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

Date: 2nd April 2026
Reference: TD JN 25148

Dear Sir / Madam,

RE: LARGE-SCALE RESIDENTIAL DEVELOPMENT APPLICATION IN RESPECT OF PROPOSED MODIFICATIONS TO PERMITTED LRD DEVELOPMENT, UNDER ABP REF.: 317438-23 / DCC REG. REF.: LRD6009/23-S3, AT ST. VINCENT'S HOSPITAL, RICHMOND ROAD AND CONVENT AVENUE, FAIRVIEW, DUBLIN 3. THE SITE CONTAINS PROTECTED STRUCTURES UNDER RPS REF.: 2032, 8788 AND 8789

Introduction

On behalf of the applicant, Richmond Village Development Company Limited, we hereby submit this cover letter to accompany the Stage 3 - LRD application to Dublin City Council in respect to proposed modifications to the permitted Large-scale Residential Development (LRD) under ACP Ref.: 317438-23 / DCC Reg. Ref.: LRD6009/23-S3 at St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3.

An application was submitted on 27th March 2026 under Reg. Ref.: WEBLRD6104/26-S3 for the proposed development. The application was deemed invalid on 1st April 2026. In response to this, the reasons for invalidation have been resolved, including the full description of development in the planning application form and red line for the application boundary on the site location map. We have removed the previous site notices erected and provided new site notices dated 2nd April 2026.

Context

The Large-scale Residential Development (LRD) was granted for a **ten-year permission** by An Bord Pleanála under ABP Ref.: 317438-23 (hereafter ACP) on the 11th of October 2023, subject to 38 no. conditions. The permitted development, as amended by condition, provides for a comprehensive residential and community scheme comprising 9 no. residential blocks accommodating 779 no. residential units (18 studios, 375 one-bedroom, 332 two-bedroom, and 54 three-bedroom units), together with a new hospital building, community facilities, and public open space. Blocks D, E, and F comprise Build-to-Rent residential units, while the remaining blocks are permitted as standard design apartments.

The applicant, Richmond Village Development Company Limited, has since secured an agreement with the Land Development Agency (LDA) to deliver the permitted LRD development, including the new mental health hospital, as a mixed-tenure scheme comprising social, affordable, and cost-rental housing. Initial enabling works have commenced on site, with main construction works anticipated to commence in March 2026.

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Summary of Proposed Modifications

The proposed development will consist of alterations to permitted residential Blocks C, DE, L, and J, to increase the total number of apartments by 27 no., from 354 no. to 381 no., all within the existing permitted building envelopes, with no increase in height, massing or site coverage. The modifications will increase the total number of residential units within the overall development from 779 no. to 806 no. units (37 no. studios, 391 no. 1 bed apartments, 328 no. 2 bed apartments and 50 no. 3 bed apartments).

The proposed modifications consist of the following:

- **Block C –** Internal reconfiguration to replace 55 sq.m of internal communal amenity space at ground-floor level to provide 1 no. additional one-bed apartment, together with the conversion of 1 no. permitted two-bed apartment to a one-bed apartment. Alterations to permitted landscaping and circulation areas. Associated modifications to the permitted west elevation to provide a new entrance. Net Change: +1 no. one-bed apartment.
- **Block DE -** Internal reconfiguration and partial replacement of permitted internal communal amenity areas at ground, first and sixth floor levels to provide 7 no. additional apartments (comprising 1 no. studio, 4 no. one-bed and 2 no. two-bed apartments). Works include a revised entrance foyer and provision of a management suite (relocated from Block J), at ground floor level. Associated modifications to permitted elevations including new balconies and revised window arrangements on the south, north and east elevations, omission of permitted external façade shading elements (brise soleil) on the south and east elevations and a new entrance and canopy on the north elevation, and associated alterations to permitted landscaping. Net change: +7 no. apartments.
- **Block L -** Internal reconfiguration and alterations at ground floor level to replace 1 no. permitted two-bed apartment with 2 no. studio apartments. At first to fourth floor levels, internal reconfiguration to replace 2 no. two-bed apartments and 1 no. three-bed apartment with 2 no. one-bed apartments and 4 no. studio apartments at each level. Associated modifications to permitted elevations including additional balconies and openings on the south and west elevations. Net Change: +13 no. apartments.
- **Block J –** Replacement of permitted amenity and management areas at ground-floor level to provide 2 no. two-bed apartments and 2 no. one-bed apartments. Internal reconfiguration to provide 2 no. additional two-bed apartments within permitted double-height space at first-floor level. Associated modifications to all permitted elevations, including the provision of a new entrance on the western elevation, alterations to façade articulation, and revised distribution of approved external materials and extension of communal open space. Net Change: +6 apartments.

It is also proposed to omit Condition No's 5, 6 and 7 of the parent permission (ACP Ref.: 317438-23), which relate to Build-to-Rent (BTR) covenants, in respect of permitted units within Blocks DE and F, as the proposed modifications to permitted LRD seek to change the permitted development from a Build-to-Rent apartment scheme to a standard apartment scheme.

A Natura Impact Statement (NIS) has been prepared for the development and accompanies the planning application.

The proposed modifications have been brought forward in the context of the Specific Planning Policy Requirements (SPPRs) contained within the recently published Design Standards for New Apartments – Guidelines for Planning Authorities (2025), which supersede the 2023 Guidelines.

The revisions also reflect updated Land Development Agency (LDA) requirements for delivery of the scheme as social, affordable, and cost-rental housing. As the Build-to-Rent (BTR) classification is no longer recognised as a distinct residential typology, the provision of the previously permitted shared BTR facilities and amenities is no longer required. In this context and given the significant level of community and commercial uses already incorporated into the wider development, the proposed modifications are considered both reasonable and appropriate.

The revisions have been developed collaboratively with the design team to improve layout efficiency, housing mix, and compliance with updated national standards, while retaining the approved height, scale, and massing parameters of the permitted scheme.

For clarity, no material changes are proposed to drainage, transport, landscaping, or archaeology. The modifications do not impact the protected structures on site, and the modifications to Block J will not alter the relationship established under the parent permission with the adjoining St. Vincent's Hospital Buildings (RPS Ref. 2032), using appropriate materials used elsewhere in the permitted development. The proposed works are confined to the new apartment blocks located west of the protected structures and do not materially affect their design, layout, massing, or visual relationship.

The development remains substantially the same as the permitted scheme. The modifications comprise internal layout optimisations and typology adjustments, resulting in a modest uplift in unit numbers. Specifically, the proposals:

- Do not alter the overall nature, scale, or intent of the development;
- Remain consistent with the permitted architectural design, save for minor external changes arising from internal reconfiguration;
- Do not involve material alterations to the site layout, landscaping, drainage, or transport infrastructure; and
- Remain fully consistent with the Z12 and Z15 zoning objectives applicable to the subject lands.

Consultation with the Planning Authority

Section 247 of the Planning & Development Act, 2000, as amended, requires that, where a proposed development meets the definition of LRD, the applicant must engage in pre-planning consultation with the planning authority (Stage 1 of the LRD process). While the current application relates to proposed modifications to a permitted LRD, the development as amended continues to meet the statutory definition of LRD (providing an uplift of 27 no. units to a total of 806 no. units). Accordingly, the requirements of Section 247 apply, and pre-planning consultation with the planning authority has been undertaken in respect of the proposed modifications.

The next stages of the LRD process involve a LRD Meeting with the Planning Authority and the forming and issuing of a LRD Opinion by the planning authority, unless the Planning Authority make a determination that no further consultations in relation to the proposed development are required, and allow the applicant to proceed with submission of an LRD application, subject to the following:

"Where a planning authority receives a request under this section in relation to a proposed development in respect of a part of which (referred to in this section as the "permitted development") permission has already been granted under section 9 of the Planning and Development (Housing) and Residential Tenancies Act 2016 or on foot of an application

in accordance with section 32A, and the planning authority is satisfied, having compared the proposed development to the permitted development, that—

a. *the proposed development is substantially the same as the permitted development, and*
b. *the nature, scale and effect of any alterations to the permitted development are not such that require the consultation process to be repeated, the planning authority may determine, notwithstanding subsection (1A), that no consultation is required under this section in relation to the proposed development and may provide a confirmation in writing to the person who made the request to that effect."*[2] (Emphasis added)

In accordance with Section 247(7) the Planning and Development Act, 2000 (as amended), a pre-application consultation took place between the applicant / design team and representatives of Dublin City Council on the 15th of October 2025 in relation to the proposed development.

On the 19th of November 2025, based on a comparison of the proposed development to the permitted development, DCC issued a letter confirming that no further consultation is required under Section 247 in relation to the proposed development. DCC were satisfied that the proposed development is substantially the same as the permitted development, and that the nature, scale and effect of any alterations to the permitted development are not such that require the consultation process to be repeated, and made a determination under S. 247(7) of the Planning and Development Act, 2000 (as amended), that no further consultation is required in relation to the proposed development. A copy of the Declaration is attached at Appendix 1 of the LRD Form No. 19.

Duration of Permission

The appropriate period for the parent LRD permission under ACP Ref.: 317438-23 was ten no. years from the date of the ACP Order (i.e. 10 years from 11th October 2023). It is respectfully submitted that this application for modifications to permitted LRD should be for the same duration of the parent LRD permission, and we would suggest attaching an appropriately worded condition to a decision to grant, such as the following:

"The appropriate period for this modifications application to the parent permission shall be ten years from the date of An Coimisiún Order under ACP Ref.: 317438-23. The development shall be carried out within this period in accordance with the phasing plan approved by under ACP Ref.: 317438-23.

Reason: In the interest of clarity and to ensure the timely and orderly development of the site for housing with the required supporting infrastructure."

Land Use Zoning

The application site is subject to three different land use zonings, namely '*Z1 – Sustainable Residential Neighbourhoods', 'Z12 – 'Institutional Land (Future Development Potential)* and *'Z15 - Community and Social Infrastructure'* under the Development Plan, which came into effect in December 2022. The areas subject to modifications under this LRD application is on Z12 – 'Institutional Land (Future Development Potential) and 'Z15 - Community and Social Infrastructure' land use zoning. The proposed modifications to the permitted LRD to provide 27 no. additional residential units, and all associated development, is permitted in principle under Z12 and Open for Consideration Uses under Z15 and therefore in accordance with the site's zoning under the Development Plan. Please refer to JSA'S Planning and Environmental Report for further details.

Uisce Eireann Requirements

The requirements in respect of Uisce Eireann (Irish Water) (IW) set out in the LRD Form No. 19 are addressed in the form, and the Engineering Report / Technical Note prepared by OCSC Consulting Engineers which includes the Uisce Eireann (Irish Water) Confirmation of Feasibility (COF) letter attached. As set out in the Engineering Report / Technical Note, Uisce Éireann have previously issued a Confirmation of Feasibility (COF) and a Statement of Design Acceptance (SODA) for the granted modifications in 2023. Copies of the COF letter and SODA are enclosed to LRD Form No. 19.

Part V

The Part V allocation for the overall permitted LRD development under ACP Ref.: 317438-23 is currently being progressed with the Dublin City Council Housing Department as part of ongoing engagement.

Under the permitted development, 168 no. Part V units in Blocks A, B and H (as revised by condition) were proposed to satisfy the Part V requirements for the 779 no. permitted residential units arising under the Planning and Development Act 2000, as amended. This equates to c. 21.5% of the total number of permitted units being allocated to Part V.

Having regard to the proposed modifications to the permitted LRD, which provide for a net increase of 27 no. residential units, it is submitted that the continued provision of 168 no. Part V units within Blocks A, B and H remains appropriate and sufficient to satisfy the statutory Part V requirement. The proposed provision represents approximately 20.8% of the revised total unit number (806 no. units), thereby exceeding the minimum 20% requirement.

We refer to the updated Part V proposals for the development which is contained in the following Part V package accompanying the application:

- DCC Part V Validation Letter dated 15th January 2026
- JSA Part V Cover Letter
- STW Part V Brochure (including drawings and schedules for the proposed Part V units)

Updated Part V cost information has not been submitted with this application, as Dublin City Council has confirmed through the Part V Validation Letter that revised costings are not required for validation purposes and that the cost information agreed under the parent permission remains applicable.

Drawings, Plans and Particulars

This application for modifications to permitted LRD is accompanied by architectural and landscape drawings. Each drawing pack is accompanied by a schedule of drawings, as required under Q. 10 of Form 19 (supplementary application form for LRD applications).

The architectural drawing package includes a full set of permitted and proposal architectural drawings of relevance to the proposed modifications prepared by STW Architects, including the Site Location Map and Site Layout Plans, at the required scales.

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

Planning and Environmental Report

A Planning and Environmental Report prepared by John Spain Associates accompanies this application for modifications to permitted LRD. The report sets out the site location, context, details of the proposed development and demonstrates that the proposed modifications to the permitted development are consistent with the relevant policies, objectives and standards of the guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), and the relevant policies, objectives and standards of the Development Plan.

A summary of the key development details and compliance with relevant standards, within the overall LRD (red line) boundary and/or within the area subject to proposed modifications (areas in orange) as appropriate, is provided in Table 5.1 of the Planning and Environmental Report for ease of review.

An Environmental Impact Assessment Report was submitted with the parent application and the development will be carried out in accordance with the mitigation measures as per Condition No. 3 of ACP Ref.: 317438-23. The proposed modifications to the LRD are within the existing permitted building envelopes, with no increase in height, massing or site coverage. The report outlines that the proposed modifications to the permitted development will not result in any additional impacts on the environment.

AA Screening / Natura Impact Statement

An updated Appropriate Assessment Screening and a supporting Natura Impact Statement have been prepared by Altemar to assess the proposed modifications to the permitted development in the context of the parent permission. These assessments take account of updated ecological baseline information, including the designation of the North-West Irish Sea Special Protection Area since the granting of the parent permission.

The Appropriate Assessment Screening concludes that, on the basis of objective scientific information and applying the precautionary principle, the proposed modifications, being minor in nature and confined within the parameters of the permitted development, do not introduce any new or altered pathways for effects on European sites and will not give rise to likely significant effects on any European site, either alone or in combination with other plans or projects.

Notwithstanding this conclusion, a Natura Impact Statement has been prepared to support the application and to provide additional assurance having regard to the precautionary requirements of Article 6(3) of the Habitats Directive. The Natura Impact Statement demonstrates, beyond reasonable scientific doubt, and taking account of the design measures and controls already required under the parent permission, that the proposed modifications will not adversely affect the integrity of any European site, including the newly designated Special Protection Area.

No changes are proposed to the approved access arrangements, drainage strategy, construction methodology or operational characteristics of the development, and the modifications do not give rise to any new sources of emissions, discharges, disturbance or hydrological connectivity beyond those already assessed as part of the parent Appropriate Assessment Screening and Natura Impact Statement.

Accordingly, it can be concluded that the proposed modifications, either individually or in combination with other plans and projects, will not adversely affect the integrity of any European site. The conclusions reached under the parent permission therefore remain valid

and robust, and no further Appropriate Assessment is required in respect of the proposed modifications.

The preparation of an updated Natura Impact Statement does not give rise to a requirement for an updated Environmental Impact Assessment Report (EIAR), as the proposed modifications do not introduce any new or materially different significant environmental effects beyond those already assessed as part of the parent Environmental Impact Assessment Report. Accordingly, the proposed modifications fall within the scope of the existing EIAR, and no updated or supplementary Environmental Impact Assessment Report is required in support of the current application.

Fee

Please find enclosed with the planning application form confirmation of EFT payment for the application fee of €13,510, based on Class 14b each additional LRD housing unit of €130 X 27 no. additional residential units (permitted 69,777 sq.m / proposed 69,752.3 sq.m including residential amenity) and Class 14d fee of €10,000 for submission of a NIS.

Please note there is no change to the permitted commercial/community uses as part of this application for amendments to the permitted LRD.

The planning application fee has been paid to Dublin City Council for this application for modifications to permitted LRD in advance of lodgement, in accordance with Section 2(14) and Section 3 of the Planning and Development Regulations 2001-2025.

Website

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

- www.richmondvillagelrd.ie

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

Ownership of the Wider Application Site

Under the parent LRD permission (ACP Ref.: 317438-23 / DCC Reg. Ref.: LRD6009/23-S3), a portion of the overall application site is owned by:

- Targeted Investment Opportunities ICAV, 25–28 North Wall Quay, Dublin 1; and
- Dublin City Council, Environment and Transportation Department, Civic Offices, Wood Quay, Dublin 8, in respect of a section of public road within the application site boundary.

In relation to third-party consents, Section 22(2)(g)(i) of the Planning and Development Regulations 2001 (as amended) requires owner consent only where the applicant is not the legal owner of the land or structure concerned, as follows: *"(g) where the applicant is not the legal owner of the land or structure concerned – (i) the written consent of the owner to make the application" (emphasis added).*

We confirm that in this instance the land "concerned", namely the area subject to the proposed modifications (outlined in orange), is wholly under the control of St. Vincent's Hospital Fairview.

No modifications are proposed to any parts of the application site owned by Targeted Investment Opportunities ICAV or Dublin City Council. However, for information purposes, the letters of consent originally submitted with the parent permission (ACP Ref.: 317438-23) are resubmitted as part of this application.

Enclosures

This application has been submitted in electronic format, via the Local Government Online Planning portal.

The planning application is accompanied by the following comprehensive set of documentation and information, with each of the relevant packages that include drawings including a register / schedule, to ensure all relevant planning matters are addressed:

Planning Particulars
- Form 19 (supplementary application form for LRD applications), and attachments including DCC S247(7) Declaration, letters of consent from St. Vincents Hospital and Land Development Agency, Targeted Investment Opportunities ICAV and Dublin City Council, Irish Water COF and SODA letters and confirmation of EFT payment of the planning application fee;
- Copies of the site notice (2nd April 2026) and newspaper notice (including original copy of newspaper notice);
- This cover letter prepared by John Spain Associates
- Part V pack containing DCC Part V validation letter, Part V cover letter prepared by JSA, and Part V brochure including drawings and schedule prepared by STW Architects;

Planning Report
- Planning and Environmental Report prepared by John Spain Associates;

Architecture
- Architectural Drawings (permitted and proposed) and Schedule of Drawings prepared by Scott Tallon Walker Architects;
- Architectural Design Statement prepared by Scott Tallon Walker Architects;
- Housing Quality Assessment and Area Schedule Statement prepared by Scott Tallon Walker Architects;
- Conservation Statement prepared by Carrig Conservation;

Engineering
- Engineering Report / Technical Note prepared by O'Connor Sutton Cronin Consulting Engineers;

Landscape
- Landscape Drawings and schedule of drawings prepared by NMP Landscape Architects;

Other
- Daylight and Sunlight Assessment prepared by IN2; and
- Appropriate Assessment Screening Report and Natura Impact Statement (NIS) prepared by Altemar.

Conclusion

In preparing this application for modifications to permitted LRD, including all drawings and reports, the applicant and design team have responded to the items raised in the pre-application consultation meeting and the LRD Determination.

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

Yours faithfully,



John Spain Associates