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PLANNING AND ENVIRONMENTAL REPORT

In respect of lands at

St. Vincent's Hospital Fairview (Application for Modifications to Permitted LRD)

Prepared on behalf of

Richmond Village Development Company Limited

March 2026

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DOCUMENT CONTROL SHEET

Client:	Richmond Village Development Company Limited
Project Title:	St. Vincent's Hospital Fairview (Modifications to Permitted LRD)
JSA Reference:	25148
Document Title:	Planning and Environmental Report

Rev.	Status	Author(s)	Reviewed By	Approved By	Issue Date
FINAL	FINAL	TD	PT	PT	27/03/26

1.0 INTRODUCTION AND EXECUTIVE SUMMARY

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

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

The developer, Richmond Village Development Company Limited, has since secured an agreement with the Land Development Agency (LDA) to deliver the permitted LRD development, as a mixed-tenure scheme comprising social, affordable, and cost-rental housing. The new medical facility will be delivered by Royalton Developments and Walls Construction for St. Vincent's Hospital. Initial enabling works have commenced on site, with main construction works anticipated to commence in the coming weeks.

The subject application is for 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 proposed modifications to the permitted LRD will increase the total number of residential units within 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).

As set out in the public notices, the proposed modifications to the permitted LRD 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 the permitted units within Blocks DE and F, as the proposed amendments seek to change the permitted development from a Build-to-Rent apartment scheme to a standard apartment scheme."

These proposed modifications to the permitted LRD have been brought forward in the context of the Specific Planning Policy Requirements (SPPRs) contained within the Design Standards for New Apartments – Guidelines for Planning Authorities (2025), which supersede the 2023 Apartment Guidelines and certain policies / objectives and standards of the Dublin City Development Plan 2022-2028.

The revisions to ACP Ref.: 317438-23 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 to the permitted LRD are considered both reasonable and appropriate.

The revisions to ACP Ref.: 317438-23 have been developed collaboratively with STW architects and 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 proposals, which remain consistent with the permitted LRD under ACP Ref.: 317438-23. The proposed modifications to the permitted LRD do not impact the protected structures on site, and the modifications to Block J will not alter its established relationship with the adjoining St. Vincent's Hospital Buildings (RPS Ref. 2032) as outlined in the Conservation Statement prepared by Carrig and the accompanying drawings and visuals prepared by STW Architects. The proposed works are confined to the new apartment blocks located west and north 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 under ACP Ref.: 317438-23. The proposed modifications to the permitted LRD comprise internal layout optimisations and typology adjustments, resulting in a modest uplift in unit numbers as a result of internal reconfiguration and replacing BTR amenity and service space with apartments. 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.

2.0 SITE LOCATION AND CONTEXT

2.1 SITE LOCATION

The subject site is located at and surrounding St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3. The site contains protected structures under RPS Ref.: 2032 (St. Vincent's Hospital), RPS Ref.: 8788 (Richmond House) and RPS Ref.: 8789 (Brooklawn). The application site boundary is as per the parent permission and includes an area of the public road / footpaths (extending for approximately 0.8km) to facilitate service connections via Griffith Court, Philipsburgh Avenue and Griffith Avenue, part of the open space within Grace Park Wood to facilitate a pedestrian / cycle connection, and part of Richmond Road to facilitate service connections and associated upgrades.

This application, which relates solely to modifications to a permitted LRD, the red line boundary has been retained as per the parent permission The areas subject to the proposed LRD amendments (Blocks C, DE, L and J) are identified in orange on the application drawings. No modifications are proposed to any parts of the application site.

2.2 OVERALL LANDHOLDING CONTEXT

As illustrated in Figure 2.1, the overall site of the LRD permitted under ACP Ref.: 317438-23 is located on lands bound by the Grace Park Wood residential development to the northwest, Griffith Court and the 'Fairview Community Unit' nursing home, Gheel Autism Services and a graveyard to the north, the An Post depot on Lomond Avenue and residential properties on Inverness Road to the east, existing residential and commercial properties on Richmond Road and Convent Avenue to the south and Charthouse Business Centre, Dublin Port Stadium and Ierne Sports and Social Club to the west of the site.

Figure 2.1: Aerial Photograph of Subject Site



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

The overall LRD site under ACP Ref.: 317438-23 comprises 9.46 ha, including 6.04 ha for residential development and 2.67 ha for the hospital element. The LRD permission is being implemented on a phased basis, with Phase 1 providing the new hospital and initial residential development (commencing in next couple of weeks), and Phase 2 comprising decanting, demolition of redundant buildings, refurbishment of retained structures and completion of the development.

The LRD 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 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.

2.3 APPLICATION SITE CONTEXT

The proposed modifications relate to Blocks C, DE (Build-to-Rent), L and J of the permitted Large-Scale Residential Development (LRD) granted under An Coimisiún Pleanála Ref.: 317438-23 highlighted in red in Figure 2.2.

Figure 2.2: Permitted Site Layout

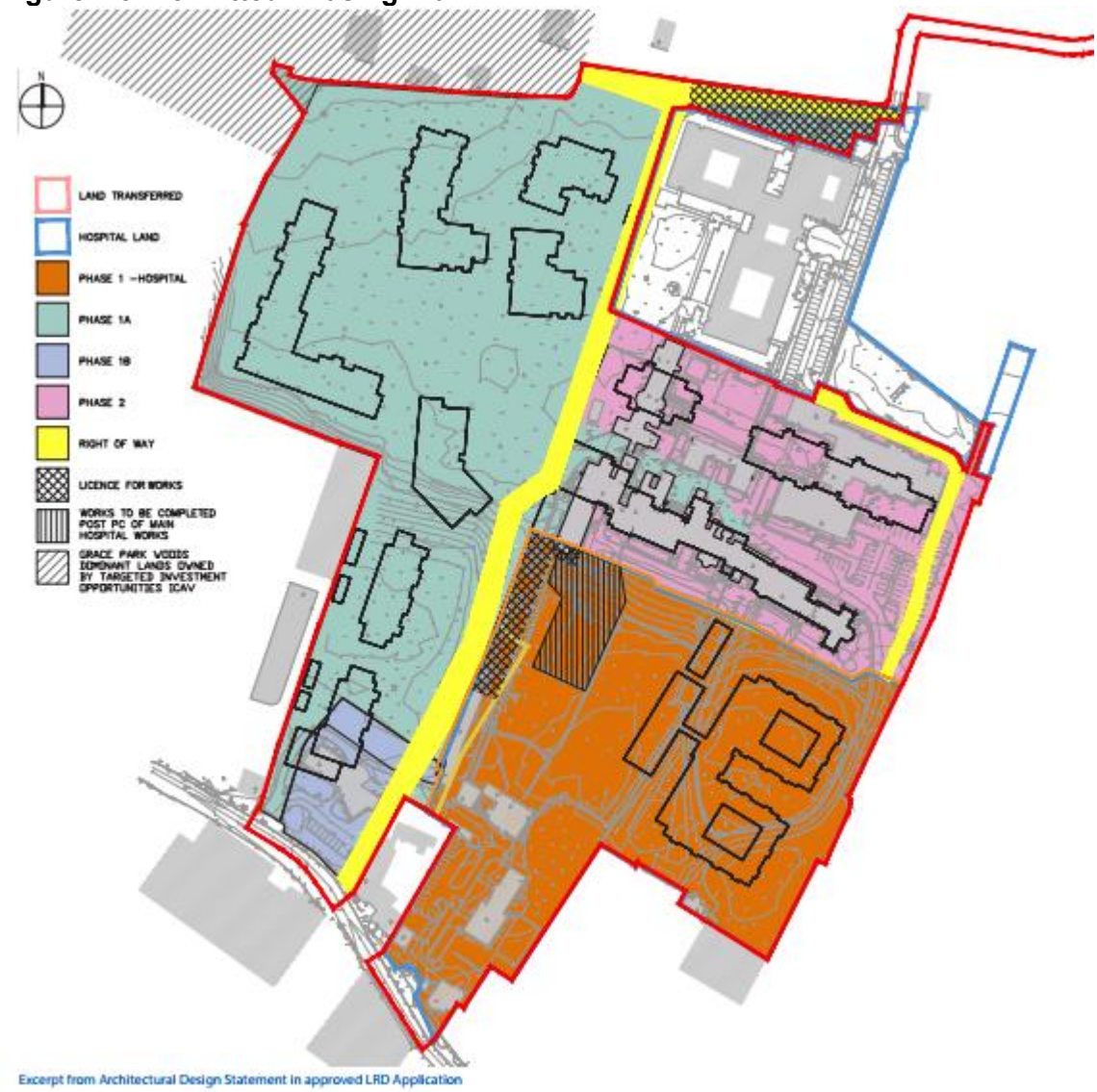


Note: The red line indicates the approximate outline of the land within the ownership of the applicant, please refer to STW's Site Location Map and Site Layout Plan for the full extent of the proposed modifications to the permitted LRD.

The proposed modifications to the permitted LRD would facilitate a net increase of 27 no. residential apartments across the overall development. These modifications have been brought forward in response to 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 Apartment Guidelines and some policies of CDP 2022-2028.

As illustrated in the extract from the approved overall phasing plan under ACP Ref.: 317438-23, included at Figure 2.3, the area subject to the proposed modifications is located within Phase 1A and 2 of the permitted phasing strategy for the development.

Figure 2.3: Permitted Phasing Plan



Excerpt from Architectural Design Statement in approved LRD Application

Accordingly, the proposed modifications, which provide for an additional 27 no. residential units within the footprint of the permitted development, are consistent with the established land use principles of the site, remain fully aligned with the permitted scheme under ACP Ref.: 317438-23, and comply with the applicable zoning objectives of the Development Plan.

3.0 PLANNING HISTORY

3.1 PERMITTED LARGE-SCALE RESIDENTIAL DEVELOPMENT

An Bord Pleanála (now An Coimisiún Pleanála) issued an Order to grant permission dated the 11th of October 2023, subject to 38 no. conditions, for an LRD consisting of 779 no. residential units (as amended by condition), in 9 no. residential buildings (Blocks A, B, C, D-E, F, G, H, J, and L), including 303 no. BTR units in Blocks DE and F. The development also included a new hospital facility for mental health services, community facilities, childcare facility, public open space and all associated development.

The development includes the partial demolition and change of use, including associated alterations, of the existing hospital building (part protected structure under RPS Ref.: 2032), to provide residential amenity areas, a gym, a café, co-working space, a community library, a childcare facility, and a community hall (referred to as Block K).

The development also includes additional residential amenities and facilities, a retail unit and a café. The development includes for the demolition of existing structures on site, including extensions of and buildings within the curtilage of the existing hospital buildings under RPS Ref.: 2032, and other existing buildings and ancillary structures on the site; and the change of use, refurbishment and alterations of a number of buildings and protected structures on the site including Brooklawn (RPS Ref.: 8789), Richmond House (RPS Ref.: 8788), the Laundry building and Rose Cottage.

In the context of the proposed modifications to the permitted LRD, the schedule below relates to the 779 residential units permitted (excluding those omitted by Condition 2 of the Board's Order).

Figure 3.1: Extract of Permitted Unit Breakdown

Development Approved by ABP

Apartment Building	Studio	1 Bed	2 Bed	2 Bed 3p	3 Bed	Total Apts - Potential
Building A	7	27	18	0	6	**58**
Building B	0	54	22	1	9	**86**
Building C	0	40	42	0	0	**82**
Building DE	7	82	96	0	0	**185**
Building F	1	63	44	2	8	**118**
Building G	1	71	41	13	13	**139**
Building H	1	8	10	1	4	**24**
Building J(K)	0	6	7	0	0	**13**
Building L	1	24	35	0	14	**74**
Total Apartments	**18**	**375**	**315**	**17**	**54**	**779**
	2.3%	**48.1%**	**40.4%**	**2.2%**	**6.9%**	

Source: STW Architects

3.2 PERMITTED BLOCKS C, DE, J AND L

In respect to the proposed modifications to the permitted LRD, the following provides details of the buildings subject to the modifications:

- Permitted Block C is a part six to part seven storey building, above a lower ground floor / basement level, comprising 82 no. apartments with 40 no. 1 bed units and 42 no. 2 bed units, with an internal communal amenity area at ground floor level. A communal roof terrace is proposed at sixth floor level. Private balconies / terraces for the apartments are provided on the west, east, and south elevations.

- Permitted Block DE, as revised by ACP Condition 4, is a part five to part eleven storey building, above basement level, comprising 185 no. Build-to-Rent (BTR) units with 7 no. studio units, 82 no. 1 bed units, and 96 no. 2 bed units. Concierge, residents' lounges, meeting rooms and a cinema room are provided at ground floor level, resident's lounge, cooking and dining facilities at sixth floor level and a residential lounge at eleventh floor level. The resident services and amenities are intended for the BTR units, and not to be used by SDA units. Five communal roof terraces are proposed, one terrace at fifth floor level, two terraces at sixth floor level, one terrace at ninth floor level, and one terrace at twelfth floor level. Private balconies / terraces for the apartments are provided on the west, east, north and south elevations.

- Block L, as revised by ACP Condition 4, is a part four to part five storey building consisting of 74 no. apartments with 1 no. studio, 24 no. 1 bed units, 35 no. 2 bed units and 14 no. 3 bed units. Private balconies/terraces for the apartments are provided on the north, east, south, and west elevations.

- Block J is a four storey building proposed as an extension to Block K (St. Vincent's Hospital Building under RPS Ref.: 2032) comprising 13 no. apartments with 6 no. 1 bed units and 7 no. 2 bed units and residential amenities and facilities, primarily to serve the BTR residential accommodation, at ground floor level. Private balconies / terraces for the apartments are provided on the north, west, and south elevations.

As outlined in Section 5, the proposed revisions to residential amenity provision reflect the updated tenure structure of the development. Internal resident amenity and support facilities were historically associated with Build-to-Rent (BTR) accommodation under earlier iterations of the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines*. However, BTR-specific provisions, including related Specific Planning Policy Requirements, were removed under the Apartment Guidelines (Amended, July 2023) and are not carried forward within the *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2025)*, which now provide a unified set of standards applicable to all apartment developments.

For the avoidance of doubt, the permitted development did not rely on BTR-specific flexibilities or compensatory measures in order to achieve compliance with applicable apartment standards. All apartments within the permitted scheme, including those within the affected blocks, were designed to comply independently with the relevant requirements relating to minimum floor areas, internal storage, private amenity space and overall residential quality. The internal residential amenity and support facilities therefore constituted additional resident facilities rather than measures required to offset any deficiency in individual unit standards.

Accordingly, there is no specific national policy or quantitative requirement mandating internal communal amenity space for Standard Design Apartments within the current Apartment Guidelines or the Dublin City Development Plan 2022–2028. The Standard Design Apartment element of the scheme remains fully compliant with all applicable standards, including private amenity space, communal open space provision and access to public open space. Furthermore, the development incorporates a range of community, commercial and shared facilities elsewhere within the scheme which adequately support residential amenity. Having regard to the operational requirements of the LDA delivery model, additional internal resident amenities are not required to ensure compliance with national or local planning policy.

3.3 RELEVANT CONDITIONS OF PERMITTED LRD

Condition 4 of the permission states that "*The proposed development shall be amended as follows:*

(a) Block D-E shall have a maximum height of 1 1 storeys. This shall be achieved by the omission of levels 10 and 1 1 and of units DE-10 01, DE-10-02, DE-10-03, DE-10-04, DE-10-05, DE-10-06, DE-10 07, DE-11-01, DE-11-02, DE-11-03, DE-11-04, DE-11-05, DE-11-06, DE-11-07.
(b) Block L shall have a maximum height of five storeys. This shall be achieved by the omission of level 05 and of units L-05-01, L-05-02, L-05-03, L-05-04, L-05-05, L-05-06, L-05-07, L-05-08, L-05-09, L-05-10, L-05-11, L-05-12.
(c) Block H shall have a maximum height of four storeys. This shall be achieved by the omission of level 04 and of units H-04-01, H-04-02,H-04-03, H-04-04, H-04-05 and H-04-06.

The development hereby approved contains 779 number dwelling units consisting of 18 number studios, 375 number one bedroom apartment units, 332 number two bedroom units and 54 number three bedroom units.

The revised plans and particulars showing compliance with these requirements shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

***Reason:** In the interest visual amenity of the streetscape, respecting the primacy of the protected structures on site and protection of residential amenities of the wider area*

In terms of the proposed modifications to the permitted LRD to change the permitted development from a Build-to-Rent apartment scheme to a standard apartment scheme, Conditions 5, 6 and 7 of ACP Ref.: 317438-23 relate to Build-to-Rent (BTR) covenants, in respect of permitted units within Blocks DE and F, and state the following:

- *5. The 303 number units in Blocks D-E and F development hereby permitted shall be for Build to Rent units which shall operate in accordance with the definition of Build to Rent developments as set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities issued by the Department of Housing, Planning and Local Government in December 2022 and shall be used for long term rentals only. No portion of this development shall be used for short-term lettings. Reason: In the interests of orderly development and clarity.*
- *6. Prior to commencement of development, the owner shall submit, for the written consent of the planning authority, details of a proposed covenant or legal agreement which confirms that the (303 number units in Blocks D-E and F) development hereby permitted shall remain owned and operated by an institutional entity for a minimum period of not less than 15 years and where no individual residential units shall be sold separately for that period. The period of 15 years shall be from the date of occupation of the first residential unit within the scheme. Reason: In the interests of orderly development and clarity.*
- *7. Prior to the expiration of the 15-year period referred to in the covenant (condition number 6 above), the owner shall submit for the written agreement of the planning authority, ownership details and management structures proposed for the continued operation of the 303 number units as a Build to Rent scheme.* ***Any proposed amendment or deviation from the Build to Rent model as authorised in this permission shall be subject to a separate planning application. Reason: In the interests of orderly development and clarity. (emphasis added)***

Condition 7 indicates that the Board envisaged the scenario for any future deviation from the BTR model that might be proposed and makes it clear this would require a separate planning application, as is now proposed.

As set out in Section 5, the proposed transition to a standard apartment scheme, together with the omission of Conditions Nos. 5, 6 and 7, reflects current market conditions and is essential to the overall viability of progressing the delivery of this high-quality residential development

in a highly accessible location, to be implemented by the Land Development Agency (LDA). The proposed modifications to the permitted LRD also aligns with recent updates to the Apartment Guidelines, which remove Build-to-Rent as a distinct development typology and require the standards previously applicable to BTR schemes to be applied uniformly across all standard apartment developments.

All prior-to-commencement compliance items have been submitted, or are in the process of being submitted on a phased basis for conservation works, in accordance with the agreed approach with Dublin City Council.

4.0 PRE-APPLICATION CONSULTATIONS

4.1 SECTION 247 PRE-APPLICATION CONSULTATION AND DETERMINATION

A pre-application meeting under S. 247 of the Planning and Development Act 2000, as amended, was undertaken with Dublin City Council (the Planning Authority), on the 15th of October 2025 under Ref. No.: LRD6079/25-S1. The meeting was attended by members of DCC Planning, in addition to relevant members of the project design team.

DCC indicated they were broadly happy with the proposed modifications to the permitted LRD as presented, noting that the changes do not involve any increase in building height or massing, and therefore will not impact residential amenity. DCC confirmed that the Conservation and Drainage Departments were invited but did not attend, as the proposed modifications to the permitted LRD were not considered significant. An updated brochure, which includes further illustration of the relationship of the proposed modifications to permitted Block J vis-à-vis the St. Vincent's Hospital protected structure, was issued to the Conservation Department following the Section 247 meeting and to inform the determination.

4.2 SECTION 247 DETERMINATION

Stage 2 of the LRD process involves 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 to Stage 3 of the LRD process (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.'*[1] *(Emphasis added)*

On the 19th of November 2025, based on a comparison of the permitted LRD, DCC issued a letter confirming that no further consultation is required under Section 247 in relation to the proposed modifications to the permitted LRD. DCC were satisfied that the proposed a modifications to the permitted LRD are 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 modifications to the permitted LRD. A copy of the Declaration is attached at Appendix 1 of the LRD Form No. 19.

[1] *Section 247(7) of the Planning and Development Act, 2000 (as amended)*

5.0 DESCRIPTION OF PROPOSED MODIFICATIONS TO PERMITTED LRD

5.1 OVERALL SUMMARY

The proposed development comprises modifications to the permitted Large Scale Residential Development (LRD) granted under ACP Ref.: 317438-23 / DCC Reg. Ref.: LRD6009/23-S3. The proposed modifications to the permitted LRD relate to residential Blocks C, DE, L and J and seek to optimise internal layouts within the existing permitted building envelopes. No increases in height, massing, footprint or site coverage are proposed.

The modifications will result in an increase of 27 no. residential units, from 354 no. to 381 no. apartments within the subject blocks. Consequently, the overall development will increase from 779 no. to 806 no. residential units, comprising:

- 37 no. studio apartments
- 391 no. one-bed apartments
- 328 no. two-bed apartments
- 50 no. three-bed apartments

All additional units are accommodated entirely within the permitted building footprint of the permitted scheme.

It is also proposed to omit Conditions 5, 6 and 7 of the parent permission (ACP Ref.: 317438-23), which relate to Build-to-Rent (BTR) covenants affecting Blocks DE and F. The proposed modifications to the permitted LRD seek to transition the BTR element of the permitted development to a standard apartment development, consistent with current national planning policy.

The proposed modifications to the permitted LRD have been prepared in response to the Apartment Guidelines 2025, which supersede the 2023 Apartment Guidelines and any conflicting provisions of the CDP, and introduce updated Specific Planning Policy Requirements (SPPRs).

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.

5.2 DEVELOPMENT DESCRIPTION

The proposed modifications to the permitted LRD are described in the public notices submitted with this LRD application as follows:

- ***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 the permitted units within Blocks DE and F, as the proposed amendments seek to change the permitted development from a Build-to-Rent apartment scheme to a standard apartment scheme."

5.3 PERMITTED AND PROPOSED KEY DEVELOPMENT DETAILS

The following provides an overview of the proposed modifications and includes a table of the key details of the permitted and proposed modifications to the permitted LRD, broken into its constituent parts for ease of reference (Table 5.1).

For further detailed description of the proposed modifications to the permitted development and the proposed architectural design, please refer to the Architectural Design Statement prepared by STW Architects. For further details in respect of the associated and minor modifications to the permitted landscape design please refer to the drawings prepared by NMP.

Table 5.1: Permitted and Proposed Key Development Details

	Overall Permitted LRD (as revised by condition)	**Proposed Modifications**	**Development Plan/ Apartment Guidelines / Compact Settlements Requirements**
Development within the overall LRD application boundary (red line)			
LRD Application Site Area	• Overall: 9.46 hectares • Residential: 6.04 ha • Net Resi Area: 4.44 ha	No change	N/A
Overall no. residential units	779 no. units Including 476 no. apartments and 303 no. BTR units	806 no. units All standard design apartments (no BTR units). Delivered as social affordable and cost rental housing	N/A
Plot Ratio	- Total Site: 0.985 (total site based on land in applicant's ownership) - Hospital Site: 0.314 (based 8,411 sq.m / 2.67 ha) Residential Site: 1.25 (based on 75,261 sq.m / 6.04 ha)	No change proposed	1.0-2.5
Site Coverage	- Total Site: 21.6%	No change proposed	45-60%
Overall density	Residential Net density: 175 uph (779/4.44 ha). Gross density: 130 uph (779/6.04 ha). Net density based on total site area (excluding public open space: 109 dwellings per hectare (779/7.11 ha)	Residential Net density: 181 uph (806/4.44 ha). Gross density: 133 uph (806/6.04 ha). Net density based on total site area (excluding public open space: 113 dwellings per hectare (806/7.11 ha)	Table 1 Appendix 3 CDP outlines for 'Outer Suburb' areas a density range of 60-120 units per hectare Compact Settlements Guidelines 50 dph to 250 dph (net) for City - Urban Neighbourhoods
Unit mix	779 no. units: • 18 no. studios (2%)	806 no. units: • 37 no. studios (5%)	APG's 2025 – SPPR 1 no min / max unit mix requirements.

	• 375 no. 1 beds (48%) • 332 no. 2 beds (43%) • 54 no. 3 beds (7%)	• 391 no. 1 beds (48%) • 328 no. 2 beds (41%) • 50 no. 3 beds (6%)	
Dual Aspect	54% (436 units)	51% (410 units)	APG's 2025 – SPPR3 min 25%
Commercial / Community Uses	Hospital 8,411m2 Café 160 m2 Retail 898 m2 Gym 1,459 m2 Creche 730 m2 Co-working 817 m2 Community hall 243 m2 Community library 163 m2	No change proposed	Z15 Community and Social Infrastructure '*To protect and provide for community uses and social infrastructure'.* requirements set out in the parent permission. Objective CUO25 5% community, arts and culture and artist workspaces
Residential Amenity and Facilities	Total resident's services and amenities (Blocks C, DE, F, G, J and K) – 1,775 sq.m	Total resident's services and amenities (Blocks DE, F, G and K) – 1,072 sq.m The reduction in resident amenity provision reflects the revised tenure mix. Internal resident amenities associated with BTR accommodation are not required for the Standard Design Apartment scheme, which does not include a specific requirement for internal communal space under the Apartment Guidelines or the Dublin City Development Plan.	DCC CDP references SPPR7 and SPPR8 of earlier versions of the Apartments Guidelines in respect of Build-to-Rent (BTR) accommodation. These provisions have since been superseded by Apartments Guidelines (2025), which no longer include SPPRs relating specifically to BTR schemes and required amenity and facilities.
Public and Communal Open Space	Total Site Public Open Area provided (26.2%) 1.6 Ha 5,645 sq.m external communal open space	No change proposed. The proposed modifications do not extend the footprint of the permitted residential buildings, but rather reconfigure	Public Open Area Required (25%)

		and modestly intensify the internal layouts	
Part V	174 no. Part V units in Blocks A, B and H *(Equivalent to 22% of 779 no. units)*	168 no. Part V units in Blocks A, B and H *(Equivalent to 20.8% of 806 no. units)*	Please refer to the Part V pack including a Part V validation letter from DCC Housing Department.
Car Parking	Hospital – 76 no. spaces Residential - 247 no. spaces (0.3 per unit) Commercial/community – 9 no. spaces Total – 329 no. spaces	No change proposed Maintained at 0.3 spaces per unit (247 spaces / 806 units)	
Cycle Parking-Residential	Hospital – 50 no. spaces, Residential - 1,680 no. spaces Commercial/community uses – 84 no. spaces	Cycle parking provision remains consistent with the permitted development, with 1,680 bicycle parking spaces retained, ensuring continued compliance with Apartment Guidelines standards notwithstanding the revised unit number (806 units).	CDP– Apartments- 1 secure space per bed, minimum 2 spaces, plus 1 visitor space per 2 units; CSGs- Apartments- 1 secure space per bed, minimum 2 spaces, plus 1 visitor space per 2 units.
Development within the area subject to proposed modifications (orange line)			
Area of site subject to modifications	3,586 sq.m	3,586 sq.m	N/A
No. residential units	354 no. apartments in Blocks C, DE, J and L Note: 303 permitted BTR units in Block DE and F	381 no. apartments (27 no. additional units)	N/A
Unit mix	• 8 no. studios • 152 no. 1 beds • 180 no. 2 beds • 14 no. 3 beds	• 27 no. studios • 169 no. 1 beds • 175 no. 2 beds • 10 no. 3 beds	APG's 2025 – SPPR 1 no min / max unit mix requirements
Residential Amenity	Block C - 53 m2 Block DE - 680 m2 Block J - 327 m2 Total – 1,060 m2	Block DE - 240 m2 Block J – 118 m2 Total – 358 m2 (reduction of 702 m2)	DCC CDP references SPPR7 and SPPR8 of earlier versions of the Apartments

			Guidelines in respect of Build-to-Rent (BTR) accommodation. These provisions were removed under Apartment Guidelines 2023, which no longer identify BTR as a distinct housing typology requiring separate design standards or amenity provisions. The subsequent Apartment Guidelines 2025 maintain this unified approach, whereby apartment developments are assessed against general apartment standards rather than BTR-specific requirements.
Building Heights	Block C – 6-7 storey Block DE – 5-11 storey Block J – 4 storey Block L– 4-5 storey	No changes proposed	CDP – Accord with Building Height Guidelines 2018 SPPR 1-4. SPPR 4- mix of heights and typologies. No minimum / maximum heights.
Dual Aspect	Block C – 41.5% Block DE – 58.9% Block J – 53.8% Block L– 61%	Block C – 41.5% Block DE – 59% Block J – 63.2% Block L – 56%	APG's 2025 – SPPR 3 25%
Over 10% min floor area	Block C – 56.1% Block DE – N/A (BTR) Block J – 61.5% Block L– 62%	Block C – 56.1% Block DE – 36.5% Block J – 42.1% Block L – 38%	Section 3.3 APG's 2025 – minimum 25% exceed floor area by 10%
Universal Design	Block C – 7.3% Block DE – N/A (BTR) Block J – 0% Block L– 46%	Block C – 7.3% Block DE – 36.5% Block J – 0% Block L – 24%	DCC CDP – 25% of total residential units should be designed as UD apartments
Private Amenity Space	Complies with Development Plan and Apartment Guidelines standards – see STW HQA	Complies with Development Plan and Apartment Guidelines standards – see STW HQA	APG's- Apartments: 5 sq.m for 1-beds, 6 sq.m for 2-bed/3 person apts, 7 sq.m for 2-bed/4 person

			apts, 9 sq.m for 3-beds. Apartments comply with Development Plan and Apartment Guidelines standards – see STW HQA

5.4 REMOVAL OF RESIDENTIAL AMENITY AND FACILITIES

The proposed amendments to the permitted LRD involve the removal and reconfiguration of certain internal residential amenity and support facilities within Blocks C, DE and J. These changes arise from the internal reconfiguration works set out in the public notices and reflect the transition of the permitted Build-to-Rent (BTR) elements to a standard apartment scheme. Under the proposed modifications:

- **Block C** replaces 55 sq.m of ground-floor communal amenity space with 1 no. additional one-bedroom apartment, with associated internal reconfiguration.
- **Block DE** partially replaces internal amenity areas at ground, first and sixth floor levels to accommodate 7 no. additional units, alongside a revised entrance and relocation of the management suite from Block J.
- **Block J** replaces ground-floor amenity and management areas with residential accommodation and introduces additional units within previously approved double-height space.

These revisions rationalise internal amenity provision previously linked to the BTR model. The reallocation of floorspace enables more efficient use of the approved built form and delivers a modest uplift in residential units, all within existing building envelopes and without changes to height, footprint or massing.

Importantly, the permitted scheme did not rely on BTR-specific flexibilities to meet the Apartment Guidelines. All units were independently compliant with standards relating to floor area, storage, private amenity and overall residential quality. The internal amenities therefore provided additional, rather than compensatory, facilities.

While the original amenity and support spaces were provided in accordance with SPPR7 of the Apartment Guidelines (2020) and Section 15.10.1 of the Dublin City Development Plan, these BTR-specific provisions were removed under the Apartment Guidelines (Amended, July 2023) and are not included in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2025), which apply a unified standard to all apartment developments. In this context, the proposed amendments rationalise internal amenity space previously associated with BTR. The revised scheme continues to provide policy-compliant residential amenity through private amenity for all units, substantial communal open space, and access to on-site and surrounding community and commercial facilities. The changes therefore represent a reconfiguration of previously permitted space, not a reduction in compliant amenity provision.

Condition 8(b) of the parent permission requires residential amenity floorspace and support services within Blocks C, D-E, F and G to be available prior to occupation of Phase 1A and 1B units. The planning documentation confirms these facilities were intended to serve the BTR component. As the proposed amendment transitions Blocks D-E and F to a standard apartment scheme, the internal amenity strategy underpinning this condition is revised accordingly. Once permitted, the LRD amendment will supersede the relevant provisions of the parent permission and establish the updated arrangement of amenity and management facilities.

It is therefore requested that Condition 8(b) be updated as follows:

"All Phase 1A and 1B ancillary residential amenity space associated with the residential development, located within Blocks D-E, F and G, shall be completed and available for use prior to the first occupation of any residential unit within Phases 1A and 1B, unless otherwise agreed in writing with the Planning Authority."

This approach aligns with Dublin City Council precedent, including the amendment to the permitted scheme at 348 Harold's Cross Road (DCC Reg. Ref. 3356/24). In that case, the Planning Authority recognised the policy shift under the updated Apartment Guidelines (2023), confirming that BTR should no longer be treated as a distinct typology. Amendments involving the reduction and reconfiguration of internal shared amenities were accepted, with the Planner concluding that, in light of updated policy and available surrounding infrastructure, such changes did not adversely affect residential amenity. This demonstrates that revisions to internal amenity provision are acceptable where a scheme transitions from BTR to a standard apartment model and remains fully compliant with current standards.

5.5 OMISSION OF BTR CONDITIONS

It is proposed to omit Conditions Nos. 5, 6 and 7 of the parent permission (ACP Ref.: 317438-23), which restrict the operation of parts of the development as a Build-to-Rent (BTR) scheme and apply to Blocks DE and F (303 no. units).

The proposed LRD amendments transition these BTR elements to a standard apartment scheme, aligned with the remainder of the development and free from BTR designation or covenant restrictions. This reflects the current national policy framework and the evolving residential delivery model for the site.

While the Development Plan references earlier versions of the Apartment Guidelines containing BTR-specific provisions (SPPR7 and SPPR8), these were removed under the Apartment Guidelines (Amended, July 2023) and are not carried forward in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines (2025). A single, unified standard now applies to all apartment developments, and BTR is no longer recognised as a distinct typology in national policy.

The proposed revisions also support the delivery objectives of the Land Development Agency (LDA), enabling social, affordable and cost-rental housing within a mixed-tenure scheme. Retaining BTR-specific covenants would unnecessarily constrain flexibility in achieving the approved tenure mix.

Apartments within Blocks DE and F remain fully compliant with applicable standards, including the Dublin City Development Plan 2022–2028 and the Apartment Guidelines 2025. Although earlier BTR provisions allowed certain flexibilities, the units were designed to meet required standards independently and can operate as standard apartments without reliance on BTR-specific measures.

As BTR is no longer recognised under national policy, the associated shared amenities previously required under SPPR7 are no longer necessary. Given the extensive provision of communal open space and access to community, recreational and commercial facilities within the development and surrounding area, the omission of these conditions is reasonable, proportionate and policy-compliant.

The removal of Conditions Nos. 5, 6 and 7 will not adversely affect the quality or operation of the development and will support the timely delivery of a high-quality residential scheme in a well-serviced urban location.

To provide clarity, it is recommended that the following condition be attached to any grant of permission:

"The development shall be carried out and completed in accordance with the terms and conditions of the parent permission granted under ABP Ref.: 317438-23, and any subsequent permissions relating thereto, save where otherwise modified by the permission hereby granted.

For the avoidance of doubt, Conditions Nos. 5, 6 and 7 of ABP Ref.: 317438-23, relating to the operation of parts of the development as a Build-to-Rent scheme, shall not apply to the development as permitted under this amendment permission and are hereby deleted.

Reason: In the interests of the proper planning and sustainable development of the area."

This approach is consistent with Dublin City Council precedent, including Reg. Ref. WEB2775/24 at No. 11C and No's 9-14 Milltown Road, Dublin 6, where comparable BTR operational conditions were removed having regard to updated national policy and tenure delivery requirements.

5.6 DURATON OF PERMISSION

In order to provide clarity regarding the relationship between the parent permission and the proposed amendments, it is considered appropriate that any grant of permission includes a condition confirming that the development shall otherwise proceed in accordance with ABP Ref.: 317438-23, except where modified by this permission, and explicitly confirming the removal of the BTR-related conditions. Suggested wording is provided below to assist the Planning Authority:

"The development hereby permitted shall be carried out within a period of 10 years from the date of this permission. Where works authorised under ABP Ref.: 317438-23 have already commenced, the duration of this permission shall apply to the development as amended by this permission.

Reason: Having regard to the scale and phasing of the development and in the interests of the proper planning and sustainable development of the area."

5.7 CONSERVATION

As set out in the Conservation Statement prepared by Carrig Conservation, the proposed modifications to the permitted LRD do not adversely affect any protected structures located within or adjoining the site.

The application site includes the protected St. Vincent's Hospital buildings (RPS Ref. 2032), Richmond House (RPS Ref. 8788) and Brooklawn (RPS Ref. 8789). The proposed modifications to the permitted LRD are confined entirely to alterations within the already permitted development envelope and do not involve any works to the fabric of the protected structures themselves.

The modifications to Block J, which forms part of the permitted extension to St. Vincent's Hospital, do not alter its established relationship with the protected hospital buildings. All works remain within the approved footprint, height, massing and curtilage, and do not introduce new built form in closer proximity to the protected structures. The architectural expression remains clearly contemporary and visually subordinate, ensuring the continued legibility and primacy of the historic buildings within the campus.

More generally, the proposed modifications to the permitted LRD do not alter key views, spatial relationships or the approved architectural hierarchy between the historic hospital buildings and the surrounding contemporary development. Revised façade articulation and material selections are consistent with those already assessed and accepted as part of the parent permission and reflect best practice for new development within historic settings.

Accordingly, the proposed modifications to the permitted LRD are considered conservation-neutral in effect and do not give rise to any adverse impacts on the character, setting or visual appreciation of the protected structures. The development therefore continues to comply with the objectives of the Dublin City Development Plan relating to the protection and conservation of architectural heritage.

5.8 DAYLIGHT AND SUNLIGHT

A Daylight and Sunlight Assessment has been prepared by IN2 Engineering in support of the proposed modifications to the permitted LRD. The assessment has been undertaken in accordance with the BRE Site Layout Planning for Daylight and Sunlight – A Guide to Good Practice (2022), having regard to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2025) and the relevant provisions of the Dublin City Development Plan 2022–2028.

The proposed modifications to the permitted LRD are limited to internal layout changes and do not alter the external massing or building envelope of the permitted development. As a result, there is no change to the previously approved impact on neighbouring properties in terms of daylight or sunlight.

The internal daylight assessment confirms that the overall Spatial Daylight Autonomy (SDA) compliance rate remains at 99%, consistent with the granted permission. Any individual rooms not meeting the minimum targets are supported by appropriate compensatory measures, including good access to sunlight, dual-aspect layouts, adjacency to well-daylit spaces, and access to high-quality communal open space.

The sunlight assessment demonstrates that 94% of residential units achieve the BRE minimum requirement of 1.5 hours of sunlight on 21 March, with this compliance rate remaining unchanged from the approved scheme.

Overall, the Daylight and Sunlight Assessment confirms that the proposed modifications to the permitted LRD continue to provide a high standard of residential amenity, with excellent levels of daylight and sunlight for future occupants and no adverse impact on the surrounding environment.

5.9 LANDSCAPING AND OPEN SPACE

The proposed modifications to the permitted LRD are supported by updated landscape drawings prepared by NMP Landscape Architects, which illustrate the associated minor modifications to the permitted landscape arrangement.

The landscape changes are localised and limited in nature, arising solely to facilitate revised building entrances and adjustments to internal pedestrian and circulation routes associated with the amended residential blocks. These modifications are confined within the established landscape framework and do not extend beyond the footprint of the permitted development.

There is no reduction in the quantity, accessibility or quality of public or communal open space. The overall landscape structure, including the central park, linear park, communal courtyards and landscaped connections throughout the site, remains as previously approved.

The permitted landscape strategy is retained, continuing to provide:

- Generous areas of high-quality public open space;
- Clearly defined pedestrian and cyclist routes integrated within landscaped corridors;
- Communal amenity spaces serving each residential block;
- Retained and enhanced tree planting, including specimen and structural planting;
- Integrated SuDS features, including rain gardens; and
- A consistent palette of high-quality hard and soft landscaping materials.

Overall, the proposed landscaping modifications are minor, functional and complementary to the permitted scheme. They do not undermine the integrity of the approved landscape concept and ensure the development continues to deliver a high-quality, accessible and well-connected open space network in accordance with the original permission.

5.10 DRAINAGE AND FLOOD RISK

An Engineering Report / Technical Note has been prepared by O'Connor Sutton Cronin in support of the proposed modifications to the permitted LRD at Saint Vincent's Hospital, Fairview.

Surface Water Drainage

The surface water drainage strategy remains as permitted. As there is no increase in impermeable area or building footprint, the existing surface water infrastructure is adequate and requires no modification.

Wastewater Drainage

The permitted wastewater drainage strategy remains appropriate to serve the proposed amendments. The original planning application assessed a higher residential quantum of 811 units, and therefore the amended total of 806 units remains within the previously assessed network capacity. Accordingly, no material changes to the permitted wastewater infrastructure or servicing strategy are required as part of this application.

The requirements of Uisce Éireann (formerly Irish Water) have been addressed within the application documentation, including the Engineering Report / Technical Note prepared by OCSC Consulting Engineers. The report confirms that Uisce Éireann previously issued a Confirmation of Feasibility (COF) and a Statement of Design Acceptance (SODA) in respect of the permitted development and subsequent modifications granted in 2023. Copies of the COF and SODA are included with LRD Form No. 19.

As the proposed amendments do not exceed the servicing capacity previously assessed and approved, the existing wastewater servicing arrangements remain valid and appropriate.

Potable Water Supply

The potable water supply strategy also remains unchanged. Uisce Éireann previously issued a Confirmation of Feasibility (January 2023) and Statement of Design Approval (March 2023). A new connection application was submitted in May 2025, and any requirements from Uisce Éireann will be incorporated as necessary.

Flood Risk

The Site-Specific Flood Risk Assessment submitted with the permitted development remains valid. The site is not at risk from flooding, and the proposed modifications to the permitted LRD do not introduce additional impermeable surfaces or flood risk.

5.11 CAR AND CYCLE PARKING

An Engineering Report / Technical Note has been prepared by O'Connor Sutton Cronin in support of the proposed modifications to the permitted LRD at Saint Vincent's Hospital, Fairview.

Traffic and Parking

The amended development will not generate higher traffic levels than those already assessed, as the total unit number remains below the previously assessed quantum of 811 units. Car parking provision remains unchanged from the permitted scheme, with 247 car parking spaces provided, equating to approximately 0.31 spaces per unit, which is consistent with the permitted development and in accordance with Development Plan standards for a highly accessible urban location.

Cycle parking provision also remains consistent with the permitted scheme. A total of 1,680 bicycle parking spaces are provided to serve the amended development of 806 residential units, ensuring continued compliance with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2025) and exceeding minimum cycle parking requirements based on the revised unit mix.

It is noted that the basement level was designed and assessed as part of the permitted scheme to accommodate the full quantum of 811 residential units. While the number of permitted units was subsequently reduced by condition of the Board's Order, no corresponding requirement was imposed to reduce the extent or capacity of the basement. Accordingly, the basement layout retains sufficient capacity to accommodate operational requirements and associated residential uses arising from the permitted development, including flexibility to cater for future residential uplift, as previously discussed with Dublin City Council at pre-application stage.

DMURS Compliance

The proposed modifications to the permitted LRD will not materially impact the internal road network or pedestrian and cyclist infrastructure. The development continues to comply with the Design Manual for Urban Roads and Streets (DMURS).

6.0 CONSISTENCY WITH PLANNING POLICY

Appendix 1 provides a comprehensive assessment of the proposed modifications to the permitted LRD against relevant national and regional planning policy, including applicable Section 28 Ministerial Guidelines.

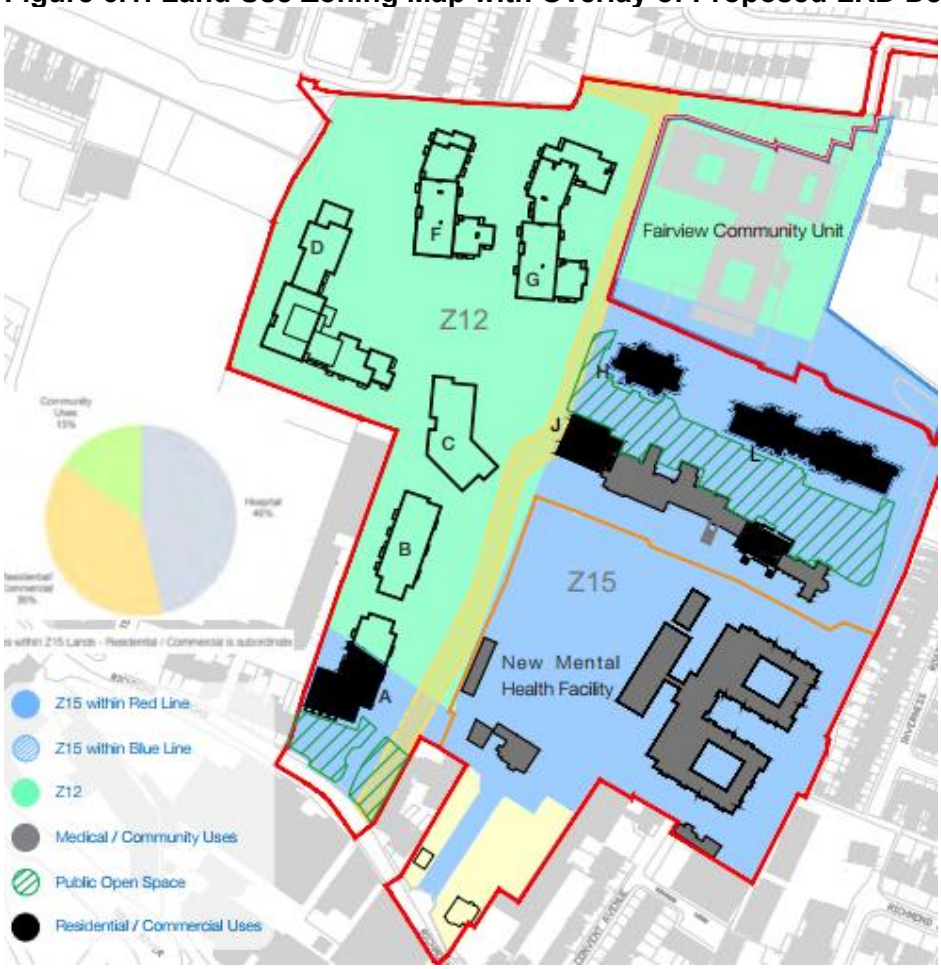
The following section provides a high-level summary of compliance with the Dublin City Development Plan 2022–2028, demonstrating that the proposed modifications to the permitted LRD remain consistent with the adopted planning policy framework and the objectives applicable to the subject site.

The Dublin City Development Plan (CDP) was adopted on the 2nd of November 2022 and came into effect on the 14th of December 2022. The CDP has been subject to 5 no. variations, including Variation No. 5 (adopted on the 8th of April 2024) which is of relevance to the subject application and made a technical update to the CDP in relation to 'Build-To-Rent' (BTR) accommodation following the publication of the guidelines 'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities', 2023, with transitional arrangements.

6.1 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.

Figure 6.1: Land Use Zoning Map with Overlay of Proposed LRD Development



The comprehensive redevelopment of the site has already been established under the parent Large-scale Residential Development permission (ACP Ref. 317438-23 / LRD-6009/23-S3).

The proposed modifications to the permitted LRD relate to:

- Blocks C and DE, located on lands zoned Z12 – Institutional Land (Future Development Potential); and
- Blocks J and L, located on lands zoned Z15 – Community and Social Infrastructure.

Residential development is permitted in principle under Z12, while residential use is identified as Open for Consideration under Z15, subject to exceptional circumstances. The proposed modifications to the permitted LRD, which provide for a net increase of 27 no. residential units, are therefore consistent with the applicable zoning objectives of the site.

The proposed modifications do not extend the footprint or envelope of the permitted residential buildings. The proposed modifications to the permitted LRD comprise internal reconfiguration and modest intensification within the already approved residential blocks.

The principle of residential development on the subject lands has been firmly established through the parent LRD permission, and the proposed modifications to the permitted LRD do not alter the approved site layout, land use distribution or masterplan strategy.

In particular:

- The 39% proportion of residential/commercial floorspace on Z15 lands remains unchanged, ensuring continued compliance with Development Plan requirements that a significant proportion of these lands be retained for community and institutional uses.
- The development continues to provide for the delivery of a new hospital building, fully supporting the primary purpose of the Z15 zoning.
- The approved public open space network is retained in full, safeguarding the social and community function of the lands.
- The reuse and integration of protected structures remains central to the scheme, ensuring heritage-led community benefit.
- The additional residential units contribute positively to housing delivery while fully respecting the strategic intent of the zoning framework.

Transition from Build-to-Rent to Standard Apartments

The proposed modifications to the permitted LRD include the removal of Build-to-Rent (BTR) covenants and the transition to a standard apartment scheme. This change is fully consistent with national and local planning policy:

- Build-to-Rent is no longer recognised as a distinct residential typology under the Apartment Guidelines (updated in 2022, 2023 and 2025).
- Variation No. 5 to the Dublin City Development Plan removed BTR as an "Open for Consideration" use, including on Z12 lands.
- All apartment development is now required to comply with standard apartment design standards, with no BTR-specific relaxations permitted.

There are no policies or objectives within the Development Plan that restrict or prohibit the transition from BTR to standard apartments.

Condition 7 of the parent permission explicitly anticipated the possibility of future deviation from the BTR model and confirmed that such a change would require a separate planning application, which is now being pursued through this application for proposed modifications to the permitted LRD.

6.2 RELEVANT POLICIES

The proposed modifications to the permitted LRD, comprising internal reconfiguration and typology adjustments within Blocks C, DE, J and L, will result in the provision of 27 additional residential units, all accommodated within the approved building envelopes and without any increase in height, massing or site coverage.

These revisions have been prepared in direct response to the Design Standards for New Apartments – Guidelines for Planning Authorities (2025), which supersede the 2023 Apartment Guidelines and introduce updated Specific Planning Policy Requirements (SPPRs) and relevant CDP Development Management standards for apartment developments. The proposed modifications to the permitted LRD reflect these updated national standards through improved layout efficiency, enhanced unit mix and strengthened compliance with minimum floor area, dual-aspect and amenity requirements.

The proposed modifications to the permitted LRD continue to fully comply with Policies QHSN36 and QHSN37 of the Dublin City Development Plan 2022–2028 by:

- Delivering high-quality apartment accommodation in accordance with current national standards;
- Maintaining appropriate levels of private and communal amenity for proposed apartment units; and
- Ensuring a high standard of residential environment for future occupants.

The proposals have also been assessed against the wider Development Plan policy framework, including Policies SC11 (Compact Growth), SC12 (Housing Mix), SC19 and SC21 (Architectural Quality and Design), QHSN1 and QHSN2 (National and Regional Policy and Guidelines), and QHSN38 (Housing and Apartment Mix).

Overall, the proposed modifications to the permitted LRD represent a modest, plan-led and policy-compliant optimisation of an already permitted scheme. The revisions do not alter the approved site layout, infrastructure provision or development strategy and remain fully consistent with the objectives of the Dublin City Development Plan 2022–2028.

Variation No. 5 to the Dublin City Development Plan 2022–2028 removed policies relating specifically to Build-to-Rent accommodation, reflecting the Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (Amended, July 2023), which no longer recognise BTR as a distinct residential typology for planning purposes. While the Apartment Guidelines 2025 post-date the adoption of Variation No. 5, they maintain this unified approach to apartment development. The proposed transition of Blocks DE and F from BTR to standard apartments, in line with the remainder of the scheme, is therefore consistent with both national planning policy and the varied Development Plan.

In summary, the proposed modifications remain fully consistent with the land use zoning objectives of the Dublin City Development Plan 2022–2028 and represent an appropriate, plan-led optimisation of an already permitted development.

6.3 DEVELOPMENT MANAGEMENT STANDARDS

The proposed modifications to the permitted LRD have been prepared having regard to the Development Management Standards set out in Chapter 15 of the Dublin City Development Plan 2022–2028, together with the updated Design Standards for Apartments – Guidelines for Planning Authorities (2025), which supersede the 2023 Apartment Guidelines and introduce revised Specific Planning Policy Requirements (SPPRs).

An assessment of the amended scheme against the requirements of the Apartment Guidelines 2025 is provided in Appendix 1 of this Planning and Environmental Report.

The proposed modifications to the permitted LRD relate solely to internal reconfiguration and limited elevational adjustments within Blocks C, DE, J and L, facilitating the provision of 27 no. additional apartments entirely within the approved building envelopes and without any increase in building height, massing or site coverage.

The proposed modifications to the permitted LRD have been assessed against the relevant Development Management Standards of the Dublin City Development Plan 2022–2028. The following sections are of particular relevance:

- **Section 15.4.3 – Architectural Design Quality:** The proposed modifications to the permitted LRD do not alter the approved architectural concept, scale or urban design strategy of the permitted development. Minor elevational revisions, including additional balconies, revised window arrangements and entrance modifications, remain consistent with the established façade rhythm, proportions and material palette approved under the parent permission. The overall architectural coherence of the scheme is therefore fully maintained.

- **Section 15.5.7 – Materials and Finishes:** All proposed elevational changes utilise the previously approved range of external materials within the permitted LRD. No new or visually discordant finishes are introduced, ensuring continuity with the high-quality architectural language of the permitted development.

- **Section 15.6.7 – Landscape Design Rationale:** Minor localised landscape adjustments are proposed solely to accommodate revised entrances and circulation routes. These do not reduce the quantum or quality of public open space and do not undermine the overall landscape framework, which remains as permitted.

- **Section 15.9 – Apartment Standards:** As outlined in Appendix 1, the revised layouts have been designed in accordance with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2025), demonstrating compliance with the applicable apartment standards relating to unit mix, minimum apartment floor areas, private and communal amenity provision, dual-aspect requirements, storage provision and overall internal design quality. The proposed modifications to the permitted LRD enhance overall housing efficiency while maintaining high standards of residential amenity for future occupants, as demonstrated in the accompanying Housing Quality Assessment prepared by Scott Tallon Walker Architects.

- **Residential Amenity and Facilities:** The proposed modifications include the rationalisation and partial reconfiguration of internal residential amenity and resident support facilities previously associated with the Build-to-Rent (BTR) components of the permitted development within Blocks C, DE and J. These changes arise from the transition of the scheme to a unified standard apartment development following the omission of BTR-specific conditions. Earlier Development Plan provisions relating to BTR amenity requirements reflected previous iterations of the Apartment Guidelines; however, BTR-specific policy provisions were removed under the Apartment Guidelines (Amended, July 2023) and are not carried forward within the Apartment Guidelines 2025. Accordingly, there is no specific national or Development Plan requirement for dedicated internal communal amenity space for Standard Design Apartments. The amended scheme continues to provide policy-compliant residential amenity through private amenity space for all units, substantial communal open space across the wider development, and access to community, commercial and landscaped facilities within the scheme and surrounding area. The proposed amendments therefore represent a reallocation of internal floor space rather than a reduction in policy-compliant residential amenity provision.

In summary, the proposed modifications to the permitted LRD to Blocks C, DE, J and L fully comply with the Development Management Standards of the Dublin City Development Plan 2022–2028 and respond directly to the updated SPPRs of the Apartment Guidelines 2025. The proposals maintain the architectural, landscape and urban design quality of the permitted scheme; and represent an appropriate and plan-led optimisation of an already approved development.

The proposed modifications therefore accord with both national and local planning policy and continue to deliver a high-quality residential environment within the St. Vincent's Hospital Fairview campus.

7.0 ENVIRONMENTAL ASSESSMENT

This section of the report assesses the potential environmental implications of the proposed modifications to the permitted LRD and considers whether the proposed changes give rise to a requirement for Environmental Impact Assessment (EIA) or the submission of an Environmental Impact Assessment Report (EIAR).

7.1 EIA LEGISLATIVE CONTEXT

Part 5 of the Planning and Development Regulations 2001–2025 sets out the classes of development and applicable thresholds above which an Environmental Impact Assessment is mandatory.

Part 2 of Schedule 5 identifies the following development types and thresholds of potential relevance to the proposed modifications to the permitted LRD:

10. Infrastructure Projects
(b)
(i) Construction of more than 500 dwelling units;
(ii) Construction of a car park providing more than 400 spaces, other than a car park provided as part of, and incidental to, the primary purpose of a development;
(iii) Construction of a shopping centre with a gross floor space exceeding 10,000 sq.m;
(iv) Urban development which would involve an area greater than:
– 2 hectares in the case of a business district;
– 10 hectares in the case of other parts of a built-up area; or
– 20 hectares elsewhere.

7.2 PARENT PERMISSION AND APPROVED EIAR

An Environmental Impact Assessment Report (EIAR) was submitted and assessed as part of the parent LRD permission (ACP Ref.: 317438-23 / DCC Reg. Ref.: LRD6009/23-S3).

The permitted development was granted subject to Condition 3, which states "*Mitigation and monitoring measures outlined in the plans and particulars, including the Environmental Impact Assessment Report submitted with this application, shall be carried out in full, except where otherwise required by conditions attached to this permission.*"

The proposed modifications to the permitted LRD are confined to internal reconfiguration and limited external alterations within the existing permitted building envelopes, with:

- no increase in building height;
- no increase in massing or footprint;
- no increase in site coverage; and
- no alteration to the approved site layout or infrastructure.

Accordingly, the proposed modifications to the permitted LRD do not introduce new environmental receptors or pathways beyond those previously assessed.

7.3 ASSESSMENT AGAINST MANDATORY EIA THRESHOLDS

The proposed modifications to the permitted LRD relate solely to permitted Blocks C, DE, J and L and provide for a net increase of 27 no. residential units within previously approved building envelopes. Having regard to the scale and nature of the proposed modifications:

- The amendments result in a total of 806 no. residential units across the overall development, representing a modest increase within a scheme previously assessed for 811 units and therefore remaining well below the mandatory EIA threshold of 500 residential units applicable to standalone urban development proposals under Schedule 5, Part 2, Class 10(b)(i) of the Planning and Development Regulations 2001 (as amended);
- No additional car parking spaces are proposed, with provision remaining at 247 spaces as previously assessed under the permitted development and associated Traffic Impact Assessment;
- The proposed modifications do not introduce any additional retail, commercial or other non-residential floorspace beyond that already permitted and assessed; and
- The proposed works are confined to internal reconfiguration and minor elevational amendments within established building footprints, with no extension to the red line boundary and no increase in the overall site area or development footprint previously assessed for environmental effects.

Accordingly, the proposed amendments constitute minor modifications to an already permitted and assessed development and do not give rise to development of a scale or nature approaching the urban development thresholds set out in Schedule 5 of the Planning and Development Regulations 2001 (as amended).

The proposed modifications to the permitted LRD therefore do not trigger mandatory EIA thresholds under Part 2 of Schedule 5 of the Regulations.

7.4 CHANGES AND EXTENSIONS – SCHEDULE 5, PART 2, CLASS 13

Consideration has also been given to Class 13 of Part 2 of Schedule 5, which relates to changes or extensions to permitted development.

Class 13 provides that EIA may be required where a change or extension would:

(i) result in the development being of a class listed in Part 1 or paragraphs 1–12 of Part 2 of Schedule 5; and

(ii) result in an increase in size greater than:

- *25%, or*
- *50% of the applicable threshold,*

whichever is the greater.

The proposed modifications to the permitted LRD do not meet either criterion.

Specifically:

- there is no increase in building envelope or site area;
- there is no increase in building height or footprint; and
- the overall gross internal floor area changes from approximately 84,281 sq.m to 83,365 sq.m, representing a net reduction and an overall reduction of approximately 1.09%, well below the 25% threshold.

Accordingly, the proposed modifications to the permitted LRD do not constitute a change or extension requiring the preparation of a new EIAR under Class 13.

7.5 REVIEW OF ENVIRONMENTAL TOPICS

The environmental topics assessed within the approved EIAR have been reviewed in the context of the proposed modifications to the permitted LRD.

A summary assessment is provided in Table 7.1, which confirms that:

- there are no material changes to the environmental parameters previously assessed;
- the mitigation measures identified in the approved EIAR remain valid and applicable; and
- the proposed modifications to the permitted LRD do not give rise to new or significantly different environmental effects.

Where relevant, updated supporting assessments have been undertaken and accompany this application.

Table 7.1: Topics from EIAR for LRD under ACP Ref.: 317438-23 / DCC Reg. Ref.: LRD6009/23-S3

EIAR Topic	Assessment of proposed modifications to the permitted LRD	Potential for Additional Significant Effects
Human Health and Population	The proposed modifications to the permitted LRD comprise internal reconfiguration within permitted residential blocks and the provision of 27 additional units. No change to site access, healthcare facilities, public open space provision or construction methodology is proposed.	No additional significant effects. Impacts remain consistent with the permitted development.
Land, Soils, Geology and Hydrogeology	No excavation beyond permitted extents. No increase in footprint, basement area or ground disturbance. No change to ground conditions or contamination pathways.	No change from permitted scheme.
Hydrology	No alterations proposed to the approved surface water or foul drainage strategy. No increase in impermeable area or discharge rates. Flood Risk Assessment remains valid.	No additional impacts anticipated.
Biodiversity	The proposed modifications to the permitted LRD are confined to previously developed areas within the permitted envelope. No loss of habitat, no works within designated sites, and no changes to landscaping strategy of ecological value.	No new or increased effects.
Air Quality	Construction activities remain as assessed under the parent permission. Operational traffic generation remains materially unchanged relative to the scale of the overall development.	No significant additional air quality effects.
Climate	No increase in building mass or energy demand beyond the assessed envelope. Development continues to comply with energy and sustainability measures approved under the parent permission.	No additional climate-related impacts.
Noise and Vibration	Construction impacts remain as assessed in the EIAR. No additional plant, traffic routes or operational noise sources proposed.	No additional significant effects.
Landscape and Visual Impact	No increase in building height or massing. Minor façade alterations are consistent with the approved architectural language and do not alter verified views assessed in the EIAR.	No new or increased landscape or visual impacts.
Archaeology and Cultural Heritage	No additional ground disturbance proposed. Archaeological mitigation strategy approved under the parent permission remains applicable.	No change from permitted development.
Architectural Heritage	The proposed modifications to the permitted LRD do not affect protected structures or their setting. Relationship between new development and protected buildings remains unchanged.	No additional impacts identified.
Material Assets – Traffic and Transportation	No change to site access arrangements or parking strategy. Increase in unit numbers does not materially alter the transport assessment conclusions of the EIAR.	No significant additional effects.

Material Assets – Waste	Waste generation marginally increased but remains within the capacity of the approved Waste Management Strategy. No change to waste infrastructure.	No significant effects.
Material Assets – Utilities	Existing permitted utility infrastructure has adequate capacity to accommodate the proposed proposed modifications to the permitted LRD. No new off-site works required.	No additional impacts.
Interactions	Interactions between environmental factors remain consistent with those assessed in the EIAR. No new pathways or receptors introduced.	No additional cumulative effects.

In summary:

- An EIAR was prepared and approved for the permitted development;
- The proposed modifications to the permitted LRD are modest in scale and confined to the permitted building envelopes;
- The proposed modifications to the permitted LRD do not exceed mandatory EIA thresholds;
- The proposals do not constitute a change or extension requiring EIA under Schedule 5, Part 2, Class 13; and
- There is no potential for significant environmental effects arising from the proposed modifications to the permitted LRD beyond those already assessed and mitigated.

Accordingly, the preparation of a new Environmental Impact Assessment Report is not required in respect of the proposed modifications to the permitted LRD.

7.6 APPROPRIATE ASSESSMENT / NIS

The parent Large-scale Residential Development permitted under ACP Ref.: 317438-23 / DCC Reg. Ref.: LRD6009/23-S3 was subject to Appropriate Assessment and was accompanied by a Natura Impact Statement (NIS). On the basis of that assessment, Dublin City Council and An Bord Pleanála concluded that the permitted development would not adversely affect the integrity of any European site, either alone or in combination with other plans or projects.

The current application relates solely to modifications to the permitted development comprising internal reconfiguration and limited elevational adjustments within the established and approved building envelopes of Blocks C, DE, L and J. The proposed modifications do not result in any increase in building height, massing, footprint, site coverage or overall development intensity beyond that already assessed and permitted under the parent permission.

An updated Appropriate Assessment Screening Report and supporting Natura Impact Statement have been prepared by Altemar to assess the proposed modifications 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 SPA since the granting of the parent permission. The updated assessment confirms that the nature, scale and location of the proposed modifications do not introduce any new or altered pathways for effects on European sites.

The AA Screening undertaken for the proposed modifications concludes, on the basis of objective scientific information and applying the precautionary principle, that the modifications do not give rise to likely significant effects on any European site, either alone or in combination with other plans or projects.

Notwithstanding this conclusion, and having regard to the requirements of Article 6(3) of the Habitats Directive, a Natura Impact Statement has been prepared to support the application as a precautionary and best-practice approach. This ensures that all potential effects, including those associated with hydrological pathways and cumulative impacts, are fully assessed and transparently addressed.

The accompanying Natura Impact Statement demonstrates, beyond reasonable scientific doubt and taking account of the design measures, mitigation and management controls already permitted 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.

It is noted that the Construction Environmental Management Plan (CEMP) referenced within the AA documentation has subsequently been updated and agreed with Dublin City Council pursuant to Condition No. 16 of the parent permission as part of the prior-to-commencement compliance process (the "Wall CEMP"). This agreed CEMP constitutes the operative construction environmental management framework for the development. As a live document, the CEMP will continue to be implemented and updated as necessary throughout the construction phase, under the oversight of Dublin City Council. The proposed modifications do not alter the nature or extent of construction activities previously assessed, and the mitigation measures contained within the agreed CEMP remain fully applicable to the amended development.

No changes are proposed to the approved access arrangements, drainage strategy, construction methodology or operational characteristics of the development. The proposed 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 and Natura Impact Statement.

Altemar concludes that, having regard to:

- the limited nature and scale of the proposed modifications;
- their confinement within the footprint and parameters of the permitted development;
- the conclusions of the Appropriate Assessment undertaken for the parent permission;
- the findings of the updated Appropriate Assessment Screening and Natura Impact Statement; and
- the absence of any new or altered potential impact pathways,

the proposed modifications to the permitted LRD, either individually or in combination with other plans and projects, will not give rise to likely significant effects on any European site and will not adversely affect the integrity of any European site.

While an updated Natura Impact Statement has been prepared to reflect updated ecological baseline information, including the designation of a new SPA, the proposed modifications do not introduce any new or materially different environmental effects beyond those already assessed as part of the parent Environmental Impact Assessment. Accordingly, the modifications fall within the scope of the existing EIAR, and no updated or supplementary Environmental Impact Assessment Report is required in support of this application.

8.0 SUMMARY AND CONCLUSIONS

This Planning and Environmental Report has been prepared in support of an application for modifications to the permitted LRD at St. Vincent's Hospital, Fairview, granted under An Coimisiún Pleanála Ref. ACP-317438-23.

The proposed modifications to the permitted LRD relate to residential Blocks C, DE, J and L only and comprise internal reconfiguration and limited associated external alterations, all accommodated fully within the approved building envelopes. No increase in building height, massing, footprint or site coverage is proposed.

The modifications to the permitted LRD will result in a modest increase of 27 no. residential units, increasing the overall residential yield from 779 no. units to 806 no. units. The revised unit mix responds directly to the updated Design Standards for Apartments – Guidelines for Planning Authorities (2025), which supersede the 2023 Apartment Guidelines and introduce revised Specific Planning Policy Requirements (SPPRs).

It is also proposed to omit Conditions Nos. 5, 6 and 7 of the parent permission, which restrict the operation of parts of the development as a Build-to-Rent scheme. The proposed transition to a standard apartment development reflects current national planning policy, under which Build-to-Rent is no longer recognised as a distinct residential typology, and aligns with Variation No. 5 of the Dublin City Development Plan 2022–2028.

The proposed modifications to the permitted LRD have been brought forward in the context of the Land Development Agency's role in delivering the scheme as a mixed-tenure development comprising social, affordable and cost-rental housing. The removal of BTR-specific covenants is essential to ensuring flexibility of delivery and the long-term viability of the project.

The assessment contained within this report demonstrates that the proposed modifications to the permitted LRD:

- Do not alter the overall nature, scale or intent of the permitted development;
- Maintain the approved architectural, urban design and landscape framework;
- Do not result in material changes to drainage, transport, traffic, parking or site infrastructure;
- Do not impact protected structures or their setting;
- Retain the full quantum and quality of public and communal open space; and
- Improve layout efficiency and housing mix while maintaining high standards of residential amenity.

The proposed modifications to the permitted LRD have been comprehensively assessed against:

- The Dublin City Development Plan 2022–2028 (as varied);
- The Design Standards for Apartments – Guidelines for Planning Authorities (2025);
- The National Planning Framework (First Revision 2025);
- Building Communities – Housing Policy Statement (Government of Ireland, 2025); and
- The Eastern and Midland Regional Spatial and Economic Strategy.

The assessment confirms that the proposed modifications to the permitted LRD are fully consistent with national, regional and local planning policy and represent a plan-led optimisation of an already permitted residential scheme.

An Environmental Impact Assessment Report (EIAR) was previously prepared and approved as part of the parent LRD permission. The proposed modifications to the permitted LRD are modest in scale and confined entirely within the permitted development envelope. Having

regard to the provisions of the Planning and Development Regulations 2001–2025, the modifications to the permitted LRD do not exceed mandatory EIA thresholds, do not constitute a change or extension requiring EIA, and do not give rise to any new or significant environmental effects beyond those already assessed and mitigated.

In conclusion, the proposed modifications to the permitted LRD:

- Represent a logical and proportionate evolution of the permitted development to comply with the Apartment Guidelines 2025;
- Support the efficient use of serviced urban land in a highly accessible metropolitan location;
- Respond directly to updated national planning policy and housing delivery policy; and
- Facilitate the timely delivery of much-needed housing, including social, affordable and cost-rental homes.

Having regard to the foregoing, it is respectfully submitted that the proposed modifications to the permitted LRD comply with the proper planning and sustainable development of the area and that planning permission should be granted.

APPENDIX 1 - CONSISTENCY WITH NATIONAL AND REGIONAL PLANNING POLICY

The key provisions of national (including relevant Section 28 guidelines) and regional planning policy as it relates to the proposed modifications to the permitted LRD is set out in the following sections. The key policy and guidance documents of relevance to the proposed modifications to the permitted LRD are as follows:

- National Planning Framework- Ireland 2040 Our Plan – First Revision 2025 (NPF)
- Building Communities – Housing Policy Statement (Government of Ireland, 2025);
- Regional Spatial and Economic Strategy for the Eastern and Midland Regional Authority 2019;
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2025;
- Sustainable Residential Development and Compact Settlement Guidelines (2024).

NATIONAL PLANNING FRAMEWORK- IRELAND 2040 OUR PLAN – FIRST REVISION 2025 (NPF)

The proposed modifications to the permitted LRD are consistent with the objectives of the *National Planning Framework – First Revision (April 2025)*, which establishes the Government's high-level strategy for sustainable growth and development to 2040 and places a renewed emphasis on accelerating housing delivery within existing urban areas. The revised Framework identifies the delivery of significantly increased housing output, averaging approximately 50,000 homes per annum nationally, as a critical national priority in response to projected population growth and housing demand.

A core principle of the revised NPF is compact growth, promoting the efficient use and optimisation of serviced urban lands, including infill and brownfield development within established settlements. The proposed amendments facilitate a net increase of 27 no. residential units entirely within previously approved building envelopes, thereby optimising an already permitted development without increasing building height, footprint or environmental effects. This approach directly supports the Framework's objective to accommodate growth through consolidation and intensification of existing urban areas rather than expansion into greenfield locations.

The amendments also support the NPF's emphasis on sustainable urban development patterns linked to public transport accessibility and reduced car dependency. By retaining the approved scale, density and mobility strategy of the permitted scheme while improving housing efficiency and tenure flexibility, the proposed modifications contribute to the delivery of high-quality housing in a highly accessible city location consistent with national policy promoting compact, well-designed and sustainable communities. The proposals therefore represent an appropriate and plan-led optimisation of an already consented development in accordance with the strategic objectives of the revised National Planning Framework.

BUILDING COMMUNITIES – HOUSING POLICY STATEMENT (GOVERNMENT OF IRELAND, 2025

The proposed modifications to the permitted LRD support the objectives of *Delivering Homes, Building Communities 2025–2030: An Action Plan on Housing Supply and Targeting Homelessness* (Government of Ireland, 2025), which seeks to accelerate housing delivery through the efficient optimisation of permitted developments, increased housing supply in sustainable urban locations, and the delivery of mixed-tenure communities.

The amendments facilitate a net increase of 27 no. residential units within previously approved building envelopes, representing an efficient intensification of an already permitted development without increases in building height, footprint or environmental impact. This approach aligns with the Action Plan's emphasis on maximising the delivery potential of serviced and consented urban lands in order to support national housing targets.

The proposed transition from Build-to-Rent designation to a unified standard apartment scheme further supports the objectives of the national housing strategy by enabling greater tenure flexibility and facilitating the delivery of social, affordable and cost-rental housing in accordance with the Land Development Agency delivery model. The amendments therefore contribute to the creation of a balanced and sustainable residential community consistent with Government policy promoting long-term housing stability and tenure diversity.

The subject site is located within a highly accessible urban area supported by existing and planned public transport, community infrastructure and services. The optimisation of residential delivery at this location is consistent with the compact growth and sustainable development principles underpinning *Delivering Homes, Building Communities 2025–2030*. Accordingly, the proposed modifications directly support the implementation of current national housing policy.

REGIONAL SPATIAL ECONOMIC STRATEGY – EASTERN AND MIDLAND REGIONAL ASSEMBLY (2019-2031)

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region (2019–2031) provides the strategic framework for implementing *Project Ireland 2040* at a regional level, with a strong emphasis on compact urban growth within the Dublin Metropolitan Area. The subject site at St. Vincent's, Fairview is located within the metropolitan footprint, which the RSES identifies as the primary focus for population and employment growth, supported by consolidation, regeneration and transit-oriented development. The proposed modifications facilitate the efficient intensification of a serviced urban site and support the RSES objectives for sustainable housing delivery, compact growth and optimal use of existing infrastructure.

SUSTAINABLE URBAN DESIGN STANDARDS FOR NEW APARTMENTS, 2025

The Sustainable Urban Design Standards for New Apartments, 2025, provide for updated guidance on apartment developments in response to the National Planning Framework. The following provides a summary of consistency of the proposed modifications with the Apartment Guidelines 2025.

Please refer to the application drawings and details, including Housing Quality Assessment (HQA) prepared by STW Architects for full details of compliance with the relevant quantitative standards required under the Guidelines.

SPPR1 – Unit Mix

The permitted LRD provides a total of 779 no. residential units, comprising:

- 37 no. studios
- 364 no. one-bed apartments
- 302 no. two-bed apartments
- 76 no. three-bed apartments

The proposed modifications to the permitted LRD, as detailed in the accompanying Housing Quality Assessment, will increase the overall residential yield to 806 no. units, comprising:

- 37 no. studios
- 391 no. one-bed apartments
- 328 no. two-bed apartments
- 50 no. three-bed apartments

The proposed modifications result in a net increase of 27 no. apartments, achieved entirely within the permitted building envelopes of Blocks C, DE, J and L and without any increase in height, massing or site coverage.

The proposed unit mix fully complies with SPPR1 of the Apartment Guidelines 2025. Furthermore, notwithstanding the removal of statutory unit mix requirements, the amended scheme continues to provide a balanced range of apartment types, supporting household diversity and the creation of a sustainable residential community.

SPPR 2 – Floor Areas

All proposed apartments meet or exceed the minimum floor area requirements of the Guidelines, as demonstrated in the Housing Quality Assessment prepared by Scott Tallon Walker Architects (STW).

The Apartment Guidelines further require that a minimum of 25% of apartments exceed the minimum floor area standards by at least 10%, with scope for a higher proportion depending on site context. As detailed in the STW Housing Quality Assessment, in excess of 25% of the proposed units exceed the minimum floor area requirements by at least 10%, thereby exceeding the minimum guideline requirement and contributing to a high-quality residential environment.

Accordingly, the proposed modifications to the permitted LRD is fully compliant with SPPR2 of the Apartment Guidelines 2025, as evidenced by the accompanying STW Housing Quality Assessment.

SPPR 3 - Dual Aspect Ratios

The proposed modifications to the permitted LRD provides for a revised total of 410 no. dual-aspect apartments, representing approximately 51% of the total 806 no. units, which significantly exceeds the minimum requirement of the Apartment Guidelines.

Compliance with SPPR3 is demonstrated within the Housing Quality Assessment prepared by Scott Tallon Walker Architects (STW), submitted as part of this application.

Accordingly, the proposed modifications to the permitted LRD is fully compliant with SPPR3 of the Apartment Guidelines 2025, providing a high standard of residential amenity in terms of daylight, ventilation and internal living quality.

SPPR 4- Floor to ceiling height

The proposed duplex apartment buildings include minimum floor to floor heights at ground floor level of 2.7m. The floors above exceed the minimum of 2.4m.

The proposed floor to ceiling heights are in accordance with the standards outlined in the Apartment Guidelines 2025 under SPRR 4.

SPPR 5- Lift and Stair Cores

Under SPPR 5 of the Apartment Guidelines 2025 there is no requirement in respect of a minimum number of units per floor per core.

OTHER RELEVANT STANDARDS FROM THE APARTMENT GUIDELINES 2025

Please refer to HQA and drawings for details of each of the below aspects of the proposed modifications.

Living / dining / kitchen floor areas and widths

The proposed duplex apartments meet / exceed the minimum width of the living / dining / kitchen area requirements as required in Appendix 1 of the Apartment Guidelines 2025.

Bedroom floor areas and widths

The proposed duplex apartments meet / exceed the minimum bedroom floor areas and width requirements as required in Appendix 1 of the Apartment Guidelines 2025.

Storage space

The proposed apartments meet / exceed the minimum storage area requirements as required in Appendix 1 of the Apartment Guidelines 2025.

Private Amenity Space

The proposed apartments meet / exceed the minimum private amenity space requirements as required in Appendix 1 of the Apartment Guidelines 2025.

Communal Amenity Space

The Guidelines recommend that communal amenity space for apartments be provided at a ratio of 5 sq.m for 1 beds, 6 sq.m for 2 beds (3 person), 7 sq.m for 2 beds (4 person), 7 sq.m for 3 beds (4 person), and 9 sq.m for 3 beds (5 person).

As demonstrated in the HQA, the proposed modifications to the permitted LRD will meet the communal amenity space requirements as required in Appendix 1 of the Apartment Guidelines 2025.

SUSTAINABLE RESIDENTIAL DEVELOPMENT AND COMPACT SETTLEMENT GUIDELINES 2024

The *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)* provide updated national policy guidance to support the delivery of higher-density residential development in appropriate locations, consistent with the compact growth objectives of the National Planning Framework. The Guidelines promote the efficient use of serviced and well-located lands within existing urban areas, encouraging increased residential densities where supported by public transport accessibility, existing infrastructure capacity and proximity to employment, services and community facilities. The Guidelines emphasise a performance-based approach to density, recognising that appropriate residential density should be determined having regard to urban context, design quality, accessibility and the creation of sustainable communities rather than adherence to rigid numerical standards alone.

In this regard, the subject site is located within an established and highly accessible urban area, where the optimisation of an already permitted residential development accords with the

principles of compact growth, sustainable mobility and efficient land use promoted by the Guidelines.

DENSITY RANGES

The application site at St. Vincent's Hospital, Fairview, is appropriately categorised as a City Urban Neighbourhood in the context of Table 3.5 of the Guidelines. This category includes highly accessible urban locations within the metropolitan area, characterised by proximity to employment, institutional uses and high-capacity public transport.

For such locations, the Guidelines indicate that net residential densities in the range of 50–250 dwellings per hectare are appropriate within the Dublin metropolitan area.

Permitted Development

- *Residential net density: 175 units per hectare (779 units / 4.44 ha)*
- *Gross density: 130 units per hectare (779 units / 6.04 ha)*
- *Net density based on total site area (excluding public open space): 109 units per hectare (779 units / 7.11 ha)*

Proposed modifications to the permitted LRD

- *Residential net density: 181 units per hectare (806 units / 4.44 ha)*
- *Gross density: 133 units per hectare (806 units / 6.04 ha)*
- *Net density based on total site area (excluding public open space): 113 units per hectare (806 units / 7.11 ha)*

The proposed modifications to the permitted LRD result in a modest increase in residential density while remaining comfortably within the density parameters identified for City Urban Neighbourhoods under the Compact Settlement Guidelines. The development represents the efficient intensification of a serviced metropolitan site and is fully consistent with national policy objectives for compact growth and sustainable urban development.

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