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

Date: 20th May 2026
Reference: TD JN 25404

Re: Large-Scale Residential Development Application in Respect of Proposed Modifications to Permitted LRD under ACP Ref.: 317438-23 / DCC Reg. Ref.: LRD6009/23-S3, at St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3. The Site Contains Protected Structures Under RPS Ref.: 2032, 8788 And 8789

Dear Sir / Madam,

Introduction

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

This application relates solely to modifications to the permitted hospital building for mental health services and Rose Cottage, and the permitted extension. No amendments are proposed to the permitted residential development. In this regard, we note that a separate live application seeking modifications to the residential element of the permitted scheme has been submitted under Reg. Ref.: WEBLRD6104/26-S3A, with a decision due on the 27th of May 2026.

Context

Permission for the Large-scale Residential Development (LRD) was granted by An Coimisiun Pleanála under ACP Ref.: 317438-23 on 11 October 2023, subject to 38 no. conditions, and for a ten-year permission period. The permitted development, as amended by condition, provides for a comprehensive residential and community development comprising a new mental health hospital, 779 no. residential units, community facilities, and public open space.

St. Vincent's Hospital Fairview subsequently entered into an agreement with the Land Development Agency (LDA) for delivery of the permitted development as a mixed-tenure scheme comprising social, affordable, and cost-rental housing, together with the new mental health hospital. Initial enabling works have commenced on site, with main construction works started in March 2026.

Summary of Proposed Modifications

This application relates solely to modifications to the permitted hospital building for mental health services and Rose Cottage, and the permitted extension.

Following the grant of permission, the applicant undertook a detailed review of pharmacy regulatory and operational requirements. This review identified that the permitted internal layout of Rose Cottage does not adequately satisfy applicable hospital pharmacy regulatory standards. Accordingly, a revised internal configuration has been developed to provide the functional relationships, circulation arrangements, and support accommodation necessary to achieve regulatory compliance.

In addition, a number of further minor amendments have arisen in response to evolving operational requirements associated with the new mental health hospital within the St. Vincent's Hospital Fairview development.

The proposed modifications to the permitted development will consist of the following:

- Amendments to Rose Cottage, including a larger proposed single-storey extension, alterations to the façade, and reconfiguration of the internal layout and north elevation. No increase in building height or permitted use, which is to serve the hospital-related administrative/pharmacy function, is proposed.
- Amendments to the permitted hospital for mental health services building comprising revisions to the ground and first floor layouts and associated elevations, including amendments to the entrance lobby, internal circulation, ward layouts, seclusion facilities, external doors and windows, delivery yard enclosures, stair cores, substation access, terrace and canopy arrangements, and plant room configuration. The proposed amendments include the provision of revised seclusion terraces and associated mesh enclosures, revisions to window openings, widening of external doors, and revisions to the second floor plant room façade. The amendments result in a minor decrease of permitted floor area. No increase in building height is proposed.

No amendments are proposed to the residential element of the permitted development. As noted above, a separate live application relating to modifications to the residential element of the scheme is currently under consideration by Dublin City Council under Reg. Ref.: WEBLRD6104/26-S3A.

A Natura Impact Statement (NIS) has been prepared in respect of the proposed modifications, as the parent permission was accompanied by an NIS, and accompanies this application.

The proposed amendments do not alter the strategic intent, scale, or planning rationale of the permitted LRD scheme. Rather, the changes arise from operational necessity and are considered minor and non-material in nature.

We respectfully note that, in accordance with the principles set out in *Southwest Regional Shopping Centre Promotion Association Limited & Anor v. An Bord Pleanála* [2016] IEHC 84, the assessment before the Planning Authority (and, if applicable, An Bord Pleanála on appeal) relates solely to the proposed amendments and revisions. The permitted development as previously approved is not subject to reconsideration as part of this application.

Consultation with the Planning Authority

In accordance with Section 247(7) the Planning and Development Act, 2000 (as amended), pre-application consultations took place between the applicant / design team and representatives of Dublin City Council on the 10th of December 2025 and 22nd of February 2026 under LRD Ref.: LRD6015/25 in relation to the proposed modifications to the permitted LRD (relating only to the hospital element, i.e. the proposals the subject of this application, with no changes to the residential element).

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

Duration of Permission

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

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

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

Land Use Zoning

The application site is subject to three different land use zonings, namely '*Z1 – Sustainable Residential Neighbourhoods', 'Z12 – 'Institutional Land (Future Development Potential)* and *'Z15 - Community and Social Infrastructure'* under the Development Plan.

The areas subject to proposed modifications to the permitted LRD under this application is on 'Z15 - Community and Social Infrastructure' land use zoning.

This application relates solely to modifications to the permitted hospital building for mental health services and Rose Cottage, and the permitted extension (administrative / pharmacy function for the hospital). Buildings for the health, safety and welfare of the public are permitted in principle uses under the Z15 zoning and therefore in accordance with the site's zoning under the Development Plan. Please refer to JSA'S Planning and Environmental Report for further details.

Uisce Eireann Requirements

This application relates solely to modifications to the permitted hospital building for mental health services and Rose Cottage, and the permitted extension. The proposed

amendments do not result in any change to the previously approved Uisce Éireann infrastructure requirements for the development.

Accordingly, there is no change to the requirements of Uisce Éireann (formerly Irish Water), and the Confirmation of Feasibility (COF) and Statement of Design Acceptance (SODA) issued in respect of the permitted development remain applicable. Copies of the relevant COF and SODA documentation are appended to LRD Form No. 19.

Part V

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

As this application relates solely to modifications to the permitted hospital for mental health services and Rose Cottage, and the permitted extension, which will accommodate hospital administrative/pharmacy functions, no amendments are proposed to the permitted residential accommodation. Accordingly, there is no change to the approved residential unit numbers or to the Part V arrangements associated with the permitted LRD development.

Drawings, Plans and Particulars

This application for modifications to the permitted LRD is accompanied by an architectural drawing package prepared by STW Architects, which is accompanied by a schedule of drawings, as required under Q. 10 of Form 19 (supplementary application form for LRD applications).

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

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

Planning and Environmental Report

A Planning and Environmental Report prepared by JSA Planning accompanies this application for modifications to the permitted LRD. The report sets out the site location, context, details of the proposed development and demonstrates that the proposed modifications to the permitted development are consistent with the relevant policies, objectives and standards of the Development Plan.

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

AA Screening / Natura Impact Statement

An updated Appropriate Assessment Screening Report and Natura Impact Statement (NIS) have been prepared by Altemar in support of the proposed modifications to the

permitted development. The assessments consider the proposed amendments in the context of the parent permission and include updated ecological baseline information, including the designation of the North-West Irish Sea SPA since the grant of the parent permission.

The assessments conclude that the proposed modifications are minor in nature, remain within the parameters of the permitted development, and do not introduce any new or altered pathways for effects on European sites. No changes are proposed to the approved access arrangements, drainage strategy, construction methodology, or operational characteristics of the permitted development, and no new sources of emissions, discharges, disturbance, or hydrological connectivity arise beyond those previously assessed under the parent permission.

The Natura Impact Statement demonstrates, beyond reasonable scientific doubt, that the proposed modifications, either individually or in combination with other plans and projects, will not adversely affect the integrity of any European site, having regard to their conservation objectives and the mitigation measures already secured under the parent permission.

Accordingly, the conclusions of the parent Appropriate Assessment and Natura Impact Statement remain valid and robust. Furthermore, the proposed modifications do not give rise to any new or materially different significant environmental effects beyond those already assessed in the parent EIAR and therefore do not require the preparation of an updated or supplementary EIAR.

Fee

Please find enclosed with the planning application form confirmation of EFT payment for the application fee of €10,100.80, based on Class 14c (14 sq.m X €7.20) and Class 14d fee of €10,000 for submission of a NIS.

Please note there is no change to the residential units as part of this application for amendments to the permitted LRD.

The planning application fee has been paid to Dublin City Council for this application for modifications to permitted LRD in advance of lodgement, in accordance with Section 2(14) and Section 3 of the Planning and Development Regulations 2001-2026.

Website

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

- www.fairviewhospitaldevelopment.ie

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

Ownership of the Wider Application Site

Since the grant of the parent permission, ownership of the residential element of the lands has transferred to the Land Development Agency (LDA), and a letter of consent from the LDA accompanies this application.

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

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

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

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

No modifications are proposed to any parts of the application site owned by Targeted Investment Opportunities ICAV or Dublin City Council. However, for information purposes, the letters of consent originally submitted with the parent permission (ACP Ref.: 317438-23) are resubmitted as part of this application. We note that the Planning Authority accepted this approach for the recent LRD amendment application, under Reg. Ref.: WEBLRD6104/26-S3A, relating to the residential portion of the permitted development.

Enclosures

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

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

Planning Particulars
- Form 19 (supplementary application form for LRD applications), and attachments including DCC S. 247(7) Declaration, Irish Water COF and SODA letters,
- Confirmation of EFT payment of the planning application fee;
- Letters of consent from the Land Development Agency, Targeted Investment Opportunities ICAV and Dublin City Council
- Copies of the site notice (yellow) and newspaper notice (including original copy of newspaper notice);
- This cover letter prepared by JSA Planning;

Planning Report
- Planning and Environmental Report prepared by JSA Planning;

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

Other

- Appropriate Assessment Screening Report and Natura Impact Statement (NIS) prepared by Altemar.

Conclusion

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

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

Yours faithfully,

JSA Planning

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