JSA PLANNING

PLANNING AND ENVIRONMENTAL REPORT

In respect of lands at
St. Vincent's Hospital Fairview (Application for Modifications to Permitted LRD)

Prepared on behalf of
St. Vincent's Hospital Fairview

May 2026

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1.0 INTRODUCTION

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

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.

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 for the development and accompanies the planning application.

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

In accordance with Section 247(7) the Planning and Development Act, 2000 (as amended), a pre-application consultation took place between the applicant / design team and representatives of Dublin City Council on the 10th of December 2025 and 22nd of February 2026 under Ref.: LRD6015/25 in relation to the proposed development.

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

2.0 SITE LOCATION AND CONTEXT

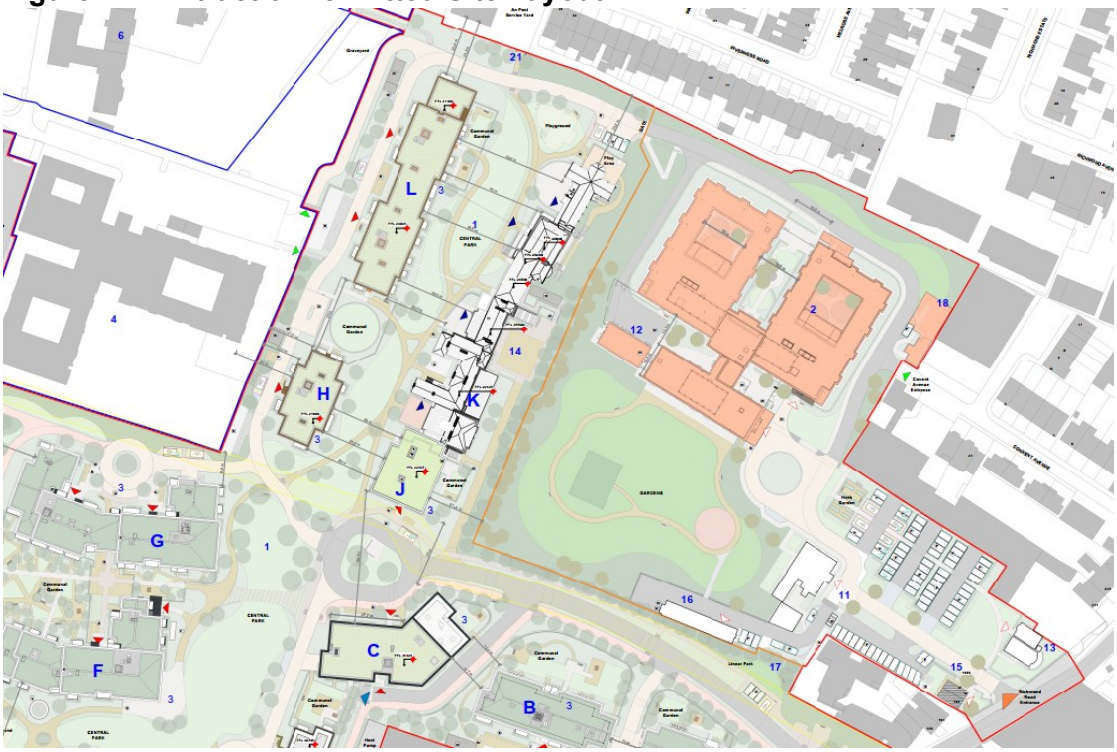
The subject site is located at and surrounding St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3. The site contains protected structures under RPS Ref.: 2032 (St. Vincent's Hospital), RPS Ref.: 8788 (Richmond House) and RPS Ref.: 8789 (Brooklawn). The application site boundary 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.

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.

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 (commenced in March 2026), and Phase 2 comprising decanting, demolition of redundant buildings, refurbishment of retained structures and completion of the development.

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 (new permitted hospital building and Rose Cottage) are identified in orange on STW Proposed Site Plan as per Figure 2.2. No modifications are proposed to any parts of the application site (modifications to the residential element of the permitted development subject to separate application under Reg. Ref.: WEBLRD6104/26-S3A).

Figure 2.1: Extract of Permitted Site Layout



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 1 of the permitted phasing strategy for the development. Construction began in March 2026.

Figure 2.2: Permitted Phasing Plan



Excerpt from Architectural Design Statement in approved LRD Application

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 LRD permission also 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.

Conservation Condition 32(f) relates to Rose Cottage and states "*1:50 elevations of the proposed extension illustrating all external finishes, which shall be sensitive to the historic structure.*"

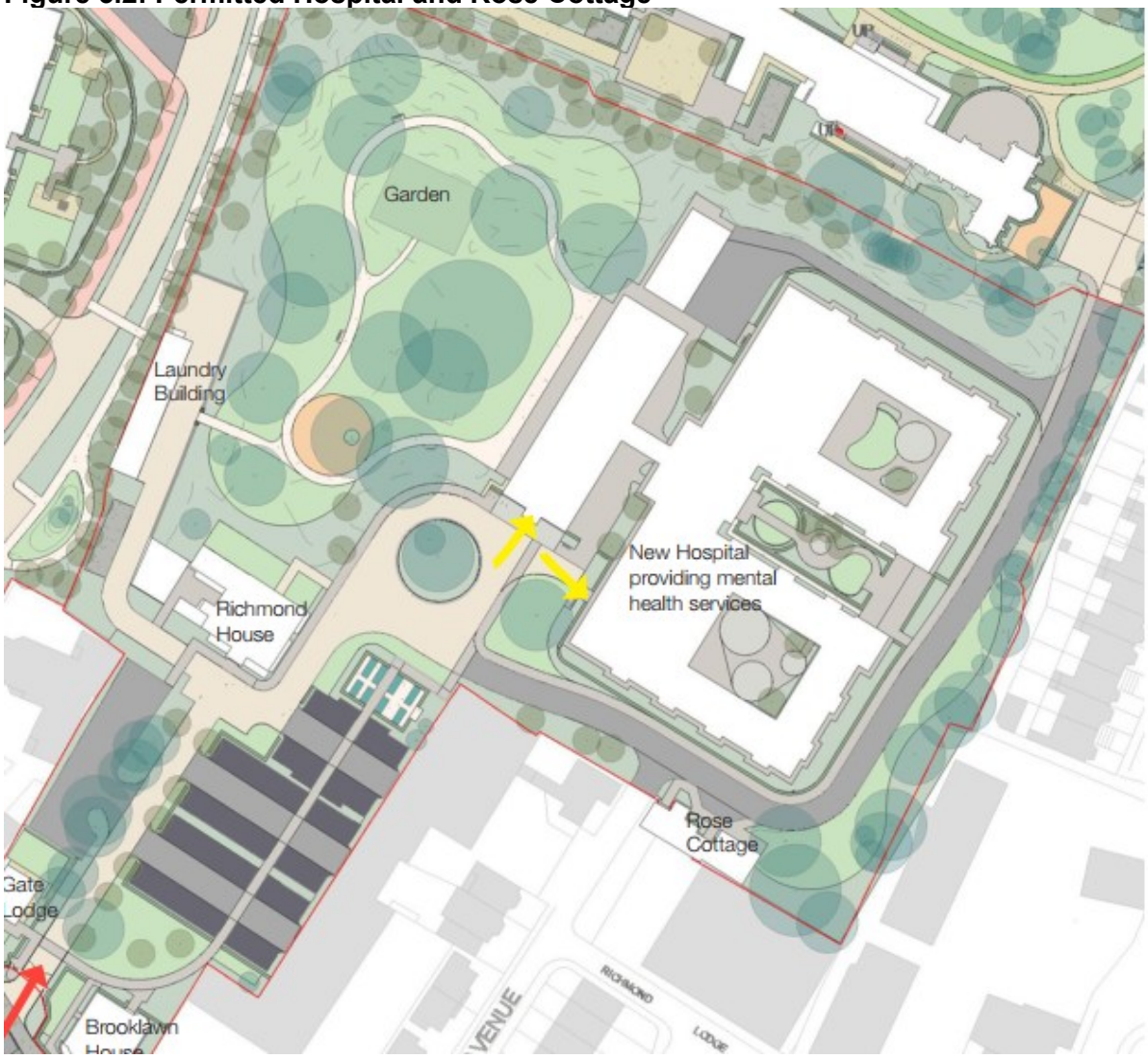
Figure 3.1: Aerial View of Permitted Development



Figure 3.2: View of Permitted Hospital for Mental Health Services



Figure 3.2: Permitted Hospital and Rose Cottage



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 10th of December 2025 and 22nd of February 2026 under Ref. No.: LRD6015/25. The meeting was attended by members of DCC Planning, in addition to relevant members of the project design team.

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)*

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 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

The proposed amendments 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.

5.1 AMENDMENTS TO ROSE COTTAGE PERMITTED EXTENSION

As outlined in the accompanying STW Design Statement, the proposed amendments to Rose Cottage comprise revisions to the permitted single-storey extension located to the west of the existing building. The revised extension increases the overall floor area of Rose Cottage from 161 sq.m to approximately 175 sq.m in order to accommodate updated operational and healthcare requirements associated with the approved Mental Health Facility pharmacy function.

The amendments include revisions to the external materiality and architectural expression of the extension, incorporating coloured render, PPC aluminium framed glazing and doors, aluminium coping, and glazed elements. The revised design maintains a clear visual distinction between the historic fabric of Rose Cottage and the contemporary extension through the use of a glazed link element.

Internally, the layout has been reconfigured to accommodate a pharmacy, clinical storage, consultation room, accessible WC, secure storage, and associated ancillary accommodation. Amendments are also proposed to the north elevation, including revised door and window arrangements to support the operational and security requirements of the pharmacy use. No increase in the approved building height is proposed and the amendments do not alter the permitted use of Rose Cottage and its extension, which will continue to serve hospital-related administrative, records, storage and pharmacy functions associated with the approved Mental Health Facility.

The proposed material palette adopts a contemporary architectural approach that remains clearly distinguishable from, yet sympathetic to, the existing historic building. The extension utilises coloured render, PPC aluminium framing, aluminium coping and high-quality glazing to provide a simple, durable and low-maintenance design response appropriate to the healthcare setting.

The selected render tone complements the existing red brickwork, while the contemporary detailing ensures the extension is clearly legible as a modern intervention. The glazed link further reinforces the visual separation between the original structure and the new extension, consistent with established conservation best practice and the wider permitted redevelopment approach across the St. Vincent's Hospital Fairview campus.

A detailed assessment of the proposed amendments to Rose Cottage, including the revised extension, conservation approach, materiality and impact on architectural heritage, is

provided within the accompanying Carrig Conservation Report. The report concludes that the proposed amendments remain consistent with the conservation-led strategy established under the permitted LRD scheme and will not materially impact the character of Rose Cottage or the setting of adjoining Protected Structures. The report further notes that the proposed extension remains subordinate to the original building and adopts a restrained contemporary material palette comprising render, glazing and powder-coated aluminium, thereby avoiding pastiche while remaining sympathetic to the existing structure and wider historic context.

Figure 5.1: Permitted and Proposed Rose Cottage Extension



5.2 AMENDMENTS TO PERMITTED HOSPITAL

The proposed amendments to the permitted Mental Health Facility principally comprise revisions to the approved internal layouts and associated elevations in response to updated operational, clinical and healthcare requirements identified during the detailed design development process.

The proposed changes relate primarily to the ground floor and first floor layouts and include amendments to entrance lobby arrangements, internal circulation routes, ward layouts, seclusion facilities, staff accommodation, stair cores, substation access, delivery yard arrangements, terrace and canopy configurations, and plant room layouts. Revisions are also proposed to external doors and windows, including widening of selected doors and amendments to window openings to support clinical functionality, accessibility, patient safety and operational efficiency.

The amendments further include revisions to the approved seclusion terraces and associated mesh enclosures, together with modifications to the second-floor plant room façade and associated screening elements. The proposed revisions have been carefully integrated within the permitted architectural design and do not materially alter the overall appearance or character of the building.

The amendments are operational and design-led in nature and have been developed to respond to updated healthcare requirements, patient welfare considerations, staff operational needs, fire safety coordination, servicing requirements and detailed building integration. The proposed revisions maintain the overall design intent, architectural quality and material palette of the permitted scheme.

Importantly, the proposed amendments do not result in any increase in the approved building height. There is a minor decrease of 14 sq.m of gross floor area of the permitted Mental Health Facility. The proposed development remains substantially consistent with the scale, form and architectural approach of the permitted development under Reg. Ref. LRD-6009/23-S3 and ACP Ref. 317438-23.

5.3 COMPARISON WITH PERMITTED LRD

The proposed amendments have been developed within the overall parameters of the permitted development under Reg. Ref. LRD-6009/23-S3 and ACP Ref. 317438-23 and do not materially alter the nature or extent of the permitted scheme. The proposed amendments results in:

- No increase in the approved height, scale or massing of the permitted hospital building;
- Minor decrease in the overall gross floor area of the permitted hospital building;
- No alteration to the permitted use or operational function of the permitted development on Z15 zoned lands;
- No change to the permitted residential development permitted under the parent LRD;
- No material alteration to the approved site layout, circulation strategy, access arrangements or public realm;
- No material intensification of the permitted development; or
- No significant alteration to the architectural character or overall design strategy of the permitted scheme.

In relation to Rose Cottage, the proposed amendments comprise a modest increase in floor area associated with the revised single-storey extension, increasing the overall building area from 161 sq.m to approximately 175 sq.m. The revised extension remains subordinate to the existing building and does not alter the established design approach or permitted use associated with the approved Mental Health Facility.

The proposed amendments are operational, technical and design-led refinements arising from the detailed design development process and maintain the overall form, character and planning strategy of the permitted development. Accordingly, the proposed amendments are considered to remain substantially consistent with the permitted scheme.

5.4 DURATION 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 ACP Ref.: 317438-23, except where modified by this permission. 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 ACP 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."

5.5 CONSERVATION

A detailed assessment of the proposed amendments in respect of architectural heritage and conservation is provided within the accompanying Carrig Conservation Report. As outlined therein, Rose Cottage, while not a Protected Structure, forms part of the wider historic setting and curtilage of adjoining Protected Structures within the St. Vincent's Hospital Fairview campus. The proposed amendments have therefore been developed in accordance with a conservation-led approach which seeks to retain and sensitively adapt the existing structure while facilitating its continued viable use as part of the operational hospital campus.

The proposed amendments primarily relate to the revised extension and internal reconfiguration works. No material alterations are proposed to the principal historic form or external elevations of the original two-storey Rose Cottage building beyond those already permitted under the parent LRD scheme. The revised extension remains subordinate in scale and clearly legible as a contemporary intervention through the use of modern materials, including render, glazing and powder-coated aluminium, connected to the original structure via a glazed link element.

The Carrig Conservation Report concludes that the proposed amendments will not materially impact the character of Rose Cottage or the setting of adjoining Protected Structures. The report further notes that the revised extension maintains the established conservation strategy approved under the permitted development and appropriately balances architectural legibility, operational requirements and sensitivity to the historic environment.

Accordingly, the proposed amendments are considered to be consistent with established conservation principles and will not give rise to any significant adverse impact on architectural heritage.

5.6 LANDSCAPE

The proposed amendments do not include any material alterations to the permitted landscape strategy approved under Reg. Ref. LRD-6009/23-S3 and ACP Ref. 317438-23.

No significant changes are proposed to the approved public realm, open space provision, planting strategy, pedestrian connections or overall landscape layout associated with the wider permitted development. Any external works associated with the proposed amendments are confined to the immediate curtilage of Rose Cottage and comprise minor ancillary elements including localised delivery/drop-off arrangements, paving, fencing, canopy and servicing infrastructure associated with the approved pharmacy use.

These works are limited in extent and remain fully consistent with the approved landscape and public realm strategy for the wider St. Vincent's Hospital Fairview campus redevelopment.

5.7 DRAINAGE AND FLOOD RISK

The proposed amendments do not give rise to any material changes to the permitted drainage infrastructure or surface water management strategy approved under Reg. Ref. LRD-6009/23-S3 and ACP Ref. 317438-23.

The proposed amendments are limited in nature and do not materially alter the extent of impermeable surfaces, site levels, site drainage arrangements or overall development footprint associated with the permitted scheme. Any minor drainage modifications required to facilitate the revised Rose Cottage extension and associated servicing infrastructure will connect to the permitted site drainage network and will be designed in accordance with the approved engineering strategy for the wider development.

The proposed amendments do not increase flood risk on the subject site or elsewhere and the development remains consistent with the conclusions and recommendations of the Flood Risk Assessment submitted and approved as part of the parent LRD permission.

5.8 CAR AND CYCLE PARKING

The proposed amendments do not result in any material alteration to the permitted car parking or cycle parking provision approved under Reg. Ref. LRD-6009/23-S3 and ACP Ref. 317438-23 for the hospital element.

The proposed amendments are operational and internal in nature and do not generate any additional parking demand beyond that already assessed and permitted under the parent LRD scheme. Existing vehicular access arrangements, internal circulation routes, servicing arrangements, car and cycle parking facilities associated with the permitted development for the hospital element remain unchanged.

Any minor delivery and servicing activity associated with the revised Rose Cottage pharmacy use will be accommodated within the established operational arrangements for the wider hospital campus and does not require additional dedicated parking provision.

6.0 CONSISTENCY WITH PLANNING POLICY

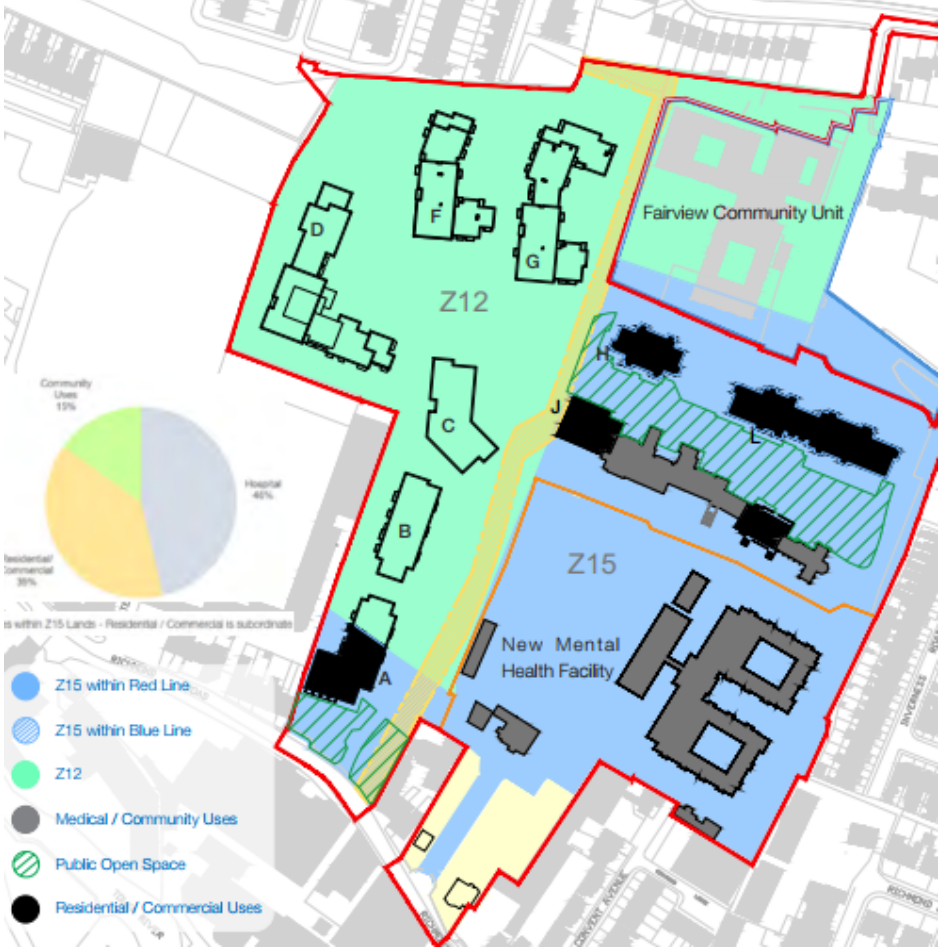
The following section provides a high-level summary of compliance with the Dublin City Development Plan 2022–2028, demonstrating that the proposed modifications to the permitted LRD remain consistent with the adopted planning policy framework and the objectives applicable to the subject site.

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)

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, including residential development, healthcare infrastructure, public open space and adaptive reuse works, has already been established under the parent Large-scale Residential Development permission (Reg. Ref. LRD-6009/23-S3 / ACP Ref. 317438-23).

The areas subject to the current amendments are located within lands zoned 'Z15 – Community and Social Infrastructure'. The proposed amendments relate to the permitted Mental Health Facility building and the extension to Rose Cottage, which will continue to accommodate hospital-related administrative and pharmacy functions associated with the approved healthcare facility.

The Dublin City Development Plan identifies "*buildings for the health, safety and welfare of the public*" as permissible in principle within Z15 zoned lands. Accordingly, the proposed amendments remain fully consistent with the zoning objective and strategic intent for the site.

The principle of development on the subject lands has already been established under the parent LRD permission and the proposed amendments do not alter the approved land use distribution, masterplan strategy or overall development framework.

In particular:

- The approved Mental Health Facility and associated healthcare uses remain unchanged and continue to support the primary purpose of the Z15 zoning objective.
- No changes are proposed to the approved residential development permitted under the parent LRD.

- The approved public open space network, pedestrian connections and community infrastructure provision remain unchanged.
- The reuse and continued occupation of Rose Cottage forms part of the wider conservation-led redevelopment strategy for the campus.
- The proposed amendments are operational and design-led in nature and do not materially alter the scale, intensity or planning rationale of the permitted development.

Accordingly, the proposed amendments are considered to remain fully consistent with the land use zoning objectives and overall policy framework of the Dublin City Development Plan 2022–2028.

6.2 RELEVANT POLICIES

The proposed amendments to the permitted Mental Health Facility and Rose Cottage extension remain consistent with the strategic objectives and policy framework of the Dublin City Development Plan 2022–2028 in respect of healthcare infrastructure, community facilities, architectural heritage and sustainable development.

The proposed amendments support the continued provision of healthcare and community infrastructure on lands zoned 'Z15 – Community and Social Infrastructure' and are consistent with the overarching zoning objective "*to protect, provide and improve community and social infrastructure".*

In particular, the proposed amendments are consistent with the following policies and objectives of the Dublin City Development Plan 2022–2028:

- Policy QHSN11 which seeks to promote healthy placemaking and support the provision of healthcare and community facilities within sustainable neighbourhoods;
- Policy SI8 which supports the provision and expansion of healthcare facilities and services across the city;
- Policy SI9 which supports the continued development and improvement of healthcare infrastructure and associated ancillary facilities;
- Policy BHA1 which seeks to protect the architectural heritage of the city and support the sensitive adaptation and reuse of historic structures;
- Policy BHA6 which supports high-quality contemporary design interventions within historic settings where appropriately designed and respectful of the existing character;
- Policy SC16 which promotes universal design and accessibility in all new development;
- Policy CCUV1 and Policy CCUV2 which support compact growth, regeneration and the consolidation of development within established urban areas; and
- Policy SMT1 which promotes sustainable movement and integrated transport infrastructure within new and existing developments.

The proposed amendments are operational and design-led refinements arising from the detailed design development process and do not materially alter the approved planning strategy, land use distribution, urban design response or overall development framework established under the parent LRD permission.

Accordingly, the proposed amendments are considered to remain fully consistent with the strategic objectives and relevant policy provisions of the Dublin City Development Plan 2022–2028.

7.0 ENVIRONMENTAL ASSESSMENT

Having regard to the nature, scale and extent of the proposed amendments, it is considered that the proposed modifications do not constitute development of a class or scale that would

trigger a mandatory Environmental Impact Assessment pursuant to Schedule 5 of the Planning and Development Regulations 2001–2025.

The proposed amendments comprise limited revisions to the permitted Mental Health Facility and Rose Cottage extension and are primarily operational, technical and design-led in nature. The amendments do not result in any increase in the approved gross floor area of the hospital building, building height, massing, site area, residential unit numbers or car parking provision previously assessed under the parent LRD permission.

The proposed amendments are confined to:

- internal layout reconfiguration;
- revisions to elevations, doors and window openings;
- amendments to seclusion terraces, canopies and plant enclosures;
- minor revisions to the Rose Cottage extension; and
- associated ancillary operational modifications.

The proposed amendments do not materially alter the characteristics of the permitted development and do not give rise to any significant additional environmental effects beyond those previously identified and assessed within the approved EIAR.

Having regard to:

- the nature and limited scale of the proposed amendments;
- the urban context of the site;
- the absence of any significant increase in development quantum;
- the operational and design-led nature of the revisions; and
- the findings of the EIAR approved under the parent LRD permission,

it is considered that the proposed amendments would not be likely to have significant effects on the environment, either individually or cumulatively with other existing or permitted development.

Accordingly, it is considered that there is no requirement for a new Environmental Impact Assessment or the preparation of an Environmental Impact Assessment Report in respect of the proposed amendments to the permitted LRD.

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 primarily confined to internal reconfiguration and limited external alterations within the existing permitted development envelope. The amendments do not result in:

- any increase in building height;
- any material increase in massing or development footprint;
- any increase in site coverage;
- any increase in residential unit numbers or hospital bed capacity; or
- any alteration to the approved site layout, access arrangements or strategic infrastructure provision.

While a modest increase in floor area is proposed in relation to the Rose Cottage extension, this increase is minor in scale, remains within the established operational and spatial parameters of the permitted development, and does not materially alter the nature or extent of the approved scheme.

Accordingly, the proposed modifications do not introduce new environmental receptors, pathways or impacts beyond those previously assessed as part of the approved EIAR accompanying the parent LRD permission.

7.3 ASSESSMENT AGAINST MANDATORY EIA THRESHOLDS

The proposed modifications to the permitted LRD are limited in scale and relate principally to internal reconfiguration works and minor external amendments to the permitted Mental Health Facility and Rose Cottage extension.

Having regard to the scale and nature of the proposed amendments:

- The proposed amendments do not alter the approved number of residential units permitted under the parent LRD and therefore do not affect the mandatory EIA threshold of 500 dwelling units applicable to standalone urban development proposals under Schedule 5, Part 2, Class 10(b)(i) of the Planning and Development Regulations 2001–2025;
- No additional car parking spaces are proposed, with parking provision remaining as previously permitted and assessed under the parent LRD permission and associated Traffic Impact Assessment;
- The proposed amendments do not introduce any additional retail, commercial or other non-residential floorspace beyond that already permitted and assessed;
- No increase in hospital bed capacity is proposed;
- The proposed works are confined to internal reconfiguration and minor elevational amendments within established building envelopes, with no extension to the red line boundary and no material increase in the overall development footprint previously assessed; and
- The proposed amendments do not materially alter the approved site layout, circulation strategy, infrastructure provision or servicing arrangements.

Accordingly, the proposed amendments constitute minor modifications to an already permitted and environmentally assessed development and do not give rise to development of a scale or nature approaching the mandatory EIA thresholds set out under Schedule 5 of the Planning and Development Regulations 2001–2025.

The proposed modifications to the permitted LRD therefore do not trigger mandatory Environmental Impact Assessment requirements 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:

- No increase in the approved site area or red line boundary;
- No increase in building height, site coverage or overall development footprint;
- No increase in residential unit numbers, hospital bed provision or car parking provision;
- Cumulative gross floor space of residential accommodation remains unchanged at 70,671 sq.m;
- Cumulative gross floor space of non-residential development remains unchanged at 11,013 sq.m;
- Total LRD floor space remains unchanged at 81,684 sq.m; and
- Amendments are confined primarily to internal reconfiguration works and limited elevational revisions associated with the permitted Mental Health Facility and Rose Cottage extension.

Accordingly, the proposed amendments do not constitute a change or extension of a scale capable of triggering the requirements of Class 13 of Schedule 5 of the Planning and Development Regulations 2001–2025.

7.5 REVIEW OF ENVIRONMENTAL TOPICS

The environmental topics assessed within the approved EIAR accompanying the parent LRD permission have been reviewed in the context of the proposed amendments to the permitted development.

The proposed amendments are limited in scale and principally comprise internal reconfiguration works and minor external revisions associated with the permitted Mental Health Facility and Rose Cottage extension. The amendments do not materially alter the approved development parameters, land use strategy, circulation arrangements, infrastructure provision or operational characteristics of the permitted scheme.

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

- No material changes to the environmental parameters previously assessed within the approved EIAR;
- Mitigation measures and monitoring requirements identified within the approved EIAR remain valid and applicable;
- Proposed amendments do not introduce new environmental receptors or impact pathways;
- Proposed amendments do not give rise to significant additional or different environmental effects, either individually or cumulatively; and
- Conclusions of the approved EIAR remain unchanged.

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 amendments are operational and design-led in nature and do not alter the permitted land use, residential population, hospital bed capacity, or overall scale and function of the approved development. The amendments relate primarily to internal reconfiguration and minor external revisions to improve healthcare functionality, accessibility, patient welfare and operational efficiency within the permitted Mental Health Facility and Rose Cottage extension. The proposed amendments do not introduce new environmental receptors or materially alter the operational characteristics previously assessed within the approved EIAR.	No additional significant effects. Impacts remain consistent with the permitted development.
Land, Soils, Geology and Hydrogeology	The proposed amendments do not involve excavation beyond the extents previously permitted and assessed under the parent LRD permission. No increase in building footprint, basement extent, site coverage or ground disturbance is proposed. The amendments are confined primarily to internal reconfiguration works and limited elevational revisions within established development parameters. Accordingly, there is no material change to previously assessed ground conditions, geological impacts, contamination pathways or hydrogeological conditions.	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 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, submitted and assessed as part of the parent LRD permission (Reg. Ref. LRD-6009/23-S3 / ACP Ref. 317438-23);
- The proposed amendments to the permitted LRD are limited in scale and are primarily confined to internal reconfiguration works and minor external revisions within the established permitted development envelope;
- The proposed amendments do not result in any increase in residential unit numbers, hospital bed capacity, building height, overall development footprint or total LRD floor space previously assessed;
- The proposed amendments do not exceed the mandatory EIA thresholds set out under Schedule 5 of the Planning and Development Regulations 2001–2025;

- The proposed amendments do not constitute a change or extension requiring EIA under Schedule 5, Part 2, Class 13 of the Regulations; and
- The proposed amendments do not give rise to any significant environmental effects beyond those previously identified, assessed and mitigated within the approved EIAR.

Accordingly, it is considered that the preparation of a new Environmental Impact Assessment Report is not required in respect of the proposed amendments 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 amendments to the permitted development comprising internal reconfiguration works and limited external alterations associated with the permitted Mental Health Facility and Rose Cottage extension. The proposed amendments do not result in any increase in residential unit numbers, building height, massing, overall development footprint, site coverage or overall LRD floor space beyond that previously assessed and permitted under the parent permission.

An updated Appropriate Assessment Screening Report and Natura Impact Statement have been prepared by Altemar Ltd. in support of the proposed amendments. The assessments consider the proposed amendments in the context of the parent permission and updated ecological baseline information, including the designation of the North-West Irish Sea SPA.
The updated AA Screening assessment concludes that the proposed amendments do not introduce any new or altered pathways for effects on European sites and, on the basis of objective scientific information, do not give rise to likely significant effects on any European site, either alone or in combination with other plans or projects.

Notwithstanding the conclusions of the Screening assessment, a Natura Impact Statement has been prepared as a precautionary and best-practice measure having regard to Article 6(3) of the Habitats Directive and the updated ecological context. The NIS assesses potential effects on the following European sites:

- South Dublin Bay SAC;
- North Dublin Bay SAC;
- South Dublin Bay and River Tolka Estuary SPA;
- North Bull Island SPA; and
- North-West Irish Sea SPA.

The accompanying NIS concludes that, having regard to the nature and scale of the proposed amendments, the absence of any new impact pathways, and the continued implementation of the mitigation measures and environmental controls previously approved under the parent permission, the proposed amendments will not adversely affect the integrity of any European site, either alone or in combination with other plans or projects.

It is also noted that the Construction Environmental Management Plan (CEMP) associated with the parent permission has been updated and agreed with Dublin City Council pursuant to the relevant prior-to-commencement compliance requirements. The agreed CEMP remains applicable to the proposed amendments and continues to provide the environmental management framework for the construction phase of the development. The proposed amendments do not materially alter the nature or extent of construction activities previously assessed.

No changes are proposed to the approved drainage strategy, SuDS measures, wastewater arrangements, site access strategy or operational characteristics of the permitted development. The proposed amendments do not give rise to any new sources of emissions, disturbance, hydrological connectivity or ecological effects beyond those previously assessed as part of the parent Appropriate Assessment process.

Altemar concludes that:

"It can be concluded beyond all reasonable scientific doubt, based on the best scientific knowledge available, that the proposed amendment to permitted development, individually or in combination with other plans or projects, will not adversely affect the integrity of any European site, in view of the conservation objectives of the relevant European sites."

Accordingly, it is concluded that the proposed amendments to the permitted LRD, either individually or in combination with other plans or projects, will not adversely affect the integrity of any European site in view of the conservation objectives of those sites.

8.0 SUMMARY AND CONCLUSIONS

This Planning Report has been prepared to accompany a Stage 3 Large-scale Residential Development (LRD) application to Dublin City Council in respect of proposed amendments to the permitted LRD 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.

The current application relates solely to amendments to the permitted Mental Health Facility building and Rose Cottage extension. No changes are proposed to the permitted residential development approved under the parent LRD permission. It is noted that a separate live application relating to amendments to the residential component of the permitted scheme is currently under consideration by Dublin City Council under Reg. Ref. WEBLRD6104/26-S3A.

Since the grant of permission, the applicant has undertaken a detailed review of pharmacy regulatory and operational requirements associated with the approved healthcare facility. This review identified that the permitted internal layout for Rose Cottage did not fully satisfy applicable hospital pharmacy operational standards. Accordingly, a revised internal configuration and associated extension amendments have been developed to provide the required functional relationships, circulation arrangements and ancillary accommodation necessary to support a compliant hospital pharmacy function.

Additional operational and technical refinements have also arisen in relation to the permitted Mental Health Facility building to support healthcare delivery, patient welfare, accessibility, circulation and operational efficiency within the approved facility.

The proposed amendments to the permitted development comprise:

- Amendments to the permitted extension to Rose Cottage, including a modest increase in floor area, revisions to the external material palette, and reconfiguration of the internal layout and north elevation, with no increase in building height or change to the permitted hospital-related administrative/pharmacy use; and
- Amendments to the permitted Mental Health Facility building comprising revisions to internal layouts and associated elevations, including amendments to entrance arrangements, circulation, ward layouts, seclusion facilities, doors, windows, terraces, canopies, plant areas and associated operational elements, with no increase in building height, massing or overall development floor space.

The proposed amendments do not alter the strategic intent, land use strategy, scale or planning rationale of the permitted LRD. The amendments arise solely from operational, healthcare and regulatory requirements and are limited and design-led in nature.

In accordance with Section 247(7) of the Planning and Development Act 2000 (as amended), pre-application consultation meetings took place between the applicant/design team and Dublin City Council on 10 December 2025 and 22 February 2026 under Ref. LRD6015/25. Dublin City Council subsequently confirmed that no further consultation under Section 247 was required, having determined that the proposed amendments were substantially the same as the permitted development and that the nature, scale and effect of the proposed alterations did not necessitate a repeat of the consultation process. A copy of the relevant declaration is appended to the application documentation.

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

- Do not alter the overall nature, scale or strategic intent of the permitted development;
- Maintain the approved architectural, urban design and landscape framework;

- Do not result in material changes to drainage, transport, parking, infrastructure or servicing arrangements;
- Do not adversely affect protected structures or the wider historic setting of the campus;
- Remain consistent with the approved conservation strategy for the site;
- Do not give rise to any significant additional environmental effects beyond those previously assessed; and
- Facilitate the continued delivery and operation of critical healthcare infrastructure within the St. Vincent's Hospital Fairview campus.

An EIAR was previously prepared and approved as part of the parent LRD permission. Having regard to the provisions of the Planning and Development Regulations 2001–2025, the proposed amendments do not exceed mandatory EIA thresholds, do not constitute a change or extension requiring EIA under Schedule 5, Part 2, Class 13, and do not give rise to any new or significant environmental effects beyond those already assessed and mitigated within the approved EIAR.

Furthermore, the accompanying Appropriate Assessment / NIS documentation concludes that the proposed amendments, either individually or in combination with other plans or projects, will not adversely affect the integrity of any European site in view of the conservation objectives of those sites.

Having regard to the foregoing, it is respectfully submitted that the proposed amendments to the permitted LRD are consistent with the proper planning and sustainable development of the area, remain in accordance with the established planning and environmental assessment framework for the site, and that planning permission should therefore be granted.

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