

**Statement of Response to DCC's LRD Opinion
under Reg Ref.: LRD6009/22-S2**

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

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1.0 INTRODUCTION

This Statement of Response report seeks to address individually the issues / items raised within the LRD Opinion, issued by Dublin City Council (DCC) under Ref.: LRD6009/22-S2 on the 15th of December 2022, following the LRD Meeting held on the 18th November 2022 in respect of the proposed redevelopment at St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3.

This Statement will refer to other documentation which forms part of the final LRD application pack and will direct the reader to the relevant information within the application documentation, which demonstrates that the issues raised in the LRD Opinion have been fully and satisfactorily dealt with as part of the final LRD application.

2.0 RESPONSE TO LRD OPINION

The LRD Pre-Application meeting took place on the 18th of November 2022 in respect to a proposed development which at that time consisted of 822 residential units, a new hospital / mental health facility building, a childcare facility, a gym, café / restaurant, retail, co-working, community facilities, open space and all associated development.

The LRD Opinion on the pre-application stage for the proposed development was issued by DCC under Ref.: LRD6009/22-S2 on the 15th of December 2022. The Opinion states that the proposals form a reasonable basis for an application for Large-scale Residential Development subject to the applicant addressing issues raised under 9 no. headings in the LRD opinion as part of the future application, as follows:

1. Zoning – Principle of Development
2. Dublin City Development Plan 2022-2028
3. Design Strategy and Height
4. Residential Amenity
5. Conservation
6. Open Space and Biodiversity
7. Drainage
8. Traffic and Transportation
9. Archaeology

Documentation has been prepared and/or updated in response to this request to ensure that the Planning Authority have all the information it requires to come to a reasoned decision on the proposed development.

A summary of the responses provided to each of the 9 no. items of the LRD Opinion is set out in the sections below with reference to accompanying application documentation.

Summary of key changes to the scheme since LRD Pre-Application Submission

As set out in STW's Architectural Response to DCC LRD Opinion, revisions have been incorporated into the proposed development primarily arising from the responses to Item 2, Item 3, Item 4 and Item 5 of the LRD Opinion, with the key changes summarised as follows and elaborated upon in subsequent sections of this Statement of Response:

- Item 2- Universal Design

The scheme has been reviewed and revised to incorporate, which in conjunction with the response to Item 3 and 4 below, results in a reduction in the no. of residential units proposed from 822 at pre-application stage to 811.

- Item 3 – Height and Item 4- Residential Amenity

Block F is the closest to the northern boundary and the Grace Park Wood residential development and in response to the LRD Opinion, the height and massing of Block F has been reduced from part 6, part 8, part 10 storeys, to part 5, part 7, part 9 storeys as part of this LRD submission, which along with the response to Item 2 results in a reduction in the in the no. of residential units proposed from 822 at pre-application stage to 811. In addition, the layout and extent of glazing on Block F has been reconsidered to ensure issues of direct overlooking don't arise, whilst still providing for passive surveillance of the adjacent open space and activity trail.

Two additional pedestrian / cycle access points are provided from the north of the application site to the Fairview Community Unit and onwards to Phillipsburg Avenue.

- Item 5- Conservation

The access road to Richmond House and the new hospital has been revised to retain more of the existing trees along the avenue and provide additional planting, to preserve the character of this tree-lined avenue. This resulted in associated changes to the car parking in this part of the site.

Zoning – Principle of Development

Item No. 1 of the LRD Opinion relates to zoning and the principle of development for the subject lands and reads as follows:

“The application will be determined under the incoming Dublin City Development Plan 2022-2028. The applicant is requested to further outline how the development will comply with the new requirements set out for zoning objective Z15 Community and Social Infrastructure and in particular, the applicant will need to adequately justify how the proposed residential and commercial development on the Z15 lands is subordinate in scale to St Vincent’s Hospital.”

Response

The response to Item No. 1 of the LRD Opinion, i.e. consistency of the element of the proposed development on the Z15 zoned lands with the requirements of that zoning objective, is addressed in greater detail in the following documentation, and we provide a summary justification below in direct response to Item 1 of the Opinion.

- Planning Report and Statement of Consistency prepared by JSA;
- Architectural Response to DCC LRD Opinion prepared by STW; and
- Business and Operational Management Plan prepared by St. Vincent's Hospital Fairview

Compliance with Z15- Community and Social Infrastructure Requirements

Section 6.1.2.2 of the Planning Report and Statement of Consistency provides a detailed assessment of the consistency of the proposed development with the Z15 - Community and Social Infrastructure zoning objective of the Dublin City Development Plan 2022-2028 (hereafter the Development Plan), which pertains to part of the site, and we refer the Planning Authority to this report for the **detailed** response to each of the different aspects and criteria pertaining to the Z15 zoning objective where an element of limited residential / commercial development is proposed to support the continued use of the subject lands for its 'community and social infrastructure' use, in this instance a new hospital on the St. Vincent's Hospital Fairview campus. We provide a

summary of the key points below and then address the particular request above in respect to how the 'proposed residential and commercial development on the Z15 lands is subordinate in scale to St. Vincent's Hospital.

The proposed development, which includes a new hospital, providing mental health services, and supporting residential and commercial development (a limited portion of which is proposed on the Z15 zoned portion of the site- see figures below), is considered to comply with the Z15 zoning objective and satisfy the requirement to demonstrate 'highly exceptional circumstance' where residential / commercial development is proposed on such lands, for the following reasons:

- 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 Business and Operational Management Plan prepared by the applicant provides further comfort on the continue community / institution use on the Z15 zoned portion of the site and includes the following statement:

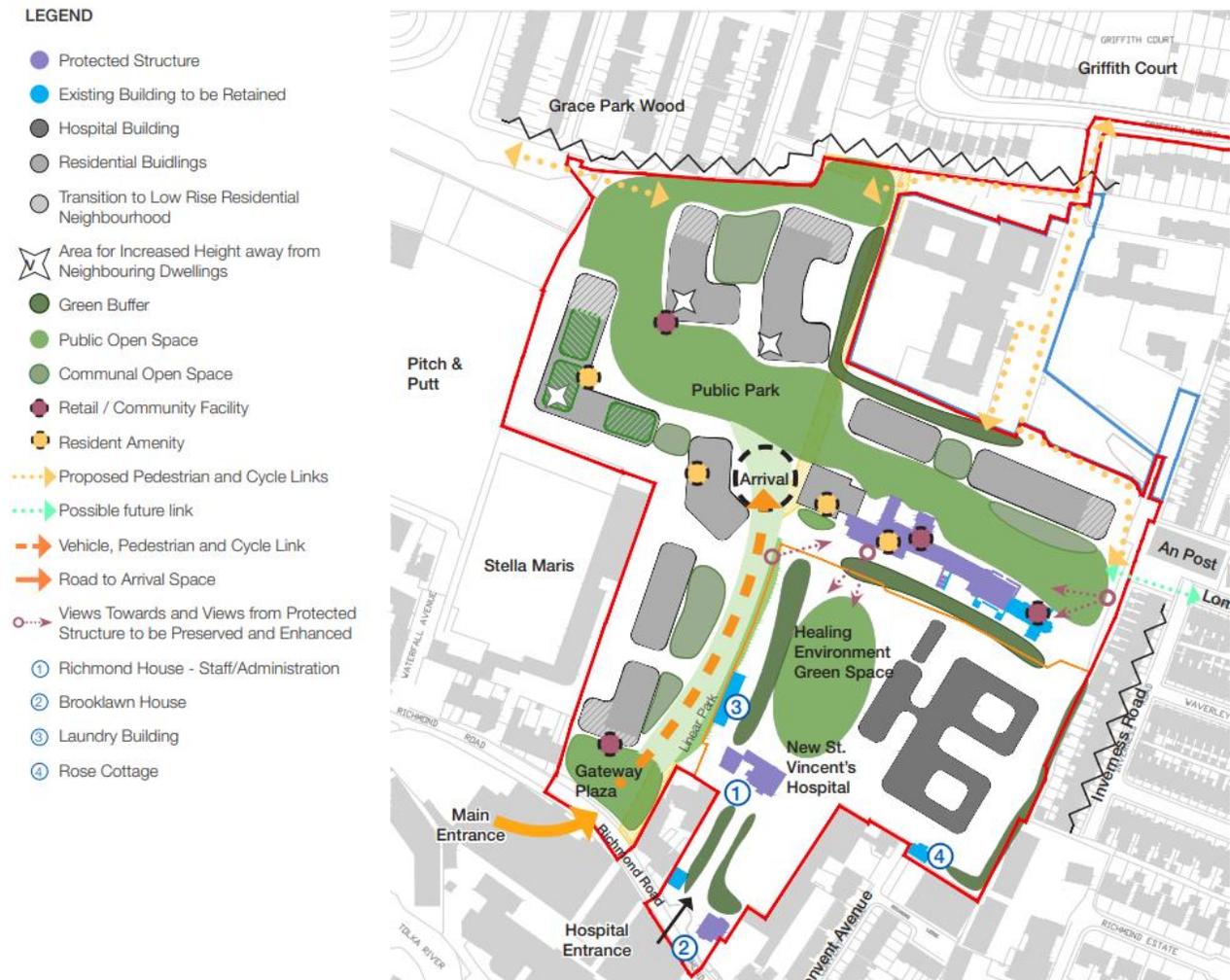
“In summary, St. Vincent's Hospital is seeking to provide a new hospital providing mental health services on the subject site to replace the aging and unsuitable current hospital buildings as they are no longer fit for purpose.

The proposal ensures that the main institutional and community uses on the subject lands, including space for any necessary expansion of such uses should they be required in the future (which is possible on the proposed c. 2.67ha hospital campus), will be maintained and improved.

The Board of St. Vincent's Hospital has made a strategic partnership agreement with the Royalton Group, to design and construct a new and much needed state of the art hospital for acute patients on the existing Fairview campus. The unique partnership will ensure the continuing support for the future of mental health services in Dublin, provide new residential accommodation and enhance the amenities available to the surrounding communities.

In order to fund the new facility, the Board of St. Vincent's Hospital Fairview has agreed to provide a high quality residential development on undeveloped land, which will include a new public park. The entire value of the land will be used to deliver the new hospital on the subject site. **The quantum of residential development is required to fund the construction of the new Hospital and therefore is necessary to maintain and provide for the function and operational viability of St. Vincent's Hospital, 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.** (Emphasis added)

Figure 2.1: Masterplan for the overall Z12 and Z15 Zoned Lands



Source: STW Z12 and Z15 Masterplan Document

Thus, the institutional use of the Z15 lands at St. Vincent's Hospital Fairview will remain as the primary use on the Z15 zoned portion of the land, with the residential and commercial uses being ancillary elements and therefore the principle of the development is considered to be acceptable and consistent with the zoning objective. The following section of this response addresses the other specific aspect of Item 1 of the Opinion.

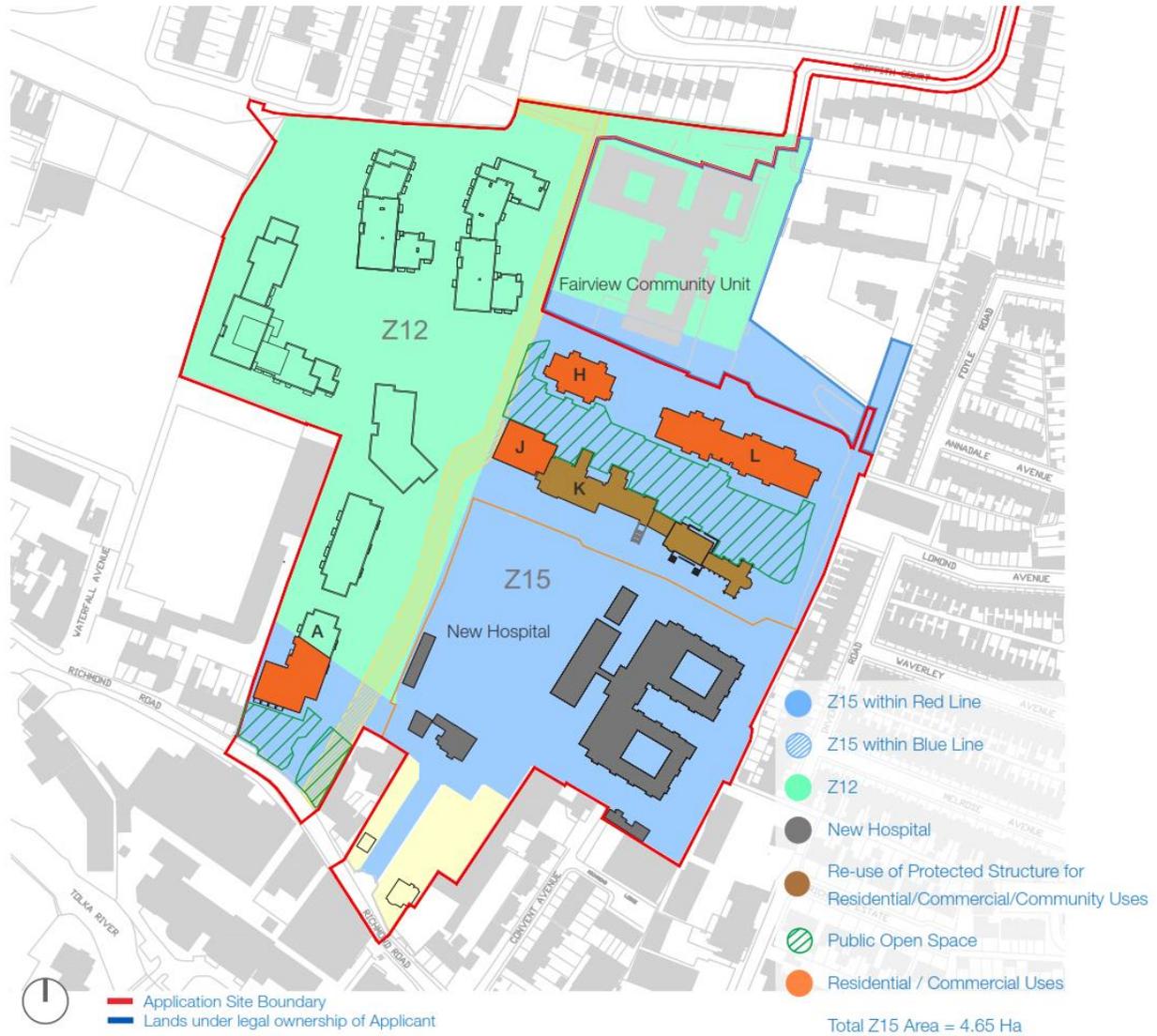
Limited Residential / Commercial Development and Subordinate in Scale to Primary Institutional / Social / Community Use

As discussed and illustrated in Figure 2.1 below, and addressed separately in STW's Architectural Statement of Response to 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.

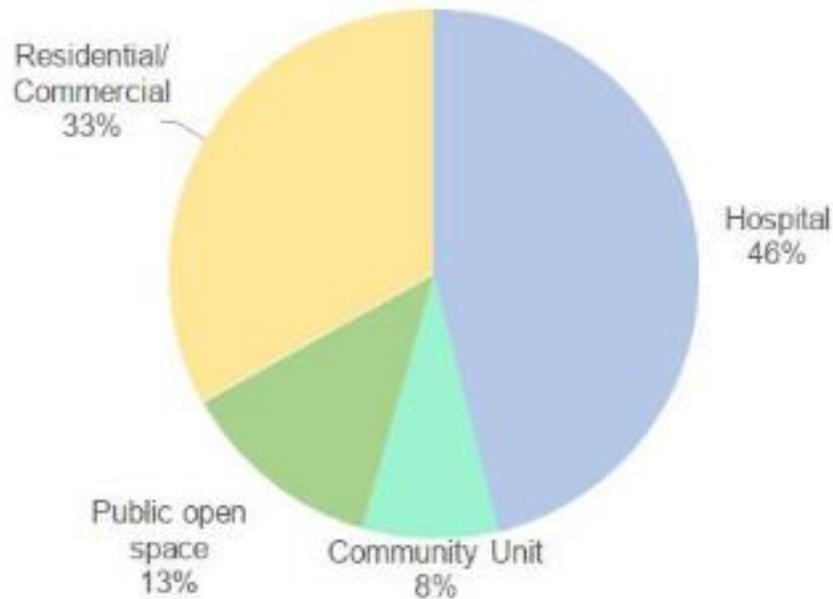
As illustrated in Figure 2.1 below, the majority of the proposed residential development is proposed on the Z12 lands and over 50% of the Z15 lands (shown in blue) will remain in use as a hospital and associated grounds (the hospital grounds provide land for potential future expansion to the immediate 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 2.2: Block Layout of Development on Z12 and Z15 lands



Source: STW Architects

The pie-chart included as Figure 2.2 below illustrates that based on site area and the extent of the proposed uses and illustrated by the block plan layout in Figure 2.1 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 2.2: Pie-Chart Illustrating Land Uses on the Z15 lands

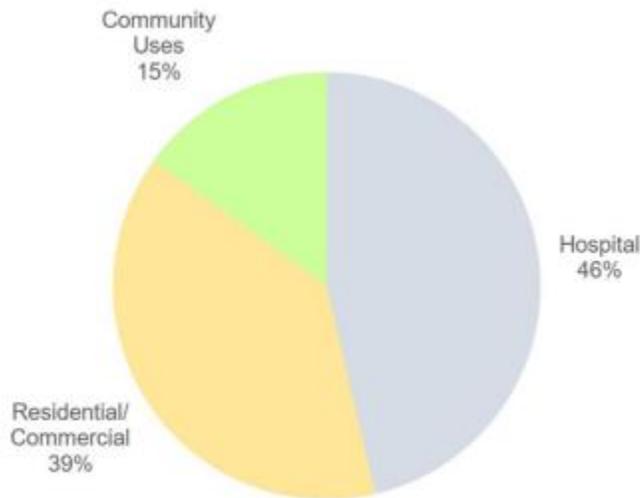
Site Uses within Z15 Lands - Residential / Commercial uses is subordinate

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 2.3 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 2.3: Percentage Footprint of uses on Z15 Lands

Footprint of uses within Z15 Lands - Residential / Commercial is subordinate

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.

Dublin City Development Plan 2022-2028

A response to each subsection under Item No. 2 of the LRD'S Opinion is set out below.

- a) ***QHSN40 – Built to Rent Accommodation - Provide justification for how the proposal shall meet the criteria set out in QHSN40, particularly in relation to requirements to facilitate the provision of Build to Rent Accommodation in the following specific locations:***
- ***Within 500 metre walking distance of significant employment locations,***
 - ***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 Build to Rent Justification Report prepared by John Spain Associates which accompanies this LRD application, and which specifically addresses Policy QHSN40 and other relevant aspects of the Development Plan. The report is accompanied by analysis of employment locations and the public transport catchment prepared by Space Syntax, attached as Appendix 1 to the BTR Justification Report, which assists in demonstrating how the proposal is consistent with the BTR policies and associated text in the Development Plan, including Policy QHSN40, and demonstrates the appropriateness of the site for an element of Build to Rent Accommodation as part of an overall mixed-use redevelopment.

In summary, the report outlines that Policy QHSN40 does not state that BTR developments will be restricted to these specific locations, but rather that BTR will be facilitated at these locations. The above mentioned locations are not mandatory requirements for all build to rent developments and therefore build to rent developments can still be permitted in other locations including inner suburban locations such as the subject site. This is reflected under the Z12 zoning objective, on which the proposed 317 no. BTR units within the scheme are located, which includes BTR as an open for consideration use and reflected elsewhere in the Development Plan which states that *“In order to achieve a sustainable tenure mix in neighbourhoods, the Build to Rent residential typology will be in the open for consideration category.”*

The BTR Justification Report demonstrates that the subject site is in an Inner Suburban location close to the city centre and will continue to accommodate St. Vincent's Hospital Fairview, a significant employment location as defined under Section 2.4 of the Apartment Guidelines 2020 / 2022, which will continue to provide employment for c. 200 persons (see St. Vincent's Hospital Fairview Business and Operational Plan).

The report demonstrates that there are a range of businesses in proximity to the site and that the site is within reasonable walking and cycling distance to employment nodes within the city centre including c. 1.6km from Eastpoint Business Park (East Wall), c. 2km from Connolly Station, c. 2.2km from IFSC and c. 2km from the Docklands. The 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 500m and 1,000m from the site which operate frequent services, as illustrated in Figure 2.3 below. Thus, the site is considered to be suitable for an element of Build to Rent development as part of an overall mixed use development.

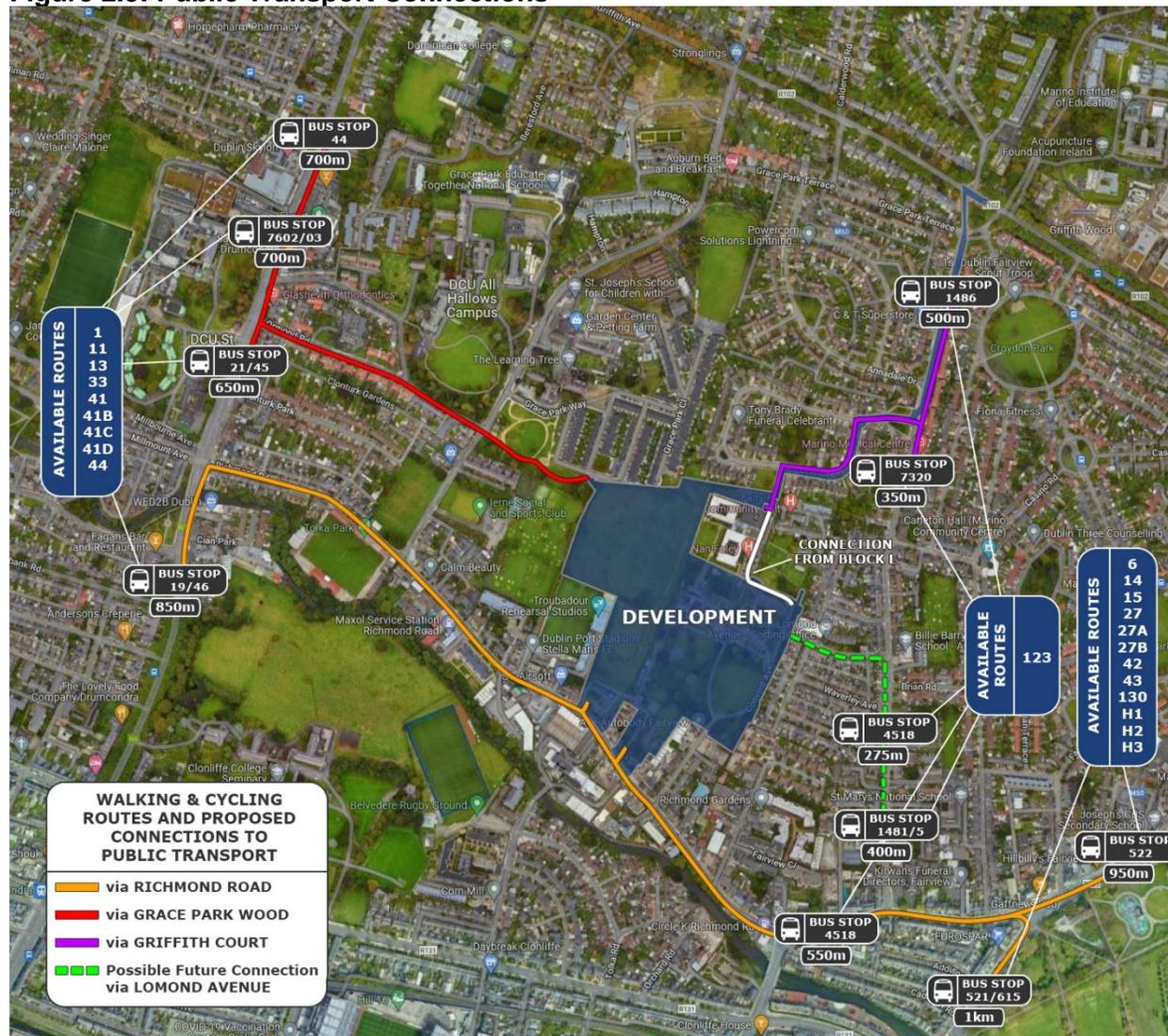
The reports also demonstrates that the proposed BTR scheme is appropriate given the current shortage of residential accommodation in Dublin, particularly in the rental market and affordability issues, and that there is a significant need for the BTR element of the proposed development, which comprises a total of 317 no. build to rent units. It is noted that the proposal also includes 494 no. standard apartments and BTR is a subordinate element of the overall proposed development and complies with the 60:40 ratio of SDA Apartments to BTR Apartments under the Development Plan.

The report also demonstrates that due to the changing demographic trends in Dublin and the rising costs of traditional renting, there is a demand for this type of accommodation and accordingly, there is a requirement for the proposed development to contribute, to addressing the private rental housing needs of the area.

We note that the Planning Authority have accepted the principle of providing a BTR development in 'other' locations within the City under the new Development Plan in a recent Notification of

Decision to Grant Permission under Reg. Ref.: 4578/22 for a proposed 54 no. unit BTR residential development at 'Dunelm', Rydalmount, Milltown Road, Dublin 6. Whilst the application site in this instance was not located within 500m walking distance of a significant employment location, or within a 500m radius of a major public transport interchange (Connolly Station, Tara Street or Heuston Station) or within a Strategic Development Regeneration Area, Dublin City Council still considered the site to be located within a suitable area being within a 1km radius of Milltown Luas stop and proximate to high quality bus services, and Inner Suburban Area close to good existing facilities and services, it is was considered a suitable site for Build to Rent apartments.

Figure 2.3: Public Transport Connections



Source: OCSC Consulting Engineers

b) All schemes currently operating as BTR within 1km should also be included in the report submitted regardless of whether the proposal description at planning stage indicated use as BTR. i.e. Griffith Woods (ABP-306836-20 & subsequent applications). For the avoidance of doubt, the 1km radius should be measured from the periphery of the site, rather than a centre point within the site.

Response

We refer to the Build to Rent Justification Report prepared by John Spain Associates which provides an assessment of BTR developments within 1km radius of the site. The 1km has been updated and we can confirm that it is measured from the periphery of the site, rather than a centre point within the site, as specified under Item 2(b) of the LRD Opinion.

The Build to Rent Justification Report demonstrates that within a 1km radius of the site there is only 1 no. BTR development of 183 no. units which is currently under consideration by An Bord Pleanala at No. 146A and 148-148A Richmond Road, Dublin 3, under SHD ABP Ref.: 312352-21.

An Bord Pleanala 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 subsequently quashed by the Courts and therefore is not included in the assessment of concentration of BTR schemes within 1km of the subject site.

We understand that an apartment scheme, which is operating as a private rental scheme (PRS), of c. 377 no. units at Griffith Wood (granted under ABP Ref.: 303296-18, not ABP Ref.: 306836-20 (which refers to a withdrawn application) as outlined in the LRD Opinion) is located within 1km of the subject site. It should be noted that while this scheme is operating as a PRS, this was applied for and approved as a standard apartment scheme in accordance with the Apartment Guidelines 2015 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 a Private Rental Scheme in a study which assesses 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 BTR Justification 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 new City Development Plan.

The estimated maximum occupancy for the new BTR residential units is c. 1,035 no. people which is calculated based on the proposed 317 BTR units on the subject site and the 183 BTR units in the Richmond Road SHD multiplied by the national average household size for apartments of 2.07. The estimated maximum BTR population equates to c. 1.5% of the estimated population in 2026 within 1km of the subject site and is therefore not considered to result in an over proliferation of the BTR housing tenure and will provide much needed and professionally managed rental accommodation in the area.

It is apparent that there are very limited BTR developments in the immediate proximity of the application site, thus, the addition of 317 no. BTR units, as part of an overall mixed use scheme which includes a new hospital and standard design apartments, on this underutilised site, will not result in an over concentration of BTR schemes in the area. It is noted that the proposal also includes 494 no. standard apartments and BTR is a subordinate element of the proposed development.

In response to housing need, Appendix 1 of the Draft Housing Strategy (forming part of the Development Plan) and Housing Need Demand Assessment, outlines that 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 within the administrative boundary. The Development Plan therefore identifies a need for rental accommodation and the proposed Build to Rent element of the proposed

development is considered to be appropriate as it complies with the relevant guidance set out in the Development Plan and the proposal will help meet this identified need.

It is respectfully submitted, that the subject site is particularly suited for an element of BTR development given the very limited provision of BTR development or rental accommodation in the immediate surroundings, the provision of a new hospital on the overall lands and the proximity to other employment nodes, public transport and the City Centre. It is recognised that having regard to the existing mix and tenure of the residential accommodation in the area, the provision of a BTR scheme will ensure it will contribute to the availability and range of residential accommodation in the area.

- c) ***QHSNO11 – Universal Design - The relevant apartments shall be designed to be adaptable, rather than being capable of being adapted. The criteria set out within QHSNO11 does not extend to the design of the lift cores.***

Response

We refer to the Architectural Response to DCC's LRD Opinion prepared by STW in response to Item 2(c) and Policy QHSNO11 relating to Universal Design which seeks "***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 or Quality Housing 2022 and the DHP&LG & DH's Housing Options for Our Ageing Population Policy***". (Emphasis added)

Firstly it is noted that the proposed BTR units should be assessed in accordance with the Guidelines issued prior to the BTR update i.e. the Apartment Guidelines 2020 that includes SPPRs 7 and 8, rather than the new BTR provisions in the Apartment Guidelines 2022, given the transitional arrangements set out in Circular Letter NRUP 07/2022, which was published with the amended Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities (2022). 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% does not apply to BTR schemes. It is therefore apparent that the requirement of Policy QHSNO11 do not apply to Build to Rent development as it seeks "***To ensure that 50% of apartments in any development that are required to be in excess of minimum sizes***".

The Architectural Response to DCC's LRD Opinion illustrates that 252 no. units out of the 494 no. standard design apartments are required to be 10% in excess of the minimum sizes, as required under Section 3.8 of the Apartment Guidelines 2022. Therefore, a total of 126 no. units (50% of 252 no. units) are required to be designed in accordance with Universal Design requirements. The units designed in accordance with Universal Design are located in residential Block A, B, C, G, H and L. The Architectural Response to DCC's LRD Opinion demonstrates compliance with Objective 'QHSNO11 – Universal Design' of the DCC Development Plan by way of a representative selection of apartments from all Standard Design Apartment blocks within the scheme. The response brochure depicts 6 sample UD apartment floor plans, which are a representative selection of the UD apartment types across the development, which in turn are incorporated as UD apartments within the blocks, as illustrated on the drawings. These 6 UD samples demonstrate the detailed spatial principles applicable to all Universal Design apartments throughout the development.

We refer to the GA floor plan drawings of each apartment block for the locations and layouts of the 126 no. proposed UD apartments, thereby demonstrating compliance with Policy QHSNO11.

- d) ***CUO25 – SDRAs and Large Scale Developments - The Social and Community Infrastructure Audit/Assessment should include the total site in measurements. The childcare facility should not contribute to the overall provision. 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.***

Response

In summary, and as addressed in greater detail in the Planning Report and Statement of Consistency and Social Community infrastructure Audit Assessment, in response to Objective CUO25 which requires 5% of floorspace for community, arts and culture spaces including exhibition, performance, and artist workspaces, in developments above 10,000 sq.m, 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 2.4: Proposed Uses in the St. Vincent's Hospital Buildings, RPS Ref.: 2032

Cultural/Community	Building	Area
Community Hall	K4	243 m ²
Creche	K3	730m ²
Community Library	K2	163 m ²
Cafe	K2	160m ²
Co-working	K2	817 m ²
Gym	K1	1,459m ²
Residents' Amenties	K1	711m ²
Total		4,283m²

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 CU025 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.

Design Strategy and Height

A response to each subsection under Item No. 3 of the LRD'S Opinion is set out below.

- a) ***In order to justify the heights and densities proposed and to demonstrate that the proposed 'central park' will function as a public open space, it will be critical to demonstrate that the pedestrian routes and connectivity through the site will be delivered as part of the proposed development. In order to ensure the Planning Authority's support of the scheme in this regard, the application shall be***

accompanied by legally binding documentation assuring the deliverability of the pedestrian connections onto Grace Park Wood, Griffith Court and Lomond Avenue within Phase 1 of the proposed development. It is preferable that such connections are included within the application site area.

Response

In response to Item 3(a) of the LRD Opinion, 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 Phillipsburg Avenue), and a pedestrian / cycle connection to Grace Park Wood, within the red line application site boundary. NMP drawings 104-1 and 104-2 (see extracts below) provides details of the proposed connections.

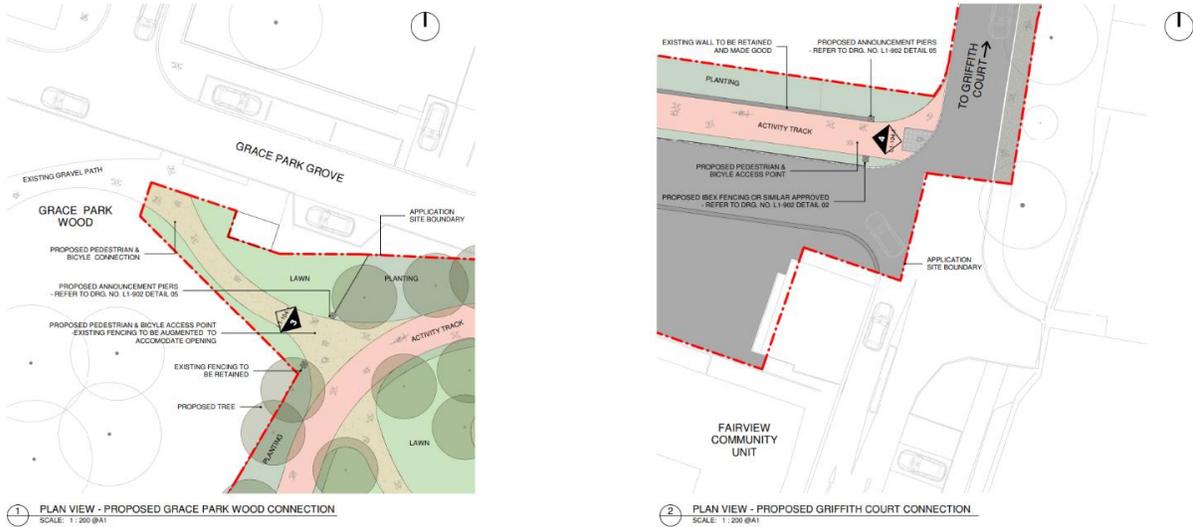
The application is accompanied by a letter of consent from Targeted Investment Opportunities ICAV, which provides consent for the inclusion of lands to provide for the pedestrian / cycle connection to Grace Park Wood, as illustrated on STW's site layout plans. The area of the site required to deliver 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.

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 (see Figure 2.6). 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 this land within the red line application site boundary.

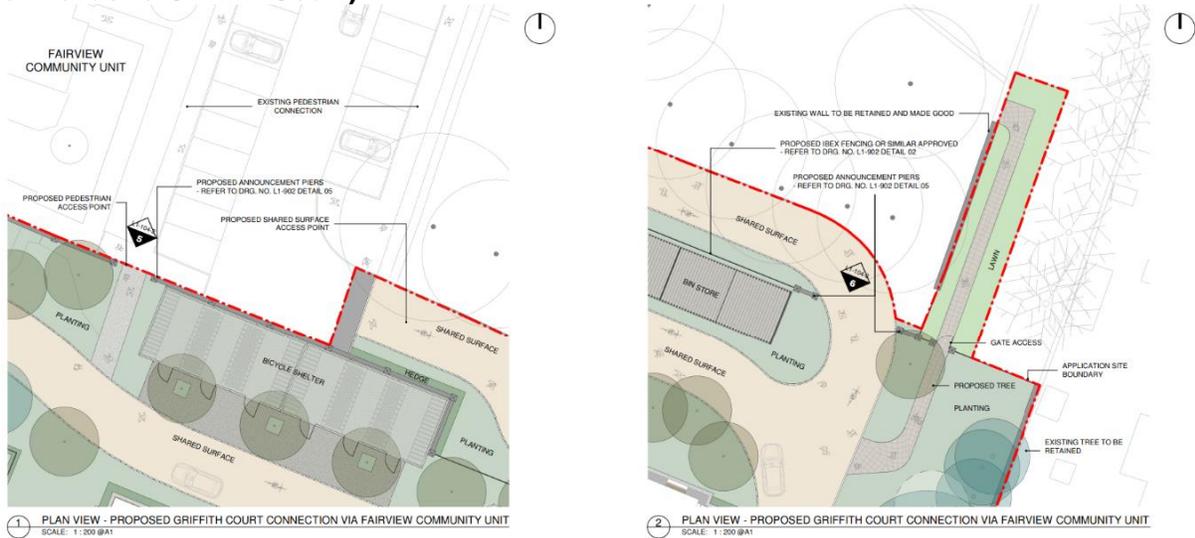
The applicant wishes to note that detailed discussions were undertaken with An Post prior to lodgement in respect to including the proposed connection to Lomond Avenue within the red line boundary, however, it was not possible to reach agreement on same prior to lodgement of the application and given 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 2.4: Illustration of the Proposed Connections to Grace Park Wood and Griffith Court



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

Figure 2.5: Illustration of the Proposed Connections to Fairview Community Unit (and onwards to Griffith Court)



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

Figure 2.6: Illustration of the Potential Future Connection to Lomond Avenue (by others)



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

As addressed in greater detail in Section 6 of the Planning Report and Statement of Consistency, the various connections proposed via the linkages to Richmond Road, Grace Park Wood and Griffith Court, to be delivered through the development of the St. Vincent's Hospital Fairview lands, ensures that the site is highly accessible to a range of public transport services, amenities and employment areas, within 500m to 1.5km of the application site, whilst also delivering improved permeability and connectivity within the area in accordance with the 15 minute concept. As noted above, the Grace Park Wood and Griffith Court connections will facilitate future residents and employees on the subject lands to walk to a range of frequent bus services on Phillipsburg Avenue and Drumcondra Road.

The applicant acknowledges that a Lomond Avenue connection would be another positive connection if facilitated at a future date, and therefore the scheme makes provision for such a future connection in the application drawings, and it could be delivered if the adjacent An Post Fairview Delivery Service Unit come forward for redevelopment, noting the site is zoned objective Z1- Residential.

The proposed connections ensure a high level of connectivity to surrounding areas and permeability through the site. The connections to the north of Block H and L to the Fairview Community Unit campus and onwards to Griffith Court and Phillipsburgh Avenue, also assists 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 respect of the requirement that the applicant demonstrate that the proposed 'central park' will function as a public open space, NMP's Landscape Design Statement, acknowledges that the access to the public open space is key to the continued use and vibrancy of the public amenities. NMP note that the seamless integration of the shared surface connection to the Fairview Community Unit and beyond encourages the use of the Central Park East (& Central Park West) amenities by the residents as well as the surrounding greater community, as accessed from the eastern side of the public open space. Additional accessibility to the eastern side of the public open space has furthermore been future-proofed by the incorporation of a pedestrian / cycle path up to the application site boundary, with the potential future connection point to Lomond Avenue / Inverness Road. An open pedestrian access allows for additional permeability along the Fairview Community Unit boundary and provides the user with a choice to either access the Central Park from the east or further along the shared surface to the west, thereby assisting in activating the public open space as a whole.

We also note that the application site boundary has been extended to include an area of the public road / footpaths (extending for approximately 0.8km) on Griffith Court, Philipsburgh Avenue and Griffith Avenue in order to provide for watermain service connections underneath the public road (works which are to be completed by or on behalf of Irish Water). The section of public road included within the application site boundary is within the charge of Dublin City Council. A letter of consent from Dublin City Council, Environment and Transportation Department, Civic Offices, Wood Quay, Dublin 8, is appended to the planning application form.

b) *Justification for the increase in the number of storeys to Blocks A, B, C, J, the northern section of Block F and the central corner of Block DE from earlier pre application consultations with consideration given to the sensitive location of some of these blocks to existing neighbouring residential development.*

Response

In response to Item 3(b), the STW Architectural Response to DCC's LRD Opinion sets out that similar heights were consistently proposed in pre-planning meetings in December 2021, January

2022 and May 2022 (except in the meeting on the 24th of May where Building J was reduced to 4 storeys to ensure the parapet was lower than the parapet of the adjoining Protected Structure). Notwithstanding this, the following provides a summary of the justification for the proposed building heights and outlines how the proposal has had regard to sensitive locations and existing neighbouring residential development.

The development responds to the 'Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale' set out in Table 3 in Appendix 3 of the DCC Development Plan. In consultation with STW, Modelworks prepared this assessment, which is included in Table 11.8 of Chapter 11 of the EIAR submitted with the application (please also refer to Appendix 1 of the Planning Report and Statement of Consistency for details of how the scheme complies with Table 3 of Appendix 3 of the Plan).

A justification for the proposed building heights is provided in STW Architectural Design Statement, the Planning Report and Statement of Consistency prepared by John Spain Associates and the LVIA and photomontages included in Chapter 11 and Volume 3 of the EIAR. These documents explain that the higher buildings within the proposed development (Blocks DE, F and G), are centrally located and address the wider part of the public open space area within the site, 'Central Park', 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 to have regard to the prevailing height on the adjacent residential neighbourhoods. The scale of the 5-storey Building H respects the adjacent Fairview Community Unit and the height of the main Protected Structure.

In contrast, within the site, the 'central park' (which is conceived as a movement corridor in addition to a public 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). The variations in height, respond to the surroundings, and 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 the area in a cohesive manner by reflecting and reinforcing the role and function of streets and places and enhancing permeability.

In respect to the appropriateness of the proposed building heights, we note that the LVIA included in Chapter 11 of the EIAR prepared by Modelworks 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 DE, is located in a corner of the site adjacent to the lerne 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 LVIA demonstrates how the proposed development enhances permeability in support of the increased density and scale. The LVIA continues to state the following in respect of providing a well-connected, high quality proposal:

“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. 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.”

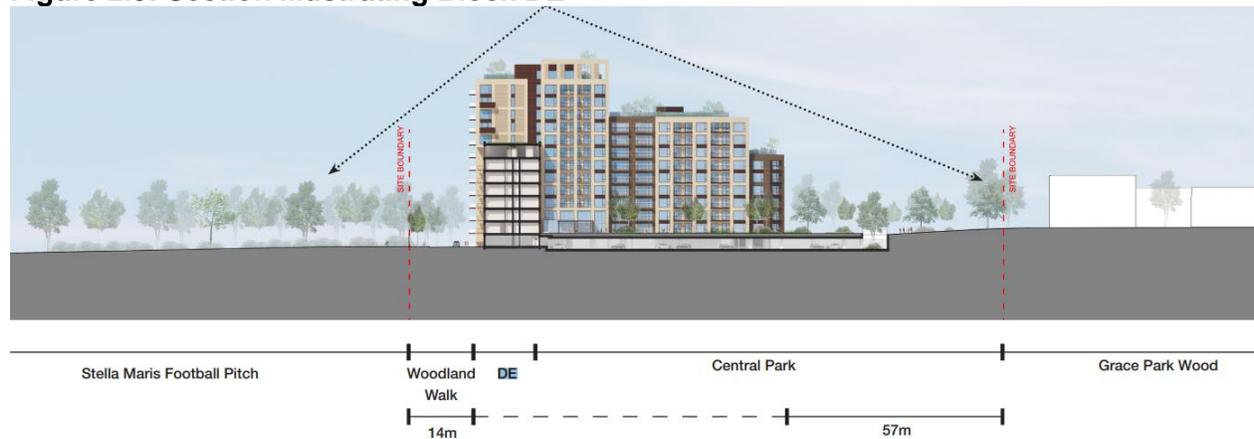
Block D-E

The STW Architectural Response to DCC's LRD Opinion states that the proposed building heights during Section 247 pre-planning meetings were described as 12 storeys owing to the 12 levels of residential accommodation. The description of the building heights was revised in the LRD pre-application submission to '13 storeys' to take account of the small pavilion communal amenity area at 12th floor level which provides access to the roof terrace (please refer to STW 12th floor plan of Block D-E for further details). STW sets out that the proposed height assists in the aesthetic appearance of the building and creates a more slender, vertical proportion. Please refer to Section 4.4 - Scale and Massing in the Architect's Design Statement for further details.

Block D-E is an L-shaped building inside the west and south boundaries of the application site. Block D-E steps up from five and six storey volumes at either end to a 13 storey 'landmark tower' in the corner, overlooking the pitch and putt course to the west and the football ground to the south. STW Design Statement states *“The form of the 13-storey building is disaggregated to create a landmark tower that anchors the building in the development. The tower element closes the vista from the central park and signals the entrance to the larger of the new neighbourhood blocks.”*

Building D-E is set back 57m from the nearest residential boundary and 69m from the nearest existing dwelling which is a 4-storey apartment block in Grace Park Wood. The proposed development has had regard to the relationship of Block D-E to the residential properties at Grace Park Wood, with significant 68.7m set back from the boundary behind an area of open space (part of the Central Park). Therefore, while Block D-E would be visible from the apartment in Grace Park Wood, the significant separation distance and public open space mitigates any concerns in respect to overbearing on the existing residents. Additionally, the large number of new trees in the open space between the buildings would soften Block D-E's presence.

STW Design Statement states *“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 communal external spaces.”* In addition, the LVIA states that *“the disaggregated form and articulation of the Block DE facades lessen the building's apparent massing and create visual interest”*.

Figure 2.5: Section illustrating Block DE

The LVIA outlines that there is limited negative landscape effects, and the summary concludes by stating that “*Considering (a) the weight of positive landscape effects identified for a large part of the receiving environment, (b) the demonstrably high urban design, architectural and landscape design quality of the proposal, (c) the consideration of the landscape context and sensitivities evident in the embedded mitigation, (d) the site’s strategic urban location, and (d) the national policy of compact growth, the landscape effects can be classified as positive overall.*”

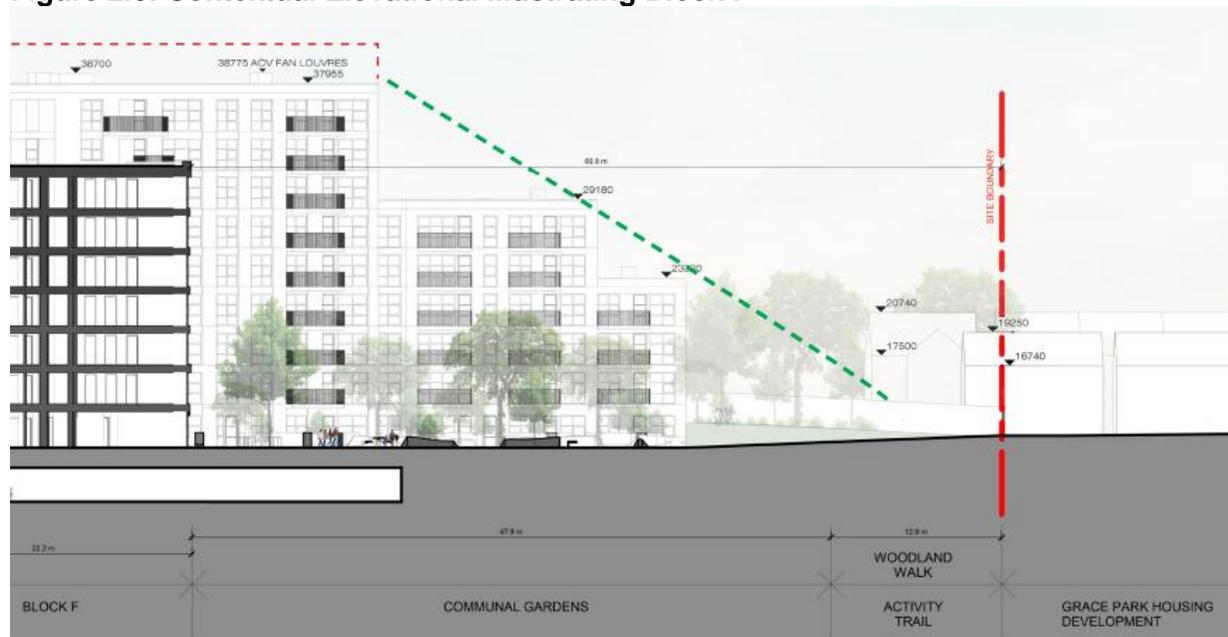
Block F

Blocks F and G are located in the northern part of the site, combining with Block D-E to enclose the internal central park. These are the closest buildings to Grace Park Wood to the north, however, the blocks are set back 20m from the shared boundary behind a densely vegetated linear open space.

As set out in STW’s Architectural Response to DCC’s LRD Opinion, the proposed development has been revised to address Item 4 of the LRD Opinion relating to residential amenity of neighbouring properties. Block F is the closest to the northern boundary and the Grace Park Wood residential development and in response to the LRD Opinion, it is proposed to reduce the higher 6/8/10 storeys to 5/7/9 storeys as part of this LRD submission. This is discussed in greater detail below.

The STW Architectural Response to DCC’s LRD Opinion provides a justification for the proposed building heights of Block F by stating the following:

- *“In response to the topography of the subject site, the ground floor level of Building F is below that of the nearby houses in Grace Park Wood, reducing the overall height difference by 0.9m.*
- *The height of the north-facing 6 and 4-storey elements sit more comfortably against the higher south-facing elements of the building, with the lower roof parapets appearing below the silhouette of the 9-storey element - see the green dashed line in Figure 2.6.*
- *There is an existing 4-storey apartment building on the southern edge of Grace Park Wood (Parapet height 25.1m), which due to the existing topography, is higher than the proposed northern 4-storey element of Building F (Parapet height 23.4m).*
- *The proposed boundary tree planting (see NMP proposals) is designed to be similar in height to the 4-storey element and provides an effective landscaped visual buffer.*
- *Following the overall reduction in height of the Southern elements from 6/8/10 storeys to 5/7/9 stories, we felt that the northern 4 and 6-storey elements were appropriate in this location. See also Section 4a) of this report.”*

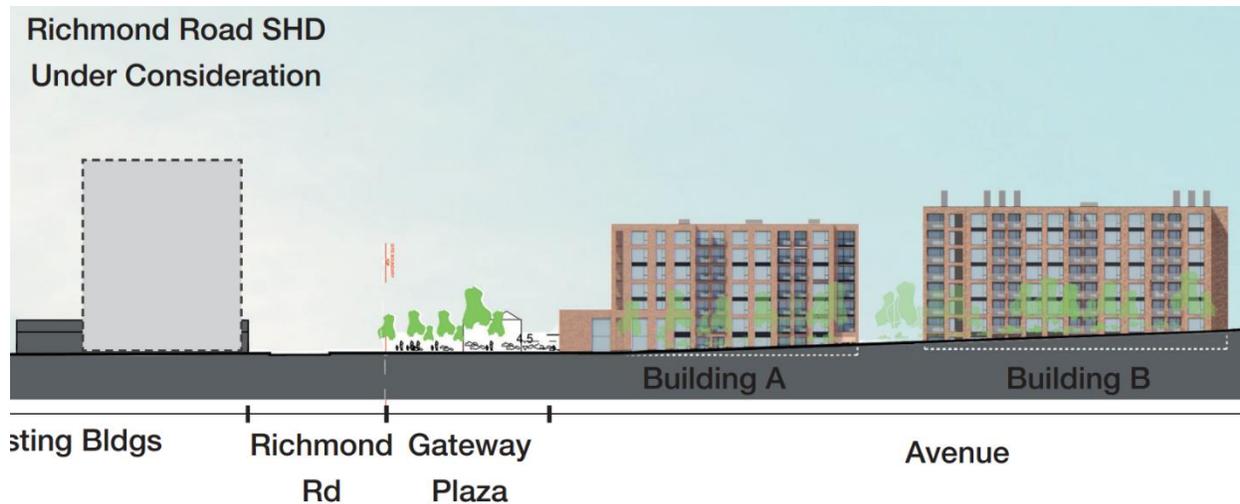
Figure 2.6: Contextual Elevational illustrating Block F

Block A and B

As set out in STW's Architectural Response to DCC's LRD Opinion, the proposed development, when compared to previous pre-application iterations, includes one additional storey on Residential Blocks A and B, and a set-back additional storey on Building C.

STW's Architectural Response to DCC LRD Opinion states that following additional analysis and design - including a series of verified views prepared by Modelworks - it was determined during the pre-application process that additional height on Block A and B could be accommodated having regard to the following:

- *"The distance of these buildings from the proposed new Hospital providing mental health services (approx 120m), especially given the extent of existing and proposed landscaping.*
- *The existence of commercial buildings and football club immediately to the west. (Note that Building A has been located so that its eastern facade does not overlook the rear gardens to the nearby existing terraced houses to the east. (See Section 4 a of this report.)*
- *The avenue follows the natural topography of the site and rises from its lowest point at the Richmond Road entrance to the Arrival point in the heart of the Central Park. The ground floors of buildings A and B are entered at the lowest - Richmond Road - level and therefore appear to be a full storey lower as viewed from the avenue, reducing their visual impact.*
- *The 2-storey element to the south of Building A relates to the adjacent terraced houses while the 7-storey residential element relates to the 9/10 storey on the Richmond Road SHD and LRD on the other side of Richmond Road. These applications are represented in the 'cumulative' versions of the relevant verified views - see yellow massing indicated in top left of Verified View No. 3 opposite."*

Figure 2.7: Proposed North / South Contextual Elevation illustrating Building Heights

- c) ***Provide a report which sets out measures to maximise future occupants' private amenity by minimising reciprocal potential overlooking between unit's balconies and window where the blocks' elevations are in close proximity to each other – such as considering applying: high screens to the sides of projecting balconies; directional overlooking treatments; opaque glazing to balconies, opaque glazing and/high level windows to unit's secondary opes (while still allowing sufficient access to daylight to best practice recommendations); mismatching directly opposing opes (hit & miss) where active windows are at close quarters with each other.***

Response

We refer to STW's Architectural Response to DCC's LRD Opinion which demonstrates measures to maximise future occupants' private amenity by minimising reciprocal potential overlooking between unit's balconies and windows where the blocks' elevations are in close proximity to each other. High screens are also proposed to the sides of opposing balconies to avoid directional overlooking.

As detailed in STW's report, the layout of the proposed apartment buildings aims to maintain the privacy of its residents and to prevent overlooking by providing generous separation distances for this inner suburban infill site. STW outline that the proposed windows and balconies have been architecturally designed and placed to prevent overlooking between the blocks where separation distances are smaller.

In designing the scheme, STW have had regard to Section 15.9.17 Separation Distances (Apartments) of the Development Plan which states that depending on orientation and location in built-up areas, reduced separation distances may be acceptable and that separation distances between buildings is assessed on a case-by-case basis.

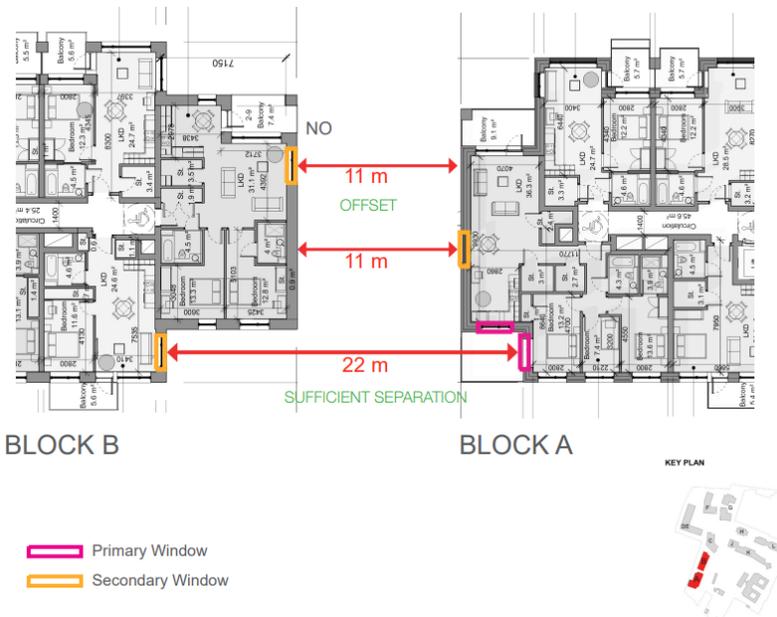
Figure 2.8: Proposed Separation Distance



Source: STW Architectural Response to DCC LRD Opinion

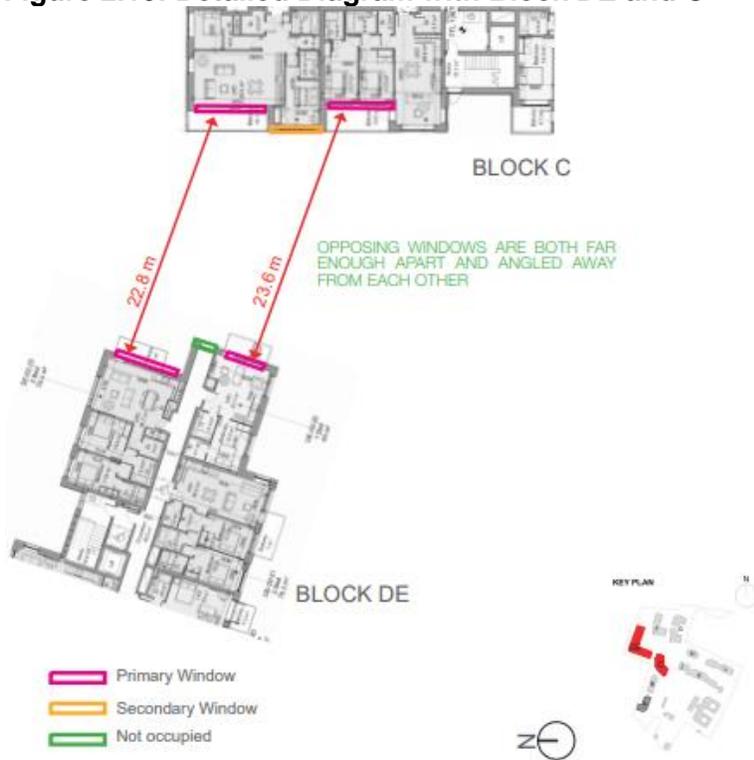
The STW report provides examples of opposing residential blocks and the design measures provided to reduce overlooking. STW indicate secondary windows facing primary windows across a reduced separation distance, which are smaller in scale, offset and the secondary window glazing is frosted for assurance of privacy for both units.

Figure 2.9: Detailed Diagram with Block B and A



Source: STW Architectural Response to DCC LRD Opinion

Figure 2.10: Detailed Diagram with Block DE and C



Source: STW Architectural Response to DCC LRD Opinion

Figure 2.11: Detailed Diagram with Block F and G



Source: STW Architectural Response to DCC LRD Opinion

Residential Amenity

A response to each subsection under Item No. 4 of the LRD Opinion is set out below.

- a) ***Demonstration that neighbouring amenity is not unduly affected in terms of overlooking or overbearing impact particularly to the north of the site and to the southwest of the site. That the proposal accords with Section 15.9.18 'Overlooking and Overbearance'.***

Response

We refer to STW's Architectural Response to DCC LRD Opinion which states that the development has had regard to Section 15.9.18 of the Dublin City Development Plan, relating to Overlooking and Overbearance, and seeks to demonstrate that the proposed scheme does not unduly impact on neighbouring amenity to the north and southwest of the site.

Block F is the closest to the northern boundary and the Grace Park Wood residential development and in response to the LRD Opinion, the STW Architectural Response document states "we have reduced the northern section of the building by a full floor, reducing the height from 10 to 9 storeys, significantly reducing the visual impact of the building on the neighbouring development. In this re-evaluation of the massing of Building F, it was considered that the northern 4 and 6-storey elements were appropriately scaled with respect to the neighbouring development and did not present an overbearing aspect - as illustrated in the sections on this page". It is proposed to reduce the higher 6/8/10 storeys to 5/7/9 storeys as part of this LRD submission, in order to reduce the impact on Grace Park Wood. In addition, the northern elevation of Block F has been altered to reduce the potential for direct overlooking into Grace Park Wood, whilst still retaining passive surveillance of the activity track and open space to the north of Block F and G, as illustrated in Figure 2.12 below. Please see STW's report for further details.

Figure 2.12: Extract from STW's Response illustrating revised proposals for Block F



Excerpt from Site plan showing Building F and Northern Boundary



Southwestern Boundary

The STW Architectural Response to DCC's LRD Opinion also demonstrates how Block A has been designed to ensure it does not unduly impact on neighbouring amenity to the southwest of the site. The STW Architectural Response states the following having regard to Section 15.9.8 of the Development Plan:

- Building Configuration: *"Building A is a 7-storey block with a 2-storey element to the south. The 7-storey element is set back on the site so that it aligns with the rear boundary of the adjacent terraced houses."*
- Elevational Design: *"The proposed 2-storey element offers only a blank façade to these rear gardens."*
- Using Architectural Features: *"The end of the recessed balconies in the southwest corner of the 7-storey apartment building have full height metal screen to prevent any oblique views from the balconies towards the adjacent houses."*
- Using Oblique Windows: *"There are no windows in Block B directly looking towards the private gardens of the terraced houses."*
- Landscape and Boundary Treatments: *"There are existing mature trees to the rear of the adjacent terrace. Existing high boundary wall".* This is considered to assist in reducing any impact on adjoining residential properties. Please see STW's report for further details.

Figure 2.13: Extract from STW's Response in respect to Block A



b) A detailed daylight and sunlight assessment of the proposed development in accordance with the relevant Guidelines- set out in Appendix 16 of the Dublin City Development Plan 2022-2028

Response

We refer to the Daylight and Sunlight Analysis Report prepared by IN2 which accompanies this submission and which states the following in the Executive Summary in respect to the daylight and sunlight assessment of the proposed development:

“Section 4.0 outlines the results for the assessed amenity spaces in accordance with BR 209. The proposed amenity spaces are predicted to receive excellent overall sunlight availability as 98% of the overall ground level amenity space is determined to receive at least 2 hours of sunlight on 21st March, which is well above the recommended 50%. In addition, the 97% of roof terrace amenity space on Building C and 85% of roof terrace amenity space on Building DE is determined to receive at least 2 hours of sunlight on 21st March.

Impact of the proposed development on the Neighbouring buildings is determined in Section 5.0. The results determined that due to the massing and careful placement of the proposed blocks there would be no impact on neighbouring residences for daylight (VSC), Sunlight (APSH), impact on solar panels (APSH) nor sunlight to amenity spaces.

Internal daylight analysis, as detailed in section 6.0, has been undertaken for all kitchen/ living/ dining (KLD) and bedroom spaces throughout the proposed development. Units have been assessed based on BRE Guide requirement for the Spatial Daylight Autonomy target of over 50% floor area at 100 Lux for bedrooms and 200 Lux for KLDs. A high rate, 99% of the rooms, were found to be compliant for BRE recommended guideline and detailed results are presented in Appendix A. As per Apartment Guidelines, where units were determined to not comply with the BRE guidelines, these have been identified and compensatory measures provided.

Section 7.0 included the results for the Exposure to Sunlight Analysis. This metric assesses the sunlight availability to the dwellings. The proposed development achieves a high compliance rate, with 94% of units exceeding the minimum recommendations. Detailed results are included in Appendix B.

Impact of trees is outlined in Appendix C with BRE description with illustration of the area where the assessment was carried. The assessment found that the existing mature evergreen trees on the Western and North-Western side of block DE do not have critical impact on the neighbouring units in block DE.

Shadow Diagrams have been provided in Appendix D. These diagrams illustrate the site shading for the equinox and both winter and summer solstice.

In summary, this report confirms that best practice Sunlight and Daylight availability have been ensured for the proposed St. Vincent's Fairview development, with no impact on the existing neighbouring environment.”

Section 2 of the report outlines the standards and guidelines that has informed the assessment and how the approach applies with best practice and the latest standards.

Conservation

A response to each subsection under Item No. 5 of the LRD Opinion has been prepared by Carrig and is included below.

The Conservation Section has had considerable engagement with the applicant as part of the inter-Departmental pre-application process, which included an inspection of the lands. In addition, there was a Conservation Meeting on the 9th February which included detailed feedback to the applicant team. There followed a S.247 Meeting on the 24th May at which a number of issues were raised including:

- 1) *Retain as much historic fabric as possible.***

Response

Carrig have provided the following response to the above item:

“Over the course of the design stages to date and in close collaboration with the DCC Conservation Department, the design team have worked to develop a scheme which retains as much of the historic fabric as feasibly possible. The presented scheme seeks to retain and conserve a total floor area of 4,600 sq.m of the protected structures across the site. The removal of historic fabric is only proposed where its retention will jeopardise the overall progress of the scheme or where its removal will either:

- Return a part of the protected structure to its original state,*
- Improve the accessibility of the protected structures for future use by the public.*

A Section 247 meeting was held on May 24th 2022 during which the proposals were reviewed with the DCC Conservation staff. Requests for additional detail and justification for loss, salvage and relocation of historic elements were made which have subsequently been addressed in the full set of appendices to the Architectural Heritage Impact Assessment report (Volume 4 of the EIAR.”

- 2) *Provide a better understanding and methodology for relocation of gate piers.***

Response

Carrig have provided the following response to the above item:

“The proposed new location for the historic Gate Piers is described in Section 6.7.5 of Appendix 9: St Teresa’s Ward Inventory & Salvage report. This location has been selected as it is on the line of a historic boundary and will mark a proposed future pedestrian connection with the An Post Site. The piers and the protected structures beyond will be appreciated by pedestrians accessing the site from northeast. An outline specification for the disassembly and reconstruction of historic masonry has been provided in Section 3.12 of Appendix 5: Conservation Specifications for Historic Buildings. This specification will be further refined during the detailed design stage in collaboration with Scott Tallon Walker and the Main Contractor.”

- 3) *Existing historic features to be retained in their existing location as much as possible. Any item proposed for relocation must be justified.***

Response

Carrig have provided the following response to the above item:

“Within the protected structures, the proposed alterations have been designed to retain as much of the original features as possible while also ensuring a viable future use for the buildings. The new services strategy will be carefully designed in close collaboration with the conservation consultant to minimise the impact of historic internal features. The following appendices to the main AHIA report (Volume 4 of the EIAR) have been prepared which outline the proposed alterations to the historic boundary features and the justifications for each and the proposed salvage and relocation strategy for St. Teresa’s Ward:

- *Appendix 8: Conservation Assessment of Historic Boundaries and Garden Walls [and Drawings]*
- *Appendix 9: St Teresa’s Ward and Auditorium: Architectural Inventory & History, Condition Report and Salvage Strategy [and Drawings]”*

4) *Demolition of St Theresa’s and the Freeman wing accepted on balance to provide for east/west movement and having regard to the number of historic buildings to be retained.*

Response

This response is noted by the Design Team and reflects the extensive pre-application consultation with the Planning Authority which resulted in the overall masterplan and site layout strategy being developed.

We also wish to note that 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, which is considered to be necessary in light of the High Court decision in the Judicial Review against the Holy Cross College / Clonliffe SHD.

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

We note that in considering any impacts on the protected structures (whether demolition or otherwise), the Planning Authority must have regard to the need to protect the structure, and it is demonstrated that the works / demolition proposed in the context of the protected structure is necessary to achieve the benefit to the overall protected structures and their continued and re-fashioned use. Please refer to Chapter 13 and Volume 4 of the EIAR for further information, with Section 7.5 of Architectural Heritage Impact Assessment prepared by Carrig, providing details of the exceptional circumstances which arise justifying the elements of demolition associated with the protected structures and their curtilage. 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).”*

5) Salvage strategy required for demolitions.

In terms of the information now received, it is the opinion of the Section that this would be adequate to make a planning application, subject to:

- ***adherence to 1-4 above (the salvage strategy has been submitted),***
- ***new buildings adjacent to the protected structures are subordinate in height/scale (below eaves of the PS),***
- ***retention of as many mature trees on the grounds and especially along the main avenue, which (in combination) contribute to the setting of the protected structures, and***
- ***ensuring that car parking provision is limited and appropriately landscaped in the vicinity of the protected structures.***

Response

A response to each of the above items is provided below with reference to / input from Carrig, STW Architects and NMP Landscape Architects.

The **salvage strategy for demolition** is addressed in Appendix 9: St Teresa's Ward and Auditorium: Architectural Inventory & History, Condition Report and Salvage Strategy [and Drawings] of the AHIA included as Volume 4 of the EIAR. Item 1 to 4 have been addressed above and are welcomed and acknowledged.

In respect to the **new buildings adjacent to the protected structures being subordinate in height / scale**, Scott Tallon Walker have carefully designed the new building (Block J) adjacent to the protected structures to sit below their existing eave height. The detailing of junctions will be approved by the conservation consultant during the detailed design stage and care will be taken to minimise harm to the retained parts of the protected structures during the works.

In respect to the **retention of as many mature trees on the grounds and especially along the main avenue, which (in combination) contribute to the setting of the protected structures**, we note that from the outset the design team have sought to retain as many mature trees on the site as possible. The comments of the DCC Conservation Department have been taken on board resulting in an amendment to the design of the approach to Richmond House which will mitigate against the loss of a number of existing trees. Of the 88 mature trees identified by the Arborist, 29 will be removed and 59 retained. Further details have been provided in Section 6.16 Potential Cumulative Impacts, of the AHIA report.

The response prepared by NMP to this item outlines that the masterplan has been envisaged to retain as many of the existing trees as possible. Significant tree planting on the portion of the lands, earmarked for the new Hospital, add considerable character as an existing parkland to this portion of the site with a number of high value trees noted. The masterplan has been adjusted to retain the avenue of trees along the Richmond Road access into the Hospital site. Additional supplementary tree planting along the avenue has been proposed to strengthen the avenue visuals and promoting the longevity of the avenue as a tree-lined landscape feature. Hedging and planting have been proposed to assist with creating a certain level of formality within the landscape to compliment the architecture (Brooklawn House, Richmond House, etc.) as well as to assist with screening the new parking area.

In respect to the request to ensure **that car parking provision is limited and appropriately landscaped in the vicinity of the protected structures**, the design team have developed the parking strategy which seeks to minimise the location of new parking in the vicinity of the protected

structures. The proposals will in fact remove current car parking spaces from the setting of the historic Convent and Hospital buildings which will represent an improvement on the current situation.

Please refer to STW's Architectural Response to the LRD Opinion and NMP's Landscape Design Statement for further information on the points above.

Open Space and Biodiversity

A response to each subsection under Item No. 6 of the LRD Opinion has been prepared by NMP, in consultation with Altamar, CMK and other design team members, and is summarised below.

- a) *Arboriculture: 273 trees recorded with 123 proposed removed or 44% loss due to development, which is not insignificant considering the quality and maturity of trees on this site.***

Response

As detailed in NMP's Landscape Design Statement and CMK's Arboricultural Assessment, Arboricultural Impact and Tree Protection Plan Report, the revised arboricultural tree survey notes 277 trees recorded. This development proposes the removal of 122 trees, of which only 12 are category A trees (See Section 3 of the Arborist's Report for further details). A further 17 category 'U' trees are recommended for removal as they have either failed or are in a state of advanced decline. Therefore 135 existing trees will be retained on site (49% of surveyed trees). In addition to the trees being retained, a total of 420 replacement trees are proposed to negate against the total 119 no. trees identified for removal as a result of the development. Further detail on the approach to historic / veteran trees is provided in the response to (b) below. Please refer to CMK's report and drawings for further details.

Thus, tree loss is mitigated through the planting of 420 new trees on site. The revisions to the Richmond Avenue tree line since the LRD Meeting / Opinion stage is also a significant improvement made to address the issues raised in the LRD Opinion. On balance, and as discussed above and in NMP's Landscape Design Statement, it is respectfully submitted that the proposed scheme provides a suitable balance between tree removal, retention and replacement, whilst delivering an appropriate form of development on the lands, and delivering on other planning requirements for the site.

- b) *Veteran trees shall be highlighted on arboricultural plans. Compensatory tree planting is noted at 410 trees and this will create a new generation of planting. Tree protection during any permitted development would be a priority and a tree bond would also be applied.***

Response

Appendix VII of CMK's Arboricultural Assessment, Arboricultural Impact and Tree Protection Plan Report, addresses the historic trees on the site, which aligns with the term 'veteran', 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.

A comprehensive tree protection strategy is contained within appendix III of CMK's Arboricultural Assessment, Impact and Tree Protection Strategy Report and on the Tree Protection drawings YSV001 110-115. The client accepts a tree bond shall be put in place to ensure appropriate management of trees is enacted during and for an agreed period after.

Following the LRD Opinion, and as discussed above, the key positive changes made from an arboricultural perspective can be summarised as follows:

- The revised entrance avenue on the Hospital site was realigned to retain all of the existing trees along the route including 1 historic tree
- The positioning of the Hospital building was considered in detail to retain as many as possible of the historic trees in the area, thereby assisting in retaining the parkland like feel of the landscape
- Blocks H & L were positioned in such a way to retain a large Sycamore tree (not a historic tree, but a significant tree in the landscape none the less).

Thus, in summary, a suitable solution is considered to have been reached in respect to the redevelopment of the subject lands.

- c) *Richmond House Avenue: The proposed removal of one half of the tree avenue is not satisfactory, the access arrangements and car parking proposals should be amended for their retention.***

Response

As noted in the preceding section above, the site layout plan has been adjusted to retain the avenue of trees along the avenue to Richmond House and onwards to the Hospital site and the car parking provision in this area for the new hospital has been revised accordingly. Additional supplementary tree planting along the avenue has been proposed to strengthen the avenue visuals and promoting the longevity of the avenue as a tree-lined landscape feature, as detailed in NMP Landscape Design Statement.

Figure 2.14: Existing and Proposed Avenue to Richmond House

Photo of existing avenue towards Richmond House



Photomontage CGI showing proposed Avenue towards Richmond House

- d) Biodiversity: An NIS is to be prepared and submitted. No invasive species are noted. A bat survey is required to be submitted, in particular this will include a survey for roosting sites in buildings to be demolished.**

Response

An Appropriate Assessment Screening Report and a Natura Impact Statement (NIS) has been prepared by Altamar and submitted with the application, and includes the following conclusion:

“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.

The proposed project will not will adversely affect the integrity of European sites.”

The Biodiversity Chapter of the EIAR includes an assessment of potential impacts on bats based on an onsite assessment of all buildings to be demolished or upgraded, as included in Appendix 7.1 of the EIAR (Volume 2) entitled Bat Fauna Impact Assessment. The Biodiversity Chapter of the EIAR addresses all ecological issues of relevance to the site and demonstrates through the design and construction related impacts that the proposed development will not result in any significant environmental impacts from a biodiversity / ecology perspective.

- e) ***Public open space/ communal open space – area requirements are met. POS is a ‘campus’ style provision and it will be important to ensure the public are welcomed to it and wayfinding is provided. Clarity will be required to ensure privacy/security of Communal Open Space adjacent. Active recreation provision is important within the open spaces. Public Open Space will not be taken in charge.***

Response

Section 5.5 of the Landscape Design Statement provides details of the **wayfinding** and public art strategy for the proposed development. It demonstrates that wayfinding and signage is an important part of the masterplan narrative and will be further developed as part of the detailed design process of the project to ensure legibility and enable ease of circulation throughout the development. In this respect, the applicant accepts that further information on the wayfinding strategy within the landscape design can be provided as a condition of planning if considered necessary.

In response to the request for **‘Clarity will be required to ensure privacy/security of Communal Open Space adjacent’**, please refer to Section 4.2.5 of the Landscape Design Statement for details of the Public-Private Threshold + Interface Design Principles and relevant boundary treatment drawings. In summary, the boundary between private communal open space and public open space where courtyards are not enclosed by the building itself will be visually permeable to the public and residents. This practice creates a sense of welcomeness for users in the public realm and generates more engagement for residents in the communal open space. It also negates the need for unsightly railings and barriers. The courtyards will be secured with low hedging @ 1.1m-1.2m in height. A railing will be incorporated in the centre line of the hedge, creating a visual screen and an obscured physical barrier with gated access where required.

In response to the request for **‘Active recreation provision is important within the open spaces’**, the Landscape Design Statement outlines that opportunities for active recreation are provided throughout the overall landscape masterplan. An expansive multi-functional lawn space will serve as a kick-about. Exercise has been provided throughout with fixed and flexible spaces arranged appropriately. Opportunities for larger groups to exercise in the open space and engage in yoga or ‘HIIT’ / ‘HIRT’ training sessions are encouraged.

Based on the concerns raised in the Public Consultation engagement on the 21st and 22nd September 2022 in relation to the location, management and concerns with the multiuse sports area, it was decided to substitute the MUGA with an allotment garden as a more appropriate value add public amenity, to be managed by the development appointed management company. It is noted that Section 10.5.4 of the Development Plan includes reference to allotments as open space and that they can provide a social, community orientated and physical activity to all age groups and different abilities providing locally grown food, and it is considered a more appropriate open space use within this part of the site and noting the proximity to Grace Park Wood and Griffith Court. The landscape masterplan provides for formal play facilities at the eastern and western ends of the Central Park thereby encouraging activity.

f) *Green roofs- a green roof plan shall be submitted- note new development plan requirements.*

Response

Please refer to landscape drawing L1-101 - ROOF PLAN, which following coordination with STW and OCSC, identifies the extent of green roof proposed which exceeds the 70% requirement for extensive green roofs under the Development Plan, as summarised below based on calculations provided by OCSC.

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 m²).

- 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.

g) *A Biodiversity Enhancement Plan shall be submitted.*

Response

Please refer to Section 3.10 of the Landscape Design Statement for details of the Biodiversity Enhancement Plan, which has been coordinated with Altemar the project ecologists. NMP outlines that the loss of habitat will be negated by the inclusion of native trees & plant species within the vegetation palette. The proposed landscape incorporates measures to enhance biodiversity in an urban setting, with introduction of built-in bat & swift boxes and free-standing wooden bird boxes located throughout the development thereby, overall, promoting a net gain in biodiversity. The Biodiversity Enhancement Plan is indicative only and the full extent & positioning will be confirmed at detailed design stage.

The Landscape Design Statement states the following in relation to the Biodiversity Enhancement Plan which has been coordinated with Altemar:

"An awareness and the enhancement of the site's existing natural features will inform the character of vegetation and the sense of place it derives from this character. In turn, there will be a net gain in biodiversity by planting native tree species, coupled with plants selected from a list of pollinator friendly species and maintained to increase the availability of flowering plants in the shoulder months. The loss of habitat will be negated by the inclusion of native tree & plant species within the vegetation palette and complimented with habitat boxes, etc.

The proposed landscape incorporates measures to enhance biodiversity in an urban setting, with introduction of built-in bat & swift boxes incorporated within the buildings located high up, where possible. Free-standing wooden bird boxes will be located in the trees throughout the development. The planting proposed will greatly enhance the biodiversity resource on the proposed development by creating new, pollinator friendly habitats and inclusion of pollinator nesting boxes.”

Drainage

A response to each subsection under Item No. 7 of the LRD Opinion (Drainage Issues) has been prepared by OCSC, which accompanies the LRD submission, and is summarised below.

- a) *The Drainage Division has previously met with OCSC consulting Engineers prior to submission, circa mid October 2022.***
- b) *The Drainage Division are generally satisfied with the submission received.***
- c) *Flood Risk Assessment - The Drainage Division has received a Flood Risk Assessment and note that the Developer has assessed the potential for flooding within the site and have mitigated against the same.***

Response

OCSC's response to LRD Opinion (Drainage Issues) acknowledges that DCC Drainage Division are generally satisfied with the proposal as mentioned in subsections a)-c) and no additional action is required.

- d) *The Drainage Division notes that there is Historical Flooding on the adjacent hospital Lands and has specifically requested that the Developer review this against potential effects on the proposed development and propose any mitigation that may be required.***

Response

The OCSC response to LRD Opinion (Drainage Issues) outlines that the Site-Specific Flood Risk Assessment has been revised to include a review of the historical flooding on the adjacent hospital lands as noted under Reg. Ref.: 2991/15. The response states *“It is concluded that it has no effect on the proposed development and as such no additional mitigation measures are required.”* Please refer to Section 4.5 Historical flooding of the revised Site-Specific Flood Risk Assessment.

- e) *Surface Water Management Proposal - The Drainage Division notes that the proposal outlines a minimum area of 70% green roof coverage, blue podium, intensive landscaping integrated with drainage, pervious paving and filter drains. Along with rain gardens infiltration basins and flow control devices which lead to an Attenuation tank that permits site infiltration. The Drainage Division is satisfied with the proposal and the provision of SUDS for the development in the management of Surface Water and is satisfied that it is broadly in compliance with the new policies and objectives of the new Development Plan.***

Response

The OCSC response to LRD Opinion (Drainage Issues) notes Item 7(e) and sets out the exact extent of the green roof area, as provided in the architectural design, has been included in the revised drainage design layout (Ref. Doc: R517-OCSC-XX-XX-DR-C0500-S4-P03 to R517-

OCSC-XX-XX-DR-C-0502-S4-P03). We refer to the calculations above we clearly show that the proposal complies with the minimum area of 70% green roof coverage.

- f) *The Drainage Division is satisfied with the proposed Discharge Rate of Q Bar 3l/s/ha as proposed by the Surface Water management plan.***

Response

The OCSC response to LRD Opinion (Drainage Issues) acknowledges that DCC Drainage Department is satisfied with the proposed Discharge Rate of Q Bar 3l/s/ha and no additional action is required

- g) *The Drainage Division notes that there is a Public Surface Water Sewer (525 Dia/ 600 Dia) running through the site, alongside a 325 dia Foul Sewer. The Drainage Division requests that the Developer be clear on the proposed wayleave route and width, and that it takes cognisance of the pipe size, location and site constraints.***

Response

The OCSC response to LRD Opinion (Drainage Issues) states “*The existing Public Surface Water Sewer and the Foul Sewer have been shown on the revised drainage layout together with the existing wayleave. The existing sewers and they wayleaves will not impact proposed structures or private property*”. Please refer to the revised drainage design layout (Ref. Doc: Ref. Doc: R517-OCSC-XX-XX-DR-C-0500 to R517-OCSC-XX-XX-DR-C-0502) for the plan drawing of the proposed wayleaves.

- h) *Basement Impact Assessment - The Applicant has submitted a Basement Impact Assessment, in line with the new Development Plan requirements. The Drainage Division notes that the Applicant has outlined a number of mitigation measures to be implemented against the construction of the proposed basement, which will be required to be implemented in full as part of the constructed Development.***

Response

The OCSC response to LRD Opinion (Drainage Issues) acknowledges that the Drainage Division, following further consultation prior to lodgement of the LRD application, is satisfied with the submitted Basement Impact Assessment and no additional action is required.

We note that Item 7 of the LRD Opinion concludes by stating the following in support of the proposed development:

“The Drainage Division are satisfied that the above comments can be addressed by the Developer prior to submission of the application, and as such are satisfied that the application will be broadly in compliance with the requirements of the new Development Plan in relation to Surface Water Management requirements.”

Traffic and Transportation Issues

A response to each subsection under Item No. 8 of the LRD Opinion (Traffic and Transportation Issues) has been prepared by OCSC accompanies the LRD submission and is summarised below.

- a) *Internal Access and Works to Public Road requires review:***

- i. A Stage 1 Road Safety Audit should be provided which examines the proposed access roads within the development, any impact with the public road (Richmond Road), servicing/drop off locations, surface level parking, internal junctions and any other applicable element of the proposal which has an impact on the roadway.***

Response

The OCSC response to LRD Opinion (Traffic and Transportation Issues) refers to the RSA which has been undertaken by Bruton Consulting Engineers. The findings of this RSA are included as part of the application in a standalone report and any issues raised have been addressed in the final site layout plan and associated drawings.

- ii. Provide clarity and detailed drawings on the extent of works to be undertaken on the public road is needed as a letter of consent for works undertaken on DCC lands may be required from DCC. The applicant is advised to liaise with DCC Transportation Planning Division in advance of submission of the LRD application.***

Response

The OCSC's response to LRD Opinion (Traffic and Transportation Issues) states "*The extent of the works required on the public road has been workshopped with DCC, and a letter of consent for these works was received. This letter is included in the application*". The extent of works entails connection to the existing public storm water and sewer and tying into the existing road and footpath on Richmond Road. Furthermore, additional works are required northeast of the site which entails upgrading works to the public watermain as requested by Irish Water. These works will be along Griffith Court and Philipsburgh Avenue, terminating at Griffith Avenue. For the full extent of works required, please refer to drawing R517-OCSC-XX-XX-SK-C-0008 which is attached as an appendix to the DCC letter of consent, submitted as part of the application.

- iii. All internal road proposals should demonstrate compliance with DMURS.***

Response

The OCSC response to LRD Opinion (Traffic and Transportation Issues) outlines that all internal roads have been designed in accordance with DMURS. The DMURS statement has been expanded to include additional information, in order to further demonstrate DMURS compliance.

- iv. All access proposals require to be fully auto tracked. Auto tracking of access proposals e.g. cars, refuse, emergency, substation, deliveries etc. is required including junctions, turning areas, parking spaces and laybys and turning circles proposed.***

Response

The OCSC response to LRD Opinion (Traffic and Transportation Issues) outlines all internal roads have undergone an auto track swept path analysis. Additional drawings demonstrating this are included in the roads drawing pack. Please refer to the following:

- R517-OCSC-XX-XX-DR-C-0160-S4-P04_Swept Path Analysis Refuse Vehicle Sheet 1 of 2
- R517-OCSC-XX-XX-DR-C-0161-S4-P04_Swept Path Analysis Refuse Vehicle Sheet 2 of 2

- R517-OCSC-XX-XX-DR-C-0162-S4-P04_Swept Path Analysis Delivery Box Van Sheet 1 of 2
- R517-OCSC-XX-XX-DR-C-0163-S4-P04_Swept Path Analysis Delivery Box Van Sheet 2 of 2
- R517-OCSC-XX-XX-DR-C-0170-S4-P02_Swept Path Analysis Large Car Ingress Sheet 1 of 2
- R517-OCSC-XX-XX-DR-C-0171-S4-P02_Swept Path Analysis Large Car Ingress Sheet 2 of 2
- R517-OCSC-XX-XX-DR-C-0172-S4-P02_Swept Path Analysis Large Car Egress Sheet 1 of 2
- R517-OCSC-XX-XX-DR-C-0173-S4-P02_Swept Path Analysis Large Car Egress Sheet 1 of 2

b) Pedestrian Connectivity

- i. A letter of consent from the landowner to include the provision of the connection to the Grace Park woods development should be provided as part of the final application.***

Response

A letter of consent has been obtained from Targeted Investment Opportunities ICAV, the owner of the adjoining lands in Grace Park Woods, and is included in the planning application for the proposed connection to Grace Park Woods.

c) Car parking provision requires review:

- i. No details are provided with regards to the management of the car parking spaces for the hospital and the BTR and other apartments with no details given. Submit a Car Parking Management Plan, in particular with details on how car parking will be managed for the commercial elements on the site and how the set down/drop off areas and time constraints will be managed.***

Response

The proposed development provides the following quantum/allocation of car parking:

- Hospital – 76 no. spaces (72 spaces + 4 disabled parking spaces)
 - 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)
 - Commercial/community – 9 no. spaces (surface level)
- Total – 332 no. spaces

For the residential car parking, we refer to Section 2.1.12 of the Operational Management Plan prepared by Hooke and MacDonald which outlines that residents who have leased a car parking space in the basement car park will be provided with their space number that has been allocated to their unit. A parking control company will be engaged to manage parking in the car park. Management will control the registration of users on the GSM system to ensure that only residents who have been provided with a parking space are able to open the vehicle gates.

The Parking Management Plan prepared by OCSC sets out the proposed measures to manage the use of car parking relating to the St Vincent's Hospital Fairview (SVHF), the allocation of parking spaces between patients/visitors and staff, and provide a rationale for same. The

management of SVHF car parking is to be based on a system of signage & delineation, and ongoing enforcement. Access to car parking is controlled by means of a barrier, which will be manned by security personnel. Car parking will be managed by means of an app, where staff can book a space for the day. There will be a restriction on the type of staff members who are able to access this app. This parking allocation, as well as visitor access, will be managed by means of the aforementioned barrier. This will ensure critical staff have car parking access, while also preventing the demand for car parking from exceeding the supply, resulting in an overspill onto the local road network.

The vast majority of staff spaces are allocated to those who require the use of a vehicle as part of their essential medical work practice and/or who work long shift times with anti-social hours meaning their commuting patterns do not align with peak traffic periods. Management and admin staff, cleaners, security, porters, tech services, pharmacy staff and library staff will not be allocated any parking in line with local and national objectives to encourage travel sustainable means and limit the potential of commuting during peak traffic periods.

A Parking Management Plan for the hospital containing these details has been prepared and submitted as part of the application under separate cover (R517-OCSC-XX-XX-RP-C-0008). Car parking management for the residential and commercial elements is contained in the Traffic and Transport Assessment (R517-OCSC-XX-XX-RP-C-0004) and the Operation Management Plan prepared by Hooke and MacDonald. In relation to the car parking for the residential units, the Operational Management Plan outlines that residents who have leased a car parking space in the basement car park will be provided with their space number that has been allocated to their unit. A parking control company will be engaged to manage parking in the car park. Management will control the registration of users on the GSM system to ensure that only residents who have been provided with a parking space are able to open the vehicle gates. Accessible parking spaces are provided at ground level servicing those buildings that are not located over the basement car park. The parking control contractor will check that any car parked in these spaces displays a valid 'disabled parking badge'. Any cars parked in these spaces not displaying a valid badge will be clamped. Signage will be displayed throughout the development giving notice that cars parked incorrectly may be clamped.

The Operational Management Plan prepared by Hooke and MacDonald outlines that in relation to the management of the 9 no. surface level car spaces available to the retail and community units, it is planned that the surface level car park will have a 2-hour parking limit and will be monitored by a mobile patrol service and clamping will be arranged for cars parking beyond time restrictions. In relation to the 'Drop Off' Zone allocated to the crèche; it is envisaged that there will be a 10-minute time limit on crèche drop offs.

ii. Justification for the quantum of car parking provided for the mental health facility is required as the quantum exceeds the maximum permissible under the Development Plan.

Response

Table 2 of Appendix 5 of the Plan states the maximum car parking standard for a hospital in Zone 2 is 1 space per 100 sq.m. 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.

A Parking Management Plan for the hospital which provides details on why this quantum of car parking is necessary, i.e. based on staff numbers, shiftwork, etc., has been prepared and submitted as part of the application under separate cover (R517-OCSC-XX-XX-RP-C-0008).

- iii. It is noted that 20 no. car share spaces are mentioned in the Operational Management Plan (Go Car referenced) however there is no reference to this in the TIA and MMP. Further clarification on the car share should be provided. There are concerns about the realistic viability of a service provider being able to ensure 20 no. vehicles are available on site upon occupation. A Phasing Strategy for the delivery of car share vehicles should be provided in tandem with the overall phasing schedule of the development of the entire site.**

Response

The OCSC response to LRD Opinion (Traffic and Transportation Issues) outlines that the number of car share spaces has been reduced to 7 no. spaces at basement level. This quantum will be evaluated during the operational stage and reassessed according to demand. This has been included in both the final TTA and MMP.

- iv. The Mobility Management Plan refers to a Mobility Hub, details of this and its location should be included in application.**

Response

OCSC's response to LRD Opinion (Traffic and Transportation Issues) notes that this was part of an initial version of the MMP, which has subsequently been revised, and was therefore referenced in error in the pre-application submission. Reference has been removed as a mobility hub is not proposed in this application.

- v. Pedestrian priority should be provided across the site. Measures including contrasting materials, signing, and road marking, etc. should be incorporated to ensure that vehicles entering/leaving the development are aware that pedestrians/cyclists have priority across the site and that vehicles must yield right-of-way.**

Response

OCSC's response to LRD Opinion (Traffic and Transportation Issues) notes that raised table crossings have been included where possible. Where raised table crossings are not feasible, dropped kerbs with tactile paving have been included. Please see R517-OCSC-XX-XX-DR-C-0110-0112, as well as the DMURS Statement (R517-OCSC-XX-XX-RP-C-0007) for the location of these.

- vi. All car parking spaces should be provided on a site layout plan where the various uses are colour coded/numbered to differentiate between the areas for drop off/set down, mental health facility uses as well as the accessible parking and EV parking spaces.**

Response

The proposed architectural site plan (SVRD-STW-ST-00-DR-A-022003) shows all surface car parking spaces and set-down areas, whereas the proposed architectural basement GA plan (SVRD-STW-CP-B1-DR-A022001) shows all car parking at basement level.

d) Cycle parking proposals requires review.

- i. Details on how cyclists are to access the cycle stores at basement level should be clearly delineated/identified. If access is via the basement entrance along with other vehicles, additional user safety measures should be demonstrated including demarcated pedestrian/cyclist route, surface marking/signage, lighting and height clearance to avoid vehicular and pedestrian conflict.**

Response

This is illustrated in the Architect's Design Statement and Basement GA Plan SVRD-STW-CPB1-DR-A-022001 following coordination with OCSC.

- ii. Detailed drawings of the bicycle stores to be provided outlining type and quantum per store/area, ensuring functionality and ease of access, including the type of bicycle stands proposed and distance between each stand. Ensure bicycle stores are located at the most convenient areas close to stairs/lifts in the basement area. Ensure the access doors to these stores are appropriately located.**

Response

See STW Basement GA Plan SVRD-STW-CP-B1-DR-A-022001 and detailed store layouts SVRD-STW-CP-B1-DR-A-027001 and SVRD-STW-CP-B1-DR-A027002. (See Architect's Design Statement).

- iii. Revised site layout clearly delineating the location of all visitor bicycle parking,**

Response

NMP have provided drawings of the bicycle stores and position and number of all visitor bicycle parking. Please also refer to the Architect's Design Statement for further details on the cycle parking strategy.

- iv. More sustainable options for cycle parking should be provided e.g. non-standard bikes, cargo bikes, electric bicycle charging stations.**

Response

Cargo bike spaces and recharging facilities are provided - as per detail plans SVRD-STW-CP-B1-DR-A-027001 and SVRD-STW-CP-B1-DR-A-027002. Please also refer to the Architect's Design Statement for further details on the cycle parking strategy.

- v. Details on how bicycle stores are to be managed should be provided i.e. with access to certain areas for residents in the basement level.**

Response

This is detailed in the Operational Management Plan prepared by Hooke and MacDonald, and has also been included in the MMP prepared by OCSC.

vi. Details on the proposed bike sharing facility referred to in the Operational Management Plan and its location.

Response

The MMP notes that the potential for a bike rental scheme to be set up on-site will be investigated following completion of the development, which would further complement the aforementioned proposed cycle repair facility on the site. Examples of successful schemes include BleeperBikes which uses existing publicly accessible cycle parking to facilitate access to cycling without the need to own a bicycle. As noted in the Operational Management Plan prepared by Hooke and MacDonald the potential for Bleeper Bike station will be explored further by the applicant following a grant of permission.

vii. Showers and changing facilities for the commercial use buildings should be provided.

Response

As set out in STW's Architectural Response to the LRD Opinion, the following provision of showers and changing facilities is provided for the commercial development:

1. Retail Unit in Building A (765sq.m) 2 Showers provided (Level 00)
2. Cafe in Building F (133 sq.m) 1 Shower provided (Level 00)
3. Gym (1459sq.m) 4 Staff Showers provided (Level 01) 11 User Showers provided (Level 00)
4. Cafe (161sq.m) 1 Shower provided (Level 00)
5. Co-working and Library (980sq.m) 3 Showers provided (Level 02)
6. Creche (730sq.m) 2 Showers provided (Levels B1 and 01)

The provision of showers is considered to be sufficient for the expected staff numbers for the commercial development and reflects the requirements of Appendix 5 of the Development Plan, which are as follows:

- min 1 shower per commercial space > 75 sq.m min
- 2 showers per commercial space >500 sq.m
- 1 additional shower per every 1,000 sq.m thereafter

e) Servicing and Operations requires review:

i. All locations of all bin stores and bin staging locations should be outlined.

Response

Please refer to the Design statement prepared by STW Architects which includes a drawing in Section 4.12 – site servicing identifying the location of bin stores and staging areas. It can also be found in the appendices of the Operational Waste Management Plan (which is an appendix to the Waste Chapter of the EIAR).

ii. Details on how waste will be transferred from storage areas to collection areas to be outlined.

Response

As set out in STW's Architectural Design Statement, and following coordination with AWN Waste Consultants for the project, waste will be taken to the nearest waste staging point by facilities management, to await the waste contractor. Facilities management may avail of a mechanical aid in the form of a manual or electronic tug machine to assist with the movement of bins. Travel paths for bins to staging areas can be found under Section 4.12 of the Site Servicing in the Design Statement and in Appendix A of the Operational Waste Management plan (Appendix 15.2).

- iii. A Servicing and Operations management plan should be submitted with any forthcoming LRD application and should include details of all anticipated servicing and operational requirements for the residential and commercial components of the development, including set down location for servicing and delivery vehicles.**

Response

Please refer to Operational Management Plan prepared by Hooke and MacDonald. In respect to servicing and deliveries for the creche, cafes and retail units, the report outlines that this will be by way of set down areas located in close proximity to the units. It is anticipated that restrictions on the times that deliveries are permitted to these units will be implemented in the interest of good estate management and to prevent undue nuisance to the residential element.

In respect to servicing and operational requirements for the Hospital, please refer to the Business and Operational Management Plan prepared by St. Vincent's Hospital Fairview for the relevant details and which has informed the service areas indicated on the drawings.

- f) Drawings Additional details and clarity is needed on some of the drawings submitted:**
- i. Drop-off and collection bays at surface level need to be clearly shown for all servicing and other deliveries.**

Response

This has been included in traffic drawings prepared by OCSC. Additionally, the proposed architectural site plan (SVRD-STW-ST-00-DR-A-022003) shows all surface car parking spaces and set-down areas, and the proposed architectural basement GA plan (SVRD-STW-CP-B1-DR-A-022001) shows all car parking at basement level.

- ii. Autotrack drawings for the internal road layout to ensure that all vehicles and in particular service vehicles can access the areas and turn in the designated areas. It is noted that a number of surface level car parking spaces appear to have limited turning circles should a vehicle be parked in a nearby bay. An example of a location is between Block A and Block B where 2 no. accessibility bays are provided. No swept path analysis is provided for the basement level car park.**

Response

All internal roads have undergone a thorough swept path analysis, and additional drawings demonstrating this are included in the roads drawing pack. Additional drawings demonstrating this are included in the roads drawing pack. Please refer to the following:

- R517-OCSC-XX-XX-DR-C-0160-S4-P04_Swept Path Analysis Refuse Vehicle Sheet 1 of 2

- R517-OCSC-XX-XX-DR-C-0161-S4-P04_Swept Path Analysis Refuse Vehicle Sheet 2 of 2
- R517-OCSC-XX-XX-DR-C-0162-S4-P04_Swept Path Analysis Delivery Box Van Sheet 1 of 2
- R517-OCSC-XX-XX-DR-C-0163-S4-P04_Swept Path Analysis Delivery Box Van Sheet 2 of 2
- R517-OCSC-XX-XX-DR-C-0170-S4-P02_Swept Path Analysis Large Car Ingress Sheet 1 of 2
- R517-OCSC-XX-XX-DR-C-0171-S4-P02_Swept Path Analysis Large Car Ingress Sheet 2 of 2
- R517-OCSC-XX-XX-DR-C-0172-S4-P02_Swept Path Analysis Large Car Egress Sheet 1 of 2
- R517-OCSC-XX-XX-DR-C-0173-S4-P02_Swept Path Analysis Large Car Egress Sheet 1 of 2

g) *The applicant is requested to outline any lands for Taking in Charge by Dublin City Council.*

Response

No area of the application site within the applicant's ownership is proposed for taking in charge.

The communal and public open space will be managed by the Management Company for the proposed development.

The publicly owned lands included within the red line boundary to facilitate connections to services infrastructure will remain in control of DCC.

The lands outside of the applicant's ownership required to provide the connection with Grace Park Wood will be taken in charge up to the application site boundary, consistent with the approach for that adjoining development, but these are in separate ownership. Please see letter of consent attached.

Archaeology

Whilst these comments are not required to be addressed within the final LRD application documentation and can be conditioned to any potential grant of permission, they are noted here for the applicant's attention.

Archaeological Assessment (prior to construction)

The developer shall comply with the following archaeological requirements:

- a) No construction or site preparation work other than demolition work, may be carried out on the site until all archaeological requirements of the Planning Authority are complied with.***
- b) The project shall have an archaeological assessment of the site of all proposed building carried out as soon as possible and before any construction work commences. The assessment shall include testing in accordance with Section 3.6 of the Framework and Principles for the Protection of the Archaeological Heritage (1999) and prepared by a qualified archaeologist. It shall address the following issues:***

- i. The archaeological and historical background of the site.**
- ii. The nature, extent and location of archaeological material on site.**
- iii. The impact of the proposed development on such archaeological material.**

Where archaeological material is shown to be present, a detailed Impact statement shall be prepared by the archaeologist which will include specific information on the location, form, size and level (corrected to Ordnance Datum) of all foundation structures, ground beams, floor slabs, trenches for services, drains etc. The assessment shall be prepared on the basis of site inspection, a comprehensive desktop study and trial trenches excavated on the site by the archaeologist. The trial trenches shall be excavated to the top of the archaeological deposits only. The report containing the assessment shall include adequate ground-plan and cross-sectional drawings of the site, and of the proposed development, with the location and levels (corrected to Ordnance Datum) of all trial trenches and/or bore holes clearly indicated. No subsurface work shall be undertaken in the absence of the archaeologist without his/her express consent. The archaeologist retained by the project to carry out the assessment shall consult with the City Archaeologist in advance regarding the procedure to be adopted in the assessment.

- c) A written report containing the results of the archaeological assessment shall be forwarded on completion to the City Archaeologist. The City Council (in consultation with the National Monuments Service DHLGH) shall determine the further archaeological resolution of the site, including if necessary, archaeological excavation or the preservation in situ of archaeological remains). Before any construction work commences, the developer shall comply in full with any further archaeological requirements (including if necessary archaeological excavation or the preservation in situ of archaeological remains). Where preservation in situ is required, this may negate the facilitation of all or part of the basement. In the event of all or part of the basement being omitted from the development, prior to any construction, the developer shall first agree the foundation layout with the City Archaeologist (in consultation with the National Monuments Service).**
- d) Where archaeological material is identified, the developer shall submit an archaeological mitigation strategy and a detailed method statement for written agreement with the planning authority. The agreed archaeological mitigation shall take place under Section 26 licence prior to the commencement of development. The developer shall make provision for excavation, post excavation, interpretation and publication of the results. A preliminary report detailing the findings of the agreed resolution shall be submitted to the planning authority within four weeks of the licence expiry and a full and final report shall be submitted to the planning authority within 1 year of the licence expiry date.**

Response

An archaeological and cultural heritage assessment has been carried out for the proposed development area as part of the overall EIAR and is included as Chapter 12. This has involved a thorough analysis of the baseline records, geophysical survey, monitoring results from site investigations and a field inspection. No previously unidentified areas of archaeological potential have been identified within the proposed development area. Notwithstanding that, the mitigation measures in the EIAR chapter state that a programme of archaeological testing will be carried out prior to the commencement of construction. This will involve the excavation of test trenches, under the direction of an archaeologist, under licence as issued by the National Monuments Service of the DoHDLGH and in consultation with the Dublin City Archaeologist. Following the completion of testing a report will be produced detailing the results. If archaeological features are identified,

further consultation with the DoHLGH and the Dublin City Archaeologist, will be required. Additional mitigation may include preservation by record, in-situ and/or archaeological monitoring of topsoil stripping. All impacts and mitigation will be detailed in the archaeological testing report.

3.0 CONCLUSION

In conclusion, it is respectfully submitted that all the issues raised by the Planning Authority in the LRD Opinion have been comprehensively and successfully addressed in relation to the submission of this final LRD application to the Planning Authority. This statement of response should be read in conjunction with the comprehensive documentation accompanying this LRD application.

The proposed scheme is considered to be in accordance with national, regional and local planning policy and provides an appropriate design, layout and massing, having regard to the proximity to surrounding development, and does not result in any unacceptable adverse impacts in respect to residential amenity, transport, drainage, heritage, trees, and ecology.

The LRD process seek to deliver on key government objectives to address the housing supply issue in a sustainable manner, and the redevelopment of St. Vincent's Hospital Fairview for a new hospital and supporting residential development on the underutilised lands associated with the existing hospital campus / ownership, within the Dublin City & Suburbs within the Metropolitan Area, near high frequency public transport corridors, in a development with a very high quality urban, architectural, and public realm design, is considered to fully align with national, regional and local policies and objectives. Having regard to the above, it is respectfully submitted that the Planning Authority should grant a 10 year permission for the proposed development on the subject site.