

Planning Department  
Dublin City Council  
Civic Offices  
Wood Quay  
Dublin 8

Residents of the Eastern End of Richmond Road Area  
(Convent Ave Surrounds)  
C/o. Berni Fleming  
231 Richmond Road  
Fairview  
Dublin 3

Date: 8<sup>th</sup> May 2023

**Planning Application Reference Number:** LRD6009/23-S3

**Description of Development:** Application for a ten year planning permission for a Large-scale Residential Development (LRD), currently 9 blocks with 811 apartments (including 317 build to rent) & re-development of St. Vincent's Hospital.

**Location:** St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3

Dear Planner,

We refer to the planning application LRD6009/23-S3 and wish to make the following observation / objection in relation to the proposed development. We wish to object to the proposed development in it's current form based on the points outlined below.

The proposed development by reason of

1. Height & Density

- a. This raises the potential future developments height in an area with predominately 2 storey houses to 7 - 13 stories which is not in keeping with the area.
- b. Having 3 – 5 storeys is more acceptable and will work better in the area for the future and current residents.
- c. A development similar to Santry Demesne would be more sustainable living and less impactful on the existing infrastructure and community.
- d. The proposed development of 7 – 13 stories is not desirable accommodation for long-term homes and will create a transient population.
- e. Any future development would give rise to significant overlooking and overshadowing of adjoining residential dwellings which would seriously injure the amenities of the area and property in the vicinity and would therefore be contrary to the proper planning and sustainable development of the area.
- f. Sunlight / overshadowing
  - i. The sunlight / overshadowing study should include all the proposed buildings and their impact on the existing homes throughout the year.
- g. Wind tunneling / channeling (Venturi)
  - i. The impact of the developments buildings wind tunneling / channeling (Venturi) and the cumulative effect of other LRD's has not been fully considered for the Richmond Road area.
  - ii. The shape and design of the building does not reduce wind tunneling and should be modified to reduce the density at the higher floors
  - iii. The landscaping requires more trees and bushes at ground level to reduce the effect of wind tunneling.

- h. The requirement for deep pile driving will impact the existing houses in the area, as given the age of the houses many of which are over 150 years old and do not have foundations and are built of lime mortar and not built to withstand deep pile driving. The developer should be required as a condition to provide all homes over 50 years old within the Richmond Road area and any other homes that have concerns about potential damage due to the development with a pre survey from an engineer and a post survey to protect the existing houses and that they give an undertaking to repair any damage that occurred during the build phase
- 2. The cumulative effect of other LRD developments along Richmond Road for pedestrians, cyclists, deliveries and car traffic capacity along with the cumulative wind tunneling effect.
- 3. The development will remove the intended use of the land for a hospital and institutional land for the mentally ill & will not meet the DCC requirements to protect and provide for institutional and community uses
  - a. This is a change of use from predominately institutional land to predominately residential development and limiting the potential for the land to be utilised for its intended use as a psychiatric care facility which serves the community and therefore for the current planning application should not be permitted.
- 4. This application is only a 10-year plan, but it does not mean the hospital will not expand in height or use the green areas in any further expansions.
- 5. The current development of this land will not be the completion of this land's development so height and density should be considered most likely to develop more than the current proposed development and therefore this development's height and density should be reduced to avoid over development.
- 6. The hospital development could be extended which is a major issue for Convent Ave traffic.
- 7. The park is not guaranteed in the long term; this land should be given to Dublin City Council to maintain as a park to ensure that all members of the public can access it as well as insuring that it remains a park and if DCC require a contribution towards the maintenance of the park from the developer for 10 years, to be paid before the units can be sold or rented
- 8. Removal of permeable ground required to alleviate & reduce flooding on Richmond Road & surrounds. The proposed SuDs is not adequate giving the close proximity to a tidal river and existing housing
  - a. All development will remove permeable ground, to minimise this by reducing the number of apartment blocks and have all surfaces fully permeable, including roads & pavements.
  - b. The proposed development did not provide adequate flood impact assessment on the surrounding properties
- 9. Convent Ave should not be used for hospital vehicle traffic
  - a. Convent Ave is a traditional 19<sup>th</sup> century avenue providing access to a villa it was never intended to facilitate 2-way traffic and it is currently too narrow for 2 cars or 1 cyclist & 1 car to pass without mounting the footpath.
  - b. Given the number of goods truck, staff & visitor car movements the hospital entrance should not have vehicle traffic on Convent Ave and the hospital entrance / access should be relocated through another entrance on to Richmond Road.
  - c. Consideration should be given to ensuring that Convent Ave is safe for the children and elderly that live on the avenue and in Richmond Lodge, vehicles should not mount the pavement. Currently this is required as 2 cars can't pass each other due to the width of the road being too narrow.

- d. The current hospital gates are closed to all vehicle and pedestrian traffic from approximately 9pm in the evening to 7.30am in the morning, if the re-development for the hospital is permitted to access the hospital from Convent Ave then the current restricted access should be a condition in the planning approval.
10. The development will over burden the current flood and fowl sewerage system on Richmond Road and Irish Water should provide an impact to the current system as well as how this development would impact Ringsend Waste Water Treatment Plan. In 2002 many of the houses were flooded on Richmond Road from the sewer system (flooding through drains and toilets), the Tolka River flood alleviation work did not remove this risk.
11. To reduce the burden on Irish Waters waste water system and the risk of flooding existing resident's homes on Richmond Road the following conditions for the development should apply
  - a. The planning application should achieve a Zero Discharge Wastewater Treatment.
  - b. Given the scale of the development and the land within the development it lends itself to a Willow / Reed Bed Wastewater Treatment Systems should be a condition of planning approval, which will
    - i. Remove the pressure on the flood & fowl waste water system along Richmond Road and the risk of Richmond Road existing residents being flooded through the sewer system.
    - ii. Elevate pressure on the Ringsend Waste Water Treatment Plant (RWWPP) and flood water discharge from RWWPP into Dublin Bay.
    - iii. Encourage both plant & birdlife and increase the parks biodiversity.
    - iv. Provide a tranquil area for users of the park.
  - c. Heavy rain and flood water retention tanks should be able to cope with a 1 in 200 year flood and retain water for a minimum of 5 days.
12. Gray water system as a condition for the planning approval
  - a. The scale of the development is perfect for a more sustainable provision of water for the apartment block residents by utilising a gray water system and therefore reduce the volume of fresh water supplied by Irish Water required by the apartment blocks.
  - b. All the roads, paths and building rain water / water run off should be captured in a gray water system to be reused in the apartment blocks and any excess to be feed in to the onsite Willow / Reed Bed Wastewater Treatment System.
  - c. This should be part of the conditions for the planning approval as it will reduce the burden on the current Irish Water fresh water supply system and the accumulative impact of water shortages in times of low rain on the fresh water supply.
13. Add additional traffic that over 800 apartments will create with deliveries, car & cycle movements.
14. The development is not close enough to public transport and therefore additional parking is required for that volume of people and the current condition of Richmond Road to Drumcondra is very dangerous for pedestrians as well as cyclist due to it's narrowness, as a condition of development this development should fund DCC to make the road safer for all users.
15. There is not enough car parking spaces at a 0.3 spaces per unit.
16. The percentage of build to rent accommodation which is a lesser standard accommodation is too high is over saturation of the development. The percentage of build to rent should be reduced to 20% of the overall planning application, this should be a condition in the planning approval.
17. The build to buy apartments should only be sold as individual units to insure individuals can purchase homes and not on block to commercial interests.

18. There are no apartments designed for retired people which is a need within the area, this should be a condition of the planning approval.
19. To avoid a rat run there should not be any access from Griffith Court through St. Ita's on to Vincent's hospital and out on to Convent Ave. they are separate intuitions and should not be linked by road
20. The hospital objected to the development of Chart house 157 Richmond Rd on grounds of protecting patients and now they are ignoring the protection and privacy of their own patients
21. Given the proposed height and density is serious concern, that in the event of a fire, Dublin City Council Fire Department could not access the apartments to effectively manage the fire to prevent loss of life and damage to existing homes & this development.
22. Protected buildings, old hospital and Rose cottage. The curtilage of these buildings and surrounding area would be important to maintain. The use of Rose Cottage should be in keeping with the preserved structure.
23. Given the impact to the community there should have been more consideration for the existing Richmond Road Area community, (there seems to be more studies and concern over the impact on the trees in the area than on the humans).
24. The 2007 Richmond Road Area Action Plan was developed after DCC recognised the lack of cohesive planning and long term vision for this historic area which was first developed in the 1700's. This DCC Planning Departments action plan should be referenced when DCC consider all planning applications with in the Richmond Road area. The development of Richmond Road gives the appearance of a lack of cohesive planning and neglected by DCC and appear not to give the same considerations as other DCC areas with less historic considerations by destroying the area with high-density, large developments which are not in keeping with nor blend in to the existing buildings in the area or the flood risk when developing close to a tidal section of the Tolka River.  
[https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-05/Richmond\\_Road\\_Area\\_Action\\_Plan.pdf](https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-05/Richmond_Road_Area_Action_Plan.pdf)
  - a. The RRAAP has excluded Saint Vincent's Hospital land but it should be referenced for this development as it will impact on future DCC planning decisions along Richmond Road as it will become the 'standard' within the area.
25. All construction / development should be between the hours of 8am & 6pm Monday to Friday, 9am to 1pm on Saturdays and no work on Sundays or bank holidays. Cement pores should be with in these hours and no consent to pore outside these times.

Yours sincerely,

#### **Residents of the Eastern End of Richmond Road Area**

- Berni Fleming 231 Richmond Road, Fairview, Dublin 3
- Anne Moloney, 4 Weir House, RiverView, Richmond Road, Fairview, Dublin 3
- Rado Durina, 149c Richmond Road, Dublin 3
- Mary & Willie Burns, 1 Convent Ave, Fairview, Dublin 3
- Marina & Kevin McKenna, 4 Convent Ave, Fairview, Dublin 3
- Linda O'Dwyer, 5 Merville Villas, Convent Ave, Fairview, Dublin 3
- Vivienne Bolger, 4 Richmond Lodge, Convent Ave, Fairview, Dublin 3
- Anne Marie Farren, 8 Richmond Lodge, Convent Ave, Fairview, Dublin 3
- Aoife Henderson, 9 Richmond Lodge, Convent Ave, Fairview, Dublin 3
- Rachel Moran, 11 Richmond Lodge, Convent Ave, Fairview, Dublin 3