primary institutional/community use on the lands. We refer to the Z12 and Z15 Masterplan Report for further details.

The Development Plan states the following in relation to development on Z15 lands:



*"A: Development on Z15 Lands Limited residential/commercial development on Z15 lands will only be allowed in highly exceptional circumstances where it can be demonstrated by the landowner/applicant that the proposed development is required in order to maintain or enhance the function/ operational viability of the primary institutional/social/community use on the lands. The following criteria must also be adhered to:*

- In proposals for any limited residential/commercial development, the applicant must demonstrate that the future anticipated needs of the existing use, including extensions or additional facilities would not be compromised.*
- Any such residential/commercial development must demonstrate that it is subordinate in scale to the primary institutional/social/community use.*
- Where appropriate, proposals should be subject to consultation with the relevant stakeholder e.g. Department of Education/Health Service Executive.*
- The development must not compromise the open character of the site and should have due regard to features of note including mature trees, boundary walls and any other feature(s) as considered necessary by the Council.*
- In all cases, the applicant shall submit a statement, typically in the form of a business plan, or any other relevant/pertinent report deemed useful and/or necessary, as part of a legal agreement under the Planning Acts, demonstrating how the existing institutional/social/community facility will be retained and enhanced on the site/lands.*
- In all cases the applicant shall be the landowner or have a letter of consent from the landowner.*

*For clarity, the above criteria do not apply to residential institution use, including ancillary staff accommodation or assisted living/retirement home. Student accommodation will only be considered in instances where it is related to the primary use on the Z15 lands. Any proposed development for 'open for consideration' uses on part of the Z15 landholding, shall be required to demonstrate to the planning authority how the proposal is in accordance with and assists in securing the aims of the zoning objective; and, how such a development would preserve, maintain or enhance the existing social and community function(s) of the lands subject to the development proposal."*

## Permissible Uses

### Figure 6.6: Z15 zoning matrix

#### Z15 – Permissible Uses

Assisted living/retirement home, buildings for the health, safety and welfare of the public, café/ tearoom (associated with the primary use), cemetery, childcare facility, club house and associated sports facilities, community facility, cultural/recreational building and uses education, medical and related consultants, open space, place of public worship, primary health care centre, public service installation, residential institution (and ancillary residential accommodation for staff), sports facility and recreational uses.

#### Z15 – Open for Consideration Uses

Allotments, car park ancillary to main use, civic and amenity/recycling centre, conference centre (associated with the primary use), crematorium, craft centre/ craft shop (associated with the primary use), municipal golf course, residential (only in accordance with the highly exceptional circumstances set out above), restaurant, shop (local), student accommodation (associated with the primary institutional use), training centre (associated with the primary use), veterinary surgery.



**Response:** The Z15 portion of the application site includes a new hospital building with substantial grounds / room for future expansion, reuse of protected structures (Richmond House and Brooklawn - RPS Ref's 8788 and 8789) for offices associated with the new hospital, reuse of the existing hospital building (RPS Ref.: 2032) for a gym at ground and first levels and for tenants' amenities at second and third levels, a community hall, a 3 storey childcare facility, a café, community library and co-working space. Part of Block A which includes standard designed apartments and retail floorspace, residential Blocks H, L and J which comprise a total of 129 no. standard designed apartments, residential amenities are proposed in Block J. A total of 0.65 ha public open space is also provided on the residential portion of the Z15 zoned lands.

The proposed development, which includes a new hospital providing mental health services, and supporting residential / commercial development on the Z15 zoned portion of the lands, is considered to satisfy the requirement to demonstrate 'highly exceptional circumstance' arise to support the provision of limited residential / commercial development for the following reasons (see JSA's Statement of Response to the LRD Opinion also):

- A Z12 / Z15 Masterplan has been prepared for the overall landholding, and accompanies this application, and provides a vision for the future and long-term use of these lands, which the subject application seeks to deliver upon. The masterplan demonstrates how the primary institutional / community use, i.e. the hospital, will be protected and facilitated into the future, with new residential apartment buildings and generous new public open spaces, primarily on the Z12 zoned portion of the lands, and facilitating permeability through the site and connections to surrounding neighbourhoods.
- As set out in the Business Plan and Operational Management Plan prepared by St. Vincent's Hospital Fairview, the development provides for the construction of a new mental health hospital to replace the current seriously inadequate facilities. This Plan notes that the provision of a new hospital, providing mental health services, to replace the outdated and unsuitable current hospital buildings is the primary focus of this application. The proposed development of the new hospital, including reuse of protected structures and historic buildings, and associated substantial grounds for the new facility, will be financed by the delivery of residential development on the greater part of the site, the majority of which is located on Z12- Institutional Land (Future Development Potential).
- The new hospital will remain as the primary institutional / community use on the Z15 zoned lands included within the application site boundary, with substantial associated grounds, including potential for future expansion to the immediate west of the new hospital building.
- In respect to the residential / commercial element of the overall LRD development, there is approximately 155 no. residential units (part Block A, Block J, Block H and Block L), a retail unit (Block A) and other commercial, residential amenity and community uses proposed in Block K / J (incorporating the reuse of protected structures) proposed on the Z15 lands (zoning runs diagonally across proposed residential Block A). The residential component on the Z15 zoned portion of the application site represents 19% of the total no. of residential units proposed in the application. The quantum of residential development proposed in this overall application is required to fund the construction of the new Hospital and therefore it is required in order to maintain and provide for the provision of the new hospital facility and to secure the function and operational viability of St. Vincent's Hospital Fairview into the future, 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 St. Vincent's Hospital buildings on the Z15 lands will be utilised to provide a mixed-use building including a community hall, a community library, a childcare facility, and gym facilities to be utilised by the local community, as well as residential amenity areas for the proposed residential development on the overall site. Thus, the residential element of the overall development will help fund and support the reuse of the protected structures and historic buildings on the Z15

zoned lands. Thereby providing for the continued use of the protected structure including conservation works, to facilitate new uses for these structures.

- We note Section 11.5.1 of the 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, flexibility to the land use policies can be applied, further supporting the element of residential and commercial development proposed on the Z15 zoned portion of the overall application site.
- The development includes a total of 1.6 ha of public open space (40% on the Z15 lands / 26% in total on the Z12 / Z15 zoned lands) for the enjoyment of the local community, which exceeds the 25% requirement under the Development Plan where redevelopment of Z12 and Z15 lands is proposed.
- The Z15 zoning objective notes that such facilities, in this instance a new hospital and associated grounds, and including for reuse of protected structures, are essential in order to provide adequate community and social infrastructure commensurate with the delivery of compact growth and the principle of the 15-minute city. In this respect, it is noted that the proposed redevelopment of this overall Z12 and Z12 landholding, whilst providing for the ongoing use of these lands for the primary institution use, i.e. St. Vincent's Hospital Fairview, will also contribute to the delivery of compact growth, through a new sustainable and mixed use development on the overall lands, and contribute to the delivery of the 15-minute city in this part of the Inner Suburbs, with the proposed connections and permeability aspects of the application being a particular positive in this regard.
- In respect to delivering on the 15-minute city, and contributing to the creation of 'vibrant neighbourhoods, healthy placemaking and a sustainable well connected city', which are identified as key objectives of the Development Plan and the Z15 zoning, it is respectfully submitted that the application delivers on same through a high quality mixed-use development, provision of public open space and a network of pedestrian and cycle infrastructure which connects to the wider area.
- The application includes a proposed pedestrian / cycle connection to Griffith Court, requiring alterations to the service yard of the Fairview Community Unit, two pedestrian / cycle connections to the Fairview Community Unit campus to the north (providing an onward connection to Griffith Court and Phillipsburgh Avenue), and a pedestrian / cycle connection to Grace Park Wood, within the red line application site boundary.
- The proposed connections ensure a high level of connectivity to surrounding areas and permeability through the site. The newly proposed connections to the north of Block H and L to the Fairview Community Unit campus and onwards to Griffith Court and Phillipsburgh Avenue, further assist in encouraging east-west circulation through the central park and use of the activity track around the perimeter of the site, and ties in with existing pedestrian and cycle infrastructure in the area.
- In addition, the application 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 the adjacent lands to the east required to facilitate such a connection are in third party ownership and it was not possible to reach agreement with the adjacent landowner to include this land within the red line application site boundary, and thereby it is beyond the control of the applicant to deliver such a connection.

The following responds to the criteria set out in the Development Plan in relation to development on Z15 lands:

*The following criteria must also be adhered to:*

- *In proposals for any limited residential/commercial development, the applicant must demonstrate that the future anticipated needs of the existing use, including extensions or additional facilities would not be compromised.*

**Response:** The development provides for the construction of a new hospital, providing mental health services, to replace the current inadequate facilities. The provision of a new hospital providing mental health services to replace the aging and unsuitable current hospital buildings is the primary focus of this application. The new hospital can be constructed with no interruption of service to existing patients or hospital residents. The new hospital providing mental health services will remain as the main institution/community use on the subject site, including substantial grounds to the west, which offer the potential for future expansion to the immediate west of the new hospital building (we refer to STW's Architectural Design Statement for further details). As set out above, the application also includes for the reuse of existing protected structures and historic buildings on the Z15 lands for hospital, community, commercial and ancillary residential use, which are further positive aspects of the proposed development.

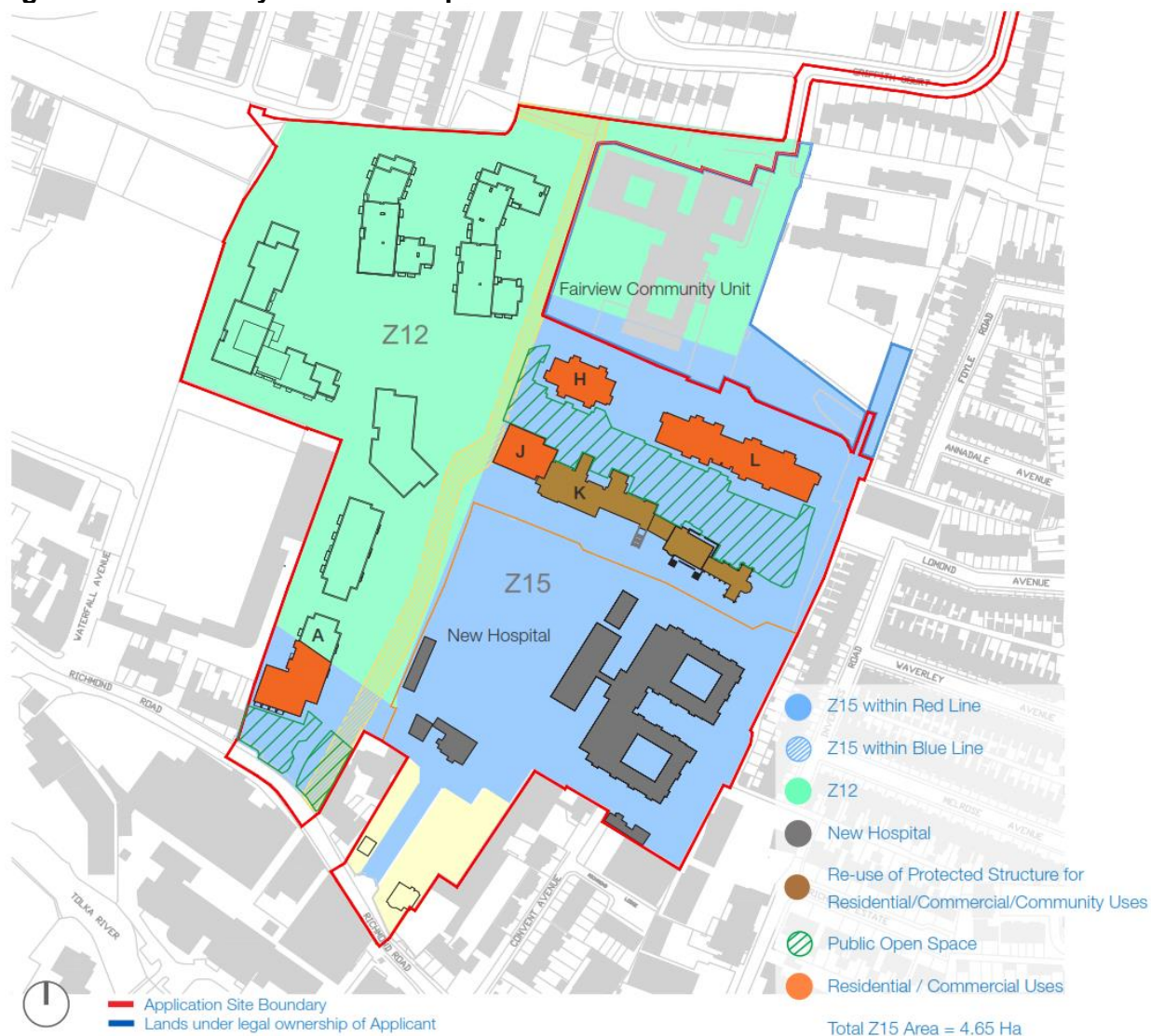
- *Any such residential/commercial development must demonstrate that it is subordinate in scale to the primary institutional/social/community use.*

**Response:** As discussed and illustrated in Figure 6.7 below, and addressed separately in STW's Architectural Statement of Response to LRD Opinion and JSA's Statement of Response to the LRD Opinion, on the Z15 zoned portion of the overall application site it is proposed to provide a new hospital building, with substantial grounds / potential room for future expansion should it be required, the reuse of protected structures (Richmond House and Brooklawn - RPS Ref's 8788 and 8789) for uses associated with the new hospital, reuse of the existing hospital buildings (RPS Ref.: 2032) for a gym at ground and first levels and for tenants' amenities at second and third levels, a community hall, a 3 storey childcare facility, a café, community library and co-working space, thereby ensuring that the community and social infrastructure on the Z15 portion of the site is enhanced. In addition, c. 1.6 ha of public open space is proposed on the Z12 and Z15 lands as part of the proposed development, of which c. 0.65 ha of this public open space is provided on the residential portion of the Z15 zoned lands.

In addition, and in order to support the substantial investment required in the new hospital facilities and reuse of protected structures, an element of the new residential / commercial development is proposed on the Z15 zoned lands, however, this remains ancillary / subordinate to the social / community infrastructure uses as described below. As discussed and illustrated in the figures below, in respect to the residential and commercial elements of the overall development which are located on the Z15 zoned portion of the site, this includes a total of 155 no. standard design apartments (SDA) (out of the overall 811 no. SDA and Build-to-Rent (BTR) apartments proposed), of which 34 are located in the part of Block A on the Z15 land, with Block A also including a retail unit at ground and first floor, 129 no. SDA apartments in Blocks H, L and J, and residential amenities and facilities are also proposed in Block J.

As illustrated in Figure 6.7 below, the majority of the proposed residential development is proposed on the Z12 lands and over 50% of the Z15 lands (shown in blue) will remain in use as a hospital and associated grounds (the hospital grounds provide land for potential future expansion to the immediate west of the new hospital, should it be required in the longer term, although the applicant does not envisage such a scenario to arise based on the services they offer). The residential and commercial development accounts for c. 30% of the Z15 lands. The remaining area includes 0.65 ha of public open space and other community uses (including creche, gym co-working, community hall and library). The total existing and proposed community and social infrastructure accounts for 70% of the Z15 zoned portion of the application site, therefore it is submitted that the residential and commercial element of the development on the Z15 zoned lands will be subordinate in scale to the proposed community and social infrastructure.

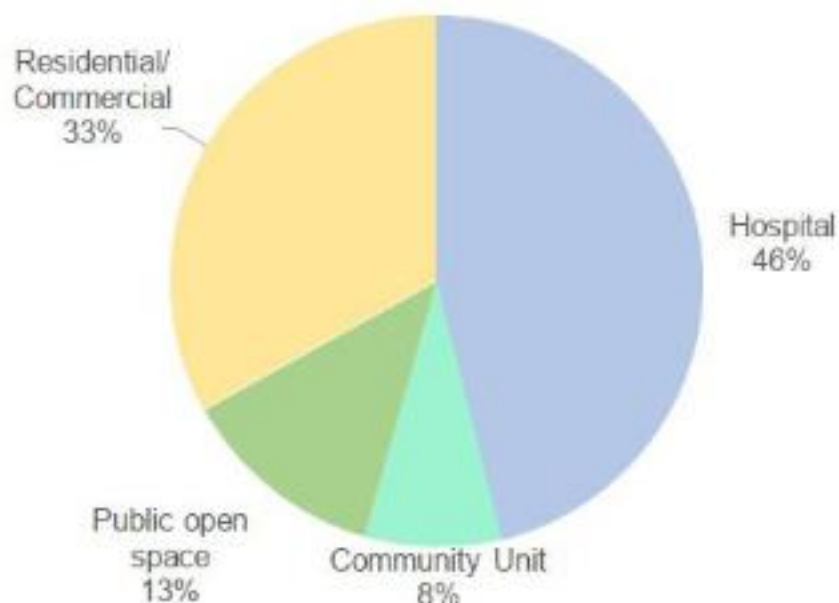
Figure 6.7: Block Layout of Development on Z12 and Z15 lands



Source: STW Architects

The pie-chart included as Figure 6.8 below illustrates that based on site area and the extent of the proposed uses and illustrated by the block plan layout in Figure 6.7 above, that the residential / commercial element (at c. 33%) will remain subordinate in scale to the proposed hospital / community uses and public open space on the Z15 zoned portion of the lands (c. 67%).



**Figure 6.8: Pie-Chart Illustrating Land Uses on the Z15 lands**

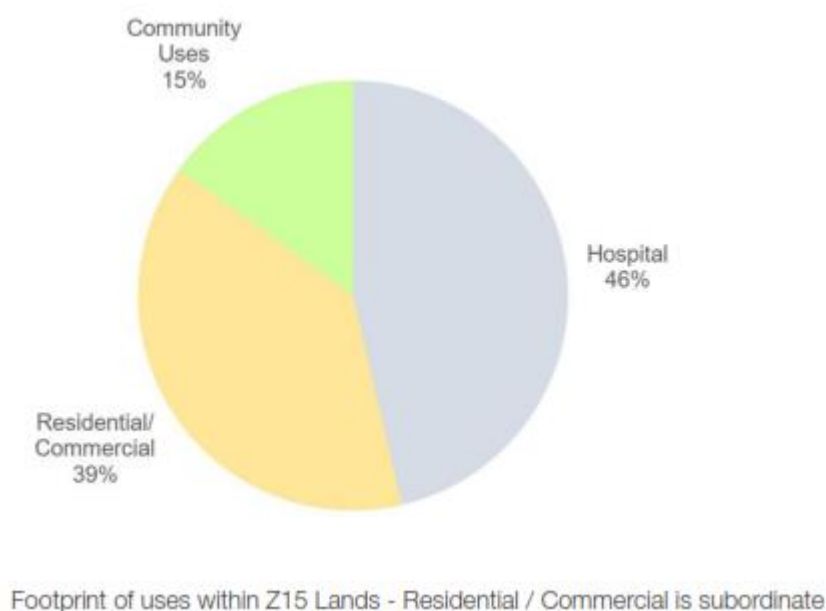
Site Uses within Z15 Lands - Residential / Commercial uses is subordinate

Source: STW Architects

In respect to built footprint, the residential and commercial development proposed in Block A, J, K, H and L, which are contained on the Z15 zoned portion of the overall lands, are also subordinate to the primary institutional and community uses proposed on the Z15 zoned land. The footprint of the new hospital building is 4,556 sq.m. The proposed development includes the retention, repurposing and refurbishment of a number of structures and protected structures on the Z15 lands with a total gross floor area of 5,050 sq.m, including St. Vincent's Hospital buildings, part of which is a protected structure under RPS Ref.: 2032, Brooklawn (RPS Ref.: 8789), Richmond House (RPS Ref.: 8788), the laundry building, Rose Cottage and the Gate Lodge. The footprint of the community uses within the refurbished hospital building is 1,475 sq.m. The area of public open space on the Z15 zoned portion of the land is c. 0.64 ha.

Figure 6.9 below illustrates that based on building footprint, that the footprint of the residential / commercial development on the Z15 zoned lands will remain subordinate to the footprint of the proposed new hospital, other community uses and reused protected structures and historic buildings.

This provides a total footprint of 12,431 sq.m for existing and proposed community and social infrastructure associated with the institutional use. The residential and commercial development within Z15 lands has a building footprint of 4,895 sq.m which is c. 44% of the total building footprint on Z15 lands. It is therefore submitted that the institutional use will remain as the primary use on the land, with the residential use being subordinate.

**Figure 6.9: Percentage Footprint of uses on Z15 Lands**

Source: STW Architects

The site coverage of the existing buildings on the Z15 lands is 17.9% (7,002 sq.m / 46,909 sq.m). This includes the main St. Vincent's Hospital building and other hospital administrative buildings, some of which are proposed for demolition as part of the development. In comparison, the proposed development provides a site coverage of 21.4% on the Z15 lands (10,059 sq.m / 46,909 sq.m) which is considered to be a marginal increase from the existing footprint of buildings. As demonstrated above, the hospital and community use accounts for the majority of the Z15 lands and the residential and commercial development is subordinate to the community and social infrastructure objective of the lands. The marginal increase of footprint/site coverage demonstrates that the proposal maintains the open nature of the Z15 lands and also maintains the hospital as the primary use on the Z15 zoned portion of the lands.

The proposed residential buildings are located around the perimeter of the Z15 Lands with the new hospital and refurbished Protected Structures in the centre. The siting of the proposed residential blocks within the overall Z15 zoned portion of the site is also considered to be subordinate relative to the primary institutional uses on the Z15 zoned lands and are necessary to support the planned enhancement of the function/operational viability of the primary institutional use on the lands.

- *Where appropriate, proposals should be subject to consultation with the relevant stakeholder e.g. Department of Education/Health Service Executive.*

**Response:** St. Vincent's Hospital Fairview is a privately run facility and not required to have consultations with HSE, however, the applicant have advised that the HSE are supportive of the proposals to provide a new state of the art hospital providing mental health services on the St. Vincent's campus.

- *The development must not compromise the open character of the site and should have due regard to features of note including mature trees, boundary walls and any other feature/s as considered necessary by the council.*

**Response:** We refer to the STW Design Statement which sets that the proposals have been designed to maintain and enhance the open character of the Z15 portion of the overall site, retained mature trees, boundary walls and other features, where appropriate, and provide for the long-term

sustainable reuse of the protected structures and historic buildings on the Z15 zoned portion of the site.

As set out in NMP's Landscape Design Statement, the footprint of the new hospital is proposed on the lawned area of the existing parkland, south of the Protected Structures and thus minimising the impact on mature trees. A significant number of high-quality mature trees are proposed to be retained and enjoyed. As the site gradually slopes up to the north, the building's ground floor level and adjacent road and pavement network has been carefully designed to optimise the number of retained mature trees both to its north and south and perimeter. We refer to Landscape Design Statement, Architectural Design Statement and Architectural Conservation Report for further analysis and assessment.

Appendix VII of CMK's Arboricultural Assessment, Arboricultural Impact and Tree Protection Plan Report, addresses the historic trees on the site, and the accompanying drawings identify these, with further elaboration provided below in consultation with CMK.

Of the 23 identified historic trees, 16 are to be retained (refer to drawings YSV001 historic trees 116-118 and YSV001 historic trees impact 119-121 for locations and impacts to historic trees). Every effort has been made to retain the maximum number of historic trees through design phases and mitigation planning (refer to CMK's Arboricultural Assessment, Impact and Tree Protection Strategy Report; section 3: Arboricultural Impact and Mitigation). NMP's Landscape Design plans detailed compensatory tree planting of 420 new trees. This will bring the total tree count within the site from 277 to 558.

Chapter 11 of the EIAR comprises the assessment of Landscape and Visual impacts and this chapter has been fully reviewed in relation to potential setting impacts on cultural heritage sites. Visual impacts have been categorised based on verified montages. This study has influenced the development of the proposed development in relation to the landscaping proposals and the retention of historic trees.

Chapter 13 includes appraisals of the protected structures on site, their curtilage and the proposed demolitions. These appraisals have informed the design of the proposed development in relation to the protected structures and are supported by detailed conservation strategies.

From a landscape and visual impact assessment perspective, the retention and conservation of the protected structures on the site, their re-purposing for hospital related or community use and the enhancement of the landscape environment through the creation of a new inter-connected public realm are key positive impacts arising from the proposals, despite their incorporation into a new high density residential neighbourhood. An important positive result of the development would be the physical and visual access to the former St Vincent's Hospital buildings given to the public, allowing for greater appreciation of the architectural heritage.

- *In all cases, the applicant shall submit a statement, typically in the form of a business plan, or any other relevant/pertinent report deemed useful and/or necessary, as part of a legal agreement under the Planning Acts, demonstrating how the existing institutional/social/community facility will be retained and enhanced on the site/lands.*

**Response:** As set out in the Business Plan and Operational Management Plan prepared by St. Vincent's Hospital Fairview, the development provides for the construction of a new mental health hospital to replace the current seriously inadequate facilities. The Development Plan states that the provision of a new hospital providing mental health services to replace the outdated and unsuitable current hospital buildings is the primary focus of this application. The key rationale for the proposed development of the new hospital providing mental health services will be financed by the development of residential on the greater part of the site. The new hospital providing mental health services will remain as the main institution/community use on the subject site with substantial

grounds / potential for future expansion to the immediate west of the new hospital secure campus. There is approximately 155 no. units proposed on the Z15 lands (zoning runs diagonally across residential Block A) which represents 19% of the total residential units. The quantum of residential development proposed in this application 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 seek to deliver high quality residential accommodation to meet the existing housing need in a sustainable location close to public transport and significant employment areas.

- *In all cases the applicant shall be the landowner or have a letter of consent from the landowner.*

**Response:** The applicant, St. Vincent's Hospital Fairview, is the landowner of the Z15 zoned lands included in the application and therefore no letter of consent is required.

The Development Plan states *"Any proposed development for 'open for consideration' uses on part of the Z15 landholding, shall be required to demonstrate to the planning authority how the proposal is in accordance with and assists in securing the aims of the zoning objective; and, how such a development would preserve, maintain or enhance the existing social and community function(s) of the lands subject to the development proposal."*

**Response:** As set out above, the quantum of residential development proposed in this application 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 development has been designed with reference to detailed information included in STW's Architectural Design Statement and Architectural Conservation Report. As illustrated in Figure 6.10, key elements envisaged for the development on the Z15 lands are as follows:

- Provision of a new 73 no. bed hospital providing mental health services, with its associated green space and ancillary buildings, accessed from Richmond Road and Convent Avenue. The hospital will maintain its historic links to the buildings (protected structures) and the landscape and will remain the primary use on the Z15 lands.
- There will be minimum impact on the mature landscape of the Z15 lands. The mature landscaped grounds will remain in hospital use, for the benefit of the patients and residents of the facility.
- Refurbished protected and historic structures will be brought into new use, much of which will be open to the general public. Retention and change of use of the existing hospital building (part of which is a protected structure under RPS Ref.: 2032) to provide residential amenity areas, community facilities; gym, café, coworking spaces, library, creche, and community hall. Retention and repurpose of existing buildings on site including Brooklawn (RPS Ref.: 8789), Richmond House (RPS Ref.: 8788), the laundry building, Rose Cottage and other buildings for ancillary uses for the new hospital providing mental health services.
- Generous new public open spaces facilitating permeability through the site and connecting surrounding neighbourhoods. The proposal includes 1.6 ha of Public Open Space including a central public park for the benefit of the wider community and a new public plaza on Richmond Road. There is also a public walking / cycling trail along the landscaped perimeter of the residential development.
- New residential apartment buildings, comprising standard designed apartments only, on the Z15 lands, with heights respecting lower existing residential areas to the east.



**Figure 6.10: Proposed Uses in Block J-K**

Source: STW Architectural Conservation Statement

It is a requirement that for sites larger than 1ha that a masterplan is provided. The masterplan must set out the vision for the lands and demonstrate that a minimum of 25% of the overall development site/ lands is retained for open space and/or community and social facilities.

**Response:** We refer to the Z12 and Z15 Masterplan submitted and Section 3 of the STW Architectural Design Statement. The Masterplan indicates the following:

- A new hospital providing mental health services with its associated green space and ancillary buildings. Privacy is maintained using existing mature and supplemented landscaping.
- A new dedicated entrance from Richmond Road to the proposed new hospital which makes use of the historic Richmond House and Brooklawn House and the associated tree-lined avenue.
- Refurbished Protected and Historic Structures brought into new use, much of which is open to the general public.
- Generous new Public Open Spaces (equating to 25% of the Z12 and Z15 lands) facilitating permeability through the site and connecting surrounding neighbourhoods.
- Interactive landscape features that contribute to the open character of the lands, including the provision of an area of allotments for the benefit of residents and for the community.
- A tree-lined avenue connecting the new Richmond Road residential entrance with the main residential arrival area and public Central Park.
- Communal Open Space for residents - both as dedicated ground level gardens and rooftop terraces.
- Retail and community uses creating active facades to Public Open Space.
- A mix of residential internal amenity spaces.
- New residential apartment buildings with higher elements relating to open space and stepping down to respect any surrounding lower existing residential areas.

### 6.1.2.3 Consistency with Z1 Sustainable Residential Neighbourhoods

The portion of the site proposed for the new hospital providing mental health services includes 0.3 ha zoned as Z1 Sustainable Residential Neighbourhoods which seeks '*To protect, provide and improve residential amenities.*'

**Response:** This area of the site includes Brooklawn House, a protected structure under RPS Ref.: 8789, and a gate lodge building which are proposed to be used by the new hospital for ancillary hospital uses and residential accommodation respectively. An area of parking is immediately accessible on entering the hospital site, on the Z1 lands, which reduces unnecessary traffic in the main body of the site.

Brooklawn House will be used for a nursing school with associated rooms including a library and training rooms, which are ancillary to the new hospital. The existing kitchen is to be retained at first level and a staff room is proposed to its north with a total GFA of 301 sqm. We note 'education' and 'training centre' are listed as permissible uses under Z1 zoning objective and therefore the proposed development is considered to be acceptable.

### 6.1.2.4 Infrastructure Works on Public Roads / Footpaths

The application site also includes an area of the public road / footpaths (extending for approximately 0.8km) to facilitate service connections via Griffith Court, Philipsburg 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.

## 6.1.3 Climate Action

Chapter 3 of the Development Plan sets out the policies in relation to Climate Action. The following summarises how proposed development is consistent with the policies of Dublin City Council.

### **Policy CA2 Mitigation and Adaptation**

*To prioritise and implement measures to address climate change by both effective mitigation and adaptation responses in accordance with available guidance and best practice.*

**Response:** We refer to Engineering Services Report which states the proposed surface water network has been designed to allow for an additional 20% increase in rainfall intensity, to allow for Climate Change projections, in accordance with the Development Plan and the GDSDS. All discussion within this report, with regards to surface water network design calculation and results, include for the allowance of an increase of 20% in rainfall intensity, as required.

Site-Specific Flood Risk Assessment of the subject site has been carried out by OCSC which outlines that the site is at a low risk of coastal and fluvial flooding. The proposed development includes various features to minimise this risk of fluvial flooding including SuDs features. These measures increase the resilience of the development by increasing its resistance to the impacts of climate change.

### **Policy CA3– Climate Resilient Settlement Patterns, Urban Forms and Mobility -**

*To support the transition to a low carbon, climate resilient city by seeking sustainable settlement patterns, urban forms and mobility in accordance with the National Planning Framework 2018 and the Regional Spatial and Economic Strategy 2019*

**Response:** The proposed development will contribute to achieving sustainable settlement patterns by delivering residential units within an urban centre which will encourage sustainable modes of transport for future residents.

**Policy CA4 - Improving Mobility Links in Existing Areas-** *To support retrofitting of existing built-up areas with measures which will contribute to their meeting the objective of a low-carbon city, such as reopening closed walking and cycling links or providing new links between existing areas.}*

**Response:** The proposed development will provide for increased permeability in the area and provide for connectivity with adjacent developments. New and improved shared surfaces and links are proposed.

**Policy CA6 Retrofitting and Reuse of Existing Buildings**

*To promote and support the retrofitting and reuse of existing buildings rather than their demolition and reconstruction where possible.*

**Response:** The proposed development includes the retention refurbishment of existing buildings, as detailed below, which will provide significant sustainable and conservation benefits:

- Rose Cottage: Additional structures for a single storey extension are proposed to the south of the Rose Cottage. The building will be used as storage associated with the new hospital providing mental health services.
- Laundry Building: The retained building of the laundry building will be primary used as a workshop associated with the hospital providing mental health services.
- *Richmond House (RPS Ref.: 8788)*: The Richmond House will be used for offices, a meeting, a boardroom, and ancillary staff related rooms with a total GFA of 397 sqm.
- *Brooklawn (RPS Ref.: 8789)*: The Brooklawn House will be used for nursing school with associated rooms including a library and training rooms. The existing kitchen is to be retained at first level and a staff room is proposed to its north with a total GFA of 301 sqm.
- *Block K (partially RPS Ref.: 2032)*: A change of use is proposed for the existing hospital building (referred as Block K). The building which is to be retained will be separated in 4 no. part (K1, K2, K3 and K4) and a fifth part will be added as an extension to the western extremity of the building (referred as Block J). The extension will be used for tenant concierge at ground floor level and residential units at first, second and third floor levels. The Block K1 to the immediate east of the extension will be used for a gym at ground and first levels and for tenants' amenities at second and third levels. The Block K4 to the eastern extremity will be a single storey community hall and the Block K3 to its immediate west will be a 2 storey creche. It is proposed to provide a café and a community library at ground floor level and co-working spaces at first, second and third floor levels in the central Block K2 of the building.

The proposal includes the demolition of westernmost range of the hospital building, which is within the curtilage of RPS Ref.: 2032. The Architectural Heritage Impact Assessment outlines this area as the Freeman Wing, Phase 2 Hospital and St. Teresa's. The development also proposed the demolition of the 3-no. existing buildings located to the north of the existing building hospital, Crannog Day Care Centre located to the southwest of the subject site and an ancillary building located to the southeast of the site, to the immediate north of the Brooklawn House.

As set out in the Architectural Heritage Impact Assessment, the buildings located to the north of the main Convent and Hospital complex array are not considered to be of heritage value, nor contributing to the character of the setting of the designated structures and as such are not described in detail in this assessment report. These buildings accommodate the nurses training school and outbuildings for services and storage. They are proposed for demolition but do not form part of the architectural recording exercise.

**Policy CA7 – Energy Efficiency in the Built Environment**

To support high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retrofitting of appropriate energy efficiency measures in the existing building stock, and to actively retrofit Dublin Council housing stock to a B2 Building Energy Rating (BER) in line with the Government's Housing for All Plan retrofit targets for 2030.

**Response:** We refer to the enclosed Demolition Works Justification Report prepared by Passive Dynamics which sets out that there is increased embodied carbon associated with the demolition of any existing building(s) and subsequent replacement of new buildings, where demolition is necessary there is opportunities to mitigate the impact. Some of the materials, which would have the largest carbon impact, such as brickwork, concrete, slates, glazing / façade can be reused within the site as part of the proposed works.

The report states the following:

*“Given the age of the St. Teresa's and The Freeman Wings, which consist of the largest buildings to be demolished, their current performance in terms of heat retention and overall building performance would be poor. While it would be possible to insulate these buildings to potentially a B rated BER, the overall performance levels in terms of operational energy / carbon would not reach the standard associated with that of a new building achieving NZEB. This is due to the fact (in part) that there will be thermal bridges associated with the original building envelope where it is not possible to design out at this stage.*

*The existing building layouts and many of the internal finishes would need to be updated if the buildings were to be retained. It is likely that a significant strip out of the existing materials would be required to both repurpose the building and insulate it to today's standards. According to LETI (London Energy Transformation Initiative Climate Emergency Design Guide) up to 35% of a building's embodied carbon is associated with internal finishes (4%), Mechanical and Electrical Services (15%) and Façade (16%). It is worth noting that even in a best-case scenario whereby these buildings were to be retained, due to the level of works and upgrades required, further embodied carbon would be added in any event.”*

IN2 Climate Action Energy Statement also sets out the energy efficiency and compliance with regard to the proposed development. The report includes energy analysis to demonstrate how low carbon, low energy and heating solutions have been considered and how they are appropriate for this development to achieve compliance to Building Regulations Technical Guidance Document (TGD) Part L 2021 and aligned with Dublin City Climate Action Plan. Section 3.0 outlines the requirements to ensure compliance, outlining the overarching EU Directive for Near Zero Energy Buildings (NZEB) and how this is implemented in Ireland and detailing associated requirements within Part L 2021 and Action Plan.

**Policy CA8 – Climate Mitigation Actions in the Built Environment**

To require low carbon development in the city which will seek to reduce carbon dioxide emissions and which will meet the highest feasible environmental standards during construction and occupation, see Section 15.7.1 when dealing with development proposals. New development should generally demonstrate/ provide for:

- A. building layout and design which maximises daylight, natural ventilation, active transport and public transport use;
- B. sustainable building/services/site design to maximise energy efficiency;
- C. sensitive energy efficiency improvements to existing buildings;
- D. energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments;
- E. on-site renewable energy infrastructure and renewable energy;
- F. minimising the generation of site and construction waste and maximising reuse or recycling;



- G. *the use of construction materials that have low to zero embodied energy and CO2 emissions; and*
- H. *connection to (existing and planned) decentralised energy networks including the Dublin District Heating System where feasible.”*

**Response:** As outlined above, we refer to IN2 Climate Action Energy Statement which provides energy analysis to demonstrate how low carbon, low energy and heating solutions have been considered and how they are appropriate for this development to achieve compliance to Building Regulations Technical Guidance Document (TGD) Part L 2021 and aligned with Dublin City Climate Action Plan. In response to the requirements under Policy CA8, we also refer to the following:

- Daylight and Sunlight Assessment prepared by IN2 which demonstrates how the proposal has maximised daylight. The Average Daylight Factor results are 95% compliant for targeted illuminance level for the proposed development and 99% compliant for Spatial Daylight Autonomy.
- STW Design Statement illustrates that the subject site is within close proximity to a number of bus stops including Drumcondra Road QBC / proposed Bus Connects 'A Spine' to the west, Fairview Strand and Philipsburgh Avenue to the south and east. The site is also 1.6km from Drumcondra Rail Station and within 1.7km Clontarf DART Station.
- The Climate Action Energy Statement which provides an energy breakdown for a typical apartment compliant to NZEB/ Part L 2021. It can be seen that Hot Water Energy consumption pre-dominates, with Heating Energy considerably lower; reflective of the extensive improvement in insulation/ air permeability/ thermal bridging/ glazing/ heating system efficiency etc. through successive Building Regulations improvements.
- Section 3.0 of the Climate Action Energy Statement details the assumptions made in terms of Building Construction, Mechanical and Electrical Systems and Renewable Technologies, compliance with Primary Energy, Carbon Emissions and Renewable Energy Ratio for the entire development. The development provides renewable technologies comprising of Air Source Heat Pumps (ASHP's) plant delivering primary contribution to the annual heating and domestic hot water load.
- We refer to Chapter 15- Waste, and the appended Resource & Waste Management Plan, prepared by AWN which outlines careful management of waste from the demolition, including segregation at source, will help to ensure maximum recycling, reuse and recovery is achieved, in accordance with current local national waste targets.
- We refer to the Construction and Environmental Management Plan for further details of material re-use and recovery rate.

#### **Policy CA9 – Climate Adaption Actions in the Built Environment**

*Development proposals must demonstrate sustainable, climate adaptation, circular design principles for new buildings / services / site. The Council will promote and support development which is resilient to climate change. This would include:*

- A. *measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect;*
- B. *ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings;*
- C. *minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS);*
- D. *reducing flood risk, damage to property from extreme events– residential, public and commercial;*
- E. *reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply;*
- F. *promoting , developing and protecting biodiversity, novel urban ecosystems and green infrastructure.*

**Response:** As outlined in the Climate Action Energy Statement, the report seeks to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development. In response to climate adaption, the development provides renewable technologies comprising of Air Source Heat Pumps (ASHP's) plant delivering primary contribution to the annual heating and domestic hot water load.

The proposed development includes green roofs and SuDs tree pits as set out in the OCSC Engineering Services Report.

**Policy CA10 – Climate Action Energy Statements**

*All new developments involving 30 residential units and/ or more than 1,000 sq. m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development."*

**Response:** The proposed development includes a new hospital and 811 no. residential units. A Climate Action Energy Statement has been prepared by IN2 and is submitted with this LRD planning application.

**Policy CA24 – Waste Management Plans for Construction and Demolition Projects**

*"To have regard to existing Best Practice Guidance on Waste Management Plans for Construction and Demolition Projects as well as any future updates to these guidelines in order to ensure the consistent application of planning requirements."*

**Response:** We refer to Chapter 15- Waste, and the appended Resource & Waste Management Plan prepared by AWN, included in the EIAR, which outlines careful management of waste from the demolition, including segregation at source, will help to ensure maximum recycling, reuse and recovery is achieved in accordance with current local national waste targets.

**Policy CA25 – Electric vehicles**

*To ensure that sufficient charging points and rapid charging infrastructure are provided on existing streets and in new developments subject to appropriate design, siting and built heritage considerations and having regard to the Planning and Development Regulations (2001) as amended, which have been updated to include EV vehicle charging point installation."*

**Objective CAO4 – Regional Strategy for Electric Vehicle (EV) Charging**

*To support and implement the forthcoming Regional Strategy for Electric Vehicle (EV) charging over the lifetime of the plan in order to facilitate the transition to low carbon vehicles required to achieve 2030 national targets."*

**Response:** The proposed development includes a total of 167 no. EV parking spaces (124 no. spaces for the residential, 39 no. spaces for the new hospital and 4 no. spaces for the commercial and community uses) which equates to 50% of standard spaces. All other car parking spaces will have ducting to facilitate charging infrastructure. Other spaces shall be ducted for future provision.

**Policy CA26 – Flood and Water Resource Resilience**

*To support, encourage and facilitate the delivery of soft, green and grey adaptation measures to enhance flood and water resource resilience in the city and support the delivery of grey adaptation measures to enhance flood and water resource resilience where necessary."*

**Response:** The proposed development includes both green and grey adaption measures to enhance flood and water resource resilience in the development, which is set out in the OCSC Consulting Engineers Engineering Services Report (ESR).

**Policy CA27 – Flood Risk Assessment and Adaption**

*To address flood risk at strategic level through the process of Strategic Flood Risk Assessment, and through improvements to the city's flood defences.*

**Policy CA28 – Natural Flood Risk Mitigation**

*To encourage the use of natural flood risk mitigation or nature based solutions including integrated wetlands, green infrastructure, and Sustainable Drainage Systems (SuDS) as part of wider adaptation and mitigation responses to achieve flood resilience*

**Response:** The proposed development includes a range of SUDS measures as set out in the Engineering Services Report (ESR) prepared by OCSC. A Site-Specific Flood Risk Assessment of the subject site has been carried out by OCSC and accompanies the LRD planning application.

**6.1.4 Shape and Structure**

Chapter 4 of the Development Plan sets out the overarching framework and strategy *to guide the future sustainable development of the city. The objective is to ensure that growth is directed to, and prioritised in, the right locations to enable continued targeted investment in infrastructure and services and the optimal use of public transport.*

The vision for the urban form and structure of the city is to achieve a high quality, sustainable urban environment, which is attractive to residents, workers and visitors. The approach includes *“the creation of a consolidated city, whereby infill and brownfield sites are sustainably developed, regenerated and new urban environments are created, and where underutilised sites and buildings are actively repurposed and intensified.”*

**Response:** The proposed development at St. Vincent's Hospital Fairview will provide for a sustainable quantum of compact urban growth, at a site accessible to public transport and third level education institutions. The site benefits from access to existing sustainable transport (bus and rail services). The proposed development will assist and underpin the regeneration of underutilised lands.

Section 4.5.2 of the Development Plan set out the policy approach to the Inner Suburbs and Outer City and states that *“Future development will be aligned with the strategic development areas and corridors set out under the Dublin MASP and further opportunities for intensification of infill, brownfield and underutilised land fully explored, particularly where it aligns with existing and future public transport infrastructure.”*

**Policy SC8 Development of the Inner Suburbs**

*To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport infrastructure.'*

**Response:** The subject lands are located within walking distance of public transport corridors / high frequency routes to the east, south and west, and proposes an appropriate intensification of this under-utilised site, and is aligned with existing public transport services and is also located adjacent to the proposed Bus Connects route (on Drumcondra Road and Annesley Bridge).

**Policy SC10 Urban Density**

*To ensure appropriate densities and the creation of sustainable communities in accordance with the principles set out in Guidelines for Planning Authorities on Sustainable Urban Development (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide and any amendment thereof.*

**Response:** As set out in Section 5, the Sustainable Residential Development Guidelines recommend minimum densities of 50 uph for such Inner Suburban lands and in general must be considered in the context of the much more recent policies included in the National Planning Framework and Urban Development and Building Height Guidelines 2018 which place significantly greater emphasis on the importance of achieving a compact urban form including increased residential densities in urban areas, as set out above.

The Development Plan has been prepared in the context of the National Planning Framework which advocates an approach of consolidation and densification in the city and also in the context of the EMRA RSES which further endorses the NPF's principles of consolidation, brownfield development, densification and compact growth. We also note that the Development Plan states that *"There will be continued consolidation of the city to optimise the efficient use of urban land. **Higher densities will be promoted** in the city centre, within KUVs, certain SDRAs and **within the catchment of high capacity public transport**. The goal is to provide for a compact city with attractive mixed-use neighbourhoods, a variety of housing types and tenure, adequate social and community infrastructure and adaptable housing, where people of all ages will choose to live as a matter of choice."*

As outlined in STW Design Statement, the proposed development provides a net density of 182 units per hectare based on the net area of the residential area (Z1, Z12 and Z15) excluding the proposed public open space.

The subject site is located within an 'Inner Suburban area', which is classified as part of the 'Outer City area' in the Development Plan and is zoned objective 'Z1, Z12 and Z15'. Residential and Build to Rent Residential uses are either permissible or open for consideration under these zoning objectives (see Section 6 for justification for residential development on Z15 to address highly exceptional circumstances). The subject site is underutilised, and given its 'Central and/or Accessible' location (as defined under Section 2.4 of the Apartment Guidelines 2022) or location within a 'Public Transport Corridor' defined as a 'Key Location' for increased heights and density in Appendix 3 of the Development Plan, is suitable for a high-density residential development and increased building heights.

Appendix 3 of the Development Plan acknowledges that *"There is recognised scope for height intensification and the provision of higher densities at designated public transport stations and within the catchment areas of major public transport corridors."* These are noted to include bus connects routes and core bus corridors. The subject site, as noted previously, is directly proximate to existing high capacity, high frequency bus routes. Therefore, the subject site is suited for the higher density proposed.

Appendix 3 of the Development Plan further states that *"Locations for intensification must have reasonable access to the nearest public transport stop. In line with national guidance, higher densities will be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station in the plan."* As 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, which are served by Bus Route No. 123 (with a peak frequency every 10 mins), and considered to be an 'Inner Suburban' site, it is therefore appropriate for increased heights and density over that of the prevailing context in the area.

The proposed development has been designed to respond positively to the criteria of the accompanying Urban Design Manual, and this has been set out in the Architectural Design Statement prepared by STW.



**Policy SC11 Compact Growth**

*In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:*

- *enhance the urban form and spatial structure of the city;*
- *be appropriate to their context and respect the established character of the area;*
- *include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents;*
- *be supported by a full range of social and community infrastructure such as schools, shops and recreational areas;*
- *and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture.*

**Response:** The proposed development represents a comprehensive development of an Inner Suburban infill and part brownfield site in close proximity to existing high quality public transport, local services, third level education facility and to future enhanced public transport in the form of Bus Connects (on Drumcondra Road and Annesley Bridge Road).

The proposed development will enhance the urban form of the area, in providing a high quality development for much needed housing, along with open space and community facilities. The proposed development has been designed in a sensitive way, with varying heights which respond to the existing land uses in the area (including protected structures). The development includes community uses (creche, community hub/library, open space, gym) which will further enhance residential amenity in the area. Further detail on the local community resources is set out in the Social Infrastructure and Community Audit / Assessment prepared by John Spain Associates. The proposed architecture and urban design response is of a high quality and has been designed with regard to the provisions of Chapter 15 of the Development Plan, as explained in the Architectural Design Statement by STW.

**Policy SC 12 Housing Mix**

*To promote a variety of housing and apartment types and sizes, as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.*

**Response:** The proposed development incorporates a mix of housing types and tenures, including social, build to rent and standard designed apartments. A range of apartment sizes is also proposed, which will add to housing variety and choice in the area. The majority of the proposed apartments are one-bedroom and two-bedroom apartments, which will complement the existing housing stock in the area which is predominantly 3 or more bedroom units (see Census data in response to Policy QHSN40). 57 no. 3 beds are also proposed which is 7% of the total unit mix provided. The proposed development provides for significant public, private, and communal open space, resulting in a high level of residential amenity for future occupants.

**Policy SC 13 Green Infrastructure**

*To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces.*

**Response:** The proposed development incorporates elements of Green Infrastructure into its design in the form of Green Roofs which are also a component of the SuDS of the development and a significant quantum landscaped areas which include pollinator friendly planting, which is set out in the landscape report prepared by NMP.

The following guidance is of relevance to Building Height:

**Policy SC 14 Building Height Strategy**

*To ensure a strategic approach to building height in the city that accords with The Urban Development and Building Height Guidelines for Planning Authorities (2018) and in particular, SPUR 1 to 4.*

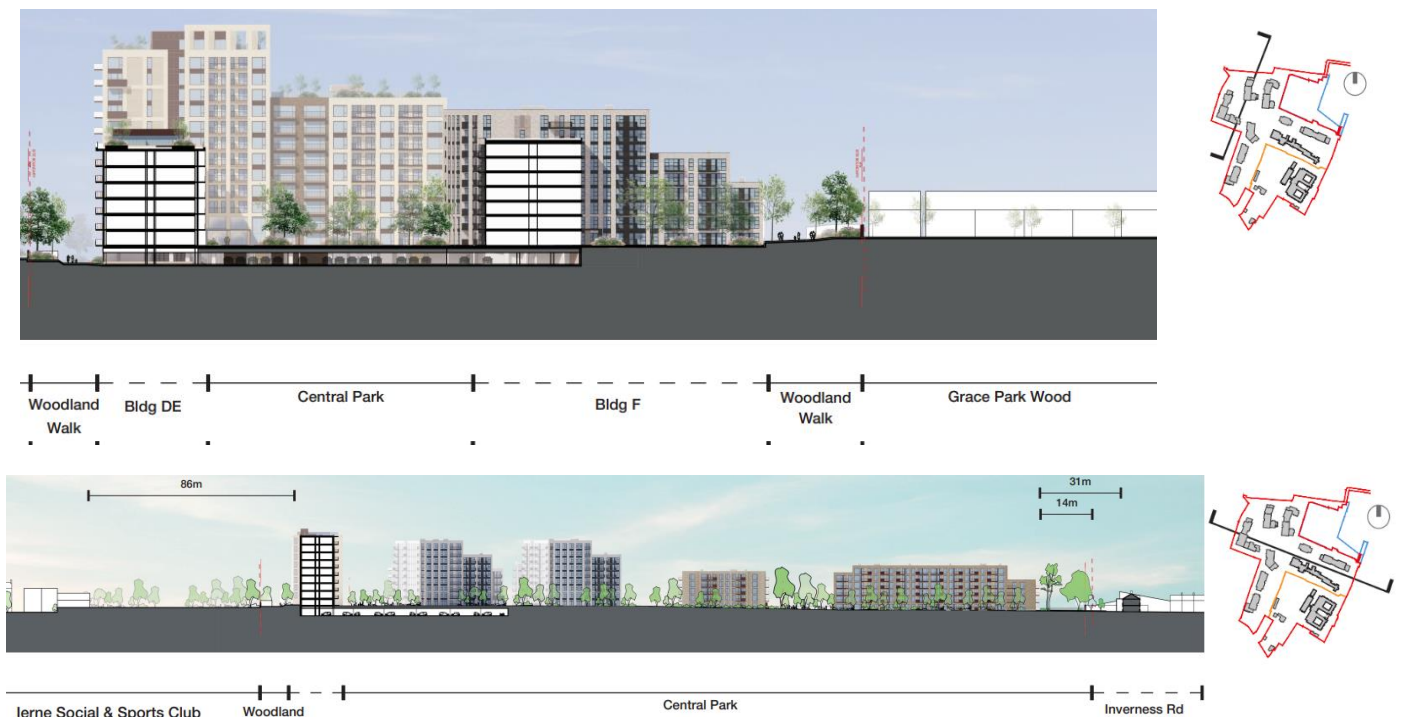
**Response:** We refer the Planning Authority to Section 5 of this Statement which outlines compliance with Section 3.2 of the Building Height Guidelines 2018 and Appendix 1 for an assessment of the scheme with Table 3 of Appendix 3 of the Development Plan, which is aligned with the Building Height Guidelines 2018.

**Policy SC16**

*“To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance **{with}** ~~(between)~~ the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area.”*

**Response:** Appendix 3 of the Development Plan sets out locations generally suitable and appropriate for accommodating a more intensive form of development, including increased height. The site is located in an Inner Suburban area which is not classified and therefore is likely to be considered to fall within the ‘Outer City (suburbs)’ which states “*heights of 3 to 4 storeys will be promoted as the minimum. **Greater heights will be considered on a case by case basis, having regard in particular to the prevailing site context and character, physical and social infrastructure capacity, public transport capacity and compliance with all of the performance criteria set out in Table 3.***”

As illustrated in Figure 6.11, the development provides for higher buildings within the proposed development (Blocks D-E, F and G). These buildings are centrally located and address the wider part of the Central Park within the site and the adjacent pitch and putt course. The proposed buildings to the east step down to four storeys to relate to the existing houses along Inverness Road and Grace Park Wood to have regard to the prevailing height on the adjacent residential neighbourhoods. The scale of the 4 and 5 / 6 storey Building H and L respects the adjacent Community Unit and the height of the main Protected Structure.

**Figure 6.11: Cross Sections demonstrating proposed heights**

Source: STW Architectural Design Statement

The proposed building heights range from part 2 to part 13 storeys and can be accommodated on the subject site, having regard to the following:

- The setback of buildings from the boundaries, with the spaces between the boundaries and the buildings densely planted for visual screening.
- Inner Suburban green field site in close proximity to existing public transport, local services, third level education institutions and to future enhanced public transport in the form of Bus Connects (on Drumcondra Road and Annesley Bridge Road).
- The setback of buildings from the boundaries (see graphic below), with the spaces between the boundaries and the buildings densely planted for visual screening.
- The stepping down of building height towards boundaries shared with sensitive neighbouring areas (to the north).
- The concentration of height adjacent to existing neighbouring open spaces (e.g. Dublin Port Stadium and Ierne Social and Sports Club), exploiting the opportunity presented by these spaces.
- The concentration of height closer to the modern, mixed density neighbourhood of Grace Park Wood.
- The modest height of the hospital building, ensuring relatively limited townscape and visual impacts on the Victorian neighbourhood to the east, including the Residential Conservation Area-zoned Inverness Road.
- Consideration of the opportunities in the urban structure, such as the opportunity to locate new open space and pedestrian and cycle entrances and routes in order to connect to the surroundings.

We refer to Appendix 1 for an assessment with performance based criteria set out in Table 3 of Appendix 3 of the Development Plan.

The scale of the proposed development is considered to integrate appropriately with its surroundings, whilst introducing an element of increased height. We refer to EIAR Chapter 11- Landscape and Visual Impact Assessment prepared by Modelworks which states:

*“As a contemporary, high density neighbourhood in an historically low density urban environment, the proposal diverts from the established townscape character. This is an unavoidable and not undesirable outcome of compact growth policy, and it can be complementary to the existing urban structure and character”.*

**Policy SC17 relating to Building Height**

*To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height:*

- *follow a design led approach;*
- *include a masterplan for any site over 0.5ha (in accordance with the criteria for assessment set out in Appendix 3);*
- *make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context;*
- *deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced;*
- *Do not affect the safety of aircraft operations at Dublin Airport (including craneage); and*
- *have regard to the performance-based criteria set out in Appendix 3.*

*All new proposals in the inner city must demonstrate sensitivity to the historic city centre, the river Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas and civic spaces of local and citywide importance.*

**Response:** As set out in the Z12 and Z15 Masterplan and Architectural Design Statement, the proposed development has followed a design led approach in respect of height which makes a positive contribution to the urban context and respond positively to existing and emerging context of the site, regard to sensitive local receptors including existing residential areas and also protected structures. A key principle in the success of new residential and mixed use development is placemaking which fosters community and provides facilities which encourage interaction and community growth, set in the context of integration and enrichment of the wider community in which it sits. The development is designed to create a variety of attractive, connected spaces and which encouraging active movement, prioritising pedestrian and cyclist movement, with limited vehicle movement.

The development provides unique opportunities to create linkages and new public spaces that connect and serve both the residents and the larger communities of Richmond Road, Grace Park Wood, Griffith Court, Philipsburg Avenue and beyond.

The proposed development will enhance the key frontages of the site on Richmond Road, where it is proposed to provide a new urban plaza. The development provides a mix of uses which include a community hub/library, creche, gym, co-working as well as high quality residential buildings and significant public open space areas.

The proposed development at St. Vincent's responds positively to the existing and emerging character of the area and seeks to integrate the existing prevailing heights with emerging proposals for higher buildings in the area.

We have notified IAA in relation to the proposed development and refer to the response, attached as Appendix 2.

Appendix 1 sets out how the proposed development addresses the performance based criteria in Appendix 3 of the Plan.

With reference to high quality architecture the Development Plan outlines the following:



**Policy SC19 – High Quality Architecture**

*To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods.*

**Policy SC21 – Architectural Design**

*To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city's character and which mitigates and is resilient to, the impacts of climate change."*

**Response:** The proposed development will contribute positively to the city's built environment, located at an Inner Suburban location close to high quality public transport. The proposed development promotes healthy placemaking through promoting sustainable modes of transport over the motor car. Please see STW's Architectural Design Statement for detailed overview of the quality of the proposed scheme including overview of materials used and quality of the public realm. The materials to be used in the proposed development have been selected to reflect the character of the area and are to be durable to reduce running costs in the future.

**Policy SC20 – Urban Design**

*Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2013)."*

**Response:** The proposed development has been designed to comply with the guidelines set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2019, as updated). Please see the DMURS compliance statement prepared by OCSC.

**Policy SC23 – Design Statements**

*That Design Statements shall be submitted for all large scale residential (+50 units) and commercial development proposals (+1,000 sq. m.) in accordance with the principles set out in Chapter 15."*

**Response:** An Architectural Design Statement has been prepared by STW Architects.

With regard to density, the Development Plan states that *"There will be continued consolidation of the city to optimise the efficient use of urban land. Higher densities will be promoted in the city centre, within KUVs, certain SDRAs and within the catchment of high capacity public transport. The goal is to provide for a compact city with attractive mixed-use neighbourhoods, a variety of housing types and tenure, adequate social and community infrastructure and adaptable housing, where people of all ages will choose to live as a matter of choice."*

**Response:** The proposed net residential density of 182 units per hectare is considered appropriate for the site, being located in close proximity to high frequency public transport services as well as a range of community and social infrastructure.

**6.1.5 Quality Housing and Neighbourhoods**

We note the following policies included in Chapter 5 of the Development Plan which are relevant to the proposed development:

*National and Regional Policy Context*

- **Policy QHSN1 National and Regional Policy** – *'To accord with the provisions of the National Planning Framework 2018, the Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019 (including the Metropolitan Area Strategic Plan) and the Ministerial Circular relating to Structural Housing Demand in Ireland and Housing Supply Targets, and the*

*associated Section 28 Guidelines: Housing Supply Target Methodology for Development Planning (2020) and make provision for the scale of population growth and housing supply targets outlined in these plans and guidelines.'*

- **Policy QHSN2 National Guidelines** – *'To have regard to the DEHLG Guidelines on 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007), 'Sustainable Urban Housing: Design Standards for New Apartments' (2020), 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual: A Best Practice Guide' (2009), Housing Options for our Aging Population 2020 and the Design Manual for Urban Roads and Streets' (DMURS) (2019).'*

**Response:** The proposed development has been designed with due regard to the relevant national and regional planning policies and guidelines as set out in Section 5 above. As set out above, the density recommendations included in the Sustainable Residential Development Guidelines 2009 must be considered in the context of the much more recent policies included in the NPF and Building Height Guidelines 2018 which place significantly greater emphasis on the importance of achieving a compact urban form including increased residential densities in urban areas, as set out above. The Development Plan has been prepared in the context of the NPF which advocates an approach of consolidation and densification in the city and also in the context of the EMRA RSES which further endorses the NPF's principles of consolidation, brownfield development, densification and compact growth. We also note that the Development Plan states that *"There will be continued consolidation of the city to optimise the efficient use of urban land. **Higher densities will be promoted** in the city centre, within KUVs, certain SDRAs and **within the catchment of high capacity public transport**. The goal is to provide for a compact city with attractive mixed-use neighbourhoods, a variety of housing types and tenure, adequate social and community infrastructure and adaptable housing, where people of all ages will choose to live as a matter of choice."*

#### *Compact Growth and Densification*

- **Policy QHSN6 Urban Consolidation** – *'To promote and support residential consolidation and sustainable intensification through the consideration of applications for infill development, backland development, mews development, re-use/adaption of existing housing stock and use of upper floors, subject to the provision of good quality accommodation.'*
- **Policy QHSN10 Urban Density** – *'To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.'*
- **Objective QHSNO4 Densification of Suburbs** – *'To support the ongoing densification of the suburbs and prepare a design guide regarding innovative housing models, designs and solutions for infill development, backland development, mews development, re-use of existing housing stock and best practice for attic conversions.'*

**Response:** The higher densities of the proposed development are appropriate in the context of the Urban Development and Building Height Guidelines 2018. The subject site is underutilised, and given its 'Central and/or Accessible' location (as defined under Section 2.4 of the Apartment Guidelines 2022) or location within a 'Public Transport Corridor' defined as a 'Key Location' for increased heights and density in Appendix 3 of the Development Plan, is suitable for a high-density residential development and increased building heights. Appendix 3 of the Development Plan acknowledges that *"There is recognised scope for height intensification and the provision of higher densities at designated public transport stations and within the catchment areas of major public transport corridors."* These are noted to include bus connects routes and core bus corridors. The subject site, as noted previously, is directly proximate to existing high capacity, high frequency bus routes. Therefore, the subject site is suited for the higher density proposed.

Appendix 3 of the Development Plan further states that *“Locations for intensification must have reasonable access to the nearest public transport stop. In line with national guidance, higher densities will be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station in the plan.”* As 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, which are served by Bus Route No. 123 (with a peak frequency every 10 mins), is considered to be an ‘Inner Suburban’ site, and therefore appropriate for increased heights and density over that of the prevailing context in the area.

The proposed development has been designed to respond positively to the criteria of the accompanying Urban Design Manual, and this has been set out in the Architectural Design Statement prepared by STW.

The high-quality architecture proposed (as set out in the STW Architectural Design Statement) will result in a development which will integrate with the character of the area.

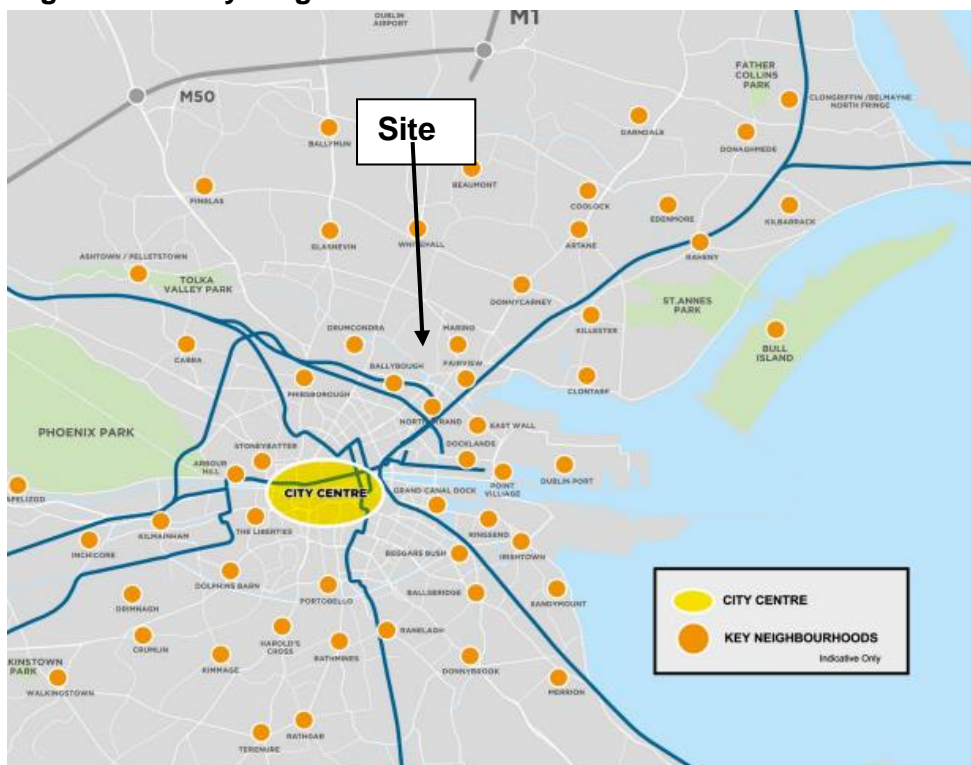
#### *Healthy Placemaking and the 15 minute City*

Section 5.5.3 of the Development Plan notes that a core objective is to promote the principle of the 15-minute city, stating that *“the 15-minute city concept envisages that within 15 minutes on foot or bike from where they live, that people should have the ability to access most of their daily needs.”*

- **Policy QHSN11 15-Minute City** – *‘To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.’*

**Response:** The proposed development is fully consistent with and supports the core principles of the 15-minute city concept by providing a mix of uses in a sustainable urban neighbourhood, and delivering new connections and permeability in what is currently a large underutilised landbank, which will provide a place to work, live, shop and also provides recreational areas (public open space) which is within walking distance of a range of essential and recreational services, public transport, facilities and amenities in Dublin City Centre and neighbourhoods in Drumcondra and Fairview.

Figure 6.12: Key Neighbourhoods



Source: Dublin City Development Plan 2022-2028

- **Policy QHSN12 Neighbourhood Development** – ‘To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing. Promote developments which:
  - Build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places;
  - Integrate active recreation and physical activity facilities including community centres and halls as part of the 15-minute city;
  - Encourage sustainable and low carbon transport modes through the promotion of alternative modes and ‘walkable communities’ whereby a range of facilities and services will be accessible within short walking or cycling distance;
  - Promote and implement low traffic neighbourhoods to ensure a high quality built environment and encourage active travel in delivering the 15 minute city model.
  - Promote sustainable design through energy efficiency, use of renewable energy and sustainable building materials and improved energy performance;
  - Promote the development of healthy, liveable and attractive places through public realm and environmental improvement projects;
  - Cater for all age groups and all levels of ability / mobility and ensuring that universal design is incorporated to maximise social inclusion;
  - Provide the necessary inclusive community facilities and design features to promote independence for older people and to maximise quality of life;
  - Have regard to the Guiding Principles for ‘Healthy Placemaking’ and ‘Integration of Land Use and Transport’ as set out in the Regional Spatial and Economic Strategy and national policy as set out in ‘Sustainable Residential Development in Urban Areas’ and the ‘Design Manual for Urban Roads and Streets (DMURS)’;
  - Are designed to promote safety and security and avoid anti-social behaviour’



**Response:** The proposed development will create a unique high-quality mixed-use area, located within the Inner suburban area and will create a new urban place which integrates within the site's existing context. The proposal includes a community hub/library which includes community floorspace. All public areas have been designed with DMURS and Part M in mind enabling users with reduced mobility to move easily throughout the scheme.

The proposed development has been designed to ensure walking and cycling is a safe, attractive, and feasible mode of transport for future residents and users of the development by creating a highly permeable development that also provides permeability within the design. A Road Safety Audit has been undertaken by Bruton Consulting and is submitted with the application (please refer to OCSC reports and drawings for further details on how any recommendations have been addressed).

Additionally, the proposed landscaping will foster safe and secure outdoor spaces within the proposed development. A lighting plan will ensure that this sense of security will be maintained throughout the evening. Good privacy and defensible urban spaces are also provided through suitable landscaping and balcony finishes.

With reference to safety and security, communal and public open spaces will benefit from passive surveillance from apartments within the scheme; with the intention to avoid anti-social behaviour. Detail on the design measures integrated into the scheme are set out in the STW Design Statement.

**Policy QHSN16 – Accessible Built Environment**

*To promote built environments and outdoor shared spaces which are accessible to all. New developments must be in accordance with the seven principles of Universal Design as advocated by the National Disability Authority, Building For Everyone: A Universal Design Approach 2012 and consistent with obligations under Article 4 of the United Nations Convention on the Rights of People with Disabilities.*

**Response:** As set out in the Architectural Design Statement, all public areas have been designed in accordance with Part M of the Building Regulations. This will enable users with reduced mobility to move easily throughout the scheme. The design includes appropriate accessible parking spaces and dipped kerbs, tactile paving and other landscape features to improve accessibility for a wide variety of users with impaired mobility.

**Policy QHSN17 – Sustainable Neighbourhoods**

*To promote sustainable neighbourhoods which cater to the needs of persons in all stages of their lifecycle, e.g. children, people of working age, older people, people living with dementia and people with disabilities.*

**Response:** The proposed development will provide a range of unit sizes and tenures catering for a broader cohort of the population and supporting the creation of a more sustainable neighbourhood.

**Policy QHSN21 – Gated Residential Development**

*It is the policy of Dublin City Council to support the creation of a permeable, connected and well-linked city and to avoid gated residential developments which exclude the public and local community and prevent development of sustainable neighbourhoods.*

**Response:** The proposal does not include gated residential development and the scheme will be open to the general public. A key principle in the success of new residential and mixed use development is placemaking which fosters community and provides facilities which encourage interaction and community growth, set in the context of integration and enrichment of the wider community in which it sits. The development is designed to create a variety of attractive, connected spaces and places based on active movement (pedestrians, cyclists, etc) with limited vehicle movement.

The proposed development improves the connectivity of the wider area by delivering a highly permeable development along the public streets through Grace Park Wood and Griffith Court residential developments.

**Policy QHSN22 – Adaptable and Flexible Housing**

*It is the Policy of Dublin City Council: To ensure that all new housing is designed in a way that is adaptable and flexible to the changing needs of the homeowner as set out in the Lifetime Homes Guidance contained in Section 5.2 of the Department of the Environment, Heritage and Local Government's 'Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities' (2007) and the Universal Design Guidelines for Homes in Ireland 2015.*

**Policy QHSN23 – Independent Living**

*To support the concept of independent living and assisted living for older people, to support and promote the provision of specific purpose-built accommodation, including retirement villages, and to promote the opportunity for older people to avail of the option of 'rightsizing', that is the process of adjusting their housing to meet their current needs within their community.*

**Policy QHSN25 – Housing for People with Disabilities**

*It is the Policy of Dublin City Council: To support access, for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated and sustainable manner, which facilitates equality of outcome, individual choice and independent living. To support the provision of specific purpose-built accommodation, including assisted/ supported living units, lifetime housing, and adaptation of existing properties.*

**Objective QHSNO11 – Universal Design**

*It is an Objective of Dublin City Council: To ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H's Design Manual for Quality Housing 2022 and the DHP&LG & DH's Housing Options for Our Ageing Population Policy Statement 2019.*

**Response:** In response to the policies and objectives above, STW's Architectural Design Statement and Statement of Response demonstrates that the development will provide the required mix of apartments (50% of apartments in excess of the minimum sizes which is 247 no. units) as suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, subject to the criteria set out in the Section 28 Guidelines Sustainable Urban Housing: Design Standards for New Apartments 2020, to ensure that they are suitable for older people, mobility impaired people and people with disabilities. The Design Statement outlines how a 2-bed apartment could be converted to comply with Universal Design Guidelines for Homes in Ireland 2015.

All public areas have been designed with DMURS and Part M in mind enabling users with reduced mobility to move easily throughout the scheme. Care has been taken to design entrances which will be well lit and clearly signposted. These entrances also provide sheltered spaces at the threshold ensuring suitability for a range of users.

As required under current Building Regulations, all of the proposed units within the development have been designed to be compliant with Technical Guidance Document M of the Building Regulations 2010, and the Apartment Guidelines 2020 / 2022. The design includes appropriate accessible parking spaces, dipped kerbs, tactile paving and other landscape features which improve accessibility for a wide variety of users with impaired mobility.

We refer to STW's Architectural Design Statement which provides further detail.

**Policy QHSN35 – Diversity of Housing Type and Tenure**

*To support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing, new models of cost rental and affordable homeownership and co-operative housing.*

**Response:** The proposed development provides a mix which includes social housing units, build to rent units and standard design apartments.

The proposed mixed-use development will provide a sustainable community through the inclusion of a mix of uses which will cater for future residents, without the reduced need for the use of a car. The proposal will provide high quality housing and well-designed, safe and inclusive public spaces which is served by local services and amenities located in Drumcondra and Fairview.

**Specific Housing Typologies**

The following policies are noted:

**QHSN36 High Quality Apartment Development**

*To promote the provision of high-quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood.*

**Response:** In addition to the public open space, publicly accessible community and social facilities are proposed as part of the development. The development includes the reuse of the existing hospital building (a protected structure), referred to as Block K for the benefit of the proposed residents and public. Block K includes a community hall (243 sq.m), a community library (730 sq.m), creche (730 sq.m), co-working spaces (817 sq.m), café (160 sq.m) and gym (1,459 sq.m). There is also a retail unit proposed in Block A and a café in Block F for the benefit of the local community.

As set out in the SCIAA prepared by JSA, the existing and proposed uses within the catchment area offer excellent service provision for the community. The surrounding area also benefits from other community, social, and religious infrastructure, including community centres, and places of worship.

Please refer to Architectural Design Statement and SCIAA prepared by JSA.

**QHSN37 Houses and Apartments**

*To ensure that new houses and apartments provide for the needs of family accommodation with a satisfactory level of residential amenity in accordance with the standards for residential accommodation.*

**Response:** The proposed development has been designed to achieve a high standard of residential amenity for all apartments, and this is set out in the Housing Quality Assessment prepared by STW. In addition, the proposed development includes play activities for a wide range of ages. The proposed development meets and where possible exceeds the standards set out in the Apartment Guidelines 2020, and therefore will provide for a high standard of amenity for all future occupants.

The development includes natural play areas (420 sq.m) and an area for allotments (295 sq.m) in the northwestern part of the site which promotes health & wellbeing, learning & social interactions and the needs for families.

**Policy QHSN38 – Housing and Apartment Mix**

*To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities.*

Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.

**Response:** The proposed development is not located within the North East Inner City sub-area, which is identified for a specific unit mix policy within the Development Plan Housing Need and Demand Assessment (Appendix 2 of the Development Plan). Therefore, the site is not subject to further unit mix requirements and the proposed unit mix is compliant with the standards set out in the Development Plan / SPPR 1 of the Guidelines (as it does not propose in excess of 50% studio / 1 bed units) set out below:

**Table 6.1: Unit Mix Provisions for Proposed Residential Development**

SDA –	BTR-	Total
10 X studios (2%)	8 studios (2.5%)	18 X studios (2%)
236 X 1beds (48%)	151 1 beds (48%)	387 X 1 beds (48%)
199 X 2beds (40%)	150 2 beds (47%)	349 X 2 beds (43%)
49 X 3beds (10%)	8 3 beds (2.5%)	57 X 3 beds (7%)

### **Policy QHSN39 – Management**

*To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas in the context of the Multi Unit Developments Act 2011 and the Property Services (Regulation) Act 2011.*

**Response:** The Operational Management Plan prepared by Hooke MacDonald sets out details in respect of the operational management aspects of the proposed residential development.

#### **6.1.5.1 Build to Rent (BTR)**

Policy QHSN40, relating to Build to Rent Accommodation, states the following:

*“To facilitate the provision of Build to Rent (BTR) Accommodation in the following specific locations:*

- Within 500 metre walking distance of a high employment area i.e. more than 500 employees per hectare.*
- Within 500 metres of major public transport interchanges (e.g. Connolly Station, Tara Street Station and Heuston Station), and*
- Within identified Strategic Development Regenerations Areas.”*

**Response:** We refer to the accompanying BTR Justification Report prepared by John Spain Associates in response to Policy QHSN40 of the Development Plan and Item No. 2(a) and (b) of DCC's LRD Opinion

From the outset, in the context of Policy QHSN40 that, we note that this policy states 'to facilitate', i.e. this is a possible intent for the location and these are not stated as mandatory requirements for all build to rent developments and therefore build to rent developments can still be permitted for other locations including inner suburban locations such as the subject site.

The BTR Justification Report demonstrates that there is a range of businesses around the site and is within reasonable walking and cycling distance to employment nodes within the city centre and therefore the site is suitable for the proposed BTR element of the overall development. This report acknowledges that although the site is not within 500m and 1,000m of a public transport interchange, as set out in Policy QHSN40, there is a significant number of bus stops within 500 and 1,000m from the site which is served by several bus routes which operate frequently. Having regard to above, the



site is considered to be suitable for Build to Rent developments having regard to being within reasonable walking distance to significant employment locations and access to public transport.

The proposed development includes the provision of a new hospital providing mental health services with a total staff of c. 200 no. persons and is considered to be a significant employment location as defined under Section 2.4 of the Apartment Guidelines 2020 which states “*Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or **significant employment locations, that may include hospitals and third-level institutions***”.

In addition to the site's accessibility, the site is also suitably located for a Build to Rent development having regard to its proximity to major employment hubs, with a number of strategic employment centres being within a convenient walking / cycling distance, including the city centre.

As illustrated the BTR Justification Report, there is also significant local employment opportunities in close vicinity of the site including c. 94 employment locations within 500m and c. 399 employment locations within 1,000m from the site.

Having regard to above the site is considered to be suitable for Build to Rent developments given the reasonable walking and cycling distance to significant employment locations.

Policy QHSN40 continues by stating “*There will be a general presumption against large scale residential developments (in excess of 100 units) which comprise of 100% BTR typology. To ensure there are opportunities for a sustainable mix of tenure and long term sustainable communities, a minimum of 60% of units within a development must be designed as standard apartments in accordance with the requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, December 2020.*”

**Response:** The proposed development provides for a total of 494 no. standard designed apartments and 317 no. BTR units and therefore exceeds the 60% of units required within a development to be designed as standard apartments in accordance with the requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, December 2020 / 2022.

Policy QHSN40 continues by stating “*There will be a presumption against the proliferation and over concentration of BTR development in any one area. In this regard, applications for BTR developments should be accompanied by an assessment of other permitted and proposed BTR developments within a 1km radius of the site to demonstrate:*

- *that the development would not result in the overconcentration of one housing tenure in a particular area and take into account the location of the proposed BTR.*
- *how the development supports housing need, particularly with regard to tenure, unit size and accessibility with particular reference to the Dublin City Council Housing Need and Demand Assessment.*

**Response:** We have carried out an assessment for other permitted or proposed Build to Rent developments within 1km of the subject site. As outlined below, there is only 1 no. BTR development of 183 no. units which is currently under consideration at No. 146A and 148-148A Richmond Road, Dublin 3 under SHD ABP Ref.: 312352-21. An Bord Pleanála permitted a BTR development of 1,614 units at Clonliffe Road Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9 under SHD ABP Ref.: 310860-21 however this decision was recently quashed by the Courts and therefore is not accounted for when considering the concentration of BTR schemes within 1km of the subject site. The accompanying report therefore demonstrates that the proposed development, in combination with existing / permitted BTR development, will not result in over proliferation of the Build to Rent units in the area as required under the Development Plan.

**Table 6.2: BTR Developments within 1km of the subject site**

No.	Ref.	Decision	Address	No. of BTR Units
1	SHD ABP Ref.: 312352-21	Under consideration (Case is due to be decided by 22/04/2022)	No. 146A and 148-148A Richmond Road, Dublin 3	183
<b>Total</b>				183

**Figure 6.13: Proximity to Other Permitted and Proposed BTR Schemes within 1km from the edge of the site**

We understand that an apartment scheme, which is operating as a PRS scheme, of c. 377 no. units at Griffith Wood (granted under ABP Ref.: 303296-18) is within 1km of the subject site. It should be noted that while this scheme is operating as a PRS, this was applied as a standard apartment scheme in accordance with the Apartment Guidelines and it is not permitted as a Build to Rent development. Therefore it is not considered appropriate or necessary in the context of Policy QHSN40 to include in the study which considers whether there is an over-proliferation of Build to Rent schemes within 1km from the periphery of the site as Griffith Woods is not a BTR scheme. The report demonstrates that the proposed development will not result in over proliferation of the Build to Rent units in the area as required under the Development Plan.

The accompanying report 'Justification for Proposed BTR and Amenity Areas' prepared by CBRE notes that there is a limited supply of institutionally owned rental stock in the vicinity of the subject site. The report notes the PRS scheme Griffith Wood on Griffith Avenue which is heavily oversubscribed, with a significant waiting list of prospective tenants. The report states new supply in the vicinity is desperately required and the rental market would easily absorb the proposed BTR units on the subject site. The BTR Justification Report also states that the location of the proposed BTR development is hugely attractive from a rental perspective due to its proximity to the city, nearby employment hubs and educational/medical facilities. Therefore the proposed development will greatly assist in meeting the housing needs of the area.

In response to 'how the development supports housing need, particularly with regard to tenure, unit size and accessibility with particular reference to the Dublin City Council Housing Need and Demand Assessment' the proposed mix for the BTR development of 8 studios (2.5%), 151 1 beds (48%), 150 2 beds (47%) and 8 3 beds (2.5%) (317 BTR units) is considered to be appropriate. In support of the proposed unit mix, we note that population statistics and demand support the provision of smaller units in DCC administrative areas, particularly the subject site which is well served by public transport. The following is noted:

- Census 2016 data for the Drumcondra South A Electoral Division, which the subject site is located within, indicates that 1 and 2 person households represent the majority of private households (59%). 3+ person households represent 41% of the total private households. As expected for a Dublin City electoral area, these percentages exceed the national average of 52% of private households being 1 and 2 person households
- Furthermore, census data indicates that there is a predominance of houses/bungalows in the area, representing 60% of the type of accommodation compared to only 36% flat/apartments. Therefore, there is a greater supply of larger housing types in the area at present, representing a significant imbalance when compared with number of 1 and 2 person households. Thus, it is submitted that it is appropriate to provide a greater provision of smaller unit types within a infill residential development at a strategic location adjacent to high quality public transport.
- 26% of the private households rented from private landlords.
- 61% of the households have 4+ rooms which equates to larger units and bedrooms.

Thus, it has been demonstrated in this application, that the proposed unit mix is appropriate for this small scale BTR development, on an infill site, adjacent to public transport, and has regard to the unit mix in the wider area and likely demand going forward.

Having regard to above the proposed provision of Build to Rent units is considered to be acceptable and compliant with Policy QHSN40.

Section 5.5.7 of the Development Plan provides further guidance in assessing the matter of overconcentration, regard must be given to the following:

- the number and scale of other permitted and proposed BTR development in the vicinity (within a 1km radius) of the site,
- the household tenure and housing type of existing housing stock in the approximate vicinity (within a 1km radius) of the site,
- and the proximity of the proposal to high capacity urban public transport stops and interchange (such as DART, Luas and BusConnects).

**Response:** As outlined above, having regard to the permitted and proposed BTR schemes within 1km of the site, the proposal for 317 no. build to rent apartments is not considered to result in the proliferation and over concentration of BTR development in the area.

In support of the proposed unit mix, we refer to the population statistics above which supports the provision of smaller units in DCC administrative areas, particularly the subject site which is well served by public transport.

The application site is in an 'Inner Suburban' and accessible location. The site is also 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.

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 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.

In respect to the connection to Grace Park Wood, the adjacent landowner has provided a letter of consent to confirm their agreement to including the proposed connection as part of this application as included within the site layout plan red line boundary, and note that this was envisaged in the application documentation for their lands.



In response to Policy QHSN40, the summary rationale for the proposed Build to Rent development at St. Vincent's Hospital is as follows:

- The Justification for Proposed BTR and Amenity Areas prepared by CBRE notes that there is a limited supply of institutionally owned rental stock in the vicinity of the subject site. The report notes the PRS scheme Griffith Wood on Griffith Avenue which is heavily oversubscribed, with a significant waiting list of prospective tenants. The report states new supply in the vicinity is desperately required and the rental market would easily absorb the proposed BTR units on the subject site.
- The BTR Justification Report also states that the location of the proposed BTR development is hugely attractive from a rental perspective due to its proximity to the city, nearby employment hubs and educational/medical facilities. The site is well located in respect to public transport provision and therefore is suitable for BTR development.
- The housing mix and tenure in the immediate surrounding area primarily consists of more traditional family housing with a high percentage of owner-occupied homes or individual units let for renting. Thus, the opportunity exists for more professionally managed high quality rental schemes in the area, such as that proposed.
- At a macro level there is a clear trend in Dublin towards renting in comparison to home ownership. The total numbers of households renting has grown considerably between 2002 and 2016. According to recent census data from the CSO, 29% of Ireland's population is now renting with higher rents within Dublin (36%) and the other main cities. There is a need for affordable housing and rental units. The proposed development seeks to provide for more affordable units and increase the supply of rental apartment units.
- As outlined in Appendix 1 of the Housing Strategy (forming part of the Development Plan) and Housing Need Demand Assessment, 4,088 additional private rental units are estimated to be sufficient to meet the needs of the private rental sector in Dublin City over the next six year Development Plan period. This represents 15% of the total housing need, of which 777 no. households comprise existing unmet need. We would argue that these figures greatly underestimate the rental needs of Dublin City and a significant increase of rental units are required to be met the unmet rental needs of the City, including significantly more than 777 no. households experiencing unmet housing need. The proposed 317 no. BTR units will help to meet the rental needs of the city within a scheme of exceptional architectural and amenity value, at an appropriate and accessible location.
- It is submitted that the proposed development, comprising 317 BTR units, is justified, not only from a need and demand perspective, but also having regard to existing policy provision and the location of the site in proximity to existing and planned services and facilities. The proposed development will facilitate a balance within the housing market providing for an alternative form to the traditional house and offering a cost rental product not immediately available in the area.
- The proposed development will accommodate the development of a new sustainable community which will be capable of integration into the existing and proposed new neighbourhood structure with adequate apartment services and facilities and communal open space.
- The Apartment Guidelines 2020 specifically supports the delivery of BTR developments in central / accessible urban locations, such as the subject site.

#### 6.1.5.2 Social and Community Infrastructure

The following policies are noted:

#### **Policy QHSN47 – High Quality Neighbourhood and Community Facilities**

*It is the Policy of Dublin City Council to encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. To also protect existing community uses and retain them where there is potential for the use to continue."*

**Response:** As detailed in STW Architectural Design Statement and Architectural Conservation Report, the proposed development will deliver a range of high-quality neighbourhood and community facilities including a new hospital, a community hall, library (with flexible community co-working multifunctional spaces), a public plaza, public open space, a creche, and children's play areas.

**QHSN46 Community and Social Audit**

*To ensure that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Refer to Section 15.8.2 of Chapter 15: Development Standards*

**QHSN011 Community Infrastructure Audit SDRAs**

*To carry out and maintain an audit of community infrastructure for Strategic Development and Regeneration Areas, where appropriate.*

**Response:** With reference to the above, a Social Community Infrastructure Audit and Assessment has been prepared by John Spain Associates which details the wide and varied range of existing community facilities in the area. The proposal includes high quality neighbourhood/community facilities in the form of a new hospital and associated grounds, a significant and substantial community hub/library, a gym, and a childcare facility (730 sq. m).

**QHSN012 Community Safety Strategy**

*That all housing developments over 100 units shall include a community safety strategy for implementation.*

**Response:** We refer to Architectural Design Statement prepared by STW for further details of how the development has been designed to promote safety and security and avoid anti-social behaviour by using the following methods:

- All routes and open spaces are overlooked by apartments to ensure passive surveillance.
- Avoided blank facades or enclosed public areas.
- There are no leftover pockets of land with no clear purpose - all open space is open and has a function to generate activity
- All spaces are well lit. IN2 have designed a site lighting strategy - see separate IN2 drawing.
- There is a clear distinction between private, communal and public open spaces - as set out in the Landscape Design by NMP.
- Main entrances are overlooked from adjacent apartments and well-trafficked public areas.
- Vehicular traffic is limited by the site layout and landscape design.
- All pedestrian and cycling routes through and around the site have been set out to provide safe edge treatment, clear sightlines and clear visibility of the route ahead

**Policy QHSN50 Sláintecare Plan**

*To support the Health Service Executive and other statutory, voluntary, private agencies and community based services in the provision of appropriate healthcare facilities - including the system of hospital care and the provision of community-based primary care facilities, mental health, drug and alcohol services} and wellbeing facilities including Men's Sheds - and to encourage the integration of healthcare facilities in accessible locations within new and existing communities in accordance with the government Sláintecare Plan.*

**Response:** In accordance with this Policy, the development includes 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 providing mental health services and to provide an appropriate utilisation of the overall landholding in St. Vincent's Hospital Fairview control. St. Vincent's Hospital Fairview is

seeking to provide a hospital providing mental health services 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 facility, 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 providing mental health services 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.

#### **6.1.6 City Economy and Enterprise**

##### ***Policy CEE30 Hospitals and Healthcare***

*To recognise that hospitals and the wider healthcare sector are crucial to the wellbeing of the city, including as major sources of employment, economic development and innovation; and to promote and facilitate their development and expansion*

**Response:** The proposed new hospital providing mental health services is a significant piece of community and social infrastructure proposed on the subject lands.

#### **6.1.7 Sustainable Transport**

Dublin City Council acknowledges the importance of transitioning to low carbon mobility solutions to mitigate against climate change and will continue to address this through an integrated set of policies and objectives.

According to the Development Plan, parking policies seek to limit car parking at destination while the need to travel generally is minimised by designing mixed used layouts where people can live close to where they work and have access to a range of community facilities and services in short walking and cycling times or accessed by high quality public transport links i.e. the 15-minute city.

The Development Plan outlines that Dublin City Council also supports the development of mobility hubs, the aim of which is to encourage varied and sustainable types of transport in areas that are close to existing public transport links with high concentrations of employment, housing, shopping, amenities and recreation. A mobility hub is a place of connectivity where different travel options such as walking, cycling, public transport and shared mobility services, are located together to facilitate ease of access and transition between transport modes. Together with quality public realm and place making, mobility hubs can help create vibrant and liveable places to support the transportation experience.

Under Objective SMT023, it is an Objective of Dublin City Council to initiate and/or implement a road schemes for Richmond Road within the six year period of the development plan, subject to the availability of funding and environmental requirements and compliance with the 'Principles of Road Development' set out in the NTA Transport Strategy.

**Response:** We note this objective was carried over from the Development Plan 2016-2022. As outlined in OCSC's Traffic Impact Statement, the upgrading of Richmond Road will be of great benefit to the development and will improve capacity and accessibility along this road. The application includes for footpath improvements along the frontage of the application site. These will be complementary to other improvements proposed by others in other recent / current applications, such

as Leyden's LRD to the south of the site. The remainder of the upgrades will need to be brought forward by the Planning Authority through their own powers.

#### 6.1.7.1 Car Parking

The Development Plan outlines the following:

##### **Policy SMT1 – Modal Shift and Compact Growth**

*To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth."*

**Response:** The proposed development will encourage the use of more sustainable forms of transport by creating a highly permeable development that prioritises the provision of active transport infrastructure and the safety of pedestrians and cyclists.

##### **SMT7 Travel Plans for New and Existing Developments**

*To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.*

**Response:** The proposed development includes a Mobility Management Plan, prepared by OCSC Consulting Engineers.

##### **Policy SMT11 – Pedestrian network**

*To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.*

**Response:** The development provides for an opportunity to improve and expand the pedestrian network by making new transitional linkages between the St. Vincent's site and the surrounding parts of Fairview including Richmond Road, Grace Park Wood and Griffith Court. All public areas have been designed with DMURS and Part M of the Building Regulations in mind enabling users with reduced mobility to move easily throughout the scheme.

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.

##### **SMT13 Urban Villages and the 15-Minute City**

*To support the role of the urban villages in contributing to the 15-minute city through improvement of connectivity in particular for active travel and public realm enhancement.*

**Response:** The proposed development includes significant enhancements to the public realm which will provide an attractive frontage to Richmond Road and connections / permeability through the site. The proposed development is within easy walking distance to the centre of Drumcondra or Fairview. The development also provides for residential amenity areas, community facilities, gym, café, coworking spaces, library, childcare facility, and community hall.



**Objective SMT02 – Improving the Pedestrian Network**

*To improve the pedestrian network, and prioritise measures such as the removal of slip lanes, the introduction of tactile paving, ramps, raised tables and kerb dishing at appropriate locations, including pedestrian crossings, street junctions, taxi ranks, bus stops and rail platforms in order to optimise safe accessibility for all users.*

**Response:** As outlined above, the development provides for an opportunity to improve and expand the pedestrian network by making new transitional linkages between the St. Vincent's Hospital site and the surrounding parts of Fairview including Richmond Road, Grace Park Wood and Griffith Court. We refer to Architectural Design Statement and Landscape Design Report for further details on the proposed materials for the pedestrian linkages and details of the public open space.

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.

**Policy SMT16 – Walking, Cycling and Active Travel**

*To prioritise the development of safe and connected walking and cycling facilities and prioritise a shift to active travel for people of all ages and abilities, in line with the city's mode share targets.*

**Response:** The proposed development has been designed to promote the use of active transport where possible by designing a permeable development that prioritises the safety and convenience of pedestrians and cyclists. The level of cycle parking provided within the development and reduced car parking provision, as set out in Section 4, is to encourage active travel by residents of the scheme.

**Policy SMT18 – The Pedestrian Environment**

*To continue to maintain and improve the pedestrian environment and strengthen permeability by promoting the development of a network of pedestrian routes including laneway connections which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe, accessible to all in accordance with best accessibility practice.*

**Response:** The proposed development will improve connectivity for pedestrians by allowing the public to pass through the development through the inclusion of connections to Griffith Court and Grace Park Wood. The site is surrounded to the east and west by existing streets, which provide north south permeability in the area.

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.

**Objective SMT012 – Cycle Parking Spaces**

*To provide publicly accessible cycle parking spaces, both standard bicycle spaces and non-standard for adapted and cargo bikes, in the city centre and the urban villages, and near the entrance to all publicly accessible buildings such as schools, hotels, libraries, theatres, churches etc. as required.*

**Objective SMT013 - Design Standards for Cycle Parking in Developments**

*To prepare, within two years of the adoption of the Plan, a comprehensive guide setting out design standards and requirements for cycle parking in developments.*

**Objective SMT012 – Cycle Parking Facilities**

*To promote and facilitate, in co-operation with key agencies and stakeholders, the provision of high-density cycle parking facilities, as well as parking for cargo and adapted bicycles at appropriate locations, taking into consideration the NTA's GDA Cycle Network Plan, and Dublin City Council's Public Realm Strategy.*

**Response:** With reference to the above, the proposed development provides the following cycle parking facilities:

- Hospital – 50 including 48 long stay spaces (85 staff) and 8 short stay spaces (73 beds).
- Residential - 1,680 no. cycle spaces including 1,274 no. long stay and 406 no. visitor spaces. 947 no. cycle spaces (including cargo and electric) at basement level and 733 no. spaces at surface level.
- Commercial/community uses – 84 no. spaces at surface level

**Policy SMT29 – Expansion of the EV Charging Network**

*To support the expansion of the EV charging network by increasing the provision of designated charging facilities for Electric Vehicles on public land and private developments in partnership with the ESB and other relevant stakeholders; and to support the Dublin Regional EV Parking Strategy.*

**Response:** The proposed development includes 167 no. EV parking spaces which equates to 50% of standard spaces. All other spaces will be future proofed for EV parking.

**Policy SMT33 – Design Manual for Urban Roads and Streets**

*To design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) and to carry out upgrade works to existing road and street networks in accordance with these standards where feasible.*

**Response:** The proposed development has been designed in accordance with the principles, approaches and standards contained within the Design Manual for Urban Roads and Streets (DMURS) as set out in the DMURS Compliance report prepared by OCSC.

**SMT 27 Car Parking in Residential and Mixed Use Developments**

- To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking.*
- To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking.*
- To safeguard the residential parking component in mixed-use developments."*

**Response:** With regard to the above, the proposed development provides a sustainable level of car parking for the subject site, consistent with the site's location close to bus routes. The development is considered appropriate for reduced car parking provision in accordance with the Development Plan, and also the Apartment Guidelines 2020 / 2022. The proposal also includes a total of 329 no. car parking spaces comprising 247 no. car parking spaces allocated in the basement for the residential element 76 no. spaces allocated to the new hospital and 9 no. spaces for the commercial/community uses. 50% of spaces will have electric vehicle charging points.

**6.1.8 Sustainable Environmental Infrastructure**

According to the Development Plan, the improvement of sustainability in terms of energy, water, waste management and resource efficiency are key future growth enablers for Dublin's development. The following policies are noted:

**Policy SI1 – Support for Irish Water**

*To support and facilitate Irish Water in the provision of high quality drinking water, water conservation and drainage infrastructure and to promote the ongoing upgrade and expansion of water supply and wastewater services to meet the future needs of the city and the Region.*

**Response:** As detailed in the Engineering Services Report, Irish Water have issued a confirmation of feasibility for the proposed development (attached to the application form also).

**Policy SI2 - Integrating Water Services with Development**

*To ensure that development is permitted in tandem with available water supply and wastewater treatment and to manage development, so that new schemes are permitted only where adequate capacity or resources exist or will become available within the life of a planning permission.*

**Response:** We refer to the Engineering Services Report prepared by OCSC Consulting Engineers, and response provided above.

**Policy SI3 - Separation of Foul and Surface Water Drainage Systems**

*To require all new development to provide separate foul and surface water drainage systems.*

**Response:** As set out in the OCSC Engineering Services Report, the proposed development separates foul and surface water drainage.

**Policy SI4 - Drainage Infrastructure Design Standards**

*To require new private development sewers which are intended to connect to the public drainage system to comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul sewer specification (where applicable).*

**Response:** We refer to the Engineering Services Report prepared by OCSC Consulting Engineers, and response provided above.

**6.1.9 Built Heritage**

The Development Plan notes that all works to protected structures shall be carried out to the highest standards in accordance with the Architectural Heritage Protection Guidelines for Planning Authorities (Department of Arts, Heritage and the Gaeltacht, 2011).

**Policy BHA2 Development of Protected Structures**

*That development will conserve and enhance Protected Structures and their curtilage and will:*

- a) *Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the 'Architectural Heritage Protection Guidelines for Planning Authorities' 2011 published by the Department of Culture, Heritage and the Gaeltacht.*
- b) *Protect Structures included on the RPS from any works that would negatively impact their special character and appearance.*
- c) *Ensure that works are carried out in line with best conservation practice as advised by a suitably qualified person with expertise in architectural conservation.*
- d) *Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.*
- e) *Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and ensure that new development does not adversely impact the curtilage or the special character of the Protected Structure.*
- f) *Respect the historic fabric and the special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials.*

- g) *Ensure that new and adapted uses are compatible with the architectural character and special interest(s) of the Protected Structure.*
- h) *Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.*
- i) *Ensure historic landscapes, gardens and trees (in good condition) associated with Protected Structures are protected from inappropriate development.*
- j) *Have regard to ecological considerations for example, protection of species such as bats."*

#### **Policy BHA019 Built Heritage and Archaeology**

*To provide for the protection, preservation and promotion of the built heritage, including architectural heritage and archaeological heritage and support the in-situ presentation and interpretation of archaeological finds within new developments.*

**Response:** We refer to Chapter 13- Architectural Heritage and Volume 4- Architectural Impact Assessment of the EIAR prepared by Carrig and Chapter 12- Archaeology and Cultural Heritage of the EIAR prepared by IAC which sets out the approach to conservation strategy for the protected structures on the application site which will be retained and significantly upgraded in conservation terms and sustainable new uses.

As set out in the Architectural Heritage Impact Assessment, the buildings located to the north of the main Convent and Hospital complex array are not considered to be of heritage value, nor contributing to the character of the setting of the designated structures and as such are not described in detail in this assessment report. These buildings accommodate the nurses training school and outbuildings for services and storage. They are proposed for demolition but do not form part of the architectural recording exercise.

#### **Policy BHA24 Reuse and Refurbishment of Historic Buildings**

*Dublin City Council will positively encourage and facilitate the careful refurbishment of the historic built environment for sustainable and economically viable uses and support the implementation of the National Policy on Architecture as it relates to historic buildings, streetscapes, towns and villages, by ensuring the delivery of high quality architecture and quality place-making and by demonstrating best practice in the care and maintenance of historic properties in public ownership.*

**Response:** We refer to the Architectural Heritage Impact Assessment. The proposed development includes the retention refurbishment of existing buildings, as detailed below:

- Rose Cottage: Additional structures for a single storey extension are proposed to the south of the Rose Cottage. The building will be used as storage associated with the new hospital providing mental health services.
- Laundry Building: The retained building of the laundry building will be primary used as a workshop associated with the new hospital providing mental health services.
- *Richmond House (RPS Ref.: 8788)*: The Richmond House will be used for offices, a meeting, a boardroom, and ancillary staff related rooms with a total GFA of 397 sqm.
- *Brooklawn (RPS Ref.: 8789)*
- The Brooklawn House will be used for nursing school with associated rooms including a library and training rooms. The existing kitchen is to be retained at first level and a staff room is proposed to its north with a total GFA of 301 sqm.
- *Block K (partially RPS Ref.: 2032)*: A change of use is proposed for the existing hospital building (referred as Block K). The building which is to be retained will be separated in 4 no. part (K1, K2, K3 and K4) and a fifth part will be added as an extension to the western extremity of the building (referred as Block J). The extension will be used for tenant concierge at ground floor level and residential units at first, second and third floor levels. The Block K1 to the immediate east of the extension will be used for a gym at ground and first levels and for tenants' amenities at second and third levels. The Block K4 to the eastern extremity will be a single storey community hall and the Block K3 to its immediate west will be a 2 storey creche. It is proposed to provide a café and



a community library at ground floor level and co-working spaces at first, second and third floor levels in the central Block K2 of the building.

### 6.1.10 Culture

#### **Policy CUO25 SDRAs and large Scale Developments**

*All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area must provide for 5% community, arts and culture and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need. \*Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.}*

#### **Policy CUO30 Co-Design and Audits**

*Large development applications (over 10,000 sq. m., either in phases or as one application) will, in the absence of a DCC local area culture audit (COU38 refers), be required to undertake a cultural audit for the local area to identify shortcomings within the area; and to work with DCC Arts Office to identify and agree appropriate arts or cultural uses, preferably as part of a co-design process in advance of lodging an application, for inclusion in the development. Such audits shall be informed by the existing cultural mapping resources in the Dublin City Cultural Infrastructure Study and by Culture Near You maps."*

**Response:** Item 2(d) of DCC LRD Opinion states the following in relation to Objective CUO25: *"More weight should be given to the overall proposals within the site including the refurbishment of existing buildings and the provision of a new hospital facility that would on balance provide a wider planning gain across the site towards meeting CUO25."*

In response to the requirements of Objective CUO25, it is submitted that the redevelopment proposals at St. Vincent's Hospital Fairview provides for significant planning benefits including the restoration and reuse of protected structures, and other existing older / historic buildings on site, the provision of a new hospital, c. 1.6 ha of public open space, improved permeability / connectivity in this area of the city, and the provision of 811 residential apartments, including 20% of units for social housing.

The total GFA of the development on the site is 83,672 sq.m, comprising 75,261 sq.m on the residential site and 8,411 sq.m on the hospital site, including the new hospital building and reuse of existing protected structures (St. Vincent's Hospital, Richmond House and Brooklawn) and other historic buildings (the Laundry building, Gate Lodge and Rose Cottage), and which are classified as new community uses proposed as part of this overall mixed use development. The 5% requirement of total floor space arising under CUO25 equates to c. 4,183 sq.m of floorspace being required for community, arts and culture, and artist workspaces.

The proposed development provides the following floorspace to meet this requirement:

- New hospital (including associated administrative buildings for the new hospital) - 8,411 sq.m
- Community Hall – 243 sq.m
- Community Library – 163 sq.m
- Total 8,817 sq.m

Based on the figures above, which do not include the childcare facility, residential amenities and other commercial uses, which will add to the quality and vibrancy of the scheme, it is apparent that

the community / cultural floorspace provision within this development equates to c. 10.54%, which exceeds the 5% requirement under CUO25, and therefore complies with this requirement of the Development Plan. Accordingly, the needs of the future residents within the proposed development regarding community and cultural uses are considered to be more than adequate and the provision will also support existing facilities in the area, thereby addressing the requirements of CUO25.

In relation to the above item of the Opinion and the statement “*More weight should be given to the overall proposals within the site including the refurbishment of existing buildings*”, which reflects other relevant provisions of the Development, the proposal provides for the restoration and reuse of protected structures and historic buildings (including RPS Ref.: 2032, 8788 and 8789). As illustrated in STW's Architectural Design Statement, the existing St. Vincent's Hospital building (RPS Ref.: 2032), referred to as Block K, will be utilised to provide a mixed-use building including a community hall, a community library, a childcare facility, co-working space, a gym, and a café, to be utilised by the local community as well as residential amenity areas for the proposed residential units, as follows:

**Figure 6.14: Proposed Uses in the St. Vincent's Hospital Buildings, RPS Ref.: 2032**

Cultural/Community	Building	Area
Community Hall	K4	243 m <sup>2</sup>
Creche	K3	730m <sup>2</sup>
Community Library	K2	163 m <sup>2</sup>
Cafe	K2	160m <sup>2</sup>
Co-working	K2	817 m <sup>2</sup>
Gym	K1	1,459m <sup>2</sup>
Residents' Amenties	K1	711m <sup>2</sup>
<b>Total</b>		<b>4,283m<sup>2</sup></b>

Source: STW's Architectural Design Statement

Therefore, taking the above floorspace into account which is being delivered through the reuse of the St. Vincent's Hospital buildings (protected structures under RPS Ref.: 2032) for a mix of community, commercial and ancillary residential uses, this increases the floorspace provision for Objective CUO25 as follows:

- New hospital (including associated administrative buildings for the new hospital in existing protected structures / historic buildings) - 8,411 sq.m
  - Community Hall – 243 sq.m
  - Community Library – 163 sq.m
  - Childcare facility – 730 sq.m
  - Café – 160 sq.m
  - Co-working – 817 sq.m
  - Gym 1,459 sq.m
- Total 11,983 sq.m (14.3% of total GFA)

The above excludes 711 sq.m of resident's amenities space also proposed in the St. Vincent's Hospital buildings, which also help supports the reuse and conservation of the protected structures,

whilst providing supporting amenities for future residents within the overall residential development proposed on the lands, but which we acknowledge will not be available or accessible to the wider community and therefore are excluded from the floorspace considered to be appropriate in contributing towards CU025.

In response to Policy CUO66, we refer to the SCIAA prepared by JSA which demonstrates the existing and proposed community and cultural spaces in the vicinity of the site.

#### **6.1.11 Development Management Standards**

Section 15.1 of the Development Plan states that the guidance in this chapter has been informed by the National Planning Framework 2040 and the Eastern and Midland Regional Assembly – Regional Spatial and Economic Strategy (2019-2031). The NPF and EMRA RSES encourage and support the densification of existing urban areas and promote the use of performance based criteria in the assessment of developments to achieve well designed and high quality outcomes. NPO 6, 13 and 35 and RPO 4.3 and 5.4 specifically encourage the rejuvenation of urban areas reutilising existing buildings and brownfield sites for increased heights and densities subject to compliance with a series of qualitative assessments. These objectives, together with the Specific Planning Policy Requirements as set out in Section 28 Guidelines, including the Urban Development and Building Height Guidelines (2018) and the Sustainable Urban Housing; Design Standards for New Apartments, Guidelines for Planning Authorities (2020) have informed the development management guidelines as set out in this chapter.

As noted in Section 5, Circular Letter NRUP 07/2022 was published with the amended Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities (December, 2022) (hereafter the Apartment Guidelines 2022), provides for transitional arrangements for BTR schemes which are ‘in the system’, stating the following:

*“Transitional Arrangements - All current appeals, or planning applications (including any outstanding SHD applications and appeals consequent to a current planning application), that are subject to consideration within the planning system on or before 21st December 2022, will be considered and decided in accordance with the current version of the Apartment Guidelines, that include SPPRs 7 and 8.*

*Furthermore, in cases where a request for a Large-Scale Residential Development (LRD) meeting has been submitted to a local authority for a proposal that includes specified BTR development in accordance with S.32B of the Planning and Development Act on or before the date of this Circular (21<sup>st</sup> December 2022), even if the LRD meeting has yet to take place, the opinion has yet to issue, or a planning application has yet to be made but is made within 6 months of receipt of the opinion as required by s.32A of the Act, the development will be assessed by the local authority and where applicable, on appeal to the Board, in accordance with the Guidelines issued prior to the BTR update, i.e. the version of the Apartment Guidelines that includes SPPRs 7 and 8, will remain applicable.”<sup>2</sup>*

The subject application received the LRD Opinion from Dublin City Council under Ref.: LRD6009/22-S2 on the 15<sup>th</sup> of December 2022, and thus, as demonstrated in Section 5, the subject BTR scheme should be assessed against the provisions of SPPR 7 and SPPR 8 of the Apartment Guidelines 2020 where relevant, rather than the new BTR provisions in the Apartment Guidelines 2022.

The following sets out how the proposed development is consistent with the key development management standards set out in the Development Plan.

##### **6.1.11.1 Planning Application Documentation – Planning Thresholds**

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<sup>2</sup> DoHLGH Circular Letter NRUP 07/2022, dated 21/12/2022, pg.4

Section 15.2.3 of the Development Plan notes that planning applications should be supported by the necessary analysis and documentation to demonstrate the proposed design and rationale for a scheme. To assist in the planning application preparation, Table 15-1 of the Development Plan sets out the development thresholds for some of the documentation related to specific planning applications.

**Response:** We have consulted Table 15.1 in Section 15.2 of the Development Plan which sets out the development thresholds for some of the documentation related to specific planning applications.

We refer to the cover letter prepared by John Spain Associates for a full list of the comprehensive documentation submitted with this LRD planning application.

#### 6.1.11.2 Environmental Assessment – EIA / AA / Ecological Impact Assessment

An Environmental Impact Assessment Report has been prepared by Awn and accompanies the LRD application given that the number of residential units being provided exceeds 500.

An AA Screening Report and Natura Impact Statement prepared by Altamar also accompany the application.

#### 6.1.11.3 Key Design Principles

Section 15.4 of the Development Plan states that “*All development will be expected to incorporate exemplary standards of high quality sustainable and inclusive urban design and architecture befitting the city’s environment and heritage and its diverse range of locally distinctive neighbourhoods.*” This section sets out key design principles which will be considered in the assessment of development proposals.

Key principles to consider are:

- *The contribution to the public realm for the benefit and / or enjoyment of the locality.*
- *The ability to create a sense of place and community using existing site features, tree coverage and landscaping to support green infrastructure and healthy streets.*
- *The use of high quality materials and finishes including hard and soft landscaping.*
- *The orientation of open space and the accessibility to daylight and sunlight.*
- *Quality of proposed public, private, and communal open spaces and recreational facilities and the relationship of proposed open spaces with any existing public open space including linkages and permeability to adjacent neighbourhood, facilities and streets.*
- *The accessibility of the development and the traffic calming measures in place in accordance with DMURS.*
- *The attractiveness of the development for various activities such as walking, cycling, sitting, dining etc.*
- *Inter-relationship of buildings / dwellings, roads, pedestrian ways, neighbourhood centre facilities and local parks and green areas – active frontages and passive surveillance will be encouraged.*

**Response:** In response to above we refer to STW Architectural Design Statement for further details of how the proposed development has been designed in accordance with the key design principles set out in the Plan.

On housing developments over 100 units, a Community Safety Strategy is required (in accordance with Policy QHSNO12) which would set out the design features incorporated to address the above measures to ensure a high level of safety and security is maintained including, overlooking, passive surveillance, street lighting and clear accessible routes.



**Response:** We refer to Section 4.4 of the Architectural Design Statement which outlines that the development has been designed to promote safety and security and avoid anti-social behaviour as follows:

- All routes and open spaces are overlooked by apartments to ensure passive surveillance
- We have avoided blank facades or enclosed public areas
- There are no leftover packets of land with no clear purpose - all open space is open and has a function to generate activity
- IN2 have designed a site lighting strategy - see drawing.
- There is a clear distinction between private, communal and public open spaces - as set out in the Landscape Design by NMP
- Main entrances are overlooked from adjacent apartments and well-trafficked public areas
- Vehicular traffic is limited by the site layout and landscape design
- All pedestrian and cycling routes through and around the site have been set out to provide safe edge treatment, clear sightlines and clear visibility of the route ahead

#### 6.1.11.4 Large Scale Development

Section 15.5.1 of the Development Plan states Dublin City Council will seek to ensure the following considerations are incorporated in proposals for large-scale, regeneration and brownfield development:

- *To encourage innovative, high quality urban design and architectural detail in all new development proposals.*
- *To analyse and review the surrounding built environment to ensure the new development is consistent with the character of the area.*
- *To respect and enhance existing natural features of interest.*
- *To contribute to the streetscape creating active and vibrant public realm.*
- *To create animation and create activity at street level and vertically throughout the building.*
- *To provide for appropriate materials and finishes in the context of the surrounding buildings.*
- *To ensure land contamination is appropriately dealt with and mitigated against.*
- *To provide high-quality new streets and open spaces connecting into the surrounding street pattern/ open space network.*
- *To create new compositions and points of interest.*
- *To provide an appropriate mix of uses comprising retail, residential, recreational, cultural, community- and/or employment generating uses to improve the existing range of uses and facilities in the area.*
- *To carefully integrate appropriate landscape planting and trees and retain and ecological features on the site.*
- *To prioritise pedestrian and cycle movements in connection with public transport infrastructure.*
- *To retain existing and create new features to make an easily navigational urban environment, including active building frontages with clearly defined edges and safe public routes.*
- *To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks.*
- *Ensure waste management facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.*

**Response:** The proposed development is considered to align with the above objectives for new large scale development as explained in detail above and we also we refer to the STW Architectural Design Statement for further details.

#### 6.1.11.5 Green Infrastructure

Section 15.6.2 states that *“All new developments will be required to prepare a Surface Water Management Plan in accordance with the requirements of the Council's Surface Water Management Guidance.”*

Appendix 11 requires a minimum of 70% extensive green roof. As outlined in Section 3.3.3.1 of the Engineering Services Report prepared by OCSC, at least 70% will be provided which accords with the DCC Development Plan.

Section 15.6.5 states *“All applications for large scale development will be encouraged to facilitate urban greening through the provision of tree planting, pocket parks, green roofs, green walls etc. The provision of urban greening methods improves the overall quality of the environment and enhances the well-being in accordance with policy CA28.”*

**Response:** We refer to the Engineering Services Report prepared by OCSC which states that *“The proposed development is to be served by a sustainable drainage system that is to be integrated with the developments landscaping features and is typically to comprise green roofs, blue podium, intensive landscaping, pervious paving and filter drains, rain gardens, infiltration basins, trapped road gullies, flow control devices, attenuation storages. The overall development is divided into a number of surface water sub catchments as a result of the natural topography, site layout, and other site constraints. All surface water runoff is to be attenuated and treated within the new development site boundary, before ultimately discharging to the existing public surface water network on Richmond Road. Sustainable Drainage Systems are to be provided, wherever practicable, and these are discussed in more detail in Section 3.3.2, with discharge rates from site being restricted to the greenfield equivalent runoff rate for design rainfall events up to, and including, the 1% AEP, in accordance with the DCC County Development Plan and the GDSDS.”*

Taken from the architectural roof layout the figures for the roof areas are as follows (this is for the total site and does not include the retained buildings (total of 5,050 m<sup>2</sup>).

- Total roof area= 20,465 sq.m (excluding existing / retained buildings with an area of 5,050 sq.m)
- Total green roof area= 15,040 sq.m or 73% coverage.

Further information can be found within OCSC's drawings and reports in respect to the SUDs strategy and green roof provision.

#### 6.1.11.6 Landscaping and Trees

The Development Plan states the following in relation to Landscaping and Trees:

*Applications for 1,000+ sq. m. of commercial development or 30+ residential units, or other applications where the planning authority consider it necessary should be accompanied by a landscape design report.*

*Landscape design reports should address the following:*

- *The protection and incorporation of existing trees and landscape features worthy of retention.*
- *The contribution of the proposed development to the landscape character and setting and open space amenity of the area.*
- *The value of ecological corridors and habitats surrounding the proposed development and the potential impact on these areas.*
- *The relationship between existing green corridors, public open spaces or area of high ecological values.*
- *The detail and specifications for materials, finishes and maintenance details.*

- *The integration of sustainable urban drainage systems such that landscaping plans may include associated biodiversity areas or wetlands which can reduce surface water run-off – see Appendix 12 and 13.*
- *The hierarchy of different types of planting throughout the development in order to give visual variety. Green roofs, walls and permeable surfaces will be encouraged and required in certain instances (see Chapter 10 and Appendix 11).*
- *The details of ecosystems services and biodiversity including pollinator friendly approach.*
- *The maintenance and management strategy for the landscaped features.*

**Response:** We refer to the Landscape Design Statement prepared by NMP Landscape Architects which describes the public open space and communal open space, boundary treatments and public realm improvements.

We also refer to the Arboricultural Impact Assessment Report prepared by CMK Horticulture and Arboriculture in relation to the impact on trees.

#### 6.1.11.7 Climate Action and Reuse of Buildings

Section 15.7.1 of the Development Plan states that “*Where development proposal comprises of existing buildings on the site, applicants are encouraged to reuse and repurpose the buildings for integration within the scheme, where possible in accordance with Policy CA5, CA6 and CA7.*”

**Response:** The proposed development includes the change of use and refurbishment of existing buildings, as detailed below:

- Richmond House and associated structures (RPS Ref.: 8788) will be refurbished for hospital administration use, with a GFA of 397 sq.m, and the proposed refurbishment works include the removal of an external staircase and balcony, removal of some internal walls, internal renovations, repair of the facades, repair and renewal of rainwater goods, and all associated conservations works.
- Brooklawn (RPS Ref.: 8789) will be refurbished for hospital administration use, with a GFA of 301 sq.m, and the proposed refurbishment works include the removal of an external staircase, replacement of rooflights, removal of some internal walls, internal renovations, repair of the facades, repair and renewal of rainwater goods, and all associated conservations works.
- Rose Cottage will be refurbished and extended for hospital administration use, with a GFA of 161 sq.m, and the proposed refurbishment works include the removal of a single storey extension, provision of a single storey extension to the southeast, and all associated works.
- The Laundry building will be refurbished for hospital administration use, with a GFA of 135 sq.m, and the proposed works include the demolition of the adjacent electric hub building to the north, the adjoining structures to the south of the building, and the refurbishment of the building including replacement rooflights and door and window opes, and all associated conservations works.
- The Gate Lodge building will remain in residential use, to be used by visiting members of staff to the new hospital.
- The change of use, refurbishment, alterations, and extensions, to the existing St. Vincent's Hospital buildings, part protected structures under RPS Ref.: 2032 (referred to as Block K), from lower ground to third floor level to provide for a mixed use building including community facilities, commercial uses, and residential amenities and facilities. The building will be separated into 4 no. parts (Block K1, K2, K3 and K4). Block K1 includes a gym at ground and first floor levels and residential amenities and facilities at second and third floor levels. Block K2 includes a café and a community library at ground floor level and co-working spaces at first, second and third floor levels. Block K3 includes a childcare facility over three levels at lower ground, ground and first floor level, and Block K4 is proposed as a community hall. The alterations to the existing buildings to facilitate the change of use includes the removal of external walls, a stair core,

external elements to the northern and southern façade, internal walls, windows and doors, new rainwater goods, associated repairs and alterations, the construction of a new lift and stair core for Block K1, K2 and K3, and all associated conservation works. A part one to part four storey building is proposed as an extension to the western end of Block K.

Section 15.7.1 of the Development Plan also states that *"Where demolition is proposed, the applicant must submit a demolition justification report to set out the rationale for the demolition having regard to the 'embodied carbon' of existing structures and demonstrate that all options other than demolition, such as refurbishment, extension or retrofitting are not possible; as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures."*

**Response:** We refer to the enclosed Demolition Works Justification Report prepared by Passive Dynamics which sets out that there is increased embodied carbon associated with the demolition of any existing building(s) and subsequent replacement of new buildings, where demolition is necessary there are opportunities to mitigate the impact. Some of the materials, which would have the largest carbon impact, such as brickwork, concrete, slates, glazing / façade can be reused within the site as part of the proposed works.

The report states the following:

*"Given the age of the St. Teresa's and The Freeman Wings, which consist of the largest buildings to be demolished, their current performance in terms of heat retention and overall building performance would be poor. While it would be possible to insulate these buildings to potentially a B rated BER, the overall performance levels in terms of operational energy / carbon would not reach the standard associated with that of a new building achieving NZEB. This is due to the fact (in part) that there will be thermal bridges associated with the original building envelope where it is not possible to design out at this stage."*

*The existing building layouts and many of the internal finishes would need to be updated if the buildings were to be retained. It is likely that a significant strip out of the existing materials would be required to both repurpose the building and insulate it to today's standards. According to LETI (London Energy Transformation Initiative Climate Emergency Design Guide) up to 35% of a building's embodied carbon is associated with internal finishes (4%), Mechanical and Electrical Services (15%) and Façade (16%). It is worth noting that even in a best-case scenario whereby these buildings were to be retained, due to the level of works and upgrades required, further embodied carbon would be added in any event."*

Section 6 of the Architectural Heritage Impact Assessment prepared by Carrig Conservation International Ltd provides a justification for the demolition of existing buildings on site. In respect to the demolition of the western wing of the hospital building, the Architectural Heritage Impact Assessment states the following rationale for the proposed demolition:

- *Refurbishment is not possible as some areas within buildings and entire buildings are currently obsolete, disused, and dilapidated. St Teresa's was last used as proper hospital accommodation in 2014.*
- *Demolition of the existing buildings is required to allow for the construction of the new residential development and associated amenities. Refurbishing or retrofitting the existing buildings on the site would not result in the delivery of the sufficient quantum of units which is required to fund the new hospital. A reduction in unit numbers will have a financial impact for the development of the hospital and could jeopardise its development. The risk of the new Hospital not being built will impact on patients and local community, and possibility of existing structures falling into further disrepair if existing Hospital is closed.*
- *The proposed scheme will conserve and rehabilitate approx. 4,800 sq.m of historic buildings on the site and provides for long term sustainable uses for them.*



- *The demolition of buildings is required in phase 1 of construction to allow for access to the hospital complex buildings for their refurbishment.*
- *The demolition of buildings will improve connectivity and permeability of the site. The existing site is located within a very large and highly impermeable urban block. Masterplan proposal has the potential of becoming a key link at a pedestrian level that can support local amenities and creates the opportunity for the site to become a destination at a neighbourhood level.*
- *The conservation of the historic buildings will be a considerable cost and the developer is investing heavily in the reuse of Block J, the laundry, Richmond House, Brooklawn and the wider grounds.*
- *Provision of Public Open Space and parklands within the scheme for patients, tenants and local residents.*
- *The existing buildings to be demolished currently divides the site creating an enclosed space that is counterintuitive to what the scheme is trying to achieve and compromises the quality of the shared open spaces.*

*“The loss of value resulting from the demolition of heritage structures is mitigated against through archival recording, the provision of high-quality residential accommodation and the facilitation of a viable redevelopment plan for the site.”*

*“The loss of original fabric will be balanced against the provision of new high-quality facilities. Its removal will allow the repair and regeneration of the rest of the site and facilitate the development of the new hospital. The complex is large (4,800 sqm of historic buildings) and these structures pose a challenge as there are finite opportunities for viable reuse. The wing proposed for demolition is of historical and architectural value but is mirrored on the opposite side - so the demolition does not represent a permanent loss of architectural detail. This western side is physically obscured by later modern development. Buildings proposed to be demolished are not in active use. Scarring to be finished using salvaged cut stone – to be confirmed at detailed design. Undamaged high quality materials should be salvaged – to be agreed.”*

In relation to the Freeman Wing, the report states *“1970’s wing is considered to have low historic and architectural significance. The mitigation is to balance the loss of original fabric against the provision of newly designed high quality facilities which allow for the practical upgrades to the majority of the historic structures.”*

In relation to St. Teresa’s the report states *“Some fabric from St Teresa’s will be carefully salvaged for repair of the main hospital. Fabric may include timber parquet flooring, fireplaces, internal window joinery. Allows for progression of wider masterplan providing significant public and social benefit through allowing for the building of a new hospital and housing scheme. Allows hospital to stay on the existing site but requires new development to provide funds needed to build new purpose-built hospital and improve services to the users. Analysis undertaken by STW to assess viability of incorporating this building into the scheme but it cannot be easily adapted to good quality, functional apartment accommodation due to the scale and form of the existing spaces. Ref to Appendix 9 St Teresa & Salvage Report.”*

#### 6.1.11.8 Residential Development

This section of the Development Plan sets out guidance on qualitative, quantitative, and development management criteria for sustainable neighbourhood infrastructure and residential developments.

- Community and Social Audit

Section 15.8.2 of the Development Plan states that *“Applications for large residential developments or mixed use developments should include provision for community type uses.”*

*All residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Each of the subsections below shall be assessed as part of the community and social audit.*

*A community and social audit should address the following:*

- *Identify the existing community and social provision in the surrounding area covering a 750m radius.*
- *Assess the overall need in terms of necessity, deficiency, and opportunities to share/ enhance existing facilities based on current and proposed population projections.*
- *Justify the inclusion or exclusion of a community facility as part of the proposed development having regard to the findings of the audit."*

**Response:** In response to above, we refer to the Social and Community Infrastructure Audit/Assessment prepared by John Spain Associates which demonstrates that the Social and Community Infrastructure within 1km of the site will be sufficient to cater for the needs of the proposed development. The proposed development provides a new hospital, a childcare facility of 730 sq.m, a community hall and library, and a gym in Block K, which will serve the needs of the proposed residents and the general public.

The provision of the childcare facility within the scheme, combined with the existing registered childcare facilities within close proximity of the scheme are sufficient in order to cater for the estimated increased demand for childcare services arising from the proposed development.

Section 15.8.3 of the Development Plan states that *"planning applications for over 50 dwellings shall be accompanied by a report identifying the demand for school places likely to be generated and the capacity of existing schools in the vicinity to cater for such demand. In the case of very large-scale developments (800+ units), the phased completion of the dwellings must be linked with the provision of new schools."*

**Response:** As demonstrated in the SCIAA, the extra demand created by the proposal for primary and post primary educational facilities will be relatively low in relation to current levels of local provision, while increased levels of demand from the scheme, this is unlikely to result in any undue strain on existing services.

Section 15.8.4 of the Development Plan relates to childcare and states one childcare facility (equivalent to a minimum of 20 child spaces) for every 75 dwellings units, shall be provided in all new mixed use and residential schemes. The Development Plan states as part of the community and social audit, an assessment of the childcare facilities in the surrounding 1km radius of the proposed should be included. The analysis should have regard to:

- The make-up of the proposed residential area, i.e. an estimate of the mix of community that the housing area seeks to accommodate (if an assumption is made that 50% approximately of the housing area will require childcare, how does the proposal contribute to the existing demand in the area).
- The number of childcare facilities within walking distance (i.e. 1km) of the proposal.
- The capacity of each childcare facility and the available capacity by completion of the project.
- The results of any childcare needs analysis carried out as part of the city childcare strategy or carried out as part of a local or area action plan or as part of the development plan in consultation with the city childcare committees, which will have identified areas already well served or alternatively, gap areas where there is under provision, will also contribute to refining the base figure.

**Response:** The proposed development includes the provision of a childcare of 730 sq.m which will provide for 77 no. childcare spaces and is considered to meet the expected need arising from the 2 and 3 beds within the development (whilst noting the number of other childcare facilities in the vicinity of the application site)

The provision of the childcare facility within the scheme, combined with the existing registered childcare facilities within close proximity of the scheme are sufficient in order to cater for the estimated increased demand for childcare services arising from the proposed development.

There is a large range of facilities for sports and recreation within a close proximity of the site which are considered sufficient to cater for the needs of the additional population in the area which the proposed development will deliver, with a wide range and variety of clubs, pitches and related facilities within reasonable distance of the site. Notwithstanding this the proposed development also includes new pedestrian and cycle infrastructure and public open spaces within the subject site which will enhance the amenity of the locality and the accessibility of the surrounding area.

The health care, community, and other facilities are well represented within the catchment area of the site which are considered sufficient to cater for the needs of the additional population in the area which the proposed development will deliver. Notwithstanding this, in addition to supporting the existing facilities, the development will deliver additional community benefits in the form 1 no. library, 1 no. gym, 1 no. café and 1 no. community hall to meet demand from the future residents.

Based on the assessment of social and community infrastructure set out above, it is considered that the extant provision in the surrounding area, combined with the new facilities incorporated into the proposed development will result in a good standard of amenity and accessibility to necessary infrastructure for future residents and the wider area.

#### - Public Open Space

Table 15.4 outlines 10% public open space is required on Z1 lands and 25% on Z12 and Z15 lands.

**Response:** The table below indicates the quantum of open space required and proposed.

**Table 6.3: Public Open Space Requirements**

Zoned Area	Public Open Space (Required)	Public Open Space (Proposed)
Z12 – 3.74 ha	25% 0.75 ha	25% 0.965 ha
Z15 – 2.29 ha	25% 0.57 ha	28.3% 0.65 ha
Z12 + Z15 6.03 ha	25% 1.5 ha	26.2% 1.6 ha

We refer to the Z12/Z15 Masterplan submitted and Section 3 of the STW Architectural Design Statement. The Masterplan indicates the following:

- 25% of the total Z15 lands (4.64 ha including 2.29 ha on the residential site and 2.35 ha on the hospital) equates to 1.16 ha.
- Generous new public open spaces are proposed on the site for the enjoyment of residents and members of the public. The public open space facilitates permeability through the site and connecting surrounding neighbourhoods which has been closed off from the public.
- The proposal includes 1.6 ha of public open space on the residential application site including a central public park for the benefit of the wider community, a new public plaza on Richmond Road and a multi use games area. This equates to 26.5% of the total lands zoned Z12 and Z15 (6.03 ha) which are proposed for residential use and therefore complies with the 25% public open space requirement for these lands.
- There is also a public walking / cycling trail along the landscaped perimeter of the residential development.

- There is an additional 0.56 ha of external communal amenity space provided to be enjoyed by future residents.
- It is not possible to provide public open space on the portion of the site dedicated to the new hospital due to privacy of patients and residents of the facility. However it acts as an amenity for the hospital and provides potential for future expansion if ever required.
- In addition to the public open space, publicly accessible community and social facilities are proposed in Block K for the benefit of the public. Block K includes a community hall (243 sq.m), a community library (730 sq.m), creche (730 sq.m), co-working spaces (817 sq.m), café (160 sq.m) and gym (1,459 sq.m). A retail unit is proposed in Block A and a café in Block F.

#### - Play Infrastructure

Section 15.8.8 states *"In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition."*

**Response:** We refer to the NMP Landscape Architect Design Statement for further details. In summary, inclusive play spaces are provided throughout the masterplan and respond to age, context and ability, encouraging users to interact with each other. These spaces will promote health & wellbeing, learning & social interactions. Based on the Design Standards for New Apartments (2020 / 2022) Section 4.0, the provision of dedicated play areas exceeds the requirement with a total of 715 sq.m of play area.

#### 6.1.11.9 Apartment Developments

Section 15.9 of the Development Plan refers to the Sustainable Urban Housing: Design Standards for New Apartments (December 2020). This section reflects the SPPRs included in the Apartment Guidelines (as updated in December 2022 for standard design apartments, and the BTR development is assessed against SPPR7 and 8 of Apartment Guidelines 2020 as per provisions of Circular Letter NRUP 07/2022). The following sets out how the development complies with the requirements for apartment standards as included in the Plan.

- Unit Mix

The Development Plan refers to Specific Planning Policy Requirement 1 of the Apartment Guidelines which states that:

*'Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the development plan process.'*

**Response:** The subject site is not located in the two sub-city areas which require increased demand for two and three person households and therefore *'SPPR1 is applicable to the remainder of the Dublin City Council administrative area'*.

The subject scheme comprises the following:

**Table 6.4: Unit Mix Provision**

<b>SDA –</b>	<b>BTR-</b>	<b>Total</b>
10 studios (2%)	8 studios (2.5%)	18 studios (2%)
236 1beds (48%)	151 1 beds (48%)	387 1 beds (48%)
199 2beds (40%)	150 2 beds (47%)	349 2 beds (43%)
49 3beds (10%)	8 3 beds (2.5%)	57 3 beds (7%)

We note Specific Planning Policy Requirement 8(i) of the Apartment Guidelines, 2020, state that there are no restrictions on dwelling mix shall apply to Build-to-Rent developments.

The 494 no. standard designed apartments provides with a maximum of 50% studio and 1 bed units and therefore complies with requirements of SPPR1 of the Apartment Guidelines 2022 and Section 15.9.1 of the Development Plan.

In support of the proposed unit mix, we note that population statistics and demand support the provision of smaller units in DCC administrative areas, particularly the subject site which is well served by public transport. The following is noted:

- Census 2016 data for the Drumcondra South A Electoral Division, which the subject site is located within, indicates that 1 and 2 person households represent the majority of private households (59%). 3+ person households represent 41% of the total private households. As expected for a Dublin City electoral area, these percentages exceed the National average of 52% of private households being 1 and 2 person households
- Furthermore, census data indicates that there is a predominance of houses/bungalows in the area, representing 60% of the type of accommodation compared to only 36% flat/apartments. Therefore, there is a greater supply of larger housing types in the area at present. Thus, it is submitted that it is appropriate to provide a greater provision of smaller unit types within a infill residential development at a strategic location adjacent to high quality public transport.
- 26% of the private households rented from private landlords.
- 61% of the households have 4+ rooms which equates to larger units and bedrooms.

Overall the proposed development will provide a greater mix of tenure in an area which currently dominated by existing low-density residential dwellings.

- Unit Size / Layout

Section 15.9.2 of the Development Plan refers to SPPR3 of the Apartment Guidelines relating to minimum floor areas for apartments which are set out as follows:

- *Studio apartment (1 person) 37 sq m*
- *1-bedroom apartment (2 persons) 45 sq m*
- *2-bedroom apartment (4 persons) 73 sq m*
- *3-bedroom apartment (5 persons) 90 sq m*

**Response:** All apartments meet, and in many cases, exceed the minimum apartment floor areas set out in SPPR3 as demonstrated in the Housing Quality Assessment prepared by STW Architects.

The Development Plan states that “*There may be a maximum of 10% of 2 bed 3 person units of the overall unit mix and will only be considered as part of specialist housing provision and will not be considered as standard residential accommodation.*”

**Response:** The proposed development includes a total of 17 no. 2 bed 3 person units which is c. 2% of the total units and is in therefore in accordance with this requirement.



The Development Plan states that “*The majority of all apartments in any proposed scheme (excluding Build to Rent accommodation) shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%).*”

**Response:** We refer to the Housing Quality Assessment prepared by STW Architects which outlines how the majority of units exceed the minimum floor area by 10%.

The Development Plan states that “*The layout of the larger units of each type should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015.*”

**Response:** We refer to Section 6 of the Architectural Design Statement which illustrates how the units could be adapted to accord with Universal Design Guidelines.

We note SPPR8(iv) outlines that the requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR scheme. In accordance with this requirement, the proposed BTR units do not exceed the minimum size floor areas by 10%.

Having regard to above, the proposal therefore exceeds the minimum requirements of SPPR3 of the Apartment Guidelines 2022 and complies with the requirements of Section 15.9.2 of the Plan.

- Dual Aspect

Section 15.9.3 refers to SPPR4 of the Apartment Guidelines 2020 / 2022 which requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations.

This section states Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate. Where single aspect is proposed, the number of south facing units should be maximised.

**Response:** The proposed development provides a total of 53% dual aspect units (419 no. units). We refer to the Architectural drawing which identify the dual aspect units. The development does not include north facing single aspect units. The high level of dual aspect units demonstrates the high quality design of the subject scheme. The proposal therefore exceeds the minimum requirements of SPPR4 of the Apartment Guidelines, 2022.

- Floor to Ceiling Heights

Section 15.9.4 of the Development Plan refers to SPPR4 of the Apartment Guidelines which requires a minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floors.

**Response:** Floor to ceiling heights throughout will exceed 2.4 metres all ground floor apartments have a ceiling height of 2.7m. The proposal therefore exceeds the minimum requirements of SPPR5 of the Apartment Guidelines 2022 and Section 15.9.4 of the Plan.

- Lift, Stair Cores and Entrance Lobbies

Section 15.9.5 of the Development Plan refers to SPPR6 of the Apartment Guidelines 2020 which states a maximum of 12 apartments per floor per core may be provided in apartment schemes.

**Response:** The maximum number of apartments per floor per core is 12 for Standard Design Apartments which accords with the requirements of SPPR6 of the Apartment Guidelines 2022. The ratio in this development varies from 6 to 12 units/core/floor.

In the BTR element of the scheme the ratio ranges from 7 to 16 units per core per floor. We note this is acceptable under SPPR8(v) of the Apartment Guidelines 2020.

- Internal Storage

Section 15.9.6 refers to the internal storage requirements in accordance with Appendix 1 of the Apartment Guidelines 2020.

**Response:** We refer to the Housing Quality Assessment prepared by STW Architects which outlines how the proposed residential units comply with the minimum internal storage requirements set out in Appendix 1 of the Apartment Guidelines 2022.

- Private Amenity Space

Section 15.9.7 refers to the private amenity space requirements in accordance with Appendix 1 of the Apartment Guidelines 2020. The Development Plan states at ground floor level, private amenity space should be sufficiently screened to provide for privacy. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, consideration may be given to the provision of a 'privacy strip' of approximately 1.5 m in depth, subject to appropriate landscape design and boundary treatment.

**Response:** We refer to the Housing Quality Assessment prepared by STW Architects which outlines how the proposed residential units comply with the minimum private amenity space requirements set out in Appendix 1 of the Apartment Guidelines. We also refer to the NMP landscape design report which provides details of the 1.5m wide defensible space to serve as a landscaped physical and visual buffer for ground floor apartments.

- Communal Amenity Space

Section 15.9.8 of the Development Plan refers to the minimum areas for communal amenity space in Appendix 1 of the Apartment Guidelines 2020. The Apartment Guidelines, 2020 outline the communal amenity space requirements as follows:

**Table 6.5: Communal Open Space Requirements**

Unit Type	No. of Units	Communal Space	Amenity	Total Amenity Required	Communal
Studio	18	4 sq.m		72 sq.m	
One Bedroom	387	5 sq.m		1,935 sq.m	
Two Bedroom (4 person)	332	7 sq.m		2,324 sq.m	
Two bedroom (3 person)	17	6 sq.m		102 sq.m	
Three Bedroom	57	9 sq.m		513 sq.m	
<b>Total:</b>	<b>811</b>			<b>4946 sq.m</b>	

**Response:** The proposed development provides 5,645 sq.m external communal open space and therefore exceeds the minimum communal amenity space required under the Apartment Guidelines 2022.

The Development Plan states that *“Development proposals shall demonstrate that the communal open space:*

- *Complies with the minimum standards based on each individual unit.*
  - *Will be soft and/or hard landscaped with appropriate plant species and landscaping materials such as those with good resistance to accidental damage and low maintenance characteristics.*
  - *Is secure for residents and benefits from passive surveillance.*
  - *Considers the needs of children in particular in terms of safety and supervision and is fully accessible to all.*
  - *Achieves good sunlight penetration – see Appendix 16.*
  - *Has appropriate arrangements for maintenance and management such as a conveniently accessed garden maintenance and storage area with water and drainage connections”*
- Roof Terraces

Section 15.9.9 of the Development Plan states that *“Roof terraces may be provided in certain circumstances subject to an assessment of accessibility, safety and micro-climatic impacts. Roof terraces will not be permitted as the primary form of communal amenity space but may contribute to a combination of courtyard and or linear green space.”* The Development Plan also states roof terraces must also accommodate landscaping features such as tree planning, shrubs and outdoor seating in order to create a quality green environment. How such roof terraces are to be maintained and managed must also be demonstrated.

**Response:** Roof terraces are proposed for Blocks C and D-E but the majority of the proposed communal amenity space is at ground floor level, in addition to the proposed public open space.

As outlined in the Daylight and Sunlight Analysis prepared by IN2, the results determined for each roof level amenity space, indicating the predicted percentage area that could achieve at least 2 hours sunlight in accordance with the methodology. Overall, these amenity spaces were found to be compliant with the guidelines. 100% of Block C and 75% Blocks D & E roof level amenity space as assessed is determined to be compliant, receiving at least 2 hours of direct sunlight on 21st March as defined within the guidance.

The Microclimatic Wind Analysis report states the terraces are predominantly suited to “Outdoor Dining” and therefore suited to their use as amenity spaces. This is due to the proposed 1.8m tall balustrades surrounding enclosing each roof terrace, providing excellent shelter from winds.

We refer to NMP Landscape Architect Design Statement for details of the proposed roof terrace planting and maintenance.

The roof terrace for Block C will benefit from panoramic views with the primary intention being to provide an amenity space for residents to relax, engage and socialise by catering for varying sizes of gatherings from individuals to small groups. The roof terrace planting will be low water usage and wind tolerant species. The provision of the roof terrace is a benefit to the residents of Block C and contributes in part to meeting the communal open space requirements.

The roof terraces for Block D-E will benefit from panoramic views across the tree tops of the surrounding grounds to the city and up to the Dublin Mountains in the distance to the south. The gardens will be fully enclosed with glazed balustrades of up to 1.5m. The intention with the landscape expression for each roof terrace is to provide amenity space for residents to relax, engage and socialise. The space will cater for varying sizes of gatherings from individuals to small groups. An

outdoor gym terrace will encourage and promote health and wellbeing. The roof terrace planting will be low water usage and wind tolerant species. The provision of roof terraces is a benefit to the residents of the blocks and contribute in part to meeting.

- Internal Communal Facilities

Section 15.9.10 of the Development Plan states that “*Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents. These facilities include laundry rooms, community or meeting rooms, management offices, co – working spaces etc. Other uses such as gyms or co-working spaces can also be provided and available to non-resident users also.*”

**Response:** The proposed development includes a total of 4,781 sq.m of residential amenity space. This includes the following:

**Figure 6.15: Amenity Areas**

Tenant Amenity	Building	Area m <sup>2</sup>
Concierge, Post, Laundry	J	327
Gym	K1	1,459
Dedicated Tenant Facilities	K1	711
Creche	K3	730
Co-working	K2	817
Library	K2	N/A
Community Hall	K4	N/A
Residents Lounge	C	55
Residents Lounge / Dining / Meeting	DE	561
Resident's Meeting	F + G	122
<b>Total</b>		<b>4,781.5m<sup>2</sup></b>

Source: STW's Architectural Design Statement

- Security

Section 15.9.11 states that “*new apartment developments should incorporate safe and secure design principles throughout the scheme by maximising natural surveillance of all common areas, streets and parking areas. The design of the development should ensure activity along all building facades to create a sense of safety and security. The location of entrance doors and lobbies should be located in highly visible areas of the building and should be well lit and overlooked. Ground floor level apartments should be provided with a privacy strip of approximately 1.5m in order to maintain adequate security and privacy within the unit.*”

**Response:** We refer to STW Architectural Design Statement for a response to security and demonstrates how the proposed development provides for passive surveillance. NMP's Landscape Design Statement and drawings provides details of the proposed privacy strips.

- Access and Services

Section 15.9.12 states that *“pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly.”*

Service ducts should be easily accessible from common circulation area to facilitate maintenance.

**Response:** We refer to STW architectural drawings for further details.

- Refuse Storage

Section 15.9.13 requires all application over 30 units to be accompanied by an Operational Waste Management Plan in accordance with Appendix 7 and Policy SI29 and SI30.

**Response:** We refer to Chapter 15 – Waste and the appended Resource & Waste Management Plan prepared by AWN for details of the proposed waste storage areas and collection areas.

- Lifecycle Reports

Section 15.9.14 requires all residential developments should include a building lifecycle report that sets out the long term management and maintenance strategy of a scheme.

**Response:** A Building LifeCycle Report prepared by STW with inputs from others on the Design Team accompanies this LRD application.

- Operational Management and Maintenance

Section 15.9.15 states that *“all apartment developments will be required to address the maintenance and management of a development to clarify the overall operational management plan for the development together with the maintenance strategy for the upkeep of the building. These plans will assist the planning authority in considering the long term contribution of the development and the strategy and objectives for the maintenance and operation of the development.”*

**Response:** We refer to Hooke and MacDonald's Operational Management Plan for further details.

- Microclimate – Daylight and Sunlight, Wind and Noise

Section 15.9.16 of the Development Plan states all apartment schemes should be accompanied by an assessment of the microclimatic impacts including daylight and sunlight, noise and wind. These assessments should outline compliance with the relevant standards and ensure a high level of residential amenity is provided both within the apartment unit and within the surrounding residential properties.

**Response:** We refer to the Daylight and Sunlight Analysis report and the Microclimate Wind Analysis report prepared by IN2. The EIAR includes a chapter on noise.

- Separation Distances (Apartments)

Section 15.9.17 of the Development Plan states traditionally a minimum distance of 22m is required between opposing first floor windows. In taller blocks, a greater separation distance may be prescribed having regard to the layout, size, and design. The Development Plan states that *“reduced separation distances may be acceptable.... In all instances where the minimum separation distances are not met, each development will be assessed on a case by case basis having regard to the specific*



*site constraints and the ability to comply with other standards set out within this chapter in terms of residential quality and amenity.”*

**Response:** As outlined in the proposed site layout plan and addressed in detail in STW's Statement of Response, most of the separation distances between the residential blocks exceeds 22m.

In the instances where the separation distance is below 22m, i.e. between Blocks A and B (11m separation), Blocks B and C (15m), Blocks C and DE (19.6m), and Blocks F and G (12.9m), the proposal has been designed to mitigate against overlooking by omitting windows in these locations or orientating windows to avoid overlooking, as illustrated in STW Architectural Design Statement.

As outlined in the Daylight and Sunlight Analysis report prepared by IN2, The ADF results is determined to be 95% compliant for targeted illuminance level for the proposed development and 99% compliant for SDA. Therefore it can be determined that a good level of daylight will be received.

#### 6.1.11.10 Build to Rent Residential Developments (BTR)

Section 15.10 of the Development Plan states “*Dublin City Council will consider ‘Build to Rent’ developments in specific locations as follows:*

- *Within 500m walking distance of a high employment area i.e. more than 500 employees per hectare.*
- *Within 500m of major public transport interchanges (e.g. Connolly Station, Tara Street Station and Heuston Station), and within identified Strategic Development Regenerations Areas.”*

**Response:** We refer to the response above demonstrating consistency with Policy QHSN40. From the outset, in the context of Section 15.10, we note that the Development Plan states that we ‘will consider BTR development in specific locations’, i.e. this is a possible intent for the location and these are not stated as mandatory requirements for all build to rent developments and therefore build to rent developments can still be permitted for other locations including inner suburban locations such as the subject site.

As outlined above, having regard to the permitted and proposed BTR schemes within 1km of the site, the proposal of 317 no. build to rent apartments is not considered to result in the proliferation and over concentration of BTR development in the area.

In response to Policy QHSN40, the rationale for the proposed Build to Rent development at St. Vincent's Hospital Fairview is as follows:

- The Justification for Proposed BTR and Amenity Areas prepared by CBRE notes that there is a limited supply of institutionally owned rental stock in the vicinity of the subject site. The report notes the PRS scheme Griffith Wood on Griffith Avenue which is heavily oversubscribed, with a significant waiting list of prospective tenants. The report states new supply in the vicinity is desperately required and the rental market would easily absorb the proposed BTR units on the subject site.
- The BTR Justification Report also states that the location of the proposed BTR development is hugely attractive from a rental perspective due to its proximity to the city, nearby employment hubs and educational/medical facilities. The site is well located in respect to public transport provision and therefore is suitable for BTR development.
- The housing mix and tenure in the immediate surrounding area primarily consists of more traditional family housing with a high percentage of owner-occupied homes or individual units let for renting. Thus, the opportunity exists for more professionally managed high quality rental schemes in the area, such as that proposed.
- At a macro level there is a clear trend in Dublin towards renting in comparison to home ownership. The total numbers of households renting has grown considerably between 2002 and 2016.

According to recent census data from the CSO, 29% of Ireland's population is now renting with higher rents within Dublin (36%) and the other main cities. There is a need for affordable housing and rental units. The proposed development seeks to provide for more affordable units and increase the supply of rental apartment units.

- As outlined in Appendix 1 of the Housing Strategy (forming part of the Development Plan) and Housing Need Demand Assessment, 4,088 additional private rental units are estimated to be sufficient to meet the needs of the private rental sector in Dublin City over the next six year Development Plan period. This represents 15% of the total housing need, of which 777 no. households comprise existing unmet need. We would argue that these figures greatly underestimate the rental needs of Dublin City and a significant increase of rental units are required to be meet the unmet rental needs of the City, including significantly more than 777 no. households experiencing unmet housing need. The proposed 317 no. BTR units will help to meet the rental needs of the city within a scheme of exceptional architectural and amenity value, at an appropriate and accessible location.
- It is submitted that the proposed development, comprising 317 BTR units, is justified, not only from a need and demand perspective, but also having regard to existing policy provision and the location of the site in proximity to existing and planned services and facilities. The proposed development will facilitate a balance within the housing market providing for an alternative form to the traditional house and offering a cost rental product not immediately available in the area.
- The proposed development will accommodate the development of a new sustainable community which will be capable of integration into the existing and proposed new neighbourhood structure with adequate apartment services and facilities and communal open space.
- The Apartment Guidelines 2020 specifically supports the delivery of BTR developments in central / accessible urban locations, such as the subject site.

- Design Standards

Section 15.10.1 of the Development Plan refers to SPPR7 of the Apartment Guidelines regarding the provision of resident support facilities (laundry, concierge, management facilities etc.) and resident services and amenities (sports facilities, resident lounge, function rooms, co-working spaces etc.) for BTR developments.

The Development Plan states that *"Whist the Guidelines do not provide for a quantitative standard residential support facilities and resident services and amenities, a general guideline of 3 sq. m. per person is recommended. This will be assessed on a case by case basis where the applicant can demonstrate a high standard of services and facilities."*

The Development Plan refers to SPPR8 and notes the specific relaxations that can be applied to BTR schemes and states *"Dublin City Council will seek to ensure a high level of amenity is provided within BTR schemes. All applications should seek to demonstrate compliance with the relevant standards for storage, private and communal open space as set out in Appendix 1 of the Sustainable Urban Housing: Design Standards for New Apartments."*

**Response:** As detailed in STW Design Statement, the proposed development includes a total of 4,781 sq.m of residential amenity space, community facilities and commercial floorspace (excluding the new hospital), to serve the overall residential development and the wider public. This includes the following:

**Figure 6.16: Overall Commercial, Community and Residential Amenity Areas**

Residential Amenity	Building	Area m <sup>2</sup>
Concierge, Post, Laundry	J	327
Gym	K1	1,459
Dedicated Tenant Facilities	K1	711
Creche	K3	730
Co-working	K2	817
Library	K2	N/A
Community Hall	K4	N/A
Residents Lounge	C	55
Residents Lounge / Dining / Meeting	DE	561
Resident's Meeting	F + G	122
<b>Total</b>		<b>4,781.5m</b>

Table 6.6 below provides a summary of the proposed resident support facilities and amenities for the BTR development in accordance with Section 15.10.1 of the Development Plan and SPPR7 of the Apartment Guidelines 2020 (Circular NRUP 07/2022 applies), which include the following:

- Resident Services and Amenities: Resident lounge, function rooms, recreational areas etc.
- Resident Support Facilities: Concierge, management facilities etc

**Table 6.6: Summary of Proposed Residential Support Facilities and Amenities for the BTR Element of the Development**

Number of BTR Units	Number of bedspaces	Total Resident Services & Amenities	Total Resident Support facilities (note this is shared with SDA units)	Total Residential Support Facilities + Resident Services & Amenities	DCC Requirement (3 sq.m per person for BTR)	Total per person
317	958	1,264.4 sq.m*	3,713.35 sq.m**	4,977.75 sq.m	2,874 sq.m of (3 sq.m X 958 no. bedspaces for the 317 no. BTR units).	5.2 sq.m

\* Block K1 (residents lounge & library), Block D-E (residents lounges, meeting rooms and a cinema room at ground floor level, resident's lounge, cooking and dining facilities at sixth floor level and a residential lounge at twelfth floor level), Block F (lounge / Meeting Area at ground floor level)

\*\* Block DE (concierge), Block J (concierge, post room, laundry), Block K2 (co-working, community library), Block K4 (community hall), bin store, bike store (NOTE: Resident Support facilities shared with SDA units)

Section 15.10.1 of the Development Plan recognises that the Apartment Guidelines 2020 do not provide a quantitative standard for resident support facilities and resident services and amenities and states that 'a *general guideline of 3 sq.m per person is recommended*'. As demonstrated above, the total resident support facilities and resident services and amenities provides for 5.2 sq.m per BTR bedspace, which has regard to best practice and satisfies the 'guideline' recommendation in the Plan. We also note that the dedicated resident amenities for the BTR units provide c. 4.2 sq.m per BTR unit which is generous in comparison to other permitted and existing BTR developments. It is submitted that the provision of resident support facilities and resident services and amenities is suitable for the proposed BTR units, having regard to the provision in other exiting and permitted

BTR schemes, and the range of other community and commercial uses proposed within the St. Vincent's Hospital Fairview Redevelopment, which all future residents will have access to.

As set out in the Hooke and MacDonald Operational Management Plan, a professional property management services provider will be appointed (the "Property Manager") which will include an on-site resident management team ("Resident Management Team"), based in the tenant concierge area of Block D-E for the Build to Rent apartments and Block J servicing the standard design apartments. The Resident Management Teams' key responsibility will be for the management of day to day operations including customer engagement, both in person and electronically. There will be multiple staff on site during the week and it is envisaged that the main on-site hours will be 8.30am-8.30pm Monday-Friday; 10am-4pm Saturday; Sunday & Bank Holidays 11am-2pm.

As outlined in the Operational Management Plan, the other facilities outlined in Table 5.1, which include the concierge in Block J, gym in Block K1, co-working in Block K2, community hall in Block K4, library in Block K2, and will be made available to the Build to Rent units, as well as serving the standard designed apartments and the wider community.

In addition to the dedicated residential support and amenity spaces in Block K1, DE, F, communal roof terraces are proposed in Block D-E, with one at fifth floor level, two terraces at sixth floor level, one terrace at ninth floor level, and one terrace at twelfth floor level. The development also includes the provision of public open space, communal open space and other communal internal amenities for the residential development which will ensure that a high-quality standard of living that encourages social interaction will be provided for the future tenants. The scheme will provide residential facilities including management/concierge, post room, bicycle storage, refuse stores, plant and services.

- Communal and Public Open Space

All Built to Rent developments will be required to provide for the same quantum of external communal open space and public open space as set out for standard apartment developments, see Section 15.6.12 and 15.8.6.

#### 6.1.11.11 Car Parking

Section 4 of Appendix 5 of the Development Plan relates to car parking standards. The subject site is within Zone 2 as indicated in Map J which occurs alongside key public transport corridors. The Development Plan states that *"a relaxation of maximum car parking standards will be considered in Zone 1 and Zone 2 for any site located within a highly accessible location. Applicants must set out a clear case satisfactorily demonstrating a reduction of parking need for the development based on the following criteria:*

- *Locational suitability and advantages of the site.*
- *Proximity to High Frequency Public Transport services (10 minutes' walk).*
- *Walking and cycling accessibility/permeability and any improvement to same.*
- *The range of services and sources of employment available within walking distance of the development.*
- *Availability of shared mobility.*
- *Impact on the amenities of surrounding properties or areas including overspill parking.*
- *Impact on traffic safety including obstruction of other road users.*
- *Robustness of Mobility Management Plan to support the development."*

The Development Plan also states that *"It is not intended to promote the use of the car within the City."*

Table 2 outlines the following maximum car parking standard for the proposed uses:

- Apartments: 1 space per dwelling
- Creche: 1 per 100 sq.m
- Hospital: 1 per 100 sq.m
- Café: 1 per 150 sq,m seating area
- Offices: 1 per 200 sq.m

Section 5 of Appendix 5 states that in all new developments, a minimum of 50% of all car parking spaces shall be equipped with fully functional EV Charging Point(s). The remaining spaces shall be designed to facilitate the relevant infrastructure to accommodate future EV charging. Space for EV charging infrastructure shall be clearly detailed in planning applications.

**Response:** Based on the total GIA for the hospital of 8,411 sq.m (new hospital + retained buildings for hospital admin use), the maximum car parking is 84 no. spaces. Therefore the 76 no. car parking spaces for the hospital is in accordance with the Development Plan requirements.

It is proposed to provide a total of 247 no. spaces, of which 13 no. are disabled spaces, for the residential portion of the development. This translates to an approximate ratio of 0.3 spaces per unit. The parking provision includes 7 no. car share spaces which forms part of the wider Mobility Management Plan.

This provision is a reduction on the maxima standards set out within the Development Plan, which would require a maximum of 811 no. spaces, however as set out in the Traffic Impact Assessment, a reduced parking provision is considered to be appropriate having regard to the site's advantageously location within close proximity to the inner city and a range of public transport services and employment nodes, as described in detail within this report. The proposed development site is also located within 1.6 km (19 min walk) of Drumcondra Station.

The proposed development is located within walking and cycling distance of several services and areas, which reduces the need for car usage:

- The site is immediately bordered and in close proximity to considerable areas of employment in the extensively developed surrounding lands to the east and west which include a wide variety of commercial developments and access into the city centre;
- Both the DCU St Patrick's & DCU All Hallows campus are located north / north west of the development site.
- There are several large retail units, leisure and fitness amenities and restaurants within walking distance of the site.

The parking provision includes 7 no. car share spaces which forms part of the wider Mobility Management Plan. In addition to this, a quantum of high-quality, covered, and secure bicycle parking is proposed for the development which should further motivate a reduction in car usage.

Given the various motivations outlined above, it is submitted that the proposed parking ratio of 0.3 spaces per dwelling is wholly appropriate for the development and promotes the objectives of sustainable transport as set out in the Development Plan.

#### 6.1.11.12 Cycle Parking

Section 3 of Appendix 5 of the Development Plan relates to cycle parking standards and states that it is an attractive transport option for urban living in accordance with sustainable development principles and the promotion of the 15 minute city. The Development Plan refers to the Apartment Guidelines 2020 and states cycle parking for residential apartment units shall be provided at a rate



of 1 secure cycle parking space per residential bedroom and 1 visitor cycle parking space for every two units.

Based on the proposed unit mix, a total of 1,280 no. spaces would be required for the proposed residents and an additional 411 no. visitor parking spaces (a total of 1,691 no. spaces).

**Response:** The development provides for a total of 1,702 no. spaces in a mix of covered, secure parking enclosures and open bike racks at surface level and secure bike parking areas at basement level. An additional 71 no. cycle spaces are also provided for the commercial/community use facilities proposed within Block K.

For the commercial uses proposed for the development, Table 1 outlines for hospital 1 long term cycle parking space per 5 staff and 1 short term space per 10 beds. The proposed development includes 17 no. long stay spaces for the 85 staff and 8 no. short stay spaces based on the 73 no. beds proposed.

#### 6.1.11.13 Residential Density

Section 3.2 of Appendix 3 of the Development Plan state appropriate higher density schemes are considered to be ones that combine mixed tenure homes, public space and community infrastructure. The Development Plan states sustainable densities in accordance with the standards set out in the Guidelines on Sustainable Residential Development in Urban Areas 2009. Table 1 outlines for 'Outer Suburb' areas a density range of 60-120 units per hectare will be supported.

**Response:** Appendix 3 does not include a range for Inner Suburban areas or areas located on Key Public Transport Corridors. However, should the Planning Authority consider that the net density range of 60 to 120 units per hectare for the Outer Suburbs to be the most applicable for this area of the City, we note that the density ranges in Appendix 3 do not set a limit on residential density for applications in the Outer Suburbs. It is noted that Section 4 of Appendix 3 under Identification of Areas for Increased Height and Density, acknowledges that greater building heights and density will be supported in 'key locations' which includes 'Public Transport Corridors', which as set out above the subject site falls within.

The proposed development has a net density of 182 units per hectare based on 811 no. units and the net site area on the residential site of 4.44 ha. As set out in previous sections of this report, the proposed density is considered to be appropriate given that the subject site is underutilised and given its 'Central and/or Accessible' location (as defined under Section 2.4 of the Apartment Guidelines 2022) or location within a 'Public Transport Corridor' defined as a 'Key Location' for increased heights and density in Appendix 3 of the Development Plan, is suitable for a high-density residential development and increased building heights.

Appendix 3 of the Development Plan acknowledges that "*There is recognised scope for height intensification and the provision of higher densities at designated public transport stations and within the catchment areas of major public transport corridors.*" These are noted to include bus connects routes and core bus corridors. The subject site, as noted previously, is directly proximate to existing high capacity, high frequency bus routes. Therefore, the subject site is suited for the higher density proposed.

Appendix 3 further states that "*Locations for intensification must have reasonable access to the nearest public transport stop. In line with national guidance, higher densities will be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station in the plan.*" 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). This site is also considered to be an 'Inner Suburban' site, and therefore appropriate for increased heights and density over that of the prevailing context in the area.

We note Dublin City Council granted permission for the Esmond Avenue LRD in Fairview under Reg. Ref.: LRD6015/22-S3 which has a density of 288 units per hectare. The Planner's Report also references the proposed SHD at No. 146A and Nos. 148-148A, Richmond Road under ABP -312352-22, with a proposed density of 301uph and a LRD proposal on the north eastern portion of a future combined 'Leyden site' with a proposed density of 240uph. The DCC's Planner's Report for the Esmond Avenue LRD states the following in relation to the increased density:

*"In conclusion it is considered that the density reflects the compact nature of the brownfield site redevelopment. The added population the development will generate will also help the viability of local services and facilities both existing and in future for this urban city area and is consistent with national development objectives in relation to the efficient use of scarce zoned and serviced urban lands, urban consolidation and compact cities. In summary the proposed scheme in this instance will secure a high density of development in this location, maximise the efficiency of urban land, retain the compact form of the urban area and help to meet housing demand in accordance with Government policy/guidance."*

#### 6.1.11.14 Plot Ratio and Site Coverage

Section 3.2 of Appendix 3 of the Development Plan outlines an indicative plot ratio of 1.0-2.5 and an indicative site coverage of 45-60% for 'Outer Employment and Residential Area'. The Development Plan states that *"Plot ratio should, therefore, be considered in conjunction with other development control measures including site coverage, building heights, public and private open space, parking provision etc."*

**Response:** The plot ratio for the overall application site is 0.94 based on a total GFA of 82,815 sq.m and site area within the control of the applicant of 8.71 ha. The plot ratio for the proposed residential area is 1.23 based on the total GFA of 75,545 sq.m and net site area of 6.04 ha. The plot ratio for the proposed hospital is 0.32 based on the total GFA of 8,343 and net site area of 2.65 ha. The proposed plot ratio is therefore considered to be in accordance with the guidance in the Development Plan.

The site coverage for the area for the residential development is 21.2%. The site coverage for the proposed hospital site is 18%.

The proposed site coverage is therefore below the indicative site coverage and considered to be in accordance with the guidance in the Development Plan.

#### 6.1.12 Building Height

Section 4 of Appendix 3 states that the general principle is to support increased height and higher density schemes in areas close to high frequency public transport. Areas close to high frequency public transport is identified as a key location generally suitable and appropriate for accommodating a more intensive form of development, including increased height. The Development Plan states *"Development proposals will primarily be determined by reference to the proximity of new public transport infrastructure and to the area character. Locations for intensification must have reasonable access to the nearest public transport stop. In line with national guidance, higher densities will be promoted **within 500 metres walking distance of a bus stop**, or within 1km of a light rail stop or a rail station in the plan"*.

In considering locations for greater height and density, all schemes must have regard to the local prevailing context within which they are situated. This is particularly important in the lower scaled areas of the city where broader consideration must be given to potential impacts such as

overshadowing and overlooking, as well as the visual, functional, environmental and cumulative impacts of increased building height. As a general rule, the development of innovative, mixed use development that includes buildings of between 5 and 8 storeys, including family apartments and duplexes is promoted in the key areas identified below. Greater heights may be considered in certain circumstances depending on the site's location and context and subject to assessment against the performance based criteria set out in Table 3, as set out in additional detail in Appendix 1.

In accordance with the guidance set out therein of the Building Height Guidelines 2018, areas are identified where increased height will be supported. As per the requirements of Section 3.2 of the Guidelines, a series of performance based development management criteria are set out to ensure protection of residential, heritage, streetscape and landscape amenity (this is assessed in detail in Section 5 above). All proposals with significant increased height and density over the existing prevailing context must demonstrate full compliance with the performance criteria set out in Table 3.

**Response:** The site is within reasonable walking distance of high quality public transport, including 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 subject site can be considered to fall within one of the key locations in the City having regard to its proximity within a 'public transport corridor' and 'Zone 2' of the City, as identified in Appendix 3 of the Development Plan as being suitable for increased density and heights. The accompanying Public Transport Capacity Study provides details the number and frequency of existing bus routes serving the site and demonstrates the capacity of the existing public transport services to cater for the additional demand arising from the proposed development.

Appendix 3 sets out locations generally suitable and appropriate for accommodating a more intensive form of development, including increased height. The site is classified as within 'Outer City (suburbs)' which states "*heights of 3 to 4 storeys will be promoted as the minimum. **Greater heights will be considered on a case by case basis, having regard in particular to the prevailing site context and character, physical and social infrastructure capacity, public transport capacity and compliance with all of the performance criteria set out in Table 3.***"

The proposed building heights range from part 2 to part 13 storeys and can be accommodated on the subject site, having regard to the following:

- The setback of buildings from the boundaries, with the spaces between the boundaries and the buildings densely planted for visual screening.
- Inner Suburban green field site in close proximity to existing public transport, local services, third level education institutions and to future enhanced public transport in the form of Bus Connects (on Drumcondra Road and Annesley Bridge Road).
- The stepping down of building height towards boundaries shared with sensitive neighbouring areas (to the north).
- The concentration of height adjacent to existing neighbouring open spaces (e.g. Dublin Port Stadium and Ierne Social and Sports Club), exploiting the opportunity presented by these spaces.
- The concentration of height closer to the modern, mixed density neighbourhood of Grace Park Wood.
- The modest height of the hospital building, ensuring relatively limited townscape and visual impacts on the Victorian neighbourhood to the east, including the Residential Conservation Area-zoned Inverness Road.
- Consideration of the opportunities in the urban structure, such as the opportunity to locate new open space and pedestrian and cycle entrances and routes in order to connect to the surroundings.

We refer to Appendix 1 sets out compliance with Table 3 of Appendix 3 of the Development Plan which has been informed by the provisions of the Building Height Guidelines.

There will be a requirement that for any significant scheme (on sites greater than 0.5ha) seeking to increase densities and height that a masterplan is prepared.

**Response:** We refer to the Masterplan prepared by STW and JSA and additional information provided in the Architectural Design Statement.

Higher density proposals including enhanced building height should be accompanied by a landscape and visual impact assessment with appropriate computer generated images (CGI's) and photomontages to demonstrate how the development will assimilate appropriately with the existing urban context.

**Response:** We refer to the LVIA, verified photomontages and CGI View brochure prepared by Model Works that accompanies this LRD planning application.

## 7.0 CONCLUSION

Overall, the subject lands are ideally located for a sustainable mixed use development, which provides a new hospital, providing mental health services, supporting residential development and significant public open space, in an inner suburban location, in accordance with the primary Z12 and Z15 zoning objectives and in line with National and Regional Planning policy. The scheme also accords with the objectives for compact growth, delivery of the 15-minute city and the creation of sustainable neighbourhoods, through the redevelopment of the lands and the significant benefits delivered through the permeability and connectivity benefits, the new uses and substantial areas of open space. The scale and density of development is considered to be appropriate for the site and accords with the objectives for higher densities and increased building heights in suitable urban locations which is sought under the Apartment Guidelines 2020 / 2022, the Building Height Guidelines 2018 and the National Planning Framework.

The proposed development represents a significant investment in a strategically located site in an inner suburban location within Dublin City which is eminently suitable for a mixed-use development. This contention is further supported by the subject site's proximity to public transport, employment, services and facilities.

This Planning Report and Statement of Consistency document has comprehensively reviewed all relevant national, regional and local planning policy documents which are considered to be pertinent to the proposed development on the subject site. The proposed development is consistent with the relevant policies, objectives and standards of the Development Plan and the relevant ministerial guidelines.

The proposal introduces a high-quality development, on an underutilised site, which is zoned Z12, Z15 and Z1 in the Development Plan, and which the range of uses and supporting infrastructure and facilities are supported by the land use zonings.

The design and scale of the proposed development has sought to respond to and respect the surrounding context and seeks to make a positive contribution to this Inner suburban location through the provision of public open space and enhanced permeability and connectivity through this substantial urban block. The layout and design of the development seeks to enhance the streetscape and integrates appropriately with the surrounding context, whilst proposing high-quality new architectural additions to the area, which is of a greater scale and massing to the existing context, as supported by national planning policy documents, but which has regard to amenity and context of the existing neighbourhood.

The proposed development is considered to fully comply with the relevant national and regional planning policy context. In particular, the appropriate development of the subject site would represent an effective and efficient use of a currently under-utilised urban site and would therefore be in full compliance with the National Planning Framework, the RSES for the EMRA 2019, and the Development Plan.

As such, it is considered that the proposed development accords with the proper planning and sustainable development of the area.



**APPENDIX 1 – COMPLIANCE WITH TABLE 3 OF APPENDIX 3 OF THE PLAN (PREPARED IN CONSULTATION WITH STW, MODELWORKS AND OTHERS)**

No.	Objective / Requirement	Response
1.	To promote development with a sense of place and character	<p>The STW Architectural Design Statement states:</p> <p><i>“The site context analysis provided a detailed understanding of the development pattern of the surrounding area including the urban character and identifiable features. These include the old hospital, neighbouring buildings such as Richmond House and mature landscape. The design retains, respects and responds to these, incorporating them as recognisable features and providing people with a sense of the past. There are views into the site towards the old hospital buildings located at the heart of the development which opens out onto the central park area and provides a distinctive sense of place. There are no major views from the site, so a series of views is provided that connect spaces within and around the site. New landscape elements, such as the central parkland area extend and complement the existing landscape features, with mature trees and planting being retained. The urban form and palette of materials and finishes for each building is varied to provide identify for people to describe where they live, while providing overall consistency. The materials have been selected based on research of those used in the surrounding area. The design maintains the unique architectural and environmental features of the site while adding contemporary design for the residents and neighbours and enhancing the sense of belonging.”</i></p> <p><i>“The development is designed as a series of ‘quarters’, each with a different architectural treatment in terms of materials, colour, and textures to provide identity and sense of place as part of the overall development. Each quarter relates with the adjacent neighbourhood, in terms of colours, rhythm and textures. The development proposes high quality brickwork and materials in their composition ensuring a lasting and sustainable series of buildings.”</i></p> <p>We also refer to the LVIA prepared by Model Works, included in Chapter 11 of the EIAR, which states the following in response to this criterion:</p> <p><i>“As a contemporary, high density neighbourhood in an historically low density urban environment (albeit with an urban mix of uses along Richmond Road, including industry), the proposal diverts from the established townscape character. This is an unavoidable and not undesirable outcome of compact growth policy, and it can be complementary to the existing urban structure and character. There are several aspects/elements of the proposal that display respect/consideration of the context and the constraints in the area, including:</i></p> <ul style="list-style-type: none"> <li>- <i>The retention, refurbishment and re-use of all buildings of architectural heritage value on the site (the protected structures in the St Vincent's Hospital complex, Richmond House and Brooklawn House). In addition to improving</i></li> </ul>

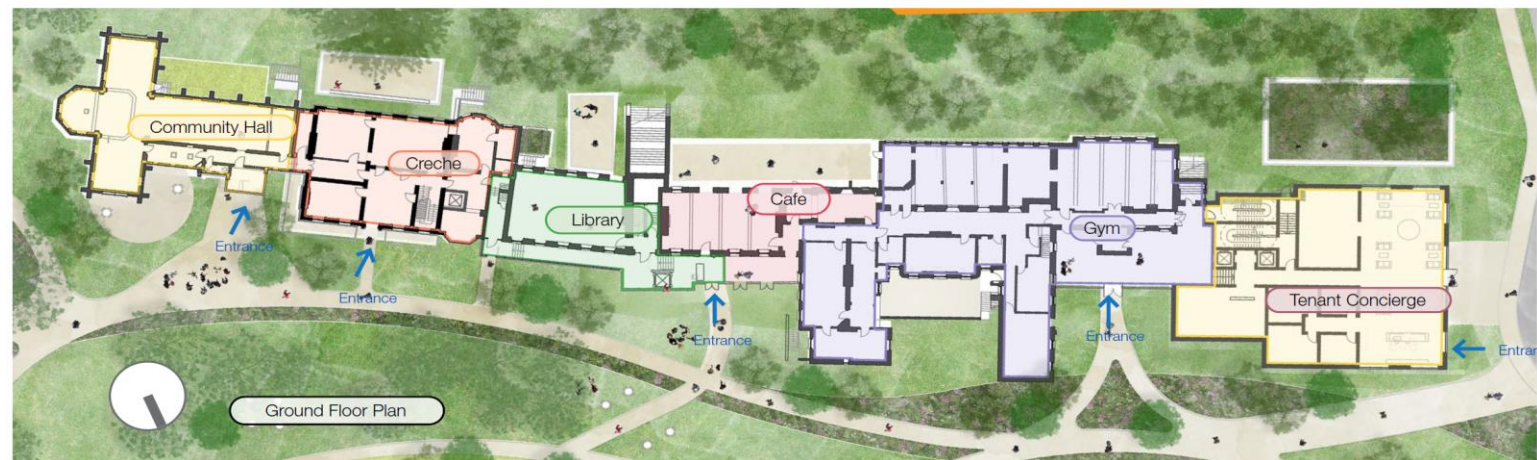
		<p><i>the condition of the buildings and their environs, by extending the public realm through/across the site, the development would integrate these buildings (which were previously enclosed in institutional grounds, separated from the public realm, and in sub-optimal condition) into the evolved urban structure. The townscape would benefit from the buildings' improved condition and new uses, and the community would benefit from increased exposure to/appreciation of the site's architectural heritage.</i></p> <ul style="list-style-type: none"> <li>- <i>The setback of buildings from the boundaries (see graphic below), with the spaces between the boundaries and the buildings densely planted for visual screening.</i></li> <li>- <i>The stepping down of building height towards boundaries shared with sensitive neighbouring areas (to the north).</i></li> <li>- <i>The concentration of height adjacent to existing neighbouring open spaces (e.g. Dublin Port Stadium and Ierne Social and Sports Club), exploiting the opportunity presented by these spaces.</i></li> <li>- <i>The concentration of height closer to the modern, mixed density neighbourhood of Grace Park Wood.</i></li> <li>- <i>The modest height of the hospital building, ensuring relatively limited townscape and visual impacts on the Victorian neighbourhood to the east, including the Residential Conservation Area-zoned Inverness Road.</i></li> </ul> <p><i>In addition to the constraints, the proposal displays consideration of the opportunities in the urban structure, such as the opportunity to locate new open space and pedestrian and cycle entrances and routes in order to connect to the surroundings."</i></p> <p><i>The proposed development includes several 'placemaking' elements supporting physical and community health, including:</i></p> <ul style="list-style-type: none"> <li>- <i>A new plaza off Richmond Road beside the entrance to the neighbourhood, fronted by Block A, which has retail use in the ground and first floors. The combination of a new open space and active use, contiguous with the street, would create a distinct new 'place' in the public realm, substantially improving the environmental quality of Richmond Road in addition to providing new community facilities.</i></li> </ul>
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- *A new community hub in the refurbished and re-purposed historic buildings of St Vincent's Hospital. This hub of community facilities includes (a) a community hall in the chapel, (b) a creche in the former convent, (c) a café, (d) community library and (e) co-working facility in the former school, and (f) a gym in the former hospital buildings. This large concentration of community uses in the cluster of restored historic buildings, would create a new 'place' of high environmental quality and strong identity, with multiple community benefits.*



North Elevation



Ground Floor Plan

- The new 'central park'. This substantial area of parkland, comprised of a series of interconnected lawn areas framed by planting, and enclosed by the proposed buildings and restored historic buildings, would constitute a significant new green structure asset and 'place' in the townscape – with positive impact on the environment and community.
- The combination of (a) restored historic buildings, (b) a complex of contemporary apartment buildings, and (c) the new hospital, arranged around a generous internal open space network and external open spaces, would create a distinct new neighbourhood with its own character and identity.



	<p><i>The proposed buildings and open space are of appreciably high design and material quality, so that the development's overall effect would be to elevate the quality of the urban environment. This effect would be most pronounced in the Richmond Road corridor where the townscape quality is currently mixed.</i></p> <p><i>The site is located in a long-established inner suburban residential area. It is less than 10 minutes' walk from two urban villages in Fairview and Drumcondra, and within walking/ cycling distance of the city centre.</i></p> <p><i>The site has frontage to Richmond Road, which is a mixed use, mixed density street of distinctly urban character. Development along the road ranges from bungalows to period houses, modern apartment blocks up to five storeys, small shops and offices, petrol stations, wholesalers, industrial sites, a park and a sports stadium.</i></p> <p><i>In the wider townscape there are historic inner suburbs (e.g. the streets off Philipsburgh Avenue and Marino), later 20th century estates (e.g. Griffith Court), and modern mixed and high density estates (e.g. Grace Park Wood, Griffith Wood on Griffith Avenue). Extensive institutional lands/uses remain, and there is a concentration of sports facilities (including lerne Social and Sports Club and Dublin Port Stadium adjacent to the site, Tolka Park and Belvedere Rugby Ground).</i></p> <p><i>Considering the diverse and evolving character of Richmond Road and the wider area, and taking account of the site's accessible location, the proposed development is appropriately located.</i></p> <p><i>The proposed development is ambitious in density/scale, but the arrangement of height responds to both the sensitivities and the opportunities presented by the surrounding lands/development. For example:</i></p> <ul style="list-style-type: none"> <li><i>- At its <b>interface with the northern boundary, facing the Grace Park Wood and Griffith Court estates</b>, the buildings (Blocks F and G) step down to four storey volumes closest to the boundary. Through a series of steps they rise to 10 no. and nine storeys respectively where they front the 'central park' internal to the site.</i></li> <li><i>- <b>The tallest building, a volume of Block DE, is located in a corner of the site adjacent to the lerne pitch and putt golf course and the Dublin Port Stadium.</b> Both of these are zoned open spaces (i.e. they will remain open space), and they form a wide green space buffer between the development and any and sensitivities (other than the sports grounds themselves*) to the west and south west.</i></li> </ul> <p><i>These variations in height, responding to the surroundings, also create visual interest and identity (a) within the neighbourhood itself, and (b) in the wider townscape – thereby contributing to legibility.</i></p>
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*\* The development would cause a significant increase in built/visual enclosure of the adjacent sports grounds (refer to Viewpoints 7 and 12), and most likely a perception of negative visual impact by the pitch-and-putt course users in particular (who, due to the nature of the sport, may be more aware of their surroundings than soccer players). It must be recognised that these are urban sports facilities and that (a) their currently unenclosed, green environs (due to the absence of development on much of the site) is not sustainable, (b) the visibility of development around such facilities is not inappropriate, and (c) the amenities are currently enjoyed by a small cohort of the population.*

*If the lands are developed, the sports grounds will function as a spatial buffer for the buildings, and as a visual amenity for the many new residents overlooking the facilities. These benefits counterbalance the negative effect on visual amenity*

that may be felt by the pitch-and-putt course users. Views/visual amenity experienced at the Ierne Club will be changed, but the club's value as an urban landscape resource will be heightened.


The proposal employs buildings of linear footprint in response to a variety of factors including (a) the shape of the site, (b) the footprint of the historic elements of St Vincent's Hospital, and (c) the design objective for the buildings to enclose/define a 'central park'. In order to avoid 'long slab blocks', each building is vertically divided into a series of volumes, with the volumes distinguished from each other by recesses and variations in façade material/treatment and steps in height. The photomontages show that this disaggregation of form and articulation of the facades succeed in avoiding monolithic massing and reducing the perceived scale of the buildings. The use of brick, which is finely textured and naturally coloured, as the predominant material, contributes further to the buildings' integration into the landscape.

The set back floors in Blocks D, F and G (pictured below) are deep so that (a) they are effective when the buildings are viewed from close-up, and (b) the tallest elements are well removed from the sensitive boundaries.





		 
2.	To provide appropriate legibility	<p>The proposed development would improve the character, quality/condition and permeability of the Richmond Road and environs.</p> <p>Along its two stretches of frontage to Richmond Road the improvements at the site interface (see cell below) would improve the condition of the streetscape, better reflecting the status of the street in the urban structure. Additionally, the removal of long stretches of high concrete wall from the site boundary would improve the visual permeability and legibility of the area.</p> <p>Importantly, the development would create public pedestrian and cycle routes north to south across the site, connecting Grace Park Wood and Griffith Court to Richmond Road via public routes across the site. The new entrances and routes across the site would result in a substantial improvement in permeability in the area, benefitting the wider community</p>

3.	To provide appropriate continuity and enclosure of streets and spaces	<p>- Along <b>Richmond Road in front of the existing Crannog hospital, a new plaza is proposed</b>, incorporating the main entrance to the new neighbourhood. The seven storey Block A is set back from the street behind the plaza, with retail use in a projecting two storey volume. This would activate the plaza and the street, and the five set-back levels above would provide passive surveillance. The 'urban design context' of Richmond Road would be considerably improved along the affected stretch. With Block A set well back from the street there would be no undue increase in built enclosure.</p> <p>The existing and proposed views from Richmond Road along the Crannog Hospital frontage are shown below, illustrating the transformative effect of the development on this stretch of the streetscape.</p> 
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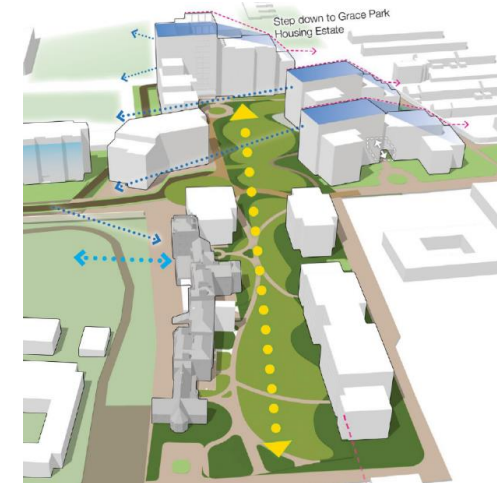
- At the former **Richmond House entrance**, relatively limited intervention is proposed. Brooklawn House, beside the entrance, would be refurbished, and the boundary wall either side of the gate would be replaced by a hedge and railing. This would improve the site-street interface, and thereby the 'urban design context' of that stretch of Richmond Road. No new buildings are proposed around the Richmond House entrance, so there would be no change to the degree of enclosure.

In contrast, within the site, the 'central park' is proposed to be enclosed by buildings ranging in height from four to 13 no. storeys (with the building height modulated depending on the varying width of the park). A high degree of built enclosure is thus a characteristic of this space. However:

(a) at 50m+ wide in places a 'canyon of excessive scale' would be avoided,

(b) a series of usable amenity spaces would be provided (a 'market space', a kick-about area, play spaces, outdoor seating areas for the café and community hall, etc.), and


(c) a high level of visual amenity would be provided to the overlooking apartments





4.	<i>To provide well connected, high quality and active public and communal spaces</i>	<p>Among the key features/characteristics of the proposed are (a) the provision of a connected network of high quality public and communal open spaces within the site, (b) the provision of pedestrian and cycle routes throughout the open space network, and (c) the integration of the internal open space and movement network with the external public realm.</p> <p>The development would thereby expand the public realm through/across the site (improving permeability/navigability for pedestrians and cyclists in the wider area), and improve the quality of the public realm overall, including by the provision of new assets such as the plaza on Richmond Road and the central park.</p>
5.	<i>To provide high quality,</i>	<p>As per the guidelines private amenity space is provided to units at ground floor as an adjoining patio or terrace area and for the upper floors is provided as a balcony. The balconies all provide the minimum depth of 1.5m and are deeper where</p>

	<i>attractive and useable private spaces</i>	possible. The minimum private amenity areas have all been met and are exceeded in a large number of units. Only one apartment (DE-00-15) does not have a balcony due to ESB requirements for the substation below. In this case, the unit is provided with a 'Juliette balcony' and is oversized (57.7sq.m instead of the minimum 37 sq.m studio).
6.	<i>To promote mix of use and diversity of activities</i>	<p>It is considered through the future development of these lands by 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 on the subject site.</p> <p>The proposed residential development, in addition to the childcare facility, community facility, co-working, open space areas and the new hospital providing mental health services proposed will and promote the delivery of a mixed use development.</p> <p>The development of 811 no. apartments and ancillary amenities and facilities will ensure the formation of a 'sustainable urban neighbourhood' will a mix of build to rent, standard designed apartments and social housing.</p>
7.	<i>To ensure high quality and environmentally sustainable buildings</i>	<p>A Daylight and Sunlight Analysis has been prepared by IN2 and is submitted with this LRD planning application. This assessment has studied the effect the proposed development would have on the level of daylight and sunlight received by the neighbouring residential properties that are in close proximity to the proposed development and demonstrates no significant adverse impacts.</p> <p>The proposal includes green roof provision in excess of 70% and the SUDs proposals accord with best practice and ensure no increased pluvial flood risk as a result of the proposed development.</p>
8.	<i>To secure sustainable density, intensity at locations of high accessibility</i>	<p>The proposed development provides a sustainable density (182 units per hectare based on the net area of the residential area excluding public open space and hospital site) and is an increased residential density relative to that of some of the surrounding residential areas, in order to facilitate the appropriate and sustainable use of public transport in the area, and to provide for much needed housing.</p> <p>The text of the Sustainable Residential Development Guidelines must be considered in the context of the much more recent policies included in the National Planning Framework and Urban Development and Building Height Guidelines 2018 which place significantly greater emphasis on the importance of achieving a compact urban form including increased residential densities in urban areas, as set out above. The City Plan has been prepared in the context of the National Planning Framework which advocates an approach of consolidation and densification in the city and also in the context of the EMRA RSES which further endorses the NPF's principles of consolidation, brownfield development, densification and compact growth.</p>

		<p>The Development Plan does not include any density requirements for Inner Suburban areas. The proposed density is considered to be appropriate having regard to the site being located within an 'Inner Suburban area', which is classified as part of the 'Outer City area' in the Development Plan and is zoned objective 'Z1, Z12 and Z15' in the Development Plan. Residential and Build to Rent Residential uses are either permissible or open for consideration under these zoning objectives (see Section 6 for justification for residential development on Z15 to address highly exceptional circumstances). The subject site is underutilised and given its 'Central and/or Accessible' location (as defined under Section 2.4 of the Apartment Guidelines 2022) or location within a 'Public Transport Corridor' defined as a 'Key Location' for increased heights and density in Appendix 3 of the Development Plan, is suitable for a high-density residential development and increased building heights.</p>
9.	<i>To protect historic environments from insensitive development</i>	<p>Both Richmond House and Brooklawn House would be refurbished for re-use as staff/administration facilities for the new St Vincent's Hospital. As elements of the townscape and visual resources, the condition of both buildings would be substantially improved, as would the condition of their immediate environs. Therefore, the development's impacts on these buildings would be entirely positive.</p> <p>The more significant impacts would be to the historic elements of the St Vincent's Hospital complex. While the modern, non-protected elements of the hospital complex would be removed (see Chapter 13 / Volume 4 for a detailed assessment of the proposed demolition and impacts), the protected structures would be refurbished and re-purposed as a hub of community facilities, including (a) a community hall in the chapel, (b) a creche in the former convent, (c) a café, (d) community library and (e) co-working facility in the former school, and (f) a gym in the former hospital buildings.</p>  <p>The condition of the buildings and their immediate environs would be substantially improved. More importantly, their context would be altered – from hospital/institutional environment in relatively poor condition, to new, high quality residential neighbourhood. This would include an increase in the density and height of built form surrounding the historic buildings, and they would be screened from view in certain views (e.g. from positions to the south west, west and north west (refer to Viewpoints 7, 12, 18).</p>

		<p>Their visibility from the wider townscape surrounding the site would thus be reduced, but it should be recognised that these views cannot be considered 'key views' and they are experienced by a small cohort of the community. Counterbalancing this effect would be the extension of the public realm through the site, incorporating the buildings themselves (in their improved condition) into the public realm. This would expose them (their exteriors and interiors) to a larger number of people, allowing for greater appreciation of their architecture. As both heritage and landscape/visual assets, their value would be increased.</p>
10.	<i>To ensure appropriate management and maintenance</i>	<p>We refer to the Mixed Use Development Operational Management Plan prepared by Hooke and MacDonald which states that a property management services provider will be appointed and will be responsible for the management of the day to day operations, including facilities management and resident engagement.</p>

**APPENDIX 2 – IAA CORRESPONDENCE**

**From:** O'NEILL Damian <Damian.ONEILL@IAA.ie>  
**Sent:** Friday 21 October 2022 11:26  
**To:** Tiarna Devlin  
**Cc:** Planning; HUGHES John; O'BRIEN Christophe; David McCann  
**Subject:** RE: St. Vincent's Hospital Fairview, Richmond Road, Dublin 3

Good morning Tiarna,

Thank you for your email and drawings relating to a LRD pre-application request to Dublin City Council on lands at St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3.

Based on the information provided, the development appears to be located approximately 5.8km South of Runway 34 Threshold at Dublin Airport with a maximum height 47.965m AGL. During the formal planning process, the Safety Regulation Division – Aerodromes will likely make the following general observation:

*"In the event of planning consent being granted, the applicant should be conditioned to contact the Irish Aviation Authority to agree appropriate obstacle warning lighting arrangements and to notify daa / Dublin Airport and the Authority of the intention to commence crane operations with at least 30 days prior notification of the erection."*

Please note, Your email will be forwarded to other domains within the Authority who may furnish further comments/observations in due course.

Best Regards,

Damian

*Damian O'Neill*  
Aerodromes Inspector  
Safety Regulation Division

Irish Aviation Authority,  
The Times Building,  
11-12 D'Olier Street,  
Dublin 2,  
Ireland.

E: [Damian.ONEill@iaa.ie](mailto:Damian.ONEill@iaa.ie)

